

EA

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PART 1 OF 2

Pages 1–49 of 71 of the enclosed document. This transmission is 50 pages including this cover sheet.

TO	Christine P. Anderson, Senior Counsel — Intake Division
ORGANIZATION	Attorney Registration and Disciplinary Commission of the Supreme Court of Illinois, One Prudential Plaza, 130 East Randolph Drive, Suite 1500, Chicago, Illinois 60601-6219 · (312) 565-2600. Copy: Althea K. Welsh, Deputy Administrator, Intake and Administration; Lea S. Gutiérrez, Administrator.
FAX	Chicago (312) 565-2320 · Springfield (217) 546-3785 — transmitted to both offices
FROM	Ehab Allababidi, self-represented · (773) 920-0030
DATE	August 14, 2026
PAGES	50 including this cover sheet
RE	Request for investigation — MAX CHRISTIAN BOOSE (respondent)

SUBJECT OF THIS TRANSMISSION

Request for investigation dated August 6, 2026 — “Investigate the Lawyer Who Told a Reviewing Court That a Complaint to This Commission Justified Barring the Complainant From Filing.” Respondent: Max Christian Boose, Staff Attorney, Office of the State's Attorneys Appellate Prosecutor, Second District, 2032 Larkin Avenue, Elgin, Illinois 60123. Six counts, eight exhibits, under Ill. R. Prof. Conduct 3.3, 4.4, 5.1 and 8.4. Complete document, 71 pages, transmitted here by facsimile in two parts.

MATTERS REFERRED TO

- People v. Allababidi, Lake County No. 23 CF 1146 / 23CF00001146 — on appeal, Ill. App. Ct., 2d Dist., No. 2-26-0352
- People v. Allababidi, Cook County No. 23 CR 0241301 — on appeal, Ill. App. Ct., 1st Dist., No. 1-26-0055
- Allababidi v. Junkin, No. 1:26-cv-01077 (N.D. Ill.) — petition for habeas corpus, pending
- Allababidi v. Shepherd, No. 1:26-cv-06738 (N.D. Ill.) — pending

COMPLETENESS AND INTEGRITY

This document was transmitted in 2 parts solely because the receiving facsimile accepts 50 pages per transmission. It is one instrument. Every part bears the SHA-256 digest below, which is the digest of the complete 71-page document and is identical on every cover sheet. If any part is not received, please telephone the sender at (773) 920-0030 and it will be retransmitted the same day.

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020fabdc878e5c8ec8fccf7db24b591b

The enclosed request is dated August 6, 2026 and states on its face that it was delivered by electronic mail on that date and that no copy was sent to the respondent. This facsimile of August 14, 2026 is a re-transmission of that same instrument, unaltered. It is not a second or amended request, and no copy of it is being sent to the respondent either.

Communications to the Commission are privileged under Ill. S. Ct. R. 775 and the Commission's file is confidential under Ill. S. Ct. R. 766. The sender relies on both.



Request for investigation · two verified filings, six days apart

Six counts · eight exhibits · nothing asserted that is not attached

Investigate the Lawyer Who Told a Reviewing Court That a Complaint to This Commission Justified Barring the Complainant From Filing

Christine P. Anderson, Senior Counsel · Intake Division

Attorney Registration and Disciplinary Commission of the Supreme Court of Illinois

One Prudential Plaza, 130 East Randolph Drive, Suite 1500, Chicago, Illinois 60601-6219 · (312) 565-2600

Copy: Althea K. Welsh, Deputy Administrator, Intake and Administration

Copy: Lea S. Gutiérrez, Administrator

Delivered by electronic mail on August 6, 2026. No paper copy is sent. No copy is sent to the respondent; see Part XVII.

RESPONDENT

Max Christian Boose — Staff Attorney, Office of the State's Attorneys Appellate Prosecutor, Second District, 2032 Larkin Avenue, Elgin, Illinois 60123

People v. Allababidi, No. 2-26-0352 (Ill. App. Ct., 2d Dist.) — Lake County No. 23 CF 1146 · Objection filed and verified July 30, 2026 · Objection filed and verified August 5, 2026 · complainant barred by order of July 31, 2026 from filing in that court or communicating with the respondent

To the Administrator and the Intake Division:

On August 5, 2026 a lawyer for the People filed a verified instrument in the Illinois Appellate Court, Second District, asking that Court to leave in place an order barring a self-represented appellant from filing anything further and from communicating with opposing counsel by any means. Paragraph 13 supplies a reason. The order, it says, **“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.”** He attached the notice as his own Exhibit 1 and directed the Court to its pages 7 through 9. Those three pages disclose that all four prior files were closed at intake without investigation, reproduce this Commission’s own closure language, and state that nothing is offered in trade.

That is Count 1, and it is the reason this request is addressed to the Commission rather than to a court. The other five concern two verified instruments filed six days apart in the same appeal: four Supreme Court Rules cited for propositions their texts contradict, and one directly adverse rule not disclosed; a footnote disclaiming the accuracy of the record inside the verification of an instrument seeking dismissal on that record; two minute sheets quoted for what helped and not for what is printed four lines away; and one assertion about an insurer that the insurer’s own filing with its regulator answers in the insurer’s voice.

Every document quoted below is attached. Eight exhibits, Bates ARDCB-000001 forward, each opening with an excerpt sheet that carries the operative language verbatim ahead of the page it was taken from, so that nothing here has to be taken on the complainant’s word. Both instruments are produced **in full**, including their attached exhibits, their verification pages, and every part of them adverse to this request. Nothing is characterized that is not quoted; nothing is quoted that is not produced.

No copy of this request has been sent to the respondent, and none can be. The order of July 31, 2026 provides that the appellant “shall not communicate by any means with appellee’s counsel” (Exhibit C). That order is the same one paragraph 13 of Exhibit A defends. The complainant does not ask the Commission to review it. He states the constraint so



the absence of service is understood as obedience to a court order rather than as a choice, and so the Commission can give whatever notice its own procedure requires.

The six counts, at a glance

#	Rule	The act, and where it is	Exhibit
1	8.4(d) · 4.4(a)	Pleading the complainant's communications to this Commission, and his four file numbers, as a ground for a court order barring him from filing. Exhibit A, ¶ 13. The same instrument attaches the notice it characterizes.	A, C, H
2	3.3(a)(1) · 3.3(a)(2)	Rules 303(a)(2), 615(a) and 609(a) cited for propositions their texts contradict; Rule 612(b) not consulted; Rule 606(b) — the criminal rule that actually governs, and whose remedy half is adverse to the request made — not disclosed. Exhibit B, ¶¶ 5, 6, 9, 10, 15.	B
3	3.3(a)(1) · 8.4(c)	Footnote 1 declines to vouch for the accuracy of the record, in an instrument certified under 735 ILCS 5/1-109 that asks for dismissal on that same record. Exhibit B, p. 2 n.1.	B
4	3.3(a)(1) · 8.4(c)	Two minute sheets cited by page for the two facts that helped; the same sheets carry the court reporting entry, "No defendant," "No defense counsel," and "WARRANT WILL NOT BE QUASHED." Exhibit B, ¶¶ 4, 8, 11.	D, E, B
5	3.3(a)(1) · 3.3(c)	Paragraph 7 states the appellant "has not factually or legally supported" the refusal of insurance payment. A regulated insurer had told its regulator otherwise ten days earlier, and the document was served on the respondent the same afternoon.	G, B
6	3.3(a)(1) · 3.3(c) · 8.4(c)	Six days after being served the text of every rule in Count 2 and the documents in Counts 4 and 5, the respondent filed again. Nothing withdrawn, nothing corrected, nothing designated.	A, B

Counts 2 through 6 are claims about how a case is being prosecuted, and the complainant does not pretend they are anything else; Part XIV explains why they are filed here anyway and what the Commission is and is not asked to do with them. **Count 1 is not a claim of that kind.** It is a lawyer asking a tribunal to treat the use of this Commission's process as a reason to close a courthouse door, and no ruling on the appeal decides it.

I. The respondent, and the two instruments

Respondent	Max Christian Boose , Staff Attorney, Office of the State's Attorneys Appellate Prosecutor, Second District — 2032 Larkin Avenue, Elgin, Illinois 60123 · (847) 697-0020 · 2nddistrict.eserve@ilsaap.org. Signatory and verifying affiant on both instruments; he signed each of them twice, once as counsel and once on a separate page headed VERIFICATION.
Also on the block	Eric F. Rinehart , State's Attorney of Lake County, and Edward R. Psenicka , Deputy Director, appear above the respondent on the signature block of both instruments. Part XVI asks the Commission to determine whether Rule 5.1 reaches either. This request makes no allegation of personal misconduct against either , and the complainant does not know what either reviewed.
Instrument one	Objection to Defendant's Emergency Request to Stay Sentence Pending Appeal , No. 2-26-0352, filed and verified July 30, 2026. Nine pages, fifteen numbered paragraphs, one footnote, five attached exhibits, a separate verification page, and a notice and proof of service certified under 735 ILCS 5/1-109. Produced whole at Exhibit B .
Instrument two	Objection to Defendant's Motion to Discharge Appointed Counsel and Pro Se Motion to Vacate the Appointment of Counsel , No. 2-26-0352, filed August 5, 2026 at 1:46 p.m. Seven pages, fifteen numbered paragraphs, two footnotes, a separate verification page, and one attached exhibit — the complainant's notice of July 30, 2026, all eleven pages of it. Produced whole at Exhibit A .
The intervening event	On the afternoon of July 30, 2026, at the electronic address on his own proof of service, the respondent was served an eleven-page notice reproducing the text of every rule discussed in Count 2 and enclosing twenty-seven pages of exhibits, including the documents at Exhibits F and G below. It asked, by paragraph number, for the



withdrawal or correction of six representations. **It is the document paragraph 13 of Exhibit A calls harassing, and the respondent attached all eleven pages of it to that filing.**

The forum

People v. Allababidi, No. 2-26-0352 (Ill. App. Ct., 2d Dist.), on appeal from an order of the Circuit Court of the Nineteenth Judicial Circuit, Lake County, No. 23 CF 1146, entered June 17, 2026, activating a stayed 180-day term of imprisonment on an oral motion at a call captioned “Status.”

