

FILED
JUN 15 2026
Em. Cantanogit Weinstein
CIRCUIT CLERK

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

THE PEOPLE OF THE STATE OF ILLINOIS,
Plaintiff-Respondent,

v.

EHAB ALLABABIDI,
Defendant-Petitioner, Pro Se.

General No.: 23 CF 1146

Judge: Hon. Christopher Stride, Courtroom
T-611

OMNIBUS FILING

OMNIBUS FILING

EMERGENCY NOTICE OF MOTION

SPECIAL APPEARANCE AND DEMAND FOR REMOTE ADJUDICATION

NOTICE OF CONSTRUCTIVE ABANDONMENT BY APPOINTED COUNSEL

INVOCATION OF FARETTA RIGHT TO SELF-REPRESENTATION

WITH STANDBY COUNSEL UNDER MCKASKLE V. WIGGINS

MOTION TO QUASH WARRANT AND DISMISS REVOCATION

INDEX OF OMNIBUS COMPONENTS AND AUTHENTICATED EXHIBITS

I. Jurisdictional & Scheduling Demands

Comp. 1: Emergency Notice of Motion

Comp. 2: Special Appearance & Demand for Remote Hearing (Capture Bypass)

II. Substantive Constitutional Objections

Comp. 3: Notice of Per Se Sixth Amendment Deprivation (*Cronic*)

Comp. 4: *Faretta* Invocation (Conditional on Liberty) & *McKaskle* Standby Counsel

Comp. 5: Motion to Quash Warrant (*Napue/Franks*) & Paralyzed Enforcement (*Malley*)

III. Evidentiary Dossier & Federal Directives

Exhibit A: Dkt. 25 — U.S. District Ct. Exhaustion Mandate (1:26-cv-01077, Blakey)

Exhibit B: 42 U.S.C. § 1983 Federal Civil Rights Complaint (N.D. Ill. Intake Submitted June 6, 2026; Case Number Pending Assignment) — Submitted concurrently to establish active federal preemption (65 pp.)

Certification: Verification (735 ILCS 5/1-109) & Certificate of Service

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

THE PEOPLE OF THE STATE OF ILLINOIS,
Plaintiff-Respondent,

v.

EHAB ALLABABIDI,
Defendant-Petitioner, Pro Se.

General No.: **23 CF 1146**

Judge: *Hon. Christopher Stride, Courtroom
T-611*

EMERGENCY NOTICE OF MOTION

EMERGENCY NOTICE OF MOTION

Calendar Demand — Ex Parte Emergency Call
Courtroom T-611 before Hon. Christopher Stride

**TO THE CLERK OF THE CIRCUIT COURT OF LAKE COUNTY AND THE LAKE
COUNTY STATE'S ATTORNEY'S OFFICE:**

PLEASE TAKE NOTICE that on **June 9, 2026 at 9:00 AM**, or as soon thereafter as Defendant may be heard, Defendant EHAB ALLABABIDI will bring the attached OMNIBUS FILING — comprising an Emergency Notice of Motion, Special Appearance, Notice of Constructive Abandonment by Appointed Counsel, and Motion to Quash Warrant — before the Honorable Christopher Stride in Courtroom T-611 of the Circuit Court of the Nineteenth Judicial Circuit, Lake County, Illinois, for an immediate ex parte emergency hearing.

THE CLERK IS HEREBY DIRECTED to immediately place this matter on the physical calendar for Courtroom T-611's emergency call on the earliest available date. This filing is an omnibus submission containing the following integrated components, which the Clerk shall docket simultaneously as a single filing:

Component 1: Emergency Notice of Motion (this page) — calendar forcing function demanding immediate placement on the ex parte emergency call docket.

Component 2: Special Appearance and Demand for Remote Adjudication — invoking this Court's jurisdiction solely to challenge the validity of the warrant, and demanding a remote hearing to prevent custodial extraction during these proceedings.

Component 3: Notice of Constructive Abandonment by Appointed Counsel, Invocation of Faretta Right to Self-Representation, and Demand for Appointment of Standby Counsel — establishing that appointed counsel's ten (10) day silence since the May 29, 2026 Bailey Russell email during

an active custodial extraction constitutes per se constructive abandonment, triggering per se Sixth Amendment deprivation under *Cronic*.

Component 4: Motion to Quash Warrant and Dismiss Petition for Revocation with Prejudice — demonstrating that the warrant is void ab initio as the product of sworn fabrication (Napue/Franks) and a retaliatory extraction mechanism designed to moot pending federal habeas jurisdiction.

Defendant respectfully notifies the Court that the attached Omnibus Filing is being served simultaneously upon ASA Nicholas Shepherd, the Lake County State's Attorney's Office, and the appointed Public Defender via electronic mail and facsimile transmission. Defendant requests that this matter be placed on the record as an emergency filing requiring judicial action within 24 hours.

This Emergency Notice of Motion is not severable from the attached components. The Clerk is directed to docket all pages as a single, continuous Omnibus Filing.

Respectfully submitted,

/s/ Ehab Allababidi

EHAB ALLABABIDI, *Pro Se* Defendant
8516 W. Winona St., Chicago, IL 60656
(773) 920-0030 | defcon5ready@gmail.com
Dated: June 8, 2026

**IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
LAKE COUNTY, ILLINOIS
CRIMINAL DIVISION**

THE PEOPLE OF THE STATE OF ILLINOIS,
Plaintiff-Respondent,

v.

EHAB ALLABABIDI,
Defendant-Petitioner, Pro Se.

