

EA

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COMPLETE

Complete document, 49 pages. 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 — BENJAMIN DILLON (respondent)

SUBJECT OF THIS TRANSMISSION

Request for investigation dated August 6, 2026 — “Investigate the Prosecutor Who Was Told in 2022 That the Drug Evidence Would Not Hold, and Was Sent the 2026 Request to Imprison on It.” Respondent: Benjamin Dillon, Assistant State's Attorney, Office of the Lake County State's Attorney, 18 North County Street, Waukegan, Illinois 60085. Three counts, nine exhibits, under Ill. R. Prof. Conduct 3.8(d), 5.1 and 8.4. Every exhibit page was produced by Lake County itself on July 29, 2026. Complete document, 49 pages.

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

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22e890ba03a4d2a0100f75def7b3bd9

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 · Lake County's own internal mail, produced July 29, 2026

Three counts · nine exhibits · every page produced by the County itself

Investigate the Prosecutor Who Was Told in 2022 That the Drug Evidence Would Not Hold, and Was Sent the 2026 Request to Imprison on It

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.

RESPONDENT

Benjamin Dillon — Assistant State's Attorney, Office of the Lake County State's Attorney, 18 North County Street, Waukegan, Illinois 60085

People v. Allababidi, No. 23 CF 1146 (19th Jud. Cir., Lake County) — on appeal, No. 2-26-0352 (2d Dist.) · assessment addressed to the respondent August 11, 2022 · plea September 8, 2025, 1,124 days later, without disclosure · revocation request addressed to the respondent April 8, 2026 · produced by Lake County July 29, 2026

To the Administrator and the Intake Division:

On August 11, 2022 at 9:41 a.m. the investigating detective wrote to the assistant State's Attorney handling this case and told him the drug evidence would not carry the charge: **"This lab report does not offer an specific amount; just Amphetamine and Benzodiazepines. I believe it would be hard pressed to prove DUI drugs."** The message was addressed to **Benjamin Dillon**. It was produced by Lake County itself on July 29, 2026 as page 198 of an 805-page production, four years after it was written and ten months after the complainant pleaded guilty. **It was never disclosed before the plea.**

That is Count 1. Count 2 is what happened to the same finding at the other end of the case. On April 8, 2026 the Division of Adult Probation Services sent the State's Attorney a memorandum requesting that a petition to revoke probation be filed. It is addressed **"ATTENTION: Ben Dillon · COURT RM: T-611."** Its second listed ground reads: **"Defendant tested positive for Amphetamines on 11/20/25."** Thirty-six days later the People swore a petition on that ground and a warrant issued.

The complainant is precise about what this respondent is and is not shown to have done, because an overstatement here would answer the whole request. **He did not swear the petition. He did not sign the filings. On several of the documents below his name is in a copy line.** What the production establishes is narrower and is not deniable: of every lawyer whose name appears in this prosecution, **one appears in every phase of it** — the charging decisions of May 2022, the assessment of August 2022, the post-plea litigation of January 2026, the revocation request of April 2026, and the routing of this Commission's own correspondence in June 2026. The document that had to be disclosed was addressed to him. Four years later the request to revoke on the same finding was addressed to him.

Nine exhibits are attached, Bates ARDCD-000001 forward, each opening with an excerpt sheet carrying the operative language verbatim ahead of the page it came from. Every page cited below is a page the County produced under the Freedom of Information Act or a court record filed in No. 23 CF 1146. Nothing here is the complainant's own document.



I. The respondent

Respondent	Benjamin Dillon , Assistant State's Attorney, Office of the Lake County State's Attorney — 18 North County Street, Waukegan, Illinois 60085 · (847) 377-3000 · BDillon@lakecountyil.gov . Named in the production as "Benjamin Dillon," "Ben Dillon," and "Dillon, Benjamin."
Courtroom	The April 8, 2026 memorandum at Exhibit E identifies him by courtroom: " ATTENTION: Ben Dillon · COURT RM: T-611. " The court minutes of the indictment at Exhibit C assign the cause to 611 STRIDE . Both are documents of the Nineteenth Judicial Circuit and neither is the complainant's.
The matter	<i>People v. Allababidi</i> , No. 23 CF 1146, Circuit Court of the Nineteenth Judicial Circuit, Lake County. Collision May 23, 2022; indictment June 14, 2023; negotiated plea and sentence September 8, 2025; petition to revoke sworn May 14, 2026; zero-bond warrant May 28, 2026, outstanding as of the date of this request. On appeal, No. 2-26-0352 (2d Dist.).
The source	E. Allababidi Emails — FINAL REDACTED , 805 pages, produced by Lake County on July 29, 2026 in response to a request under 5 ILCS 140/1 <i>et seq.</i> SHA-256 a5cc2e1514c7154ecc3388d5dab745e8f71066bde22491a2d08889bb0a9608f9. Production page numbers below are that document's own.
Not a party	The respondent is not a defendant in any action brought by the complainant and is not named in the pending federal complaint in No. 1:26-cv-06738. Nothing in this request asks the Commission to assist any litigation.

II. One inbox, four years — the ledger, every row citing a page the County produced

Date	What the record shows	Page
May 26, 2022	Det. Paul Petrick's narrative: "I contacted Assistant State's Attorney (ASA), Ben Dillon , of the Lake County State's Attorney's Office in reference to this case. I requested a warrant for the vials of blood and urine ... The warrant was issued."	121
June 2, 2022	"The Search warrant return was left for ASA Ben Dillon of the Lake County State's Attorney's Office."	121
June 16, 2022	"I contacted Assistant State's Attorney (ASA) Dillon and relayed the substance found. He recommended completing documents ... to file a subpoena requesting medical records..."	120
Aug 11, 2022	Petrick to Dillon, 9:41 a.m. — the assessment. Quoted in full in Part IV.	198
June 14, 2023	The grand jury returns a true bill for aggravated reckless driving causing great bodily harm. The minutes of that proceeding name a different assistant and assign the cause to 611 STRIDE .	200
Sep 8, 2025	Negotiated plea and sentence. The August 2022 assessment was not disclosed. 1,124 days after it was written.	—
Dec 5, 2025	ASA DeRosa circulates "Ehab Allababidi Update, 25CF1146" to the Chief Deputy of the Civil Trial Division, cc Benjamin Dillon .	186
Jan 20, 2026	ASA Shepherd to Dillon, 4:55 p.m.: "Here is the draft response to the defendant's combine motion and post conviction petition. Could you take a look and give me your thoughts on this. "	127
Apr 8, 2026	Probation's violation request, 10:57 a.m., " To: Benjamin Dillon; Nicholas Shepherd ": "PTR Request for failure to report, amphetamine use , failure to complete public service..." The memorandum it transmits is addressed " ATTENTION: Ben Dillon · COURT RM: T-611. "	184, 529
May 14, 2026	Petition for Revocation sworn. Paragraph 3.B: "tested positive for Amphetamine (illegal substance) on or about 11/10/2025." Thirty-six days after the memorandum.	—
May 27, 2026	ASA Shepherd forwards the complainant's litigation-hold and sanctions notices to the Chief Deputy, Civil Trial Division, cc Benjamin Dillon — three separate messages within two minutes.	297, 326, 640
Jun 18, 2026	Shepherd forwards the Commission's correspondence in No. 2026IN03190 "To: Benjamin Dillon; Dan E. Brown." Same day, 8:44 a.m.: the notice of a 39-page facsimile, cc Benjamin Dillon .	506, 465



Date	What the record shows	Page
Jun 29, 2026	ASA DeRosa to Dillon, 8:19 a.m.: “This is the first of the numerous emails that I began receiving from Ehab Allababidi last week. I will forward you all of the others. ” At 11:23 and 11:24 a.m. Dillon forwards them onward to the Civil Trial Division.	270, 334

Read down the right-hand column. The first row and the last are separated by **1,495 days**, and the name in every row is the same. The complainant draws no inference from the ledger beyond what the rows say. He offers it because the two counts that follow both turn on the same fact — that this respondent’s knowledge of the case did not begin in 2026 and did not end in 2022.

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

Not one of the nine exhibits is a document the complainant wrote. Seven are pages of Lake County’s own internal electronic mail, produced by that County in answer to a request under the Freedom of Information Act. One is a court record of No. 23 CF 1146. One is the correspondence of a Cook County probation officer. One is this Commission’s own correspondence.