II. The appeal, in dates

Two of the counts below turn on an interval rather than on a document, so the intervals are set out once, here, and not re-argued. Every entry is either a file-stamped date on an instrument produced in this packet or a date fixed by a Supreme Court Rule running from one.

Date	Event	Source
May 28, 2026	Call in Courtroom T611 captioned “Arraignment On Petition To Revoke.” No defendant present, no defense counsel present. “Issue Warrant.” The warrant recites a “technical violation” and commands custody.	Ex. D
June 17, 2026	Call captioned “Status.” A stayed 180-day term of imprisonment is activated on an oral motion. “WARRANT WILL NOT BE QUASHED.” The written order is one sentence. The order under review.	Ex. E
July 23, 2026	Notice of appeal file-stamped in the circuit court, together with five other instruments. No. 2-26-0352 is docketed.	Ex. B ¶ 5
July 28, 2026	Docketing statement served. Rule 323(a)’s seven-day designation window opens.	R. 323(a)
July 30, 2026	The Objection is filed and verified (Exhibit B). The same afternoon the respondent is served an eleven-page notice reproducing every rule text in Count 2 and twenty-seven pages of exhibits, and asking by paragraph number for six withdrawals or corrections by 5:00 p.m. August 4.	Ex. A, B
July 31, 2026	The Court appoints the Office of the State Appellate Defender and orders that “appellant himself shall file nothing further with this court and shall not communicate by any means with appellee’s counsel.”	Ex. C
August 4, 2026	The deadline in the notice passes with no answer. The Rule 323(a) window closes. Nothing is designated.	R. 323(a)
August 5, 2026	The second Objection is filed (Exhibit A). Nothing withdrawn, nothing corrected, nothing designated. Paragraph 13 offers the notice of July 30 to the Court as further justification for the restraint, and attaches all eleven of its pages.	Ex. A
August 6, 2026	This request is transmitted. Seventy days since the warrant at Exhibit D issued; it is outstanding. The circuit court call in No. 23 CF 1146 is today.	—
August 13, 2026	The Rule 323(c) window for the People’s proposed amendments to the bystander’s report served July 30 closes. Stated as a date on a calendar; no prediction is offered.	R. 323(c)

III. The documents this request relies on, and how each was obtained

An exhibit set is worth what its provenance is worth. **Not one of the eight exhibits is a document the complainant wrote.** Four are the State’s own filings, one is an order of the reviewing court, two are records of the Nineteenth Judicial Circuit, one is a regulated insurer’s statement to its regulator, and one is this Commission’s own correspondence.

Ex.	Document	Who generated it	How obtained
A	Objection filed August 5, 2026, seven pages with verification	The respondent	Served on the complainant by the People at his two electronic addresses



Ex.	Document	Who generated it	How obtained
B	Objection filed July 30, 2026, nine pages plus five exhibits and proof of service	The respondent	Served on the complainant by the People at his two electronic addresses
C	Order of July 31, 2026 and notice of order	Clerk of the Illinois Appellate Court, Second District	Transmitted by the Clerk; copied on its face to Christopher Michael McCoy and Max Christian Boose
D	Minute sheet of May 28, 2026 and the warrant of arrest	Circuit Court of the Nineteenth Judicial Circuit	Court records of No. 23 CF 1146, reproduced unaltered
E	Minute sheet and two orders of June 17, 2026	Circuit Court of the Nineteenth Judicial Circuit	Court records of No. 23 CF 1146, reproduced unaltered
F	Electronic mail of December 8 and 10, 2025	Cook County Adult Probation Department	Correspondence of the supervising probation officer; served on the respondent July 30, 2026
G	Response to the Illinois Department of Insurance, File No. 01124092, July 20, 2026	Allstate Fire and Casualty Insurance Company	A regulated insurer's written statement to its regulator; served on the respondent July 30, 2026
H	Closure letters of June 18 and July 1, 2026	This Commission, Intake Division	Sent to the complainant by the Commission; produced in full, including the paragraphs adverse to him

Two consequences follow, and they are the reason this part exists. **Nothing in this request depends on the complainant's account of anything.** And every quotation in it can be checked against a page that the Commission can obtain from a source other than the complainant — from the respondent's own office, from the Clerk of the Second District, from the Circuit Clerk of Lake County, from the Department of Insurance, or from the Commission's own file.

IV. Count 1 — a communication to this Commission, pleaded to a court as a ground for barring the person who made it

Paragraph 13 of Exhibit A is set out below in full, so that the sentence at issue is read in the company of the sentences around it rather than lifted out of them. It is the last paragraph of the instrument before the two concluding paragraphs, and it is the only paragraph in either instrument that addresses the filing bar itself.

Exhibit A, paragraph 13 — filed and verified August 5, 2026

*[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. ... **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.]***

The structure is not ambiguous. The paragraph identifies an order that restrains a litigant from filing and from communicating with counsel; it states that the order is "further justified" by something; and the something it names first, and at greatest length, is that litigant's disciplinary referral together with his four prior files at this Commission. The



Supreme Court has spoken about communications of that kind:

Ill. S. Ct. R. 775 — Immunity

[Any person who submits a claim to the Client Protection Program or who communicates a complaint concerning an attorney ... to the Attorney Registration and Disciplinary Commission, or its administrators, staff, investigators or any member of its boards, shall be immune from all civil liability which, except for this rule, might result from such communications or complaint.]

The complainant states the rule's reach precisely rather than broadly, because an overstatement here would be the one thing that lets the whole request be answered in a sentence. **By its terms Rule 775 confers immunity from civil liability. It does not by its terms decide every procedural use to which such a communication might be put, and no claim is made here that it does.** What the rule does establish is the Supreme Court's judgment that reporting a lawyer to this Commission is protected conduct rather than wrongful conduct. Treating the bare fact of a report as evidence of improper litigation purpose therefore requires authority. **Paragraph 13 cites none, does not mention Rule 775, and does not argue it away.** The paragraph cites no rule, no statute and no decision for any part of its request.

A. The paragraph tells the Court where to look, and the pages it names refute it. The citation is to "Exhibit 1, pp. 7-9" — the respondent's own exhibit, at three pages he selected. Those pages are produced in this packet inside Exhibit A, because he attached them. Set his characterization beside what is printed there:

What paragraph 13 tells the Court is at its Exhibit 1, pp. 7-9	What is printed at Exhibit 1, pp. 7-9 (inside Exhibit A)
A "harassing" notice of disciplinary referral.	A table naming all four prior files by number and disposition and stating that every one was closed at intake without investigation — a disclosure against the complainant's own interest, volunteered before anyone asked for it.
"[F]our prior, as well as future, intended ARDC claims against various representatives of the People."	This Commission's closure language, quoted: "this Commission will not act on such claims unless a court has first found that a prosecutor acted improperly." The notice then concedes in terms that the fifth file will in all probability close the same way.
"[V]arying demands and vexatious litigation tactics."	"None of this is an offer. There is nothing in this letter to trade and no consideration proposed ... bargaining over whether a false statement of law stays in front of a reviewing court would be its own violation, for both of us."
Conduct offered as a reason to keep a litigant from filing.	"If you do withdraw or correct the six representations, I will say so to the Administrator, in the referral itself, in the same paragraph." And, on the same pages: "Supreme Court Rule 775 immunizes that communication from civil liability."
Cited to a reviewing court as evidence of improper purpose.	A statement that the referral will be filed whether or not the demand is met, so that nothing in the letter is contingent on the respondent doing anything.

The respondent read those pages. His own citation is to them, by page number, and the eleven pages are bound into his filing. A document that discloses its author's four consecutive failures before this Commission, quotes the Commission's refusal, expressly refuses to trade anything, and undertakes to report a correction in the respondent's favour is not the document paragraph 13 describes to the Court.



B. The two rules, stated narrowly. The complainant identifies what he says each rule reaches and does not stretch either.

III. R. Prof. Conduct 8.4 — Misconduct

*[It is professional misconduct for a lawyer to ... (c) **engage in conduct involving dishonesty, fraud, deceit, or misrepresentation**; (d) **engage in conduct that is prejudicial to the administration of justice** ...]*

Rule 8.4(d) reaches conduct prejudicial to the administration of justice. A request that a tribunal restrict a litigant's access on the ground that he used this Commission's process operates on that process directly, because the proposition, if adopted, is that reporting a lawyer costs the reporter his forum. The prejudice is not to the complainant alone. It attaches to every person who has to decide whether reporting a lawyer will be held against him by the court in which he is appearing.