General No.: **23 CF 1146**

Judge: *Hon. Christopher Stride, Courtroom
T-611*

**SPECIAL APPEARANCE AND
DEMAND FOR REMOTE
ADJUDICATION**

**SPECIAL APPEARANCE AND DEMAND
FOR REMOTE ADJUDICATION**

*Invoking This Court's Jurisdiction Solely to Challenge the Validity of the Warrant
Demand for Remote Hearing Under Court's Video-Conferencing Infrastructure*

Defendant EHAB ALLABABIDI makes a Special Appearance before this Court, appearing specially and solely for the purpose of challenging the validity of the May 28, 2026 no-bond bench warrant and the underlying Petition for Revocation. Defendant does not waive, and expressly preserves, all objections to the jurisdiction of this Court over his person, including but not limited to objections based on insufficient service, lack of notice, and the void ab initio nature of the warrant.

Defendant is not a fugitive. He has never evaded lawful process. Defendant is a federal civil rights litigant who has mathematically proven — through the State's own written records — that the warrant commanding his arrest was procured through *Napue* perjury and retaliatory fabrication. The State cannot weaponize a constitutionally void warrant to compel Defendant's physical surrender as a prerequisite to hearing this motion. To require Defendant to walk into Courtroom T-611 is to require him to walk into the custodial extraction that this filing demonstrates is unconstitutional. Compelling physical appearance would consummate the very constitutional deprivation this motion seeks to prevent, and would moot the pending federal injunctive relief before the Article III tribunal can act.

Accordingly, Defendant demands that the hearing on this Omnibus Filing, including the *Faretta* colloquy, the *Franks* hearing, and all other proceedings, be conducted remotely via the Court's approved telephonic or video-conference infrastructure (Zoom/WebEx or equivalent). Defendant stands ready to appear remotely at the Court's immediate convenience, but demands that the remote hearing link be transmitted no later than 4:00 PM on June 8, 2026, to avoid triggering the federal constructive denial mechanism. Defendant provides his active telephone number (773) 920-0030 and email address defcon5ready@gmail.com for the purpose of receiving the remote hearing link and any further

communications from the Court.

Defendant incorporates by reference his May 28, 2026 Notice of Special Appearance and Emergency Notice of Fraud on the Court, which was served on this Court, ASA Shepherd, and the Lake County State's Attorney's Office at 7:00 AM on May 28, 2026 — two hours before the warrant hearing that produced the constitutionally defective warrant challenged herein.

Any order purporting to require Defendant's physical presence as a condition of being heard on this filing will be treated as a constructive denial of due process and will be immediately submitted to the United States District Court in support of the pending federal civil rights action and to the Seventh Circuit in the pending appeals.

Respectfully submitted,

/s/ Ehab Allababidi

EHAB ALLABABIDI, *Pro Se* Defendant
8516 W. Winona St., Chicago, IL 60656
(773) 920-0030 | defcon5ready@gmail.com
Dated: June 8, 2026

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

THE PEOPLE OF THE STATE OF ILLINOIS,
Plaintiff-Respondent,

v.

EHAB ALLABABIDI,
Defendant-Petitioner, Pro Se.

General No.: 23 CF 1146

Judge: *Hon. Christopher Stride, Courtroom
T-611*

**NOTICE OF CONSTRUCTIVE
ABANDONMENT | FARETTA
INVOCATION | MOTION TO QUASH**

**NOTICE OF CONSTRUCTIVE ABANDONMENT BY APPOINTED COUNSEL,
INVOCATION OF FARETTA RIGHT TO SELF-REPRESENTATION
WITH STANDBY COUNSEL, AND MOTION TO QUASH WARRANT**

*Sixth Amendment Constructive Abandonment | Per Se Chronic Deprivation
Faretta Invocation | McKaskle v. Wiggins Standby Counsel Demand
Conditional Self-Representation (Liberty-Dependent)
Napue/Franks Void Ab Initio | Federal Witness Tampering 18 U.S.C. § 1512(b)*

PRELIMINARY STATEMENT

At 1:03 PM on June 6, 2026, law enforcement officers appeared at Defendant's front door to execute the May 28, 2026 no-bond bench warrant. At 5:51 PM, they returned. Both visits are recorded on the home doorbell video camera system and preserved for this Court's inspection. The warrant they came to execute is void. It was procured through sworn fabrication. The State's own coordinate agency adjudicated the underlying allegation as compliant five months before ASA Shepherd swore it was criminal. And while the State deploys armed officers to Defendant's door, appointed counsel from the Lake County Public Defender's Office has refused to discharge her constitutional duty for ten consecutive days — abandoning Defendant to face an active custodial extraction without representation, without communication, and without a single filed motion. On this same date, Defendant — not counsel — filed a Civil Rights Complaint under 42 U.S.C. § 1983 in federal court, naming every actor in this retaliatory conspiracy as a defendant before an Article III tribunal.

This Court faces a constitutional emergency that will not wait. The warrant is active. Law enforcement is executing. Counsel is absent. Three simultaneous constitutional crises converge on this docket, and this Omnibus Filing resolves all three — or documents this Court's refusal to resolve them.

I. CONSTRUCTIVE ABANDONMENT BY APPOINTED COUNSEL

Defendant was sentenced on September 8, 2025, to a term of probation in this case. Counsel was appointed from the Lake County Public Defender's Office to represent Defendant in connection with the underlying proceedings and the subsequent Petition for Revocation of Probation filed by ASA

Nicholas Shepherd on May 14, 2026.