Ex.	Document	Who generated it	How obtained
A	Production page 198 — the assessment of August 11, 2022	Lincolnshire Police Department; addressed to the respondent	Lake County FOIA production, July 29, 2026
B	Production pages 120–121 — the investigating officer’s case narrative	Lincolnshire Police Department	Lake County FOIA production, July 29, 2026
C	Production page 200 — court minutes of the indictment, June 14, 2023	Circuit Court of the Nineteenth Judicial Circuit	Lake County FOIA production, July 29, 2026
D	Production pages 186 and 127 — two internal messages, December 2025 and January 2026	Lake County State’s Attorney’s Office	Lake County FOIA production, July 29, 2026
E	Production pages 184 and 529 — the violation request and the memorandum	Division of Adult Probation Services, Nineteenth Judicial Circuit	Lake County FOIA production, July 29, 2026
F	Petition for Revocation, filed May 14, 2026	Lake County State’s Attorney’s Office	Court record of No. 23 CF 1146, reproduced unaltered
G	Electronic mail of December 8 and 10, 2025	Cook County Adult Probation Department	Correspondence of the supervising officer
H	Production pages 506, 270 and 334 — the routing of this Commission’s correspondence	Lake County State’s Attorney’s Office	Lake County FOIA production, July 29, 2026
I	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

The production, and how it is authenticated. The source is a single PDF, *E. Allababidi Emails — FINAL REDACTED*, 805 pages, delivered by Lake County on July 29, 2026. Its SHA-256 digest is a5cc2e1514c7154ecc3388d5dab745e8f71066bde22491a2d08889bb0a9608f9. The pages reproduced here are rendered from that file at 300 dots per inch and are otherwise unaltered; the page numbers used throughout this request are the production’s own. Every



quotation on an excerpt sheet was read off the page image that ships behind it, so a reader who distrusts a quotation has the source on the next sheet under the same Bates range. Portions of several pages carry black masking applied by the producing County, including part of the handwritten notation on Exhibit C; the complainant states the fact of the masking and draws no inference from it.

IV. Count 1 — the assessment that was addressed to him and never disclosed

Exhibit A is production page 198. It is an electronic mail message from Detective Paul J. Petrick of the Village of Lincolnshire Police Department, sent Thursday, August 11, 2022 at 9:41 a.m., **“To: Dillon, Benjamin,”** copied to two investigators, subject “report LPD 22-7193,” with the complainant’s medical records attached. In full, so far as it bears on the drug evidence:

Exhibit A — production page 198, August 11, 2022, 9:41 a.m.

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

Three things about that message are on its face and require no argument. It is addressed to this respondent by name, in the second person. It transmits the medical records themselves, so the underlying document went with it. And it states the investigating officer’s conclusion that the toxicology result carried no quantities and would not prove impairment.

The plea was entered on September 8, 2025 — **1,124 days later**. The assessment was not produced in discovery, was not disclosed before the plea, and was not disclosed at sentencing. The complainant learned of it on July 29, 2026, from the County’s own response to a request under the Freedom of Information Act.

III. R. Prof. Conduct 3.8(d) — Special Responsibilities of a Prosecutor

*[The prosecutor in a criminal case shall ... (d) **make timely disclosure to the defense of all evidence or information known to the prosecutor that tends to negate the guilt of the accused or mitigates the offense, and, in connection with sentencing, disclose to the defense and to the tribunal all unprivileged mitigating information known to the prosecutor, except when the prosecutor is relieved of this responsibility by a protective order of the tribunal ...**]*

The complainant asks the Commission to note four features of that rule, because they are what make this count a disciplinary question rather than a discovery question. **First**, the duty runs to “all evidence or information known to the prosecutor” and is not limited to admissible evidence. **Second**, it contains no materiality filter — the rule asks whether information tends to negate guilt or mitigate, not whether a reviewing court would find its suppression prejudicial. **Third**, the duty is expressly extended “in connection with sentencing” and there runs **to the tribunal as well as to the defense**. **Fourth**, the only stated exception is a protective order of the tribunal, and none was entered as to this message.

Each element is satisfied on the face of Exhibit A. The information was known to a prosecutor — it was sent to him. It tends to negate guilt on the impairment theory and, at the least, mitigates. There was a sentencing, on September 8, 2025, at which it was not disclosed to the defense or to the tribunal. And there is no protective order.

What the complainant does not assert. He does not assert that this respondent alone bore the duty; the obligation is the office’s and reaches every lawyer who held the information. He does not assert that the assessment would have changed the outcome, because Rule 3.8(d) does not ask that question and answering it is a court’s work, not this Commission’s.



He asserts that a document tending to negate guilt was in a named prosecutor's hands for three years and one month before a plea and was not disclosed.

V. Count 2 — the same finding, addressed to the same lawyer, four years later

On April 8, 2026 at 10:57 a.m. the Unit Manager of Lake County Adult Probation sent the State's Attorney a request that a petition to revoke be filed. The message is addressed **"To: Benjamin Dillon; Nicholas Shepherd"** and its subject line is "Ehab Allababidi 23CF1146 PTR Request T611." Its second stated ground is "amphetamine use." The memorandum it transmits is Exhibit E:

Exhibit E — production page 529, memorandum of the Division of Adult Probation Services, April 8, 2026

[**TO: STATE'S ATTORNEY, LAKE COUNTY, IL · ATTENTION: Ben Dillon · COURT RM: T-611 · RE: EHAB ALLABABIDI ... IN VIOLATION OF AFORESAID ORDER, TO WIT, PARAGRAPH(S) 2, 4, 12, 19, & 23 AS FOLLOWS: ... 4. Defendant tested positive for Amphetamines on 11/20/25. Defendant has not provided an updated prescription. ... RECOMMENDATION: I REQUEST THAT PETITION BE FILED.**]

Set the two documents side by side. They are separated by **1,336 days** and they are addressed to the same lawyer.

August 11, 2022 — what he was told about the amphetamine finding	April 8, 2026 — what he was asked to do with the amphetamine finding
"This lab report does not offer an specific amount ; just Amphetamine and Benzodiazepines."	"Defendant tested positive for Amphetamines on 11/20/25. Defendant has not provided an updated prescription."
" I believe it would be hard pressed to prove DUI drugs. "	" RECOMMENDATION: I REQUEST THAT PETITION BE FILED. "
Sent by the investigating detective, to Dillon, Benjamin , with the medical records attached.	Sent by the probation unit manager, To: Benjamin Dillon; Nicholas Shepherd ; the memorandum reads ATTENTION: Ben Dillon · COURT RM: T-611.
Never disclosed to the defense before the plea of September 8, 2025.	Thirty-six days later the People swore a petition alleging a positive test for Amphetamine " (illegal substance) " and a zero-bond warrant issued (Exhibit F).

There is one further discrepancy on the face of the two documents that the complainant states without characterizing. **The memorandum dates the screen 11/20/25. The petition sworn thirty-six days later dates the same screen 11/10/2025.** Both are attached; the Commission can read both dates. No inference is asked for beyond the fact that the two instruments do not agree.

Rule 8.4(d) reaches conduct prejudicial to the administration of justice. What is charged here is not that a prosecutor may not act on a probation officer's report. It is that the lawyer who had been told in writing that this exact finding carried no quantities and would not prove drug impairment was, four years later, the addressee of the request to imprison the same person on that same finding — and the 2022 assessment still had not been disclosed to anyone.

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 ...]*

VI. What the assessment went to, and why it was information tending to negate guilt

Rule 3.8(d) contains no materiality test, and this request does not supply one. A reader will nevertheless want to know what the August 2022 assessment bore on, and the answer is on the face of a document the County produced rather than in anything the complainant says.

The charge returned by the grand jury on June 14, 2023 was aggravated reckless driving **causing great bodily harm, permanent disability, or disfigurement** — an offence whose aggravating element requires proof of injury, and whose companion count rested on the manner of driving. The State’s theory of impairment rested on the toxicology. Exhibit A is the investigating officer telling the prosecutor, in writing, that the toxicology carried no quantities and that he believed it “would be hard pressed to prove DUI drugs.”

The minutes of the proceeding at which the indictment was returned are Exhibit C. Two entries on them are relevant, and the complainant states both without characterizing either:

On the face of the minutes of June 14, 2023 (Exhibit C)	What is not in dispute about them
“WHAT ARE INJURIES?” and “Nothing in file — No med recs etc.” — handwritten on the form, partly obscured by the production’s own black masking.	The notation is the bench’s, not the prosecution’s. Read most favourably to the court it records a judge observing what the file contained. The complainant does not contend the notation was improper and charges nothing on it.
ASA: STEVE SCHELLER — the assistant named on the form.	Not this respondent. No count in this request rests on the charging decision or on anything that occurred at that proceeding.
Case assigned to 611 STRIDE ; bond \$50,000; Warrant to Issue Instantly.	Courtroom 611 is the courtroom the April 2026 memorandum at Exhibit E identifies as this respondent’s: “ATTENTION: Ben Dillon · COURT RM: T-611.”