III. R. Prof. Conduct 4.4(a) — Respect for Rights of Third Persons

*[In representing a client, a lawyer **shall not use means that have no substantial purpose other than to embarrass, delay, or burden a third person**, or use methods of obtaining evidence that violate the legal rights of such a person.]*

The complainant does not assert that the whole of Exhibit A had no substantial purpose other than to burden. He asserts it of the clause, and the clause is severable on the face of the paragraph: paragraph 13 argues judicial economy in its own right for three sentences before it reaches the referral, and would have argued it identically had the sentence never been written. The sentence adds one thing to the paragraph, and the thing it adds is the complainant's use of this Commission.

C. The same request, six days earlier, without the referral. The filing bar was not the Court's idea. It was asked for, by this respondent, in the earlier instrument, in a paragraph also numbered 13:

Exhibit B, paragraph 13, last sentence — filed and verified July 30, 2026

*[The People therefore request that **defendant be barred from further supplement or otherwise asserting additional matters after this objection is filed.**]*

A filing restriction on a self-represented litigant is an extraordinary remedy. It was sought in a paragraph of a responsive pleading — without a motion, without notice that it was coming, without a rule to show cause, and without any opportunity to be heard on it — against a person then under an outstanding custodial warrant. Rule 375(b), the rule that governs sanctions in a reviewing court, requires a rule to show cause before a sanction is imposed and requires the reasons for it to be set forth. **Neither instrument cites Rule 375.** The second one supplies reasons six days after the order it defends was entered.

D. One point about care rather than intent, stated once. The sentence at issue calls the document a notice “dated July 30, 2026” and then cites it as **“Defendant’s July 31, 2026, Letter.”** The letter bears one date on its face, and the respondent attached the page it is printed on. The sentence gives two.

V. Count 2 — four Supreme Court Rules cited for what their texts contradict, and one adverse rule not disclosed

Exhibit B is nine pages. Its jurisdictional argument, its good-cause argument and its record argument each rest on a single rule, and in each instance the rule provides something else. The table states what was certified and what the rule says; each rule is then quoted whole in the text below, including the parts adverse to the complainant.



¶	What the Objection certified	What the rule provides
5, 10, 15	The notice of appeal “is not yet in effect, this Court lacks jurisdiction, and defendant’s motion must be rejected.” Ill. Sup. Ct. R. 303(a)(2) (eff. Jul. 1, 2017).	Rule 303 is captioned “ Appeals from Final Judgments of the Circuit Court in Civil Cases. ” Its text provides that a premature notice “ becomes effective ” when the disposing order is entered. It is a savings clause. It provides for no dismissal at all , and it is cited three times as the entirety of the jurisdictional argument. No alternative ground is pleaded.
5, 10, 15	The same rule, offered as the rule governing a criminal appeal.	Rule 612(b) is the closed list of civil appeals rules made applicable in criminal cases — nineteen subparagraphs, enumerated. Rule 303 is not on it. Across the whole of Rules 602 through 615, Rule 303 appears exactly once: at Rule 606(d), and then only for amending a notice of appeal under Rule 303(b)(5).
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 quoted words appear in it once — as the object of the clause that excuses the omission. The rule states no requirement. It is quoted whole below.
6, 15	“Defendant has not established good cause”; “defendant has not carried his burden.” Ill. Sup. Ct. R. 609(a).	Sentence one of Rule 609(a) governs an appeal from an order revoking probation and imposing imprisonment, and provides that the sentence may be stayed “ by a judge of the trial or reviewing court. ” It attaches no condition to the defendant. “Good cause” enters at sentence two, which governs a motion to revoke a stay already entered . No party has filed one.
11	The People “are unable to respond in full to defendant’s claims in the absence of the underlying transcripts,” the incompleteness to be resolved against the appellant under <i>Foutch</i> .	Both sheets the same instrument cites — SR-46 and SR-51 — name an ECR Specialist, Lake County Court Reporters on their face (Exhibits D, E). The proceedings were recorded. Rule 607(b) commands transcription upon the filing of a notice of appeal and gives it to a defendant in this posture without charge .
none	Rule 606(b) is not cited anywhere in the nine pages.	Rule 606(b) is the criminal rule on a notice of appeal filed while a motion is pending. Half of it is adverse to the complainant. The other half is adverse to the Objection, and both halves are quoted below.

A. Rule 615(a), whole, with nothing removed:

Ill. S. Ct. R. 615(a) — Plain Error

*[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.**]*

The eight words the Objection places inside quotation marks are in the rule. They are the object of the clause that waives them. The complainant anticipates the answer and takes it now, rather than waiting to be given it: plain-error review is an exception, and an exception implies a general rule. It does — and the general rule lives in the forfeiture case law, which is exactly where the Objection’s own citation to *People v. Chambliss*, two sentences earlier in the same paragraph, found it. **That is what distinguishes this sentence from a losing argument.** A correct authority for the proposition was already on the page. A second authority was then added for a proposition it does not contain, in words taken from the clause that contradicts it, and what the addition supplies is the appearance that a Supreme Court Rule says what it does not say.

B. Rule 609(a), the sentence that was never quoted:

Ill. S. Ct. R. 609(a) — Stays in criminal cases

*[A judgment revoking probation ... and imposing a sentence of imprisonment ... may be appealed, and pending the appeal **the defendant may be admitted to bail and the sentence or condition of imprisonment or periodic imprisonment stayed, with or without bond, by a judge of the trial or reviewing court.** ... [Sentence two:] A stay so entered may be revoked **for good cause shown.**]*



Sentence one describes this posture exactly and imposes nothing on the appellant. The words “good cause” belong to sentence two, which governs revoking a stay that already exists. The Objection uses the standard from sentence two four times, at paragraphs 6 and 15, and never quotes sentence one.

C. The rule that was not disclosed, and the half of it that hurts the complainant. Rule 3.3(a)(2) requires disclosure of controlling authority directly adverse to the client’s position and not disclosed by opposing counsel. The criminal rule on a notice of appeal filed while a motion is pending is Rule 606(b). The complainant quotes the adverse half himself rather than leaving it to be found:

Ill. S. Ct. R. 606(b) — Notice of appeal; postjudgment motions

[[A] notice of appeal filed before the entry of the order disposing of [a timely postjudgment motion directed against the judgment] shall have no effect and shall be stricken by the trial court ... and a new notice of appeal must be filed within 30 days of entry of the order disposing of the motion.]

That language is adverse to the complainant and he does not hedge it. It still does not reach the relief the Objection asked for, and the reasons are on the face of the same rule. The striking is done **by the trial court**, with the order transmitted to the reviewing court within five days — it is not a dismissal by the reviewing court, which is the only relief paragraph 15 requests. The same sentence provides for a **new notice within thirty days**, and Rule 606(c) provides for leave to file one late. **Rule 606(b) appears nowhere in the nine pages.** The rule cited in its place is the civil one that saves a premature notice, offered for the proposition that it destroys one.

Ill. R. Prof. Conduct 3.3(a) — Candor Toward the Tribunal

[A lawyer shall not knowingly: (1) make a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer; (2) fail to disclose to the tribunal legal authority in the controlling jurisdiction known to the lawyer to be directly adverse to the position of the client and not disclosed by opposing counsel ...]

The complainant does not ask the Commission to decide who is right about jurisdiction in the Second District. He asks it to set four citations against four rule texts — an exercise that requires no view of the merits and produces the same answer whoever ultimately wins the appeal.

VI. Count 3 — a disclaimer of the record, inside the verification of an instrument seeking dismissal on that record

Footnote 1 sits at the foot of page 2 of Exhibit B, attached to the paragraph reciting the revocation allegations:

Exhibit B, page 2, footnote 1

[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.]

The instrument carrying that footnote is certified on a separate page under 735 ILCS 5/1-109. The records it declines to vouch for are the records supplying every factual citation in it: **SR-32, SR-33, SR-41, SR-46, SR-51, SR-53, SR-57 through SR-63, and SR-70** — which is to say the entire factual basis of the jurisdictional argument at paragraphs 5, 10 and 15, of the good-cause argument at paragraphs 6 and 7, and of the request at paragraph 13 that a litigant be barred from filing.

The complainant is careful about what follows, and it is less than it might appear. Section 1-109 provides:



735 ILCS 5/1-109, penalty sentence

*[Any person who makes a false statement, material to the issue or point in question, **which he does not believe to be true**, in any pleading, affidavit or other document certified by such person in accordance with this Section shall be guilty of a Class 3 felony.]*

The element the statute makes central — a statement the signer does not believe to be true — is not supplied by this complainant and is not asserted anywhere in this request. Part XV repeats that, and it is not a formality: the criminal provision needs a state of mind the complainant has no way to establish, and asserting it would be the single overreach that answers this whole document. What is asserted is narrower and belongs to the professional rules alone: a lawyer may not ask a reviewing court to dismiss an appeal on a record and, in the same certified instrument, decline to vouch for that record. One of those two positions has to be abandoned, and neither instrument abandons either.