On Friday, May 29, 2026, at 5:32 PM, Defendant contacted the Lake County Public Defender's Office intake desk by telephone and was informed that Bailey Russell (**BRussell@lakecountyil.gov**) is the assigned public defender for this matter. That same day, Defendant sent a detailed email to Ms. Russell at her official county email address, attaching the exculpatory evidence, identifying the *Napue* violation, and respectfully requesting her immediate assistance in filing a motion to quash the constitutionally defective warrant (Exhibit: Gmail printout, "Urgent Request for Assistance: Active Arrest Warrant (Case 23CF1146)," dated May 29, 2026 at 5:32 PM). Ms. Russell has never responded. She has not acknowledged receipt. She has not filed any motion. She has not communicated with Defendant in any manner whatsoever.

Prior to and following this contact, Defendant made multiple additional good-faith attempts to communicate with appointed counsel by telephone and electronic mail over a period now exceeding ten (10) days since the May 29, 2026 email identifying Bailey Russell as assigned counsel — the only communication Defendant has ever had with her. Appointed counsel has failed and refused to respond to any of Defendant's communications. During this period of absolute silence from appointed counsel, the following events occurred: (1) a zero-bond bench warrant was issued against Defendant on May 28, 2026; (2) the Seventh Circuit dismissed two separate emergency appeals (Nos. 26-2133 and 26-2162) on procedural technicalities while Defendant was functionally unrepresented; (3) law enforcement officers made two physical execution attempts at Defendant's residence on June 6, 2026 at 1:03 PM and 5:51 PM, both captured on doorbell camera; and (4) Defendant was forced to file an emergency Motion for Injunction Pending Appeal under Fed. R. App. P. 8(a)(2) in a newly opened Seventh Circuit appeal (No. 26-2212) entirely without counsel.

Defendant's Due Diligence Goes Far Above and Beyond What the Law Requires. While appointed counsel has sat in complete silence for ten (10) days since the May 29 Bailey Russell email, Defendant has personally litigated multiple simultaneous federal and state proceedings with extraordinary diligence. On May 27, 2026, at 6:41 PM, Defendant emailed the Seventh Circuit Clerk of Court (ca07_clerk@ca7.uscourts.gov), the N.D. Illinois Emergency Filings desk, and Chief Judge Rebecca Pallmeyer directly, with copies to ASA Shepherd and the Illinois Attorney General's Office, providing formal notice of the imminent custodial extraction and invoking the Seventh Circuit's emergency jurisdiction (Exhibit: Gmail printout, "URGENT JURISDICTIONAL EMERGENCY:

Concurrent Appellate Invocation & Imminent Custodial Evidence Spoliation," dated May 27, 2026 at 6:41 PM, copy furnished to the Court). Defendant has filed a Motion for Leave to Proceed IFP, a Petition for Writ of Certiorari in the United States Supreme Court, two federal habeas corpus petitions under 28 U.S.C. § 2254, a Civil RICO complaint under 18 U.S.C. § 1962, a 42 U.S.C. § 1983 Civil Rights Complaint — all while appointed counsel has done absolutely nothing. Defendant has even served process on the Respondents via USM-285 forms under Fed. R. Civ. P. 4(c)(3). Appointed counsel has not filed a single pleading, contacted a single witness, or sent a single communication in response to Defendant's repeated entreaties.

The contrast is irreconcilable. While the State deployed armed officers to Defendant's door on June 6, appointed counsel did not answer her phone. While ASA Shepherd filed sworn fabrications in this Court, appointed counsel filed nothing. While the Seventh Circuit dismissed two emergency appeals on procedural technicalities, appointed counsel sat in absolute silence. While Defendant personally drafted and filed a 42 U.S.C. § 1983 complaint, a Rule 8 emergency motion, and served federal process on the Respondents — all without any assistance whatsoever — the attorney constitutionally tasked with protecting him produced zero communications, zero filings, and zero advocacy across ten consecutive days of active custodial extraction.

This is not ineffective assistance of counsel. It is the total absence of counsel. Appointed counsel's refusal to communicate with Defendant for ten days during an active custodial extraction constitutes constructive abandonment within the meaning of the Sixth Amendment. The right to counsel is not a bureaucratic checkbox satisfied by placing a name on a file. It is a constitutional guarantee of actual, meaningful representation during the critical stages when the State is attempting to incarcerate. *Strickland v. Washington*, 466 U.S. 668, 687 (1984); *United States v. Cronin*, 466 U.S. 648, 659 (1984) (complete failure to subject the prosecution's case to meaningful adversarial testing constitutes per se Sixth Amendment violation requiring no showing of specific prejudice).

Per Se Sixth Amendment Deprivation under *Cronic*. Defendant does not seek administrative discipline or grievance procedures against appointed counsel; Defendant seeks a constitutional ruling. Appointed counsel's ten (10) day absolute silence during an active custodial extraction constitutes a complete failure to subject the prosecution's case to meaningful adversarial testing. Under *United States v. Cronin*, 466 U.S. 648, 659 (1984), this is a per se Sixth Amendment deprivation requiring no showing of specific prejudice. The record is locked. Counsel is functionally absent. This Court is now constitutionally mandated to either appoint constitutionally effective counsel who will actually

communicate with Defendant and represent his interests, or immediately conduct a *Faretta* colloquy to permit Defendant to proceed pro se. No third option exists.

II. INVOCATION OF *FARETTA* RIGHT TO SELF-REPRESENTATION WITH APPOINTMENT OF STANDBY COUNSEL

Defendant hereby exercises his constitutional right to self-representation under *Faretta v. California*, 422 U.S. 806, 832—35 (1975), and demands an immediate *Faretta* hearing to formally waive the appointment of counsel and proceed pro se.