The point of this part is narrow and it is the only one made in it. An assessment that the drug evidence would not prove impairment is information tending to negate guilt on the theory the prosecution was pursuing, and it remained so through a negotiated plea entered three years later. **Nothing in this part is offered as a separate count, and nothing in it is charged against anyone.**

VII. Count 3 — the duty did not end at the plea, and the 2026 record shows it was live

A respondent could answer Count 1 by saying the disclosure duty ran out when the case was over. It did not, and the production shows the case was never over. Rule 3.8(d)’s text contains no terminal date. The proceeding in which the assessment is material has been continuously pending since the plea: a post-conviction petition was litigated in January 2026, a petition to revoke was filed in May 2026, a custodial warrant issued the same month and is outstanding today, and an appeal is pending in the Second District.

Two pages of the production fix the respondent’s involvement in that live proceeding. On January 20, 2026 the assistant handling the case sent him the draft response to the complainant’s combined motion and post-conviction petition:



Exhibit D — production page 127, January 20, 2026, 4:55 p.m.

[Hey Ben, Here is the draft response to the defendant's combine motion and post conviction petition. Could you take a look and give me your thoughts on this.]

And on June 29, 2026 the assistant who had handled the case before that forwarded him the complainant's correspondence with this Commission, which the respondent then forwarded onward within the office:

Exhibit H — production page 270, June 29, 2026, 8:19 a.m.

[Good Morning Ben, This is **the first of the numerous emails that I began receiving from Ehab Allababidi last week. I will forward you all of the others.** For reference, his case number was 23CF 1146.]

The complainant makes no complaint about the fact of that routing; an office is entitled to manage its correspondence, and forwarding a disciplinary notice to a colleague is not misconduct. He offers the two pages for one purpose only, and it is the purpose that answers the strongest defence available to this count: **in 2026 this respondent was reviewing the State's filings in this matter and receiving the case's correspondence, at a time when the 2022 assessment remained undisclosed and the duty to disclose it had never expired.**

VIII. Supervisory responsibility, put as a question the Commission can answer and the complainant cannot

Page 127 shows a colleague sending this respondent a draft filing and asking for his thoughts. Page 270 shows a colleague routing the case's correspondence to him as the person who handles it. Page 529 shows an outside agency identifying him as the assistant for the courtroom in which the case sits. **Those pages are consistent with supervisory authority and they are also consistent with collegial consultation, and the complainant cannot tell which from outside the office.** He does not guess.

III. R. Prof. Conduct 5.1 — Responsibilities of Supervisory Lawyers

[(b) A lawyer having **direct supervisory authority over another lawyer** shall make reasonable efforts to ensure that the other lawyer conforms to the Rules of Professional Conduct. (c) A lawyer shall be responsible for another lawyer's violation of the Rules of Professional Conduct if ... (2) the lawyer ... has direct supervisory authority over the other lawyer, and **knows of the conduct at a time when its consequences can be avoided or mitigated but fails to take reasonable remedial action.**]

The Commission can obtain the office's reporting structure for the relevant period in one letter. The complainant asks it to do so and to determine whether Rule 5.1(b) or 5.1(c)(2) reaches this respondent as to the filings in this matter. **He makes no allegation that it does.**

IX. The three counts in element form

Each count restated as the rule requires it to be proved: the element, what the record shows, and where the record is. Nothing new is asserted here.

#	The element	What the record shows	Where
1	3.8(d) — the person charged is "the prosecutor in a criminal case."	Assistant State's Attorney of Lake County, identified in the investigating officer's own narrative as the assistant handling this matter from May 2022, and identified by an outside agency four years later by name and courtroom.	Ex. B, Ex. E



#	The element	What the record shows	Where
1	3.8(d) — “evidence or information known to the prosecutor.”	The message was addressed to him by name, in the second person, and transmitted the medical records themselves.	Ex. A
1	3.8(d) — information that “tends to negate the guilt of the accused or mitigates the offense.”	“This lab report does not offer an specific amount ... I believe it would be hard pressed to prove DUI drugs.” The rule imposes no materiality threshold and reaches information as well as evidence.	Ex. A
1	3.8(d) — “timely disclosure to the defense”; and, in connection with sentencing, disclosure “to the defense and to the tribunal.”	Not disclosed in discovery, not disclosed before the plea of September 8, 2025, not disclosed at sentencing. Produced to the complainant on July 29, 2026 — 1,124 days after it was written — only in answer to a FOIA request.	Ex. A
1	3.8(d) — the only stated exception: a protective order of the tribunal.	None was entered as to this message, and none is asserted.	—
2	8.4(d) — conduct prejudicial to the administration of justice.	The lawyer told in writing in 2022 that this amphetamine finding carried no quantities and would not prove impairment was, 1,336 days later , the named addressee of the memorandum asking that probation be revoked on that same finding — the 2022 assessment still undisclosed. A petition on that ground was sworn 36 days after the memorandum and a warrant issued.	Ex. A, E, F
2	The two instruments do not agree on the date of the screen.	Memorandum: “positive for Amphetamines on 11/20/25 .” Petition sworn 36 days later: “on or about 11/10/2025 .” Stated, not characterized.	Ex. E, F
3	3.3(a)(1) / 3.8(d) — the duty is continuing and the proceeding was live.	January 20, 2026: the draft response to the post-conviction petition sent to him for his thoughts. June 29, 2026: the case’s correspondence routed to him and forwarded onward by him. Throughout, the 2022 assessment undisclosed; a petition to revoke pending; a warrant outstanding; an appeal docketed.	Ex. D, H
—	5.1(b) / 5.1(c)(2) — direct supervisory authority.	Not charged. Pages 127, 270 and 529 are consistent with supervisory authority and with collegial consultation, and the complainant cannot tell which. The Commission can obtain the office’s reporting structure in one letter.	Ex. D, E, H

X. What the record does not show, stated before anyone has to ask

This part exists because the strength of the two counts above depends entirely on their being believed, and nothing costs a request its credibility faster than a claim the exhibits do not carry.

- **He did not swear the petition to revoke.** Exhibit F is signed by a different assistant, and the verification is his. No allegation about the swearing of that petition is made against this respondent.
- **He is not the author of the plea-offer correspondence.** The messages in the production about revoking an offer and asking for prison were written by a different assistant. They are not attached and are not relied on.
- **On several of the ledger rows his name is in a copy line.** Rows 7 and 11 of Part II, and the second half of row 12, are copy lines and the table says so. They are offered as continuity of knowledge, not as acts.
- **He is not named on the indictment minutes.** Exhibit C names a different assistant. It is produced because the charge returned that day was aggravated reckless driving causing **great bodily harm** — which is what the August 2022 assessment was material to — and for no other purpose. **No charge in this request rests on it**, and the complainant does not contend that the notation on it was improper.
- **Nothing about the December 2025 clearance is imputed to him.** Exhibit G is the Cook County supervising officer’s written statement that the same screen was “all negative in my eyes because I know you are still taking the Adderall.” **The production does not place that message in this respondent’s hands**, and the complainant does not assert that it was. It is attached because it is the other half of the record on the same screen, and the Commission should have both.
- **No claim of destruction, alteration or concealment of any record**, and no claim about any judge, court reporter, clerk or probation officer.



- **No civil claim against this respondent and none contemplated.** He is not a defendant in any action brought by the complainant, and this request seeks nothing but an investigation.

XI. Why the Commission's standing closure ground does not fit this one

The complainant holds four files closed at intake and attaches both letters, unedited, including the paragraphs adverse to him. The stated ground is that claims of prosecutorial misconduct “are appropriately addressed and resolved in the courts through motions, appeals and other legal actions,” and that the Commission “will not act on such claims unless a court has first found that a prosecutor acted improperly.” He does not dispute the policy. He asks the Commission to look at what applying it to this file would require.