VII. Count 4 — two minute sheets, quoted for what helped

Paragraph 4 of Exhibit B cites both sheets by supporting-record page, which establishes that both were open in front of the drafter. What the paragraph told the Court each one shows, and what else is printed on the same sheet within a few lines of the quoted matter, are set out below. Both sheets are produced at Exhibits D and E.

What paragraph 4 told the Court	What is printed on the same sheet
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.”	“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 recites a “ technical violation ” and commands that the defendant “be held in custody for First Appearance Court.”
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.”	“ECR Specialist, Lake County Court Reporters.” Also printed: “ Public Defender Discharged ” and “ WARRANT WILL NOT BE QUASHED. ” The written order activating a 180-day term of imprisonment is one sentence. A separate order of the same day discharges the Public Defender <i>nunc pro tunc</i> to October 6, 2025, while the minutes of that same proceeding list that counsel as present.

Paragraph 8 then calls it an “extrapolation” for the appellant to read the June 17 sheet as showing “[n]o evidence, no witness, no stipulation, no admission, no finding.” The same instrument reads the same sheet four paragraphs earlier and takes two facts out of it. A minute sheet is either a record of what occurred at a call or it is not; it cannot be proof of presence and insufficient proof of absence in one document.

The half of this count with a date on it is paragraph 11. The Objection told the Court the People were unable to respond “in the absence of the underlying transcripts.” Both sheets it cited name a court reporting officer, so the proceedings were electronically recorded and the audio exists in the custody of a county office — Courtroom 611, Nineteenth Judicial Circuit, May 28, 2026 and June 17, 2026, each at 9:00 a.m. What does not exist is a transcript. Rule 323(a) gave the People seven days from service of the docketing statement to designate additional proceedings for transcription.

August 4, 2026

The Rule 323(a) designation window closes. **Nothing was designated.**



August 5, 2026	The same signatory files Exhibit A. It designates nothing either, and says nothing about the record.
August 13, 2026	The Rule 323(c) window for the People's proposed amendments to a bystander's report served on them July 30 closes. The complainant states this as a date on a calendar; he makes no prediction about what will be filed.

The complainant does not characterize why nothing was designated. He states two dates and the absence between them, and notes that a reviewing court was asked to resolve doubts against him because a document had not been produced that a rule obliges the State's own courthouse to produce, that the People had seven days to designate, and that they did not designate.

VIII. Count 5 — paragraph 7, and the insurer's own filing with its regulator

Paragraph 7 of Exhibit B states that the appellant “has not factually or legally supported that the People in fact refused payment from his insurance company.” Exhibit G is the response of Allstate Fire and Casualty Insurance Company to the Illinois Department of Insurance in File No. 01124092, dated **ten days before that sentence was filed** and signed by a Delivery Senior Manager of the company. It is a regulated insurer's written statement to its own regulator about its own conduct, and it answers the sentence in the insurer's voice: \$100,000 in property damage limits available; coverage denied to no one; civil liability not disputed; **“at no time was Allstate presented”** with the \$2,670.86 loss; counsel retained to reach the State's Attorney and the public defender to pay it; and **“no one will respond or cooperate.”**

The complainant does not assert that the respondent had Exhibit G in hand when he filed on July 30, 2026. He asserts three things instead, each of them a date. The document was served on the respondent that afternoon, as Exhibit E to the notice. Six days later the respondent filed Exhibit A. Paragraph 7 has not been corrected, withdrawn, or qualified in the interval.

III. R. Prof. Conduct 3.3(c) — Duration of the duty

*[The duties stated in paragraphs (a) and (b) **continue to the conclusion of the proceeding**, and apply even if compliance requires disclosure of information otherwise protected by Rule 1.6.]*

IX. The exhibit set attached to the July 30 Objection

This part is context for Count 1 and is not itself charged as a violation. The Objection of July 30 attaches five exhibits. They ship in this packet at Exhibit B, pages 10 through 15, so the table below can be checked in under a minute.

The People's exhibit	What it is	Which case	What it decided
1	Order of the Second District, November 17, 2025	No. 2-25-0440 — the direct appeal from the negotiated plea	Dismissed that appeal for failure to file a Rule 604(d) motion. Rule 604(d) governs appeals from pleas.
2	Order of the Supreme Court of Illinois, June 26, 2026	No. 133301 , <i>Allababidi v. Stride</i>	“Emergency motion by Movant, pro se, for a supervisory order. Denied. ”
3	Order of the Supreme Court of Illinois, July 6, 2026	No. 133295 , <i>Allababidi v. Cartwright Weinstein</i>	“Motion by Petitioner, pro se, for leave to file a petition for an original writ of mandamus. Denied.”
4	Order of the Supreme Court of Illinois, July 16, 2026	No. 133342 , <i>Allababidi v. Shanes</i>	“Motion by Petitioner, pro se, for leave to file a petition for an original writ of mandamus. Denied.”



The People's exhibit	What it is	Which case	What it decided
5	Order of the Supreme Court of Illinois, July 16, 2026	No. 133389, <i>Allababidi v. Shanes</i>	"Emergency motion by Movant, pro se, for a supervisory order. Denied. "

Four of the five were entered in other matters, against other respondents, and none of the five is from the proceeding under review — the Objection attaches nothing from the June 17, 2026 order, the May 28, 2026 minute sheet, or the petition to revoke. Two of the five are denials of **leave to file**, which adjudicate no question of law. The complainant does not assert that attaching prior adverse orders is misconduct and does not charge it. He sets the table out because the instrument that stacks five denials from other proceedings is the same instrument, at paragraph 13, that asks the Court to bar him from filing — and because six days later paragraph 13 of the second instrument counts “‘seven’ or ‘five’ coordinated proceedings” against him and adds his four Commission files to the tally.

X. What the respondent was asked to do, and what it would have cost

Rule 3.3(a)(1) does not only forbid a false statement of law. It requires the correction of one already made, and Rule 3.3(c) keeps that duty alive to the conclusion of the proceeding. The notice of July 30, 2026 asked for the correction and itemized it, so that the Commission can see exactly what was declined. Each item is reproduced from the notice as the respondent received it, and each was answerable in a single paragraph of a supplemental filing. **Not one of them asks the People to abandon a defence.**

#	What the notice of July 30 asked for	What answering it would have required
1	Withdraw the Rule 303(a)(2) argument at paragraphs 5, 10 and 15, or file a corrected citation to Rule 606(b) stating, in the same sentence, the remedy Rule 606(b) prescribes and the availability of Rule 606(c) leave.	One sentence. The alternative preserves the argument and merely cites the rule that governs it.
2	Withdraw the second sentence of paragraph 9, or reproduce Rule 615(a) in full so the panel can see where the quoted words sit.	One sentence, or thirty-eight words of rule text. <i>Chambliss</i> was already cited two sentences earlier for the same proposition, so nothing is lost either way.
3	Withdraw the “good cause” assignment at paragraphs 6 and 15, or identify by sentence which part of Rule 609(a) imposes it on an appellant rather than on a movant to revoke an existing stay.	One sentence. If sentence one does impose it, saying so ends the point in the People's favour.
4	Withdraw the request at paragraph 13 that the appellant be barred from further filing.	One sentence, and it asks the People to give up relief they never moved for and never supported with authority.
5	Correct paragraph 7, or state in writing that the insurer's letter has been reviewed and the representation is maintained notwithstanding it.	One sentence. The alternative maintains the position and merely records that the document was read.
6	Serve a Rule 323(a) designation of the May 28 and June 17, 2026 electronic recordings, or state on the record that the People decline to designate them.	A form, or one sentence. Either answer disposes of the record dispute the same instrument pleads.

The window closed on August 4, 2026 without an answer, and the instrument filed the following day withdrew none of the six. The complainant records one further feature of the notice, because it bears on how the request was framed rather than on how it was answered: the notice stated, in terms, that the disciplinary referral would be made **whether or not** the corrections were made, and that if they were made the fact would be reported to the Administrator in the referral itself. **Nothing in it was conditional, and nothing was offered in trade.** That undertaking is honoured here: had any of the six



been withdrawn, this part would say so.

XI. Count 6 — six days, and what was filed at the end of them

Counts 2 through 5 would each present a question of state of mind if this were the first document on the subject to reach the respondent. It is not, and the proof of that is in his own filing. The notice served on July 30, 2026 reproduced Rule 615(a) whole, quoted Rule 609(a) sentence by sentence, set out Rule 303's caption and Rule 612(b)'s closed list, supplied Rule 606(b) including the half adverse to the complainant, and enclosed twenty-seven pages of exhibits including the clearance at Exhibit F and the insurer's letter at Exhibit G. It asked, by paragraph number, for the withdrawal or correction of six representations, and it set a deadline of 5:00 p.m. on August 4, 2026.

July 30, 2026	Exhibit B filed and verified, 1:46 p.m. The notice served the same afternoon at the address on the People's own proof of service, with twenty-seven pages of exhibits.
August 4, 2026	The deadline in the notice passes. No answer. The Rule 323(a) designation window closes the same day. Nothing designated.
August 5, 2026	Exhibit A filed. Nothing withdrawn. Nothing corrected. The notice is instead attached as the People's Exhibit 1 and offered to the Court, at paragraph 13, as further justification for the restraint.
August 6, 2026	This request for investigation is transmitted. Seventy days after the warrant described at Exhibit D issued; it remains outstanding, and the circuit court call is today.