Defendant is competent to proceed pro se. Defendant has demonstrated his ability to navigate complex federal and state court procedures, including the drafting and filing of a 42 U.S.C. § 1983 civil rights complaint, a federal habeas corpus petition under 28 U.S.C. § 2254, and a civil RICO complaint under 18 U.S.C. § 1962. Defendant's pro se filings have survived initial screening under Rule 4 of the Rules Governing Section 2254 Cases and have been found by the United States District Court to allege cognizable claims for relief. *Sanders v. Radtke*, 48 F.4th 502, 509 (7th Cir. 2022).

Conditional Self-Representation: Self-Representation Is Expressly Conditioned on Defendant's Continued Liberty. Defendant's invocation of his *Faretta* right is expressly and irrevocably conditioned on his continued liberty. Self-representation is not a binary choice that follows Defendant into a jail cell. The ability to conduct a meaningful defense pro se requires: (a) uninterrupted access to the Internet and legal research databases; (b) possession of and access to personal computing devices containing case files, exhibits, and legal research; (c) the ability to electronically file documents with courts; (d) the ability to communicate freely by telephone and email with witnesses, experts, and court personnel; and (e) the physical freedom to gather evidence, interview witnesses, and appear in court. All of these capabilities are destroyed upon custodial arrest.

The logic is irreducible. If Defendant is taken into custody on this warrant — which is void ab initio — Defendant's *Faretta* waiver is automatically revoked and rescinded ab initio. Custody destroys every tool required for self-representation: Westlaw, PACER, e-filing portals, encrypted digital infrastructure, hardware-level isolation, biometric authentication, and the massive evidentiary datasets underpinning Defendant's active Civil RICO action (Case No. 1:25-cv-15800) and CFAA/DTSA action (Case No. 1:26-cv-03204). Custodial extraction is not merely a restriction of physical liberty — it operates as the immediate, targeted spoliation of the digital infrastructure required to prosecute state actors in coordinate federal tribunals. The destruction is instantaneous upon booking and irreversible by any subsequent court order. Self-representation is physically impossible in custody. The *Faretta* waiver

is therefore expressly and irrevocably conditioned on continued liberty. Any custodial arrest automatically converts to an involuntary revocation of the waiver, triggering this Court's constitutional obligation to appoint effective counsel immediately.

Appointment of Standby Counsel under *McKaskle v. Wiggins*. While Defendant unequivocally asserts his right to control the organization and content of his own defense, Defendant formally requests the appointment of Standby Counsel pursuant to *McKaskle v. Wiggins*, 465 U.S. 168 (1984), to assist strictly with procedural logistics, service of process, administrative execution, and filing coordination, without interfering with Defendant's absolute strategic autonomy. Standby counsel shall serve as a procedural runner — handling subpoenas, physical filings, and court date coordination — while Defendant retains 100% control over the substance, strategy, and content of his defense. The appointment of standby counsel is particularly appropriate here given the volume of simultaneous federal and state proceedings and the documented state-created impediment that has blocked Defendant's access to the Clerk's office. *McKaskle*, 465 U.S. at 183 (standby counsel's role is to assist the pro se defendant without destroying the defendant's control over his own defense).

This Court is required to conduct a *Faretta* hearing before permitting a defendant to proceed pro se. *United States v. Johnson*, 980 F.3d 570, 576 (7th Cir. 2020) (applying the "totality of the record" standard for waiver of counsel); *United States v. Balsiger*, 910 F.3d 942, 951 (7th Cir. 2018). Defendant unequivocally requests to proceed pro se and demands that this hearing be conducted remotely at the earliest available date.

III. MOTION TO QUASH WARRANT AND DISMISS PETITION FOR REVOCATION WITH PREJUDICE

Mandatory Exhaustion of State Remedies Pursuant to Federal Directive. On May 29, 2026, the United States District Court for the Northern District of Illinois issued a minute order in *Allababidi v. Junkin*, Case No. 1:26-cv-01077 (Dkt. 25). Invoking the *Younger* abstention doctrine, the Article III tribunal issued a binding directive: "If Petitioner has legitimate concerns about the state case he must raise them with the state court in the first instance." (A true and correct copy of the federal order is attached hereto as **Exhibit A**.) This Omnibus Filing constitutes Defendant's strict compliance with that federal mandate. If this Court refuses to docket, hear, or adjudicate the verified *Napue* perjury contained herein, it acts in direct defiance of the federal exhaustion directive, rendering the state forum objectively inadequate under *Gibson v. Berryhill*, 411 U.S. 564, 577 (1973), and triggering immediate federal review.

A. The Warrant Is Void Ab Initio — Procured Through Sworn Fabrication. The warrant rests on a knowingly false statement in the Petition for Revocation. Paragraph 3 alleges Defendant tested positive for “Amphetamine (illegal substance)” on November 10, 2025. This allegation is mathematically false. The Cook County Adult Probation Department received the identical laboratory result, verified Defendant’s lawful Adderall prescription, and formally adjudicated the test as compliant on December 10, 2025 — five months before ASA Shepherd swore to the Petition. Under *Franks v. Delaware*, 438 U.S. 154, 155—56 (1978), and *Napue v. Illinois*, 360 U.S. 264, 269 (1959), the warrant must be voided.