- 1 **No court has the document.** Exhibit A was produced under the Freedom of Information Act on July 29, 2026 — after the plea, after the guilty finding, after the petition to revoke, and after the notice of appeal. A finding that a prosecutor acted improperly by withholding it cannot be made by a court that has never been shown it, and the complainant is presently barred by an order of the Second District from filing anything in the appeal in which it would be shown.
- 2 **The records that would produce such a finding are the ones being withheld.** The felony-review screening file and the office's internal assessment of the charge have been withheld from criminal discovery on work-product and Rule 412 grounds and withheld from the FOIA production on the same grounds. The route the closure letter names runs through documents the respondent's office declines to produce.
- 3 **Rule 3.8(d) is not a court's standard.** A court asked about a suppressed document applies *Brady* and its materiality test. Rule 3.8(d) has no materiality test, reaches information as well as evidence, and expressly extends to sentencing. A ruling that suppression was not prejudicial would not answer the question this request asks, and a ruling that it was is not needed for the Commission to read Exhibit A.
- 4 **The disclosure duty is a professional duty by its terms.** It appears in the Rules of Professional Conduct, not in the Code of Criminal Procedure. The Commission is the body that administers it.

XII. What the Commission is asked to do

- 1 **Docket this as a request for investigation** of Benjamin Dillon, Assistant State's Attorney, Lake County, and assign it a file number.
- 2 **Obtain production page 198 from the respondent's own office** in native form, with its metadata and its attachment, together with every message in the same thread. The complainant holds only the scanned image the County produced.
- 3 **Ask the respondent, in writing, two questions.** Whether the August 11, 2022 message or its substance was disclosed to the defense at any time before September 8, 2025; and if not, on what basis it was withheld.
- 4 **Obtain the felony-review screening file** in No. 23 CF 1146. It has been withheld from criminal discovery and from the FOIA production on work-product and Rule 412 grounds. The Commission's access to it does not depend on either.
- 5 **Determine the office's reporting structure** for the period covered by Part II, and whether Rule 5.1(b) or 5.1(c)(2) reaches this respondent as to the filings in this matter. No allegation is made that it does.
- 6 **Keep this file open for supplement.** Any finding by any court will be transmitted here under the same file number, in the manner the Commission's own letters at Exhibit I invite.

XIII. Delivery

Transmission	By electronic mail on August 6, 2026 to Igilmore@iardc.org and information@iardc.org , copied to canderson@iardc.org , awelsh@iardc.org and Igutierrez@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 is sent to the respondent or to the Office of the Lake County State's Attorney. If the Commission gives notice, that is the Commission's act under its own procedure.



Enclosures	Nine 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, ARDCD-000001 forward. Each exhibit opens with an excerpt sheet reproducing the operative language verbatim; the source page follows under the same range.
Companion file	A separate request for investigation of Max Christian Boose , Staff Attorney, Office of the State's Attorneys Appellate Prosecutor, is transmitted the same day. The two concern different lawyers, different offices and different conduct, and neither depends on the other. They share one exhibit: the Commission's closure letters.
Reply to	defcon5ready@gmail.com and ehabhilfiger@gmail.com. A reply to either is a reply to both.

Everything in this request reduces to one document and one date. A detective told a named prosecutor, in writing, that the drug evidence in this case would not prove what the case alleged. The plea came 1,124 days later and the document did not. It surfaced only because the County produced its own mail. **Read Exhibit A first; the rest of this request is the chronology around it.**

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	August 11, 2022 — Det. Petrick to ASA Benjamin Dillon, the assessment Production page 198. Sent 9:41 a.m., “To: Dillon, Benjamin,” copied to two investigators, subject “report LPD 22-7193,” with the medical records attached. Never disclosed before the plea of September 8, 2025.	ARDCD-000001 – ARDCD-000003
B	May 26 and June 2, 2022 — the charging-era record naming ASA Ben Dillon Production pages 120 and 121. The investigating officer’s own case narrative, establishing that this respondent was the assistant State’s Attorney handling the matter when the warrants issued and the toxicology came back.	ARDCD-000004 – ARDCD-000007
C	June 14, 2023 — the court minutes of the indictment Production page 200. Produced for one purpose only: the charge returned that day requires proof of great bodily harm, which is what the August 2022 assessment was material to. This respondent is not named on it, and no count in this request rests on it. Part X says so.	ARDCD-000008 – ARDCD-000010
D	December 5, 2025 and January 20, 2026 — the case in his hands after the plea Production pages 186 and 127. The first circulates a case update to county civil counsel, copied to him. The second sends him the State’s draft response to the complainant’s post-conviction petition and asks for his thoughts on it.	ARDCD-000011 – ARDCD-000014
E	April 8, 2026 — the request to revoke, addressed to him by name and courtroom Production pages 184 and 529. The transmitting message and the memorandum it carries. The memorandum’s addressee line reads “ATTENTION: Ben Dillon · COURT RM: T-611.” Its second listed ground is the amphetamine screen.	ARDCD-000015 – ARDCD-000018
F	May 14, 2026 — the Petition for Revocation, and the date that does not match Two pages. Sworn by a different assistant, and this request makes no allegation about the swearing of it. It is produced because paragraph 3.B is the amphetamine ground, and because it dates the screen 11/10/2025 where the memorandum at Exhibit E dates it 11/20/25.	ARDCD-000019 – ARDCD-000022
G	December 8–10, 2025 — the supervising officer’s written clearance of the same screen Three pages. Attached because it is the other half of the record on the same screen. The production does NOT place this message in the respondent’s hands, and nothing in this request asserts that it does.	ARDCD-000023 – ARDCD-000027
H	June 18 and June 29, 2026 — this Commission’s correspondence, routed through him Production pages 506, 270 and 334. Offered for one purpose: to fix that the matter was live in this respondent’s hands in 2026, while the 2022 assessment remained undisclosed. No complaint is made about the fact of the routing.	ARDCD-000028 – ARDCD-000032
I	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 XI is built on them.	ARDCD-000033 – ARDCD-000038



EXHIBIT A

**August 11, 2022 — Det. Petrick to ASA Benjamin Dillon, the
assessment**

ARDCD-000001 – ARDCD-000003

*Production page 198. Sent 9:41 a.m., "To: Dillon, Benjamin," copied to two investigators, subject
"report LPD 22-7193," with the medical records attached. Never disclosed before the plea of
September 8, 2025.*

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

Detective Paul J. Petrick, Village of Lincolnshire Police Department, to “Dillon, Benjamin” — Thursday, August 11, 2022, 9:41 a.m. (production page 198)

The message, as it bears on the drug evidence

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

The interval

*[Written August 11, 2022. Plea and sentence September 8, 2025 — **1,124 days**. Produced to the complainant July 29, 2026 — **1,448 days**, and only in answer to a request under the Freedom of Information Act.]*

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

Dillon, Benjamin

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

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

Mr. Dillon,

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

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

Thank you.

Detective Paul J. Petrick
 Village of Lincolnshire
 Police Department

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



VILLAGE OF
 LINCOLNSHIRE

CONFIDENTIAL COMMUNICATION

This electronic mail message and any attachments are intended only for the use of the addressee(s) named above and may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If you are not an intended recipient, or the employee or agent responsible for delivering this email to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you received this email message in error, please immediately notify the sender by replying to this message or by telephone. Thank you.

**EXHIBIT B****May 26 and June 2, 2022 — the charging-era record naming
ASA Ben Dillon**

ARDCD-000004 – ARDCD-000007

Production pages 120 and 121. The investigating officer's own case narrative, establishing that this respondent was the assistant State's Attorney handling the matter when the warrants issued and the toxicology came back.

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

Case narrative, Lincolnshire Police Department case 2022-00007193 — Officer ID POLICE\pPetrick (production pages 120–121)

May 26, 2022

[On May 26, 2022, **I contacted Assistant State’s Attorney (ASA), Ben Dillon**, of the Lake County State’s Attorney’s Office in reference to this case. I requested a warrant for the vials of blood and urine collected at Advocate Condell Medical Center ... **The warrant was issued.** A second warrant for the “black box” of the 2021 Lexus LC500 was also requested and issued.]

June 2, 2022

[On June 02, 2022, I presented the search warrant return from Advocate Condell Medical Center to Judge Potkonjak at the Lake County Court House. **The Search warrant return was left for ASA Ben Dillon** of the Lake County State’s Attorney’s Office.]

June 16, 2022

[On June 16, 2022, I reviewed the lab report from this case. Results of the analysis showed Amphetamine was in the urine sample ... **I contacted Assistant State’s Attorney (ASA) Dillon and relayed the substance found. He recommended completing documents** for the Lake County State’s Attorney’s Office to file a subpoena requesting medical records...]