Whether the respondent knew on July 30, 2026 what the four rule texts say is not asserted here and does not need to be. The complainant asks the Commission to determine what he knew on August 5, 2026 — six days after the texts were placed in his hands, when he filed again and withdrew nothing. Rule 3.3(a)(1) forbids a knowingly false statement of law to a tribunal *and* requires the correction of one already made. Rule 8.4(c) reaches conduct involving dishonesty or misrepresentation. Both attach to the interval rather than to the first filing, and the interval is documented by the respondent himself.

XII. Supervisory responsibility, stated as a question and not as a charge

Both instruments carry three names. 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, if he fails to take reasonable remedial action.

The complainant does not know what either supervising lawyer reviewed, and does not assert that either reviewed anything. He states the two facts he can prove: the notice of July 30, 2026 was copied to the Office of the Lake County State's Attorney at statesattorney@lakecountyil.gov the afternoon it was served, and both instruments carry both names above the respondent's. Whether Rule 5.1 reaches either is a question the Commission can answer and the complainant cannot.

XIII. The six counts in element form

Each count is restated below as the rule requires it to be proved: the element, what the record shows, and where the record is. Nothing new is asserted in this part; it is the same material in the form in which the question is answered.



#	The element	What the record shows	Where
1	Rule 8.4(d) — conduct prejudicial to the administration of justice.	A verified filing asks a reviewing court to keep in place an order barring a litigant from filing, on the stated further justification that he made and intends to make complaints to this Commission. Rule 775 marks such communications as protected. No authority is cited.	Ex. A ¶ 13
1	Rule 4.4(a) — means with no substantial purpose other than to burden.	The clause is severable: the paragraph argues judicial economy in its own right for three sentences before reaching the referral, and would read identically without the sentence at issue. What the sentence adds is the complainant's use of this Commission.	Ex. A ¶ 13
2	Rule 3.3(a)(1) — a false statement of law to a tribunal, or failure to correct one.	Rule 303(a)(2) — a civil savings clause providing that a premature notice “becomes effective” — cited three times as a jurisdictional bar requiring dismissal. Rule 615(a) — the plain-error rule — cited as stating a “general requirement,” in words taken from the clause that excuses it. Rule 609(a) sentence two's good-cause standard applied to an appellant four times; sentence one never quoted.	Ex. B ¶¶ 5, 6, 9, 10, 15
2	Rule 3.3(a)(2) — failure to disclose directly adverse controlling authority.	Rule 606(b) is the criminal rule governing the point. Its remedy half — striking by the trial court, a new notice within thirty days, Rule 606(c) leave — is adverse to the dismissal requested. It appears nowhere in the nine pages.	Ex. B, whole
3	Rule 3.3(a)(1) / 8.4(c) — inconsistent representations in one certified instrument.	Footnote 1 declines to vouch for the accuracy of the records; every factual citation in the instrument is to those records; the prayer asks for dismissal on them; the instrument is certified under 735 ILCS 5/1-109 on a separate page.	Ex. B p. 2 n.1
4	Rule 3.3(a)(1) — a partial account of a document to a tribunal.	Two minute sheets are cited by supporting-record page for the two facts that helped. The same sheets carry the court reporting entry, “No defendant,” “No defense counsel,” “Issue Warrant,” “Public Defender Discharged” and “WARRANT WILL NOT BE QUASHED.” Paragraph 11 then pleads the absence of a transcript the same sheets show was recorded.	Ex. B ¶¶ 4, 8, 11; Ex. D, E
5	Rule 3.3(a)(1) and 3.3(c) — a statement of fact, and the duty to correct.	Paragraph 7 states the appellant “has not factually or legally supported” the refusal of insurance payment. Ten days earlier the insurer told its regulator that \$100,000 was available, that it had retained counsel to pay, and that “no one will respond or cooperate.” The document was served on the respondent July 30 and paragraph 7 stands.	Ex. B ¶ 7; Ex. G
6	Rule 3.3(c) — the duty continues to the conclusion of the proceeding.	Rule texts and documents delivered July 30. Deadline passed August 4 with no answer. Second instrument filed August 5 withdrawing nothing, correcting nothing, designating nothing — and attaching the notice itself as an exhibit, which is what proves receipt.	Ex. A, B

The complainant does not ask the Commission to accept the right-hand column on his word. Every row cites a document in this packet, and every one of those documents came from somewhere other than him.

XIV. Why the Commission's standing closure ground does not reach Count 1

The complainant holds four closed files and quotes the reason rather than disputing it:

Exhibit H — Intake Division, June 18 and July 1, 2026

*[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.**]*



Counts 2 through 6 are claims of that kind. They are pleaded in the Second District, and if that Court makes a finding it will be transmitted here under the Commission's own standing invitation, which is quoted on the excerpt sheet at Exhibit H and is the reason a file is asked for now rather than later — a supplement to an existing number, opened before the event it reports, is a different document from an accusation arriving cold. **Count 1 is not a claim of that kind, and the sentence above does not reach it, for three reasons that are independent of one another.**

- 1 **The conduct is directed at this Commission's process, not at the merits of a case.** The proposition paragraph 13 asks a court to adopt is that a litigant's use of the disciplinary process is a reason to restrict his access to that court. No ruling on this appeal, for the complainant or against him, decides that question, because the question is not in the appeal. It is a question about what a lawyer may ask a tribunal to do with a report made to the Commission, and that subject belongs to the Commission.
- 2 **The forum the closure letter names is the forum the conduct defends closing.** The instruction is to raise prosecutorial misconduct "in the courts through motions, appeals and other legal actions." The order at Exhibit C provides that the complainant "shall file nothing further with this court." Paragraph 13 asks that Court to keep that order in place and offers the disciplinary referral as a further justification for doing so. Applied to Count 1, the closure ground directs the complainant to a forum in which, if paragraph 13 succeeds, he may not be heard at all.
- 3 **The four closed files are now part of the record of a pending appeal.** Their numbers and dispositions were placed before the Second District by the respondent, in his own exhibit, and characterized to that Court as evidence of harassment. The complainant does not ask the Commission to reopen any of them and does not complain of their closure. He states, because it bears on how a fifth file should be handled, that the four are no longer confidential intake matters between him and the Commission. They are cited paragraphs in an appellate record.

XV. The limits of what is charged

A request that overreaches is discounted, and the boundaries belong on the face of the document rather than in an answer to a question nobody has asked yet.

- **A legal contention is not a statement of fact.** The complainant does not assert that the citations in Count 2 engage 735 ILCS 5/1-109 as a criminal matter, and will not assert it later. They engage Rules 3.3(a)(1) and 3.3(a)(2), which is the whole of the charge.
- **No claim of knowledge before July 30, 2026.** Every count needing a mental state is dated to the delivery of the notice, and the notice is attached to the respondent's own filing.
- **No claim that the People may not oppose the motion.** The People are entitled to counsel and to every position the record supports. What is charged is citing four rules for propositions their texts contradict, and pleading a Commission complaint as a ground for restraint.
- **No claim that anyone destroyed, altered or concealed evidence,** and no claim about the conduct of any lawyer other than the respondent and, as a supervisory question only, the two named above him.
- **No complaint about any judge, court reporter, clerk or deputy clerk,** and no request that the Commission review any ruling. The letters at Exhibit H state that it cannot, and nothing here asks it to.
- **No complaint about appointed appellate counsel,** who acted promptly and in good faith throughout and is named nowhere in this request except here.
- **No civil claim against the respondent, and none contemplated, for filing a brief.** Threatening opposing counsel with suit over a responsive pleading is not something this complainant is doing. The leverage in this document is a set of dated facts and nothing else.

XVI. What the Commission is asked to do

- 1 **Docket this as a request for investigation** of Max Christian Boose and assign it a file number.



- 2 **Reach Count 1 on its own footing.** It does not depend on the outcome of any appeal, no court has been asked to decide it, and it is the one count the closure ground at Exhibit H does not answer.
- 3 **Obtain both instruments from the respondent's own office,** together with the drafting file behind the citations at paragraphs 5, 6, 9, 10, 11 and 15 of Exhibit B, and the correspondence transmitting this file to the Office of the State's Attorneys Appellate Prosecutor from the Office of the Lake County State's Attorney.
- 4 **Put one written question to the respondent:** what authority supports pleading a litigant's communication to this Commission as a justification for restraining his filings in a reviewing court. Paragraph 13 cites none.
- 5 **Determine whether Rule 5.1 reaches** Edward R. Psenicka, Deputy Director, and Eric F. Rinehart, State's Attorney of Lake County. No allegation of personal misconduct is made against either and the complainant does not know what either reviewed.
- 6 **Keep this file open for supplement.** Any finding by the Second District, by the United States District Court for the Northern District of Illinois, or by any other court will be transmitted here under the same file number, in the manner the Commission's own letters at Exhibit H invite.