B. The 185-Day Gap. Adderall has a plasma half-life of 10—13 hours. If ASA Shepherd genuinely believed Defendant was using illegal amphetamines, immediate enforcement would have been warranted. Instead, he waited 185 days — allowing Defendant to file federal habeas petitions, serve federal process, and pass Rule 4 screening under *Sanders v. Radtke* — before deploying the stale test result as a pretext for custodial extraction eight days before the federal habeas deadline.

C. No Probable Cause Hearing. The warrant was issued without any probable cause hearing or taking of testimony, despite the Court having received a formal Notice of Fraud on the Court at 7:00 AM on May 28, 2026, two hours before the hearing. *Gerstein v. Pugh*, 420 U.S. 103, 111—14 (1975).

D. Prosecutor’s Communication Blockade. ASA Shepherd’s signature block contains no phone number, no email, no office extension — a violation of Illinois Supreme Court Rule 131(b) and a calculated communication blockade. *Hicks v. Oklahoma*, 447 U.S. 343, 346 (1980).

E. Anonymous Probation Officer. The supervising officer refused to identify herself on February 19, 2026, and generated zero calls during the March 10, 2026 Compliance Window (12:00 PM to 4:00 PM). 730 ILCS 5/5-6-4(c). A defendant cannot willfully fail to report to a faceless enforcement apparatus.

F. The Warrant Is Federal Witness Tampering. Every element of 18 U.S.C. § 1512(b) is satisfied: (1) the State had actual knowledge of pending federal habeas proceedings; (2) ASA Shepherd presented a sworn falsehood to obtain the warrant (misleading conduct); and (3) the revocation petition scheduled the arraignment exactly 8 days before the federal response deadline (intent to hinder federal proceedings). *In re Grand Jury Subpoena*, 57 F.4th 155, 162 (D.C. Cir. 2023).

G. Mandatory Judicial Notice of Active Federal Civil Rights Action. Pursuant to Illinois Rule of Evidence 201, Defendant demands this Court take Mandatory Judicial Notice of the active federal civil rights action, *Allababidi v. Shepherd, et al.*, filed via the United States District Court N.D. Ill. Pro Se Portal on June 6, 2026 (Case Number Pending Assignment). A true and correct copy of the submitted 65-page Federal Complaint, along with its electronic transmission receipt, is attached hereto as **Exhibit B** and incorporated by reference. This Court is now on actual, verified notice that proceeding with this revocation places this tribunal in direct conflict with an active Article III adjudication regarding the constitutionality of this exact warrant. The federal complaint specifically alleges that the May 28, 2026 warrant was procured through a multi-agency retaliatory conspiracy, prosecutorial fabrication of evidence, and the knowing submission of false sworn testimony in violation of *Napue* and the Fourteenth Amendment. This Court cannot adjudicate the validity of the revocation without directly conflicting with the pending federal adjudication of the identical factual predicate. *Colorado River Water Conservation Dist. v. United States*, 424 U.S. 800, 817 (1976) (federal courts have exclusive jurisdiction over federal claims; state courts must defer where parallel federal litigation presents the identical controversy).

IV. THE MATHEMATICAL TIMELINE — RETALIATION AS LOGICAL CERTAINTY

Date	Event	Significance
Dec. 10, 2025	Cook County adjudicates drug test compliant	Amphetamine allegation resolved in Defendant's favor
Apr. 13, 2026	Federal habeas deadline set	State ordered to answer by June 5 in both habeas cases
May 14, 2026	Revocation petition filed	Exactly 31 days after deadline; false drug allegation
May 15—21	Mail spoliation: 7-day transit in 14-day window	Memorial Day compresses response to 3 business days
May 28, 2026	No-bond warrant issued at 9:00 AM	8 days before federal deadline; no PC hearing
June 6, 2026	Two execution attempts (1:03 PM, 5:51 PM)	Doorbell camera confirmed; federal § 1983 filed 6/6/2026

The cumulative weight of this timeline is not circumstantial — it is mathematical. Seven independent state actions, spanning two counties, three agencies, and 185 days of strategic delay, converge on a single operational objective: the physical incarceration of a federal habeas petitioner eight days before the federal court required the State to answer. The statistical probability that this alignment is coincidental is functionally zero.

V. THE JUNE 6, 2026 EXECUTION ATTEMPTS — LIABILITY CREATED

A formal NOTICE OF DEFECTIVE WARRANT was served on June 6, 2026 on the Lincolnshire Police Department, CPD 16th District, Corporation Counsel, and Village Attorney via certified mail, email, and facsimile. That Notice: (a) strips qualified immunity from any officer executing the warrant after receipt (*Malley v. Briggs*, 475 U.S. 335 (1986)); (b) bars municipal indemnification under 745 ILCS 10/2-202 and 10/9-102; (c) invokes the 7th Circuit duty to intervene under *Byrd v. Brishke*, 466 F.2d 6 (7th Cir. 1972); and (d) activates a mandatory litigation hold under Fed. R. Civ. P. 37(e) preserving all dispatch logs, BWC footage, and doorbell camera evidence from the June 6, 2026 visits.

Notice of Paralyzed Enforcement — The Institutional Paradox. This Court is formally notified that on June 6, 2026, the executing agencies (Chicago Police Department 16th District and Lincolnshire Police Department) were served with formal *Malley v. Briggs* liability notices accompanied by the objective, documentary proof of *Napue* perjury. The legal consequence is absolute: the qualified immunity of every officer in the chain of command is permanently destroyed. Municipal indemnification is barred under 745 ILCS 10/2-202 and 745 ILCS 10/9-102. Every officer who executes this warrant faces personal, individual, uninsured liability for all compensatory and punitive damages — with no municipal treasury, no union fund, and no governmental shield to rescue them.