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

OfficerID: POLICE\pPetrick, Case Narrative

On June 16, 2022, I reviewed the lab report from this case. Results of the analysis showed Amphetamine was in the urine sample obtained by search warrant from Advocate Condell Medical Center in Libertyville for patient Ehab Allababidi.

I contacted Assistant State's Attorney (ASA) Dillon and relayed the substance found. He recommended completing documents for the Lake County State's Attorney's Office to file a subpoena requesting medical records from Advocate Condell Medical Center for Allababidi with a treatment date of May 23, 2022.

I prepared the documents and sent the request to Lake County State's Attorney's Office Grand Jury email.

On June 20, 2022, I was informed data was recovered from the Airbag Control Module (aka "black box"). See Detective Forkes' supplemental report.

I prepared the search warrant return document and filed it along with the recovered data documents at the Lake County Courthouse. A copy was sent to records to be added to this report.

On June 21, 2021, I took custody of the Airbag Control Module (ACM) from Officer P. Murray of the Gurnee Police Department. The ACM was entered into evidence.

FPD 00040

OfficerID: POLICE\pPetrick, Case Narrative

On May 26, 2022, I contacted Assistant State's Attorney (ASA), Ben Dillon, of the Lake County State's Attorney's Office in reference to this case.

I requested a warrant for the vials of blood and urine collected at Advocate Condell Medical Center in Libertyville IL, on May 23, 2022, from Ehab Allababidi. The warrant was issued. A second warrant for the "black box" of the 2021 Lexus LC500 was also requested and issued.

I swore to the warrants in front of Judge Potkonjak, where he signed both warrants. I executed the warrant at Advocate Condell Lab at 3:35 p.m. on May 26, 2022. A copy of the warrant was given to Phlebotomist Stacy Rietschel. She complied with the warrant and gave me three vials of blood and one vial of urine; marked with patient name Ehab Allababidi.

I signed a hospital form, and a copy was provided to me and sent to records to be added to this report. The vials were entered into evidence and placed in the temporary refrigerator to be sent to the lab for testing.

On May 27, 2022, the warrant to recover the "black box" from the 2021 Lexus was executed with the assistance of a Major Crash Assistance Team (MCAT) Investigator, Officer Murray of Gurnee Police. A copy of the warrant was left with the vehicle. The "black box" was recovered from the Lexus and Officer Murray maintained custody of the box to preserve the item for potential recovery of information. The "black box" is awaiting download.

[REDACTED], owner of the GMC Savana involved in this crash, provided consent to recover the "black box" from his vehicle. The form was signed and faxed to me at the Lincolnshire Police Department. The faxed copy was sent to records to be added to this report. A copy was also left with the vehicle. Officer Murray, MCAT Investigator, obtained the "black box" information.

Copies of the warrants and affidavit for warrant were sent to records to be added to this report.

On June 02, 2022, I presented the search warrant return from Advocate Condell Medical Center to Judge Potkonjak at the Lake County Court House. The Search warrant return was left for ASA Ben Dillon of the Lake County State's Attorney's Office.

No further action by this investigator at this time.

FPD 00041



EXHIBIT C

June 14, 2023 — the court minutes of the indictment

ARDCD-000008 – ARDCD-000010

Production page 200. Produced for one purpose only: the charge returned that day requires proof of great bodily harm, which is what the August 2022 assessment was material to. This respondent is not named on it, and no count in this request rests on it. Part X says so.

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

Court minutes, Nineteenth Judicial Circuit — June 14, 2023, No. 23 CF 1146 (production page 200)

The entries on the form

[DATE: JUNE 14, 2023 · CASE NUMBER: 23CF 1146 · DEFENDANT: EHAB ALLABABIDI · JUDGE: SHANES · ASA: STEVE SCHELLER · CT REPORTER: [blank] · ACTION TAKEN: *True Bill Indictment returned in open court · Warrant to Issue Instante* · bond \$50,000 · case assigned to 611 STRIDE.]

The handwritten notation, partly obscured by the production's own masking

[“WHAT ARE INJURIES?” / “Nothing in file — No med recs etc.”]

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



EXHIBIT D

December 5, 2025 and January 20, 2026 — the case in his hands after the plea

ARDCD-000011 – ARDCD-000014

Production pages 186 and 127. The first circulates a case update to county civil counsel, copied to him. The second sends him the State's draft response to the complainant's post-conviction petition and asks for his thoughts on it.

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

Two internal messages of the Lake County State's Attorney's Office (production pages 186 and 127)

December 5, 2025, 5:33 p.m. — ASA Francis De Rosa to Melanie Nelson, Chief Deputy, Civil Trial Division, cc Benjamin Dillon

[Subject: **Ehab Allababidi Update, 25CF1146**. Hi Melanie, Please let me know what else you need from me.]

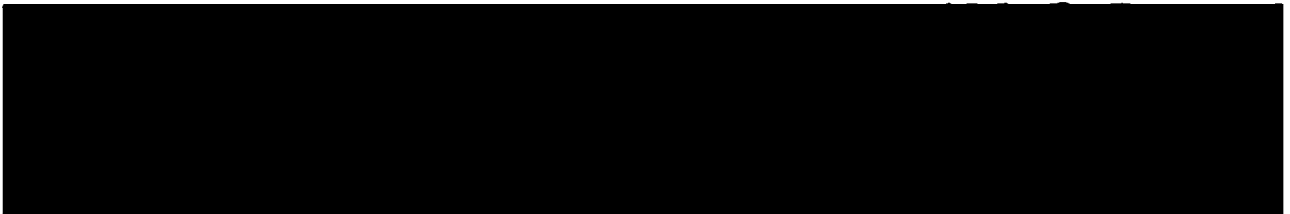
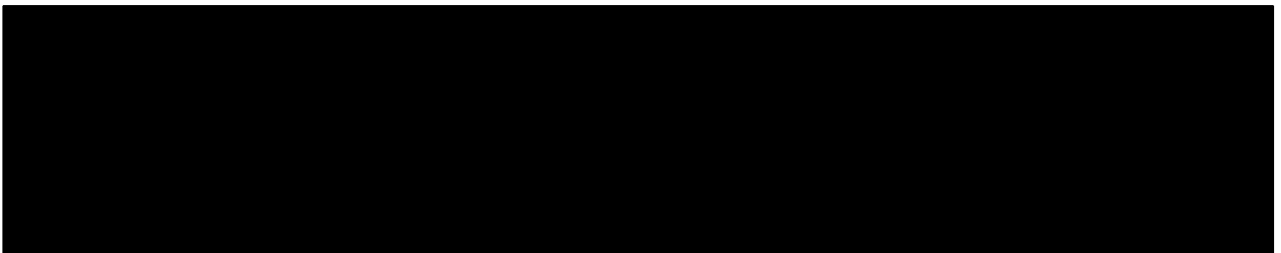
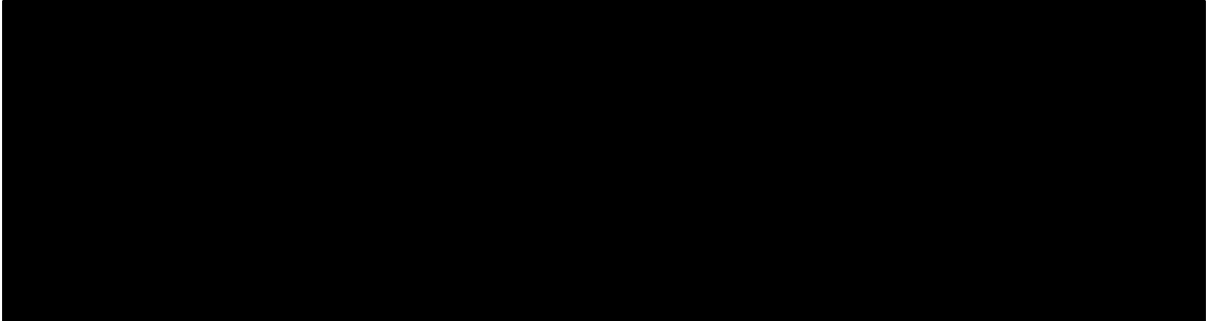
January 20, 2026, 4:55 p.m. — ASA Nicholas Shepherd to Benjamin Dillon

[Subject: Allababidi 23CF1146 Response motion Could You Take a Look and Give Me Your thoughts. — Hey Ben, Here is the draft response to the defendant's combine motion and post conviction petition. **Could you take a look and give me your thoughts on this.**]

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

From: Francis De Rosa
To: Melanie Nelson
Cc: Benjamin Dillon
Subject: Ehab Allababidi Update, 25CF1146
Date: Friday, December 5, 2025 5:33:02 PM
Attachments: Binder1.pdf
image001.png
AllababidiE 2-25-0440 Lake order dismissing appeal and mandate.pdf

Hi Melanie,



Please let me know what else you need from me.