XVII. Delivery, and the constraint on the complainant

Transmission	By electronic mail on August 6, 2026 to lgilmore@iardc.org and information@iardc.org , copied to canderson@iardc.org , awelsh@iardc.org and lgutierrez@iardc.org . No paper copy is sent and no reply by mail is requested or required. The complainant is without funds and files and serves electronically in every forum in which he appears.
Not served	No copy has been sent to the respondent, to his office, or to the Office of the Lake County State's Attorney. The order of July 31, 2026 (Exhibit C) provides that the appellant "shall not communicate by any means with appellee's counsel." If the Commission gives the respondent notice, that is the Commission's act under its own procedure and the complainant has no part in it.
Enclosures	Eight exhibits, Bates-stamped at both feet of every page including covers. Left foot: the exhibit-specific mark and the page within that exhibit. Right foot: the packet number, ARDCB-000001 forward, with the page count of the exhibit section. Each exhibit opens with an excerpt sheet reproducing the operative language verbatim; the source page follows under the same range.
Reply to	defcon5ready@gmail.com and ehahilfiger@gmail.com. A reply to either is a reply to both.

The complainant expects this file to be closed, and says so before it is opened, because everything else in this document can be checked and that should be checkable too. Four have closed for the same stated reason and he has attached both letters saying so. What is asked is narrower than a result. It is that **Count 1 be read before that reason is applied to it** — because the reason directs him to a court, and the conduct in Count 1 is a request that the same court hear nothing further from him.

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	The August 5, 2026 Objection, in full, with its verification page Seven pages, filed 1:46 p.m. Paragraph 13 is the subject of Count 1. Signed “/s/ Max C.. Boose, Staff Attorney,” and signed a second time on a page headed VERIFICATION under 735 ILCS 5/1-109.	ARDCB-000001 – ARDCB-000009
B	The July 30, 2026 Objection, in full, with footnote 1 and its verification page Fifteen pages — the nine-page instrument, its five attached exhibits, and the notice and proof of service. Paragraphs 5, 6, 7, 9, 10, 11, 13 and 15 are the subject of Counts 2 through 5. Footnote 1 appears at the foot of page 2 and is the subject of Count 3.	ARDCB-000010 – ARDCB-000026
C	The order of July 31, 2026 — the bar the respondent asks the Court to keep in place One page, Second District, Jeffrey H. Kaplan, Clerk of the Court. Copied to Christopher Michael McCoy and Max Christian Boose. It is the order paragraph 13 of Exhibit A defends, and it is why no copy of this request has been sent to the respondent.	ARDCB-000027 – ARDCB-000029
D	May 28, 2026 — the minute sheet cited at SR-46, and the warrant it produced Three pages. The sheet the respondent cited for one fact at paragraph 4 of Exhibit B. Count 4 concerns what else is printed on it.	ARDCB-000030 – ARDCB-000034
E	June 17, 2026 — the minute sheet, the one-sentence order, and the nunc pro tunc discharge Three pages. The sheet the respondent cited at SR-51 and SR-53 for the defendant's presence and the oral motion, in a call captioned “Status.”	ARDCB-000035 – ARDCB-000039
F	December 8–10, 2025 — the supervising probation office's written clearance of the screen Three pages of the electronic mail thread. Served on the respondent as Exhibit C to the notice of July 30, 2026, five days before he filed Exhibit A.	ARDCB-000040 – ARDCB-000044
G	July 20, 2026 — the insurer's written statement to its regulator Three pages of a six-page response of Allstate Fire and Casualty Insurance Company to the Illinois Department of Insurance, Complaint No. 01124092. Served on the respondent as Exhibit E to the notice of July 30, 2026.	ARDCB-000045 – ARDCB-000049
H	The Commission's closure letters of June 18 and July 1, 2026 Four pages. Nos. 2026IN03189, 2026IN03190, 2026IN03266 and 2026IN03281, all closed at intake without investigation. Produced in full, including the paragraphs adverse to the complainant, because Part XIV is built on them.	ARDCB-000050 – ARDCB-000055

**EXHIBIT A****The August 5, 2026 Objection, in full, with its verification
page**ARDCB-000001 – ARDCB-000009

*Seven pages, filed 1:46 p.m. Paragraph 13 is the subject of Count 1. Signed “/s/ Max C.. Boose,
Staff Attorney,” and signed a second time on a page headed VERIFICATION under 735 ILCS
5/1-109.*

The pages that follow are a true copy of the referenced record, produced without alteration.

Objection to Defendant's Motion to Discharge Appointed Counsel and Pro Se Motion to Vacate the Appointment of Counsel — No. 2-26-0352, filed August 5, 2026, 1:46 p.m.

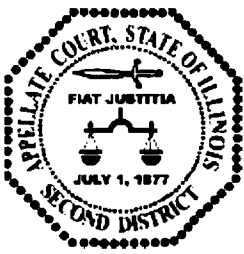
Paragraph 13, second sentence — the ground pleaded for the filing bar

*[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.**]*

Page 7 — the 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]

Quoted without alteration. The source page follows under the same Bates range.



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

Edward R. Psenicka
Deputy Director

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

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

**EXHIBIT B****The July 30, 2026 Objection, in full, with footnote 1 and its
verification page**

ARDCB-000010 – ARDCB-000026

Fifteen pages — the nine-page instrument, its five attached exhibits, and the notice and proof of service. Paragraphs 5, 6, 7, 9, 10, 11, 13 and 15 are the subject of Counts 2 through 5. Footnote 1 appears at the foot of page 2 and is the subject of Count 3.

The pages that follow are a true copy of the referenced record, produced without alteration.

Objection to Defendant's Emergency Request to Stay Sentence Pending Appeal — No. 2-26-0352, filed and verified July 30, 2026

Paragraph 9, third sentence — cited for Ill. S. Ct. R. 615(a)

[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).]

Footnote 1, at the foot of page 2

[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.]

Paragraph 13, last sentence — the request for a filing bar

[The People therefore request that **defendant be barred from further supplement or otherwise asserting additional matters** after this objection is filed.]

Paragraph 7, fourth sentence

[Defendant has **not factually or legally supported that the People in fact refused payment from his insurance company**, or that Allstate's understanding that it might refuse payment from it was improper.]

Quoted without alteration. The source page follows under the same Bates range.

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 EMERGENCY REQUEST TO STAY
SENTENCE PENDING APPEAL

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 C. Boose, Staff Attorney, State’s Attorneys Appellate Prosecutor, respectfully object to defendant’s emergency motion to stay sentencing conditions pending appeal.

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).

2. On September 8, 2025, defendant entered into a negotiated guilty plea, and was sentenced to 30 months of probation with various conditions, including: reporting to probation, to not use or possess any illegal substance or another’s prescription medication, to attend a live victim impact

panel, to perform 240 hours of public service work, and a stayed sentence of 180 days in jail. Docket Sheet pp. 2-3; Def. Supp. Rec., p. 32-33 SR-32-33.¹

3. On November 17, 2025, this Court dismissed defendant's direct appeal, noting defendant's "admitted failure to file" a motion to withdraw his guilty plea before pursuing an appeal, in light of defendant's appellate request for "a limited remand for proceedings under Rule 604(d)." 2-25-0440 November 17, 2025 Order, attached as Exhibit 1.

4. On May 14, 2026, the People filed a petition to revoke probation. Docket Sheet, p. 7. Defendant's document lists the following violations: unpaid financial obligations; a positive amphetamine test; the failure to report to probation/compliance on five dates; the failure to prove completed public service work; and the failure to prove he completed the victim impact panel. Def. Supp. Rec. p. 41, SR-41. A court minutes sheet indicates a member of Adult Probation Services was present on May 28, 2026. Def. Supp. Rec. p. 46, SR-46. A June 17, 2026 minutes sheet and order reflect defendant's presence by video, and the circuit court granting an oral motion to lift the stay on his jail sentence. Def. Supp. Rec. p. 51, 53 SR-51, SR-53.

5. On July 23, 2026, defendant filed a variety of documents in the circuit court, including: a "Motion to Correct the June 15, 2026 Docket," a "Motion for the Indigency and Representation," a "Petition for Appointment of a Special Prosecutor," and a notice of appeal. Docket Sheet, p. 7; Def. Supp. Rec. pp. 57-63, SR-57-63. Defendant's records show he filed the emergency motion with this Court before the circuit court date for those filings: August 6, 2026. Def. Supp. Rec. p. 70, SR-70. Given these pending filings, presented alongside his notice of appeal, defendant's notice of appeal

¹While 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.

is not yet in effect, this Court lacks jurisdiction, and defendant's motion must be rejected. Ill. Sup. Ct. R. 303(a)(2) (eff. Jul. 1, 2017).

6. On July 28, 2026, at or after 10:38 p.m., defendant filed an "Omnibus Emergency Motion" and other filings with this Court. Notice of Filing, p. 1. Defendant's "Omnibus Emergency Motion" requests the relief of: (1) accepting his notice of appeal as timely; (2) staying the circuit court's June 17, 2026 order as well as his 180 day term of incarceration and releasing him on his own "recognizance or the least restrictive conditions supported by a stated necessity;" (3) appoint him counsel and free report of proceedings; and (4) order the report of proceedings, correct his representation status, and "SUSPEND briefing until the certified record is filed." Def. Em. Mtn. to Stay, 1. Defendant also asserts that the Clerk of the Circuit Court and court reporters "are adverse" to him. Def. Docketing Statement, p. 4. Defendant has not established good cause. He has not established his factual disputes to the probation violations were presented to the circuit court, that the People were allowed to respond and failed to provide a basis to revoke, and circuit court error.