The institutional paradox is now complete. This Court maintains a warrant that its own coordinate law enforcement agencies cannot legally execute without exposing their individual officers to personal financial destruction under 42 U.S.C. § 1983. The warrant's sole remaining function is not law enforcement — it is the denial of Defendant's safe passage to this courthouse to defend against the very revocation the warrant was designed to enforce, and to prevent him from prosecuting his active federal civil rights action (*Allababidi v. Shepherd, et al.*, Exhibit B). The State has constructed a constitutional trap: incarcerate Defendant if he appears, default him if he does not. This Court must dismantle that trap today.

VI. IRREPARABLE HARM

If the warrant is executed: (1) encrypted ESI underpinning the federal RICO action (1:25-cv-15800) is permanently destroyed; (2) Defendant's federal habeas petitions are mooted; (3) the newly-filed § 1983 federal action is impaired; (4) the Seventh Circuit's appellate jurisdiction over Appeal No. 26-2212 (the active appeal) is jeopardized; and (5) Defendant's ability to prosecute the active federal civil rights action (*Allababidi v. Shepherd, et al.*, Exhibit B) is permanently impaired.

Self-Executing Constructive Denial — Formal Judicial Notice of Consequences. This is not a request. It is a mathematical notice. If the Lake County Circuit Clerk refuses to docket this Omnibus Filing, or if this Court fails to transmit the demanded remote hearing link by **4:00 PM on June 8, 2026**, Defendant will certify such refusal directly to the United States District Court for the Northern District of Illinois as the final, irrevocable exhaustion of state remedies. The certification will permanently satisfy the bad-faith and inadequate state forum exceptions to the *Younger* Abstention doctrine under *Gibson v. Berryhill*, 411 U.S. 564, 577 (1973), and *Dombrowski v. Pfister*, 380 U.S. 479, 490 (1965), thereby clearing the path for an immediate federal injunction against this Court's continued enforcement of the constitutionally void warrant. The federal court has already directed Defendant to raise his concerns here first (Exhibit A, Dkt. 25). This filing is that directive's fulfillment. If this Court refuses to act, the federal court will.

VII. PRAYER FOR RELIEF

WHEREFORE, Defendant Ehab Allababidi respectfully demands:

- (1) Quash and vacate the May 28, 2026 no-bond bench warrant immediately as void ab initio under *Napue* and *Franks*;
- (2) Order all law enforcement agencies to cease execution, recall active LEADS/NCIC entries, and return the warrant unexecuted;
- (3) Find that appointed counsel has constructively abandoned Defendant and relieve counsel of any further obligation;
- (4) Conduct an immediate *Faretta* hearing to permit Defendant to proceed pro se, conditional on his continued liberty, with appointment of standby counsel under *McKaskle v. Wiggins*;
- (5) In the event of custodial arrest on this warrant, automatically rescind the *Faretta* waiver and appoint constitutionally effective counsel;
- (6) Dismiss the May 14, 2026 Petition for Revocation with prejudice;

-
- (7) Hold an immediate *Franks* hearing;
 - (8) Issue an order to show cause to ASA Shepherd for presenting sworn falsehoods to this Court;
 - (9) Refer this matter to the appropriate disciplinary authority for investigation of ASA Shepherd's conduct in presenting fabricated evidence to this Court; and
 - (10) Grant such other relief as justice requires.

This Court now faces a binary constitutional imperative. Either this Court quashes the void warrant, conducts the *Faretta* colloquy, and adjudicates the verified *Napue* perjury on the merits — or this Court's refusal to act becomes the final, documented proof that the state forum is constitutionally inadequate, permanently clearing the path for the federal Article III tribunal to exercise the jurisdiction this Court declined. There is no third option. The record is open and the clock is running.

VERIFICATION UNDER 735 ILCS 5/1-109

I, EHAB ALLABABIDI (DOB: September 24, 1996), declare under penalty of perjury under the laws of the State of Illinois pursuant to 735 ILCS 5/1-109 that the facts set forth in the foregoing Omnibus Filing are true and correct based on my personal knowledge, except those matters stated on information and belief, which I believe to be true. I confirm that the June 6, 2026 execution attempts at 1:03 PM and 5:51 PM were recorded on my front doorbell video camera system, and the recordings are preserved for this Court's inspection.

Respectfully submitted,

/s/ Ehab Allababidi

EHAB ALLABABIDI, *Pro Se* Defendant
8516 W. Winona St., Chicago, IL 60656
(773) 920-0030 | defcon5ready@gmail.com
Dated: June 8, 2026

CERTIFICATE OF SERVICE

I, EHAB ALLABABIDI, certify under penalty of perjury that on June 8, 2026, I caused the foregoing OMNIBUS FILING: EMERGENCY NOTICE OF MOTION, SPECIAL APPEARANCE, NOTICE OF CONSTRUCTIVE ABANDONMENT, AND MOTION TO QUASH WARRANT, together with all incorporated Exhibits, to be served upon the following parties.