Sincerely,
Frank

Francis P. DeRosa IV
Assistant State's Attorney, Felony Traffic Division
Lake County State's Attorney's Office
18 N. County St.
Waukegan, IL 60085
Phone (direct): 847-377-3525
Fax: (847) 625-7129

From: Nicholas Shepherd
To: Benjamin Dillon
Subject: Allababidi 23CF1146 Response motion Could You Take a Look and Give Me Your thoughts
Date: Tuesday, January 20, 2026 4:55:14 PM
Attachments: Allababidi People's Response to Defendant's Petition for Post-Conviction Relief.docx

Hey Ben,

Here is the draft response to the defendant's combine motion and post conviction petition. Could you take a look and give me your thoughts on this/

Best,
Nick



EXHIBIT E

**April 8, 2026 — the request to revoke, addressed to him by
name and courtroom**

ARDCD-000015 – ARDCD-000018

Production pages 184 and 529. The transmitting message and the memorandum it carries. The memorandum's addressee line reads "ATTENTION: Ben Dillon · COURT RM: T-611." Its second listed ground is the amphetamine screen.

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

Division of Adult Probation Services, Nineteenth Judicial Circuit — April 8, 2026 (production pages 184 and 529)

The transmitting message, 10:57 a.m., from the Unit Manager

[**To: Benjamin Dillon; Nicholas Shepherd** · Cc: Marisa Cervantes; PDRemoteCourt · Subject: **Ehab Allababidi 23CF1146 PTR Request T611** — “PTR Request for failure to report, **amphetamine use**, failure to complete public service and failure to attend the victim impact panel.”]

The memorandum itself

[**TO: STATE’S ATTORNEY, LAKE COUNTY, IL · ATTENTION: Ben Dillon · COURT RM: T-611 ... 4. Defendant tested positive for Amphetamines on 11/20/25. Defendant has not provided an updated prescription. ... RECOMMENDATION: I REQUEST THAT PETITION BE FILED. · OFFICER: MARISA CERVANTES · Approved By: LORI CARRIER.**]

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

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

Good morning,

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

Termination scheduled for 3/7/28 in T611.

Thank you,

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

The contents of this message are privileged and confidential. If you have received this email in error, please delete it and any attachments immediately. The erroneous receipt of this message by anyone other than its intended recipient does not waive any privileges that may apply. Please do not forward or share this message without the express consent of the author.

FILED

4/8/2026 10:38 AM



Erin Cartwright
Clerk of the Court
Lake County, Illinois

Lake County, Illinois

ADMINISTRATIVE OFFICE OF THE NINETEENTH JUDICIAL CIRCUIT

Division of Adult Probation Services

215 West Water Street
Waukegan, IL 60085-5616
Phone: (847) 377-4504
Fax: (847)984-5790

MEMORANDUM

TO: STATE'S ATTORNEY, LAKE COUNTY, IL
ATTENTION: Ben Dillon COURT RM: T-611
RE: EHAB ALLABABIDI
ADDRESS: 8516 W Winona St, Chicago, IL 60656
FROM: MARISA CERVANTES, Probation Officer
DATE: 04/08/2026
CASE #: 23CF00001146

THE ABOVE REFERENCED WAS PLACED ON 30 MONTHS Probation by Judge CHRISTOPHER R. STRIDE on 09/08/2025 for AGG RECKLESS DRVG/BODILY HARM IN VIOLATION OF AFORESAID ORDER, TO WIT, PARAGRAPH(S) 2, 4, 12, 19, & 23 AS FOLLOWS:

2. Defendant is assessed \$2,531.00 in court cost and fees. The defendant has an outstanding balance of \$1,131.00.

4. Defendant tested positive for Amphetamines on 11/20/25. Defendant has not provided an updated prescription.

12. Defendant failed to report to probation on the following dates: 02/19/26, 02/27/26, 03/10/26, 03/11/26 & 03/26/26.

19. Defendant failed to complete 240 public service hours.

23. Defendant failed to complete the victim impact panel.

RECOMMENDATION:

- ☒ REQUEST THAT PETITION BE FILED
☐ Request hearing to determine status of case with Court
☐ Take no action
☐ Other/Comments: __

COPY: Judge
Defense Attorney
Probation File

OFFICER: MARISA CERVANTES PHONE: (847)377-3614

Approved By: LORI CARRIER

AOC-3-36-18-R-0399



EXHIBIT F

**May 14, 2026 — the Petition for Revocation, and the date that
does not match**

ARDCD-000019 – ARDCD-000022

Two pages. Sworn by a different assistant, and this request makes no allegation about the swearing of it. It is produced because paragraph 3.B is the amphetamine ground, and because it dates the screen 11/10/2025 where the memorandum at Exhibit E dates it 11/20/25.

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

Petition for Revocation — People v. Allababidi, No. 23 CF 1146, filed May 14, 2026, 1:41 p.m.

Paragraph 3, the alleged violations

*[A. The defendant willfully failed to pay court ordered financial obligations. **B. The defendant tested positive for Amphetamine (illegal substance) on or about 11/10/2025.** C. The defendant failed to report to Probation/Compliance ...]*

The two dates for one screen

*[Exhibit E, memorandum of April 8, 2026: “**positive for Amphetamines on 11/20/25.**” · This petition, sworn 36 days later: “**on or about 11/10/2025.**” Both are attached; neither is characterized.]*

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

IN THE CIRCUIT COURT OF THE NINETEENTH
JUDICIAL CIRCUIT, LAKE COUNTY, ILLINOIS

Erin Cartwright Weinstein
Clerk of the Court
Lake County, Illinois

PEOPLE OF THE STATE OF ILLINOIS

vs.

EHAB ALLABABIDI

GEN. NO. 23CF00001146

PETITION FOR REVOCATION

NOW COMES the People of the State of Illinois by Eric F. Rinehart, Lake County State's Attorney, by and through, Nicholas Shepherd, Assistant State's Attorney, and petitions this Honorable Court to revoke the defendant's probation, pursuant to 730 ILCS 5/5-6-4. In support of this petition, the People of the State of Illinois state the following, upon information and belief:

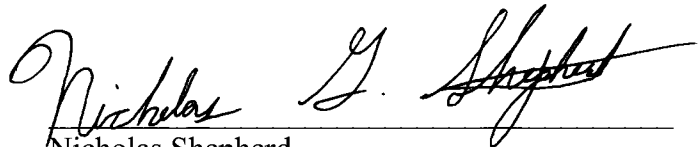
1. That on or about September 8, 2025, the defendant was placed on 30 months of probation, for the offense of AGG RECKLESS DRVG/BODILY HARM, a Class 4 Felony.
2. That the defendant's probation, includes the following condition(s):
 - A. The defendant shall pay all fines, fees, court costs, assessments, and restitution.
 - B. The defendant shall not use any illegal substance.
 - C. The defendant shall report to Probation as directed.
 - D. The defendant shall perform 240 hours of public service at a minimum rate of 20 hours per month.
 - E. The defendant shall comply with a Live Victim Impact Panel.
3. The defendant failed to comply with the terms of their probation, and in support of this allegation, the People state the defendant violated the terms of their probation in the following manner:
 - A. The defendant willfully failed to pay court ordered financial obligations.
 - B. The defendant tested positive for Amphetamine (illegal substance) on or about 11/10/2025.
 - C. The defendant failed to report to Probation/Compliance on or about 02/19/2026, 02/27/2026, 03/10/2026, 03/11/2026, and 03/26/2026.
 - D. The defendant failed to provide proof of completion of 240 hours of public service.
 - E. The defendant failed to provide proof of completion of the Live Victim Impact Panel

WHEREFORE, The People of the State of Illinois pray this Honorable Court revoke the Defendant's probation of the said named defendant for failure to perform the conditions of the sentence heretofore entered, and further moves this Honorable Court to lift the stay on any jail sentence previously imposed or issue a warrant for the arrest and apprehension of the said named defendant, who shall be brought immediately to court for the purpose of setting a date of hearing on said petition or to order a summons to the offender to appear.

The undersigned, having been first duly sworn, states she is informed and believes the allegations of the above petition are true and correct.