7. Additional issues with defendant's claims prevents a finding of good cause due to the lack of clarity on either the nature of the violations or defendant's support for his rebuttals. Defendant conflates the restitution figure with paying outstanding financial obligations, does not establish that he has complied with the requirement for "equal monthly installments," and defendant identifies some amount of being in arrears. See Def. Memo. p. 2. Defendant has not factually or legally supported that the People in fact refused payment from his insurance company, or that Allstate's understanding that it might refuse payment from it was improper. See Def. Memo. p. 2-3. Defendant notes probation's requirement of an updated *prescription* for his medication. Def. Memo., p. 3. While the People are unable to verify defendant's and probation's position given the lack of record,

it is not clear that probation lacked cause to require more than an image of the prescription bottle, or whether the circuit court erred in rejecting defendant's claim. Defendant has not confirmed that he accomplished any amount of public service work, making it unclear to what extent defendant has attempted to comply with, or violated, this requirement and thus defendant has not established good cause. See Def. Memo., p. 4.

8. Defendant's own insistence that his factual disputes "need not be resolved today. They need to be tested" directly contradicts his attempt to have this Court resolve the factual matters of his case before the circuit court has the opportunity to consider these arguments or make factual findings. Def. Memo., p. 5. Defendant insists on a ruling before the next circuit court date. Defendant's citation to court minutes as to either the factual underpinnings for the PTR or his attorney status, without any transcript of the proceedings, is similarly insufficient to establish good cause, particularly where defendant extrapolates from the June 17, 2026 minutes that there was "[n]o evidence, no witness, no stipulation, no admission, no finding." Def. Memo., pp. 5-6.

This extrapolation fails, since as the appellant he "has the burden to present a sufficiently complete record of the proceedings at trial" and any "doubts which may arise from the incompleteness of the record will be resolved against the appellant." *Foutch v. O'Bryant*, 99 Ill. 2d 389, 391-92 (1984). Defendant fails to provide any authority that overrides his obligation to provide the necessary factual support when seeking relief. See Def. Memo., p. 6. *Foutch* straightforwardly establishes that a defendant's argument fails if it involves review of a circuit court proceeding where the transcript is necessary to determine the court's actions and reasoning. *Foutch*, 99 Ill. 2d at 392 (stating "[a]s there is no transcript of the hearing on the motion to vacate here, there is no basis for holding that the trial court abused discretion in denying the motion."). That holding applies directly

to this case. Defendant's sole proffered case in opposition is mischaracterized as saying he does not have to pay, while the case in fact agrees with *Foutch*'s longstanding principle of law. See Def. Memo., p. 6 (citing *People v. Banks*, 378 Ill.App.3d 856, 861 (2d Dist. 2007)). *Banks* noted alternatives for presenting a complete record in the *absence* of a court reporter, while still confirming that "[t]he responsibility for preserving a sufficiently complete record of the proceedings before the trial court rests with the defendant, as the appellant," and that "[w]here the record on appeal is incomplete, any doubts arising from that incompleteness will be construed against the defendant and every reasonable presumption will be taken in favor of the judgment below." *Id.* (internal citations omitted). Defendant indicates that a court reporter was present. Def. Memo., p. 6. Thus, the only application of *Banks* to this case *forecloses* a finding of good cause, as the record is incomplete.

9. Defendant appears to seek an expedited factual rulings on his appellate claim(s) which would preclude any circuit court finding that he violated his petition to revoke, before allowing the circuit court to clarify or confirm its factual basis for lifting the stay on his jail term. The Illinois Supreme Court has established that the failure to verify or attempt to correct error in the circuit court results in the forfeiture of a claim, not its expedited success. See, *e.g.*, *People v. Chambliss*, 2026 IL 130585, ¶ 58 (stating "[t]hat forfeiture principle encourages the defendant to raise errors when they happen, allowing the court to correct them and disallowing the defendant from obtaining a reversal through inaction."). 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). That forecloses defendant's claim(s) even before considering the lack of good cause where this Court and the People lack the benefit of the prepared record to evaluate his arguments.

10. On July 29, 2026, at 8:02 a.m., defendant filed a document titled “emergency motion to supplement the pending omnibus emergency motion, and for a ruling on part II before 9 a.m. on August 6, 2026 – the circuit court date on his pending motion(s). Def. Em. Mtn. Supp., p. 1; . Defendant appears to seek to disqualify the judge and prosecutor in his circuit court case, providing a motion to substitute judge for cause and naming an Assistant State’s Attorney as a defendant in a federal lawsuit, while also apparently asking this Court to resolve those matters including who the circuit court can allow to preside over his case as it is litigated. Def. Mtn. Supp., pp. 2-3. By his proposed order regarding his “emergency motion to supplement,” defendant requests that this Court, before the next circuit court date, either: (1) order that the circuit court must require a different judge to resolve his motion to substitute judge before any other proceedings; or (2) that concurrent proceedings that may occur in the circuit court on August 6, 2026, are “WITHOUT PREJUDICE” to defendant’s relief sought in his emergency motion “and in the supplement.” Def. Proposed Order Em. Supp., p. 1. This confirms defendant’s tandem approach to litigate his claims in multiple courts at the same time; defendant suggests that this appeal was premature by indicating he continues to concurrently litigate matters in the circuit court on the same subject matter. See Def. Proposed Order, p. 1. Again, in light of pending postjudgment motion(s) filed at the same time as his notice of appeal, the notice of appeal is not yet effective. Ill. Sup. Ct. R. 303(a)(2) (eff. Jul. 1, 2017). Therefore, defendant’s notice of appeal was improper given the ongoing matters in the circuit court and his insistence on continuing to litigate them.

11. The record has not yet been filed in this case. The report of proceedings is currently due on September 10, 2026, and the record on appeal is due on September 24, 2026. The People are unable to respond in full to defendant’s claims in the absence of the underlying transcripts and

common law record providing whatever basis the circuit court utilized in lifting the stay on defendant's 180 day jail sentence. See Def. Notice of Appeal, p. 2.

12. In addition to the above matters, this Court should decline to bypass obtaining the record and briefing the issues, given the limited factual basis available and lack of objective proof of the circuit court's reasoning and support for its ruling. Defendant's conclusion that the circuit court acted without a legitimate basis fails, since a circuit judge is presumed to know and correctly apply the law. See, e.g., *People v. Askew*, 273 Ill. App. 3d 798, 805 (1st Dist. 1995).

13. Defendant employs a piecemeal litigation process through filing multiple documents alongside an "omnibus emergency motion" seeking multiple points of relief including records retention while citing a federal civil suit, as well as two documents seeking to modify and supplement his emergency motion – all while seeking to bind this Court to rule upon an expedited schedule as if he had not presented numerous additional filings containing more than 170 pages of argument and material. To the extent defendant's second supplement is not redundant with his previous arguments, he attempts to hyperbolize a court services representative Friday colloquial statement² of being the "bearer of bad news" that they received a motion for the following Monday while stating they did not want the judge to be surprised as being an "ex parte communication" vaguely stating the substance of the motion itself was "bad news," instead of the plain language that the short notice was. Def. Mtn. 2nd Supp., p. 3. Defendant provides no legal authority to generally smear the prosecution for stating a plea offer would expire if defendant proceeded to trial and that if defendant was found guilty the prosecution would ask for prison, or for his request for this Court

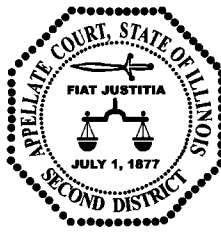
² Defendant also mischaracterizes the statement by omitting language emphasizing the timeliness and court schedule issues, namely that "I said we had another matter up for trial so if he could get in right at 9 and he said he understood..." 2nd Supp., p. 29, FSSR-29.

to intervene in FOIA redactions. Def. Mtn. 2nd Supp., pp. 3-4. The People therefore request that defendant be barred from further supplement or otherwise asserting additional matters after this objection is filed. Defendant's multiple filings undermine the efficiency of quickly responding to and analyzing an emergency motion, functions to deny or limit the People's opportunity to respond, and seeks to impose an open-ended ability to modify and add argument while demanding this Court be allowed less and less time to review his claims.

14. The additional concerns over concurrent litigation in the circuit court and inconsistent factual findings weigh against defendant's motion. The circuit court is in a more appropriate, superior position to evaluate those facts, including through the ongoing proceedings therein which involve credibility or fact-finding.

15. As such, this Court should dismiss defendant's premature appeal while still litigating the facts underlying his legal claims in the circuit court. Further, defendant has failed to establish a basis for ignoring the findings and sentence of the circuit court while his appeal is pending. Since defendant has not cited or supported a finding for good cause to stay sentence, defendant has not carried his burden and his motion should be denied.