Pursuant to Illinois Supreme Court Rule 11(c) and the exigent circumstances generated by the active custodial warrant, service was executed concurrently via direct electronic mail and confirmed facsimile transmission to the official operational channels of the recipients listed below:

ASA Nicholas Shepherd

Lake County State's Attorney's Office

Email: nshepherd@lakecountyil.gov

Eric F. Rinehart, State's Attorney

Lake County State's Attorney's Office

Email: statesattorney@lakecountyil.gov

Lake County Public Defender's Office

18 N. County Street, Waukegan, IL 60085

(Notice to appointed counsel; *Cronic* deprivation record)

Village Attorney

Village of Lincolnshire

1 Olde Half Day Road

Lincolnshire, IL 60069

Fax: (847) 883-8608

Corporation Counsel

City of Chicago Department of Law

121 N. LaSalle Street, Room 600

Chicago, IL 60602

Fax: (312) 744-5185

A copy of this Omnibus Filing was concurrently transmitted to the Clerk of the United States District Court for the Northern District of Illinois for integration with the active federal civil rights action (*Allababidi v. Shepherd, et al.*, filed June 6, 2026; Case Number Pending Assignment).

Executed under Illinois Supreme Court Rule 11 and 735 ILCS 5/1-109.

/s/ Ehab Allababidi

EHAB ALLABABIDI, *Pro Se* Defendant

Dated: June 8, 2026

**UNITED STATES DISTRICT COURT
FOR THE Northern District of Illinois – CM/ECF NextGen 1.9 (rev. 1.9)
Eastern Division**

Ehab Allababidi

Plaintiff,

v.

Case No.: 1:26-cv-01077

Honorable John Robert Blakey

Matt Junkin

Defendant.

Exhibit A

NOTIFICATION OF DOCKET ENTRY

This docket entry was made by the Clerk on Friday, May 29, 2026:

MINUTE entry before the Honorable John Robert Blakey: Petitioner filed an "emergency motion for temporary restraining order and preliminary injunction," [16], claiming that Lake County prosecutors are moving to revoke his supervision in retaliation for filing the instant lawsuit; he seeks an order barring the state case from proceeding and also claims he will be unable to defend his case while detained. Initially, detainees traditionally and consistently litigate their cases while in custody, and his claim of being unable to litigate his case while in jail remains frivolous. Moreover, federal courts may generally not interfere with state court proceedings, see *Younger v. Harris*, 401 U.S. 37 (1971). If Petitioner has legitimate concerns about the state case he must raise them with the state court in the first instance. The Court admonishes Plaintiff that he should refrain from filing pleadings beyond his reply in support of the habeas corpus petition without leave of Court. Additionally, the Office of the Illinois Attorney General has filed a notice of non-involvement [12] and no one from the Office of the Lake County State's Attorney has appeared. The Court, on its own motion, extends Respondent's responsive pleading deadline to 7/10/26, and directs the Clerk to mail a copy of this order to Eric F. Rinehart, State's Attorney, Lake County, 18 N. County Street, 3rd Floor, Waukegan, IL 60085. The Clerk shall also email a copy of this order to statesattorney@lakecountyil.gov. Mailed notice. (evw,)

ATTENTION: This notice is being sent pursuant to Rule 77(d) of the Federal Rules of Civil Procedure or Rule 49(c) of the Federal Rules of Criminal Procedure. It was generated by CM/ECF, the automated docketing system used to maintain the civil and criminal dockets of this District. If a minute order or other document is enclosed, please refer to it for additional information.

For scheduled events, motion practices, recent opinions and other information, visit our web site at www.ilnd.uscourts.gov.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

EHAB ALLABABIDI,
Plaintiff, Pro Se,

v.

NICHOLAS SHEPHERD, Assistant State's
Attorney, Lake County;
MARISA CERVANTES, Adult Probation Officer,
Lake County;
DESTINY LEE, Adult Probation Officer,
Cook County;
MARGARET K. FONTANA, Director, Division of
Adult Probation Services, 19th Judicial Circuit
(Lake County);
LAKE COUNTY, ILLINOIS,
COOK COUNTY, ILLINOIS,
Municipal Defendants.

Case No.: 1:26-cv-0 ____

Judge: *(To Be Assigned)*
Magistrate: *(To Be Assigned)*

Exhibit B

JURY TRIAL DEMANDED

**COMPLAINT FOR DEPRIVATION OF CIVIL RIGHTS
UNDER 42 U.S.C. § 1983**

*First Amendment Retaliation | Fourth Amendment Malicious Prosecution
Fourteenth Amendment Due Process (Fabrication of Evidence)
Supervisory Liability | Conspiracy to Deprive Civil Rights
Jury Trial Demanded*

TABLE OF CONTENTS

I. Preliminary Statement
II. Jurisdiction and Venue
III. Exception to the Anti-Injunction Act and the Younger Abstention Doctrine
IV. Parties
V. Factual Allegations
A. The Federal Habeas Deadlines (April 13, 2026)
B. The Retaliatory Petition for Revocation (May 14, 2026)
C. The Anonymous Officer (February 19, 2026)
D. The Mobility Kill (January 14, 2026)
E. The Litigation Hold (May 22, 2026)
F. The 7:00 AM Fraud Notice (May 28, 2026)
G. The Warrant Execution (May 28, 2026)
H. The Post-Warrant Lure (May 29, 2026)
I. The Causal Nexus: AG Withdrawal and Local Retaliation
J. Chronological Timeline of the Conspiracy
VI. Claims for Relief
Count I: First Amendment Retaliation (All Defendants)

Count II: Fourteenth Amendment Due Process (Shepherd)
Count III: Fourth Amendment Malicious Prosecution (Shepherd, Cervantes)
Count IV: Supervisory Liability (Fontana)
Count V: Conspiracy to Deprive Civil Rights (All Defendants)
Count VI: Municipal Liability (Monell) (Lake County, Cook County)