ERIC F. RINEHART

LAKE COUNTY STATE'S ATTORNEY



Nicholas Shepherd
Assistant State's Attorney

SUBSCRIBED and SWORN to before me
12th day of May, 2026



NOTARY PUBLIC





EXHIBIT G

**December 8–10, 2025 — the supervising officer's written
clearance of the same screen**

ARDCD-000023 – ARDCD-000027

Three pages. Attached because it is the other half of the record on the same screen. The production does NOT place this message in the respondent's hands, and nothing in this request asserts that it does.

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

Adison Weeks, Officer, Cook County Adult Probation Department, to Ehab Allababidi — December 10, 2025, 12:37 p.m.

The clearance

[Do you mind still please sending me a picture of your updated Adderall prescription? I know you are still being prescribed it ... **Your drug test results were positive for amphetamine, but it is all negative in my eyes because I know you are still taking the Adderall.** I just want to avoid anyone who sees this result though giving you a hard time for future reference.]

What is and is not asserted about it

[It is dated **five months before** the petition at Exhibit F was sworn and **four months before** the memorandum at Exhibit E was written. **The complainant does not assert that this respondent saw it.** It is here so that the Commission has both halves of the record on one screen.]

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



Ehab Hilfiger <defcon5ready@gmail.com>

Re: Prescription Verification & Compliance Letter

1 message

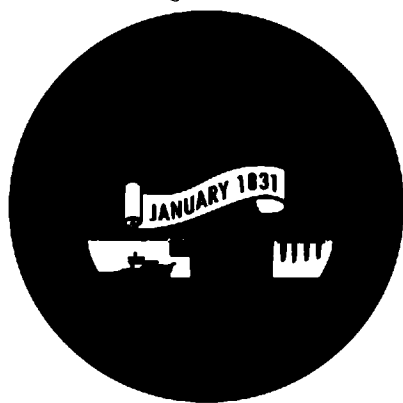
Adison Weeks (Adult Probation) <Adison.Weeks@cookcountyil.gov>

Wed, Dec 10, 2025 at 10:32 PM

To: Ehab Hilfiger <defcon5ready@gmail.com>

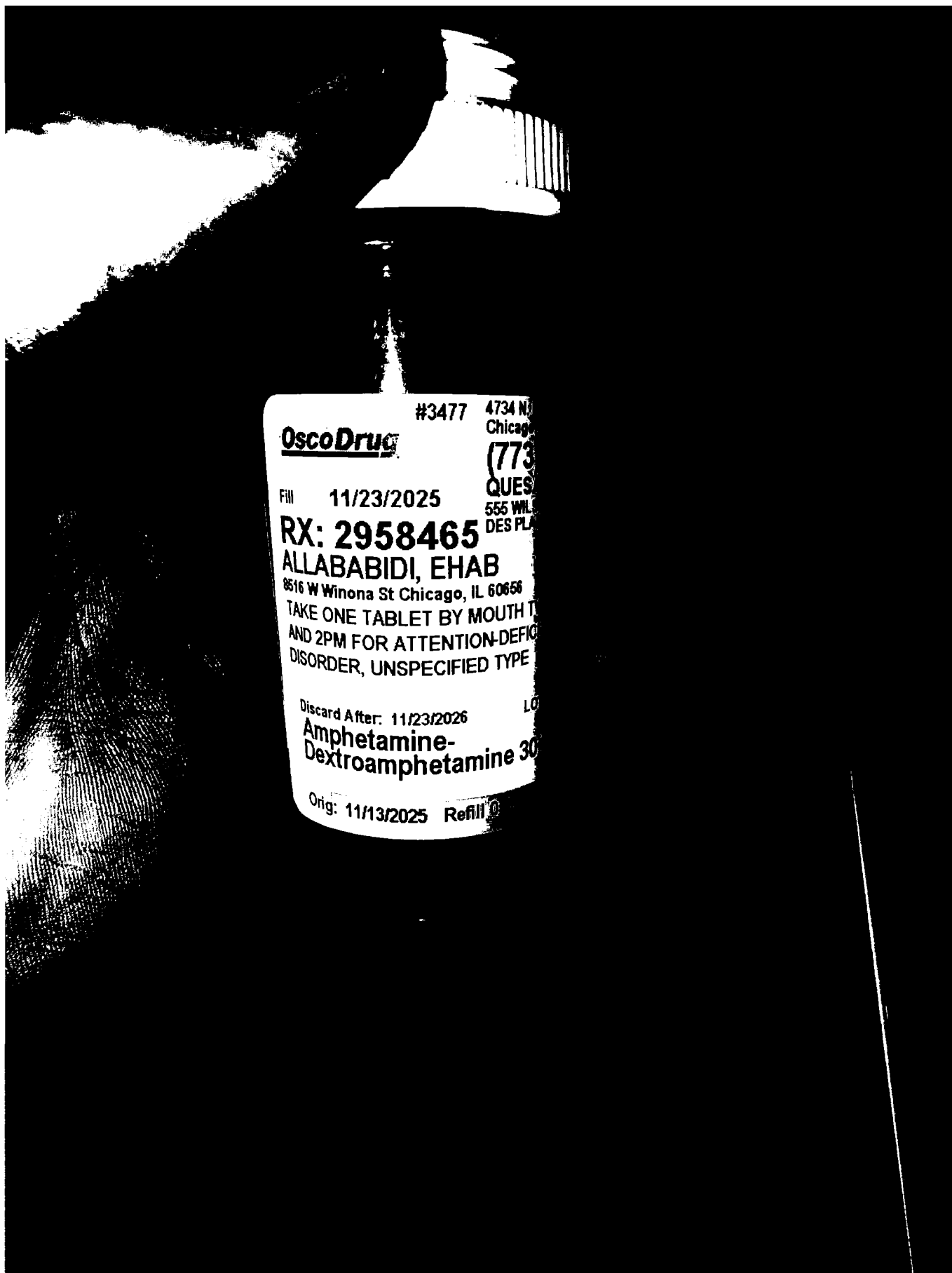
Thanks so much!!

Adison Weeks, Officer
Cook County Adult Probation Department
2121 Euclid Ave
Rolling Meadows, Illinois 60008
Office: (847)818-2360
adison.weeks@cookcountyil.gov
adison b. weeks



From: Ehab Hilfiger <defcon5ready@gmail.com>**Sent:** Wednesday, December 10, 2025 1:40 PM**To:** Adison Weeks (Adult Probation) <Adison.Weeks@cookcountyil.gov>**Subject:** Re: Prescription Verification & Compliance Letter**External Message Disclaimer**

This message originated from an external source. Please use proper judgment and caution when opening attachments, clicking links, or responding to this email.



Hi! Here you go ms Adison.

On Wed, Dec 10, 2025 at 12:37 PM Adison Weeks (Adult Probation) <Adison.Weeks@cookcountyil.gov> wrote:

Hey Ehab,

Do you mind still please sending me a picture of your updated Adderall prescription? I know you are still being prescribed it, but I just want to avoid anyone giving you a hard time for taking it. Your drug test results were positive for amphetamine, but it is all negative in my eyes because I know you are still taking the Adderall. I just want to avoid anyone who sees this result though giving you a hard time for future reference.

Thank you!

Best Regards,

Adison Weeks, Standard Caseload Officer

Cook County Adult Probation Department

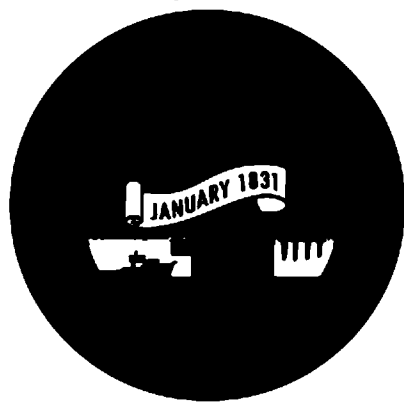
2121 Euclid Ave

Rolling Meadows, Illinois 60008

Office: (847)818-2360

adison.weeks@cookcountyil.gov

adison b. weeks



From: Ehab Hilfiger <defcon5ready@gmail.com>

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

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

Subject: Re: Prescription Verification & Compliance Letter

External Message Disclaimer

This message originated from an external source. Please use proper judgment and caution when opening attachments, clicking links, or responding to this email.

Re: Prescription Verification & Compliance Letter

Hi Adison,

Thank you so much for handling everything so quickly, I really appreciate it. I'll be there on Tuesday, December 23rd at 9 AM in person without fail.

I'll also keep you updated on the Lake matter.