ARDCB-000020
Page 20 of 55



ILLINOIS APPELLATE COURT SECOND DISTRICT

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

November 17, 2025

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

RE: People v. Allababidi, Ehab
Appeal No.: 2-25-0440
County: Lake County
Trial Court No.: 23CF1146

The court has this day, November 17, 2025, entered the following order in the above entitled case:

Appellant's motion to stay this appeal and issue a limited remand for proceedings under Rule 604(d) is denied, as appellant's admitted failure to file a Rule 604(d) motion requires instead that his appeal be dismissed. See *People ex rel. Alvarez v. Skryd*, 241 Ill. 2d 34, 40 (2011) ("Where a defendant has failed to file a motion to withdraw the guilty plea, the appellate court must dismiss the appeal."). (Although appellant offers certain excuses for why he failed to file the motion, he does not offer the only excuse that is legally actionable, which applies "[w]here a circuit court fails to give applicable Rule 605 admonishments." *Id.* at 41.) Accordingly, this appeal is dismissed.

THIS ORDER IS FINAL AND SHALL STAND AS THE MANDATE OF THIS COURT.
(McLaren, Hutchinson, Schostok, JJ.)

Jeffrey H. Kaplan
Clerk of the Court

cc: Edward Randall Psenicka
Lake County Circuit Court

Ex. 1



SUPREME COURT OF ILLINOIS

SUPREME COURT BUILDING
200 East Capitol Avenue
SPRINGFIELD, ILLINOIS 62701-1721

CYNTHIA A. GRANT
Clerk of the Court

(217) 782-2035
TDD: (217) 524-8132

June 26, 2026

FIRST DISTRICT OFFICE
160 North LaSalle Street, 20th Floor
Chicago, IL 60601-3103
(312) 793-1332
TDD: (312) 793-6185

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

In re: Allababidi v. Stride
133301

Today the following order was entered in the captioned case:

Emergency motion by Movant, *pro se*, for a supervisory order. Denied.

Order entered by the Court.

Very truly yours,

Clerk of the Supreme Court

cc: Attorney General of Illinois - Criminal Division
Bailey Clare Russell
Hon. Christopher R. Stride
Eric Frederick Rinehart
Francis Paul DeRosa
Gregory R. Ticsay
Lake County Adult Probation
Lake County Circuit Court
Lake County Sheriff
Nicholas Shepherd
State's Attorney Lake County
State's Attorney's Appellate Prosecutor - Second District

Ex. 2



SUPREME COURT OF ILLINOIS

SUPREME COURT BUILDING
200 East Capitol Avenue
SPRINGFIELD, ILLINOIS 62701-1721

CYNTHIA A. GRANT
Clerk of the Court

(217) 782-2035
TDD: (217) 524-8132

July 06, 2026

FIRST DISTRICT OFFICE
160 North LaSalle Street, 20th Floor
Chicago, IL 60601-3103
(312) 793-1332
TDD: (312) 793-6185

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

In re: Allababidi v. Cartwright Weinstein
133295

Today the following order was entered in the captioned case:

Motion by Petitioner, *pro se*, for leave to file a petition for an original writ of mandamus. Denied.

Order entered by the Court.

Very truly yours,

Clerk of the Supreme Court

cc: Attorney General of Illinois - Criminal Division
Bailey Clare Russell
Eric Frederick Rinehart
Erin Cartwright Weinstein
Francis Paul DeRosa
Gregory R. Ticsay
Lake County Adult Probation
Lake County Sheriff
Nicholas Shepherd
State's Attorney Lake County
State's Attorney's Appellate Prosecutor - Second District



SUPREME COURT OF ILLINOIS

SUPREME COURT BUILDING
200 East Capitol Avenue
SPRINGFIELD, ILLINOIS 62701-1721

CYNTHIA A. GRANT
Clerk of the Court

(217) 782-2035
TDD: (217) 524-8132

July 16, 2026

FIRST DISTRICT OFFICE
160 North LaSalle Street, 20th Floor
Chicago, IL 60601-3103
(312) 793-1332
TDD: (312) 793-6185

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

In re: Allababidi v. Shanes
133342

Today the following order was entered in the captioned case:

Motion by Petitioner, *pro se*, for leave to file a petition for an original writ of mandamus. Denied.

Order entered by the Court.

Very truly yours,

A handwritten signature in black ink that reads "Cynthia A. Grant".

Clerk of the Supreme Court

cc: Attorney General of Illinois - Criminal Division
Hon. Daniel B. Shanes
Lake County Circuit Court
State's Attorney Lake County
State's Attorney's Appellate Prosecutor - Second District



SUPREME COURT OF ILLINOIS

SUPREME COURT BUILDING
200 East Capitol Avenue
SPRINGFIELD, ILLINOIS 62701-1721

CYNTHIA A. GRANT
Clerk of the Court

(217) 782-2035
TDD: (217) 524-8132

July 16, 2026

FIRST DISTRICT OFFICE
160 North LaSalle Street, 20th Floor
Chicago, IL 60601-3103
(312) 793-1332
TDD: (312) 793-6185

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

In re: Allababidi v. Shanes
133389

Today the following order was entered in the captioned case:

Emergency motion by Movant, *pro se*, for a supervisory order. Denied.

Order entered by the Court.

Very truly yours,

A handwritten signature in black ink that reads "Cynthia A. Grant". The signature is written in a cursive, flowing style.

Clerk of the Supreme Court

cc: Attorney General of Illinois - Criminal Division
Hon. Daniel B. Shanes
State's Attorney Lake County
State's Attorney's Appellate Prosecutor - Second District

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.

NOTICE AND PROOF OF SERVICE

TO: Ehab Allababidi
8516 W. Winona St.
Chicago, Illinois 60656
defcon5ready@gmail.com
ehabhilfiger@gmail.com

(In light of defendant's use of the above emails to file and correspond on this case,
the People provide service to both addresses)

Under the penalties provided in law pursuant to Section 1-109 of the Code of Civil Procedure, I hereby certify that an objection to defendant's emergency request to stay sentence pending appeal in the above-entitled cause is being electronically filed with the Clerk of the Appellate Court, Second District, on July 30, 2026. Upon acceptance of the filing from this Court, the defendant will be served at ehabhilfiger@gmail.com using the court's electronic filing system, and a copy of this objection will be emailed to defendant at defcon5ready@gmail.com.

/s/ Sandra J. Lorigan

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



EXHIBIT C

**The order of July 31, 2026 — the bar the respondent asks the
Court to keep in place**

ARDCB-000027 – ARDCB-000029

One page, Second District, Jeffrey H. Kaplan, Clerk of the Court. Copied to Christopher Michael McCoy and Max Christian Boose. It is the order paragraph 13 of Exhibit A defends, and it is why no copy of this request has been sent to the respondent.

The pages that follow are a true copy of the referenced record, produced without alteration.

Illinois Appellate Court, Second District — order entered July 31, 2026 in No. 2-26-0352

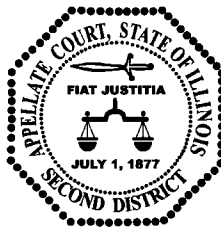
The operative sentence

[Now having been appointed counsel, **appellant himself shall file nothing further with this court and shall not communicate by any means with appellee’s counsel.**]

The sentence immediately before it

[Appellant’s “omnibus emergency motion” is granted as to its request for the appointment of appellate counsel, and the Office of the State Appellate Defender is hereby appointed.]

Quoted without alteration. The source page follows under the same Bates range.



ILLINOIS APPELLATE COURT SECOND DISTRICT

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

July 31, 2026

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

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

The court has this day, July 31, 2026, entered the following order in the above entitled case:

Appellant's "omnibus emergency motion" is granted as to its request for the appointment of appellate counsel, and the Office of the State Appellate Defender is hereby appointed. Now having been appointed counsel, appellant himself shall file nothing further with this court and shall not communicate by any means with appellee's counsel. Appellant's "omnibus" motion, and his other pending motions, are otherwise denied without prejudice to any motion filed by his counsel, including a motion to stay. (Appellant's counsel is hereby advised of appellant's suggestion that his jail term will begin on August 6, 2026.) This court reserves any issue of its jurisdiction.

Jeffrey H. Kaplan
Clerk of the Court

cc: Christopher Michael McCoy
Max Christian Boose



EXHIBIT D

**May 28, 2026 — the minute sheet cited at SR-46, and the
warrant it produced**

ARDCB-000030 – ARDCB-000034

*Three pages. The sheet the respondent cited for one fact at paragraph 4 of Exhibit B. Count 4
concerns what else is printed on it.*

The pages that follow are a true copy of the referenced record, produced without alteration.

Court minutes, Nineteenth Judicial Circuit, Courtroom T611 — May 28, 2026, captioned “Arraignment On Petition To Revoke” (cited in the Objection as SR-46)

What paragraph 4 of Exhibit B told the Court the sheet shows

[A court minutes sheet indicates **a member of Adult Probation Services was present** on May 28, 2026. Def. Supp. Rec. p. 46, SR-46.]

What is printed on the same sheet

[Court reporting: **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 issued on it recites a “**technical violation**” and commands that the defendant “be held in custody for First Appearance Court.”]

Quoted without alteration. The source page follows under the same Bates range.



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

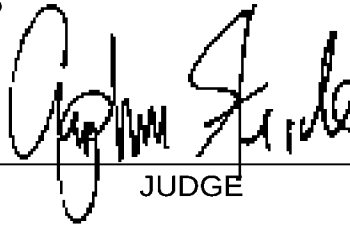
To all Peace Officers of the State of Illinois:

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:			