Thanks again for all your help and communication.



EXHIBIT H

**June 18 and June 29, 2026 — this Commission's
correspondence, routed through him**

ARDCD-000028 – ARDCD-000032

Production pages 506, 270 and 334. Offered for one purpose: to fix that the matter was live in this respondent's hands in 2026, while the 2022 assessment remained undisclosed. No complaint is made about the fact of the routing.

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

Internal routing of the Commission's correspondence, Lake County State's Attorney's Office (production pages 506, 270 and 334)

June 18, 2026, 5:26 p.m. — ASA Nicholas Shepherd

[**To: Benjamin Dillon; Dan E. Brown** · Subject: Fw: [EXTERNAL] 2026IN03190 — **Shepherd** — forwarding the Commission's notice that "[t]he ARDC attorney handling this matter is Christine Anderson."]

June 29, 2026, 8:19 a.m. — ASA Francis De Rosa to Benjamin Dillon

[Good Morning Ben, This is **the first of the numerous emails that I began receiving from Ehab Allababidi last week. I will forward you all of the others.** For reference, his case number was 23CF 1146.]

June 29, 2026, 11:23 and 11:24 a.m. — from BDillon@lakecountyil.gov

[The same two messages forwarded onward within the office, the second **"To: Dan E. Brown."** Subject in both: **Formal Notice of Administrative Exhaustion and Mandatory Preservation Demand — ARDC Nos. 2026IN03189 / 2026IN03190.**]

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

From: Nicholas Shepherd
To: Benjamin Dillon; Dan E. Brown
Subject: Fw: [EXTERNAL] 2026IN03190 - Shepherd
Date: Thursday, June 18, 2026 5:26:09 PM
Attachments: Binder1.pdf

Best,
Nick

Get [Outlook for iOS](#)

From: Dosunmu, Bolytife <BDosunmu@iardc.org>
Sent: Thursday, 18 June 2026 17:19:05
To: Nicholas Shepherd <Nshepherd@lakecountyil.gov>
Subject: [EXTERNAL] 2026IN03190 - Shepherd

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

Attached please find correspondence from the Attorney Registration and Disciplinary Commission (ARDC).

The ARDC attorney handling this matter is Christine Anderson. Email is our preferred method of communication. Please address communications regarding this matter to Ms. Christine Anderson and submit them via email at: lgilmore@iardc.org.

If you have any questions or need to speak with a member of our staff, please call our general number: (312) 565-2600.

Warm Regards,

Bolu Dosunmu

Bolu Dosunmu (she/her/hers)
ARDC| Legal Secretary
One Prudential Plaza
130 East Randolph Drive, Ste. 1500
Chicago, IL 60601
Telephone: 312-565-2600

From: BDillon@lakecountyil.gov
Subject: FW: [EXTERNAL] Formal Notice of Administrative Exhaustion and Mandatory Preservation Demand — ARDC Nos. 2026IN03189 / 2026IN03190
Date: Monday, June 29, 2026 11:23:29 AM
Attachments: EA
ARDC RESPONSE AND LITIGATION HOLD.pdf
image001.png

From: Francis De Rosa <fderosa@lakecountyil.gov>
Sent: Monday, June 29, 2026 8:19 AM
To: Benjamin Dillon <BDillon@lakecountyil.gov>
Subject: FW: [EXTERNAL] Formal Notice of Administrative Exhaustion and Mandatory Preservation Demand — ARDC Nos. 2026IN03189 / 2026IN03190

Good Morning Ben,

This is the first of the numerous emails that I began receiving from Ehab Allababidi last week. I will forward you all of the others. For reference, his case number was 23CF1146.

Sincerely,
Frank

Francis P. DeRosa IV
Assistant State's Attorney, Juvenile Justice Division
Lake County State's Attorney's Office
24647 North Milwaukee Avenue
Vernon Hills, Illinois 60061
Phone (direct): 847-377-3525
Fax: (847) 625-7129
Email: FDeRosa@lakecountyil.gov



Confidentiality Notice: This message and any attached files contain information intended for the exclusive use of the person(s) to whom it is addressed and may contain information that is privileged, confidential, and/or exempt from disclosure under applicable law. If you are not the intended recipient, you are notified that any viewing,

From: Benjamin Dillon
To: Dan E. Brown
Subject: FW: [EXTERNAL] Re: Formal Notice of Administrative Exhaustion and Mandatory Preservation Demand — ARDC Nos. 2026IN03189 / 2026IN03190
Date: Monday, June 29, 2026 11:24:44 AM
Attachments: EA
dec15 1983.pdf

From: Francis De Rosa <fderosa@lakecountyl.gov>
Sent: Monday, June 29, 2026 8:25 AM
To: Benjamin Dillon <BDillon@lakecountyl.gov>
Subject: FW: [EXTERNAL] Re: Formal Notice of Administrative Exhaustion and Mandatory Preservation Demand — ARDC Nos. 2026IN03189 / 2026IN03190

Most recent and final email related to Ehab Allababidi, 23CF1146.

From: Ehab Hilfiger <defcon5ready@gmail.com>
Sent: Saturday, June 27, 2026 6:54 AM
To: lgilmore@iadc.org; information@iadc.org
Cc: canderson@iadc.org; awelsh@iadc.org; lgutierrez@iadc.org; bdosunmu@iadc.org; Lake County State's Attorney <statesattorney@lakecountyl.gov>; Nicholas Shepherd <nshepherd@lakecountyl.gov>; Francis De Rosa <fderosa@lakecountyl.gov>; Bailey Russell <BRussell@lakecountyl.gov>
Subject: [EXTERNAL] Re: Formal Notice of Administrative Exhaustion and Mandatory Preservation Demand — ARDC Nos. 2026IN03189 / 2026IN03190

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

File-Stamped Federal Copy — ARDC Nos. 2026IN03189 / 2026IN03190

Counsel and ARDC Administration:

Please see the attached file-stamped copy of **Plaintiff's Verified Fourth Supplemental Evidentiary Submission — ARDC Disciplinary-Channel Closure and Litigation Hold**, filed June 25, 2026 as **Document 15** in *Allababidi v. Shepherd, et al.*, No. **1:26-cv-06738**, in the United States District Court for the Northern District of Illinois.

This filing places into the federal record the ARDC Intake Division's June 18, 2026 closure of Investigation Nos. **2026IN03189** and **2026IN03190**, together with my June 23, 2026 preservation notice and litigation-hold demand served on the Commission by email and facsimile.

I am sending this follow-up for one narrow purpose: to provide the ARDC and all relevant



EXHIBIT I

The Commission's closure letters of June 18 and July 1, 2026

ARDCD-000033 – ARDCD-000038

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 XI is built on them.

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

Attorney Registration and Disciplinary Commission, Intake Division — Christine P. Anderson, Senior Counsel, to Ehab Allababidi, June 18, 2026 and July 1, 2026

The ground of both closures

*[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.**]*

The final substantive paragraph of both letters

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

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



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 (800) 826-8625
Fax (312) 565-2320

3161 West White Oaks Drive, Suite 301
Springfield, IL 62704
(217) 546-3523 (800) 252-8048
Fax (217) 546-3785

Ehab Allababidi
By Email: defcon5ready@gmail.com

Chicago
June 18, 2026

Re: Bailey Clare. Russell
No. 2026IN03189

Nicholas Shepherd
No. 2026IN03190

Dear Mr. Allababidi:

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

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

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

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

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

Ehab Allababidi
June 18, 2026
Page 2

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

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

Very truly yours,

/s/ Christine P. Anderson

Christine P. Anderson
Senior Counsel
ARDC Intake Division

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



ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION
of the
SUPREME COURT OF ILLINOIS
www.iardc.org

One Prudential Plaza
130 East Randolph Drive, Suite 1500
Chicago, Illinois 60601-6219
(312) 565-2600 (800) 826-8625
Fax (312) 565-2320

3161 West White Oaks Drive, Suite
301
Springfield, IL 62704
(217) 546-3523 (800) 252-8048
Fax (217) 546-3785

Ehab Allababidi
By email: defcon5ready@gmail.com

Chicago
July 1, 2026

Re:

Francis Paul De Rosa
No. 2026IN03266

Gregory R. Ticsay
No. 2026IN03281

Dear Mr. Allababidi:

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

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

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

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

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

Mr. Allababidi
July 1, 2026
Page 2

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

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

Very truly yours,

/s/ Christine P. Anderson

Christine P. Anderson
Senior Counsel
ARDC Intake Division

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