VII. Damages

VIII. Anticipatory Rebuttal of Immunity Defenses

IX. Prayer for Relief

X. Jury Demand

Declaration Under Penalty of Perjury
Certificate of Service
Index of Exhibits

INDEX OF EXHIBITS

The following exhibits are attached hereto and incorporated by reference as though fully set forth herein, pursuant to Fed. R. Civ. P. 10(c) and authenticated under Fed. R. Evid. 902(1), 902(13), and 902(14):

Exhibit 1: Cook County Adult Probation Drug Test Correspondence — Officer Adison Weeks confirmation emails (December 8 and 10, 2025) establishing prescription verification and “all negative” adjudication

Exhibit 2: Petition for Revocation of Probation (May 14, 2026) — filed by ASA Nicholas Shepherd, containing the knowingly false “Amphetamine (illegal substance)” allegation and the Rule 131(b)-violating signature block omitting all contact information

Exhibit 3: Pitney Bowes Envelope with USPS Tracking — forensic timestamps proving the two-stage mail delay (May 15 meter stamp, May 18 USPS intake, May 21 delivery)

Exhibit 4: Formal Memorialization Email (February 19, 2026) — sent to Director Fontana, documenting the anonymous officer call and requesting identification

Exhibit 5: Lake County Court Minute Entry (May 28, 2026) — reflecting Defendant Cervantes’s physical presence at the warrant hearing

Exhibit 6: Warrant of Arrest (May 28, 2026) — commanding all peace officers to arrest Plaintiff and hold without bond

Exhibit 7: Cervantes Post-Warrant Letter (May 29, 2026) — first and only communication from the assigned probation officer, sent one day after the warrant executed

Exhibit 8: Notice of Mandatory Litigation Hold (May 22, 2026) — served on all Defendants, identifying the fabricated drug allegation and forensic spoliation of response time

Exhibit 9: Notice of Special Appearance and Fraud on the Court — filed with the Lake County Circuit Clerk identifying Napue perjury

Exhibit 10: Emergency Email to Circuit Clerk and All Defendants (May 28, 2026, 7:00 AM) — attaching exculpatory evidence and warning that issuing the warrant would constitute federal witness tampering

I. PRELIMINARY STATEMENT

This case exposes a coordinated, multi-agency retaliatory conspiracy to incarcerate a federal civil rights litigant eight days before his federal habeas deadline. The mechanism was surgically precise: a prosecutor who swore under oath that a lawfully prescribed medication was an “illegal substance”; a probation officer who concealed her identity for 100 days to manufacture a fake “failure to report” default; a second probation officer who demanded impossible physical appearances despite documented vehicle sabotage; and a supervisory director who received written notice of the entire scheme and did nothing.

The mathematical timeline is the confession. On April 13, 2026, a federal court set habeas deadlines for June 5, 2026. Exactly thirty-one days later, on May 14, 2026, Defendant Shepherd filed a Petition for Revocation built on a drug allegation that the State’s own coordinate agency had formally adjudicated as compliant five months earlier. The arraignment was scheduled for May 28, 2026 — eight days before the federal deadline. The State’s mailroom then held the notice for 96 hours over Memorial Day weekend, compressing Plaintiff’s window to seek federal emergency intervention to exactly three business days. When Plaintiff sent an Emergency Notice of Fraud on the Court at 7:00 AM on May 28 — two full hours before the warrant hearing — the state court issued a zero-bond bench warrant anyway, without conducting a probable cause hearing, without taking testimony, and without acknowledging the exculpatory evidence served upon it that morning.

This is not a close case. The evidence is not circumstantial. The State’s own written records mathematically disprove the sworn allegation in the Petition for Revocation. The conspiracy is not inferred from parallel conduct — it is demonstrated by cross-jurisdictional data extraction, synchronized court appearances, deliberate mail delays, and a post-warrant lure letter sent the day after the custodial extraction was already consummated. Plaintiff brings this action under 42 U.S.C. § 1983 to obtain declaratory and injunctive relief, compensatory and punitive damages, and to vindicate the constitutional rights that Defendants have conspired to destroy.

II. JURISDICTION AND VENUE

1. This action arises under 42 U.S.C. § 1983 and the First, Fourth, and Fourteenth Amendments to the United States Constitution. This Court has subject-matter jurisdiction under 28 U.S.C. § 1331 (federal question) and 28 U.S.C. § 1343(a)(3) (civil rights).

2. Venue is proper in the Northern District of Illinois, Eastern Division, pursuant to 28 U.S.C. § 1391(b) because all Defendants reside in or committed the acts alleged within this District, and the events giving rise to this action occurred substantially within this District.

3. This Court may award declaratory and injunctive relief under 28 U.S.C. §§ 2201–2202 and Fed. R. Civ. P. 57 and 65. Plaintiff seeks compensatory and punitive damages under 42 U.S.C. § 1983 and Fed. R. Civ. P. 38.

III. EXCEPTION TO THE ANTI-INJUNCTION ACT AND THE YOUNGER ABSTENTION DOCTRINE

4. This Court's exercise of jurisdiction is not barred by the Anti-Injunction Act, 28 U.S.C. § 2283, because 42 U.S.C. § 1983 is an Act of Congress that expressly authorizes federal courts to enjoin unconstitutional proceedings in state courts. *Mitchum v. Foster*, 407 U.S. 225, 243 (1972).

5. This Court's intervention is independently required under the bad-faith, harassment, and extraordinary circumstances exceptions to the Younger abstention doctrine. The state prosecution in Lake County Case No. 23 CF 1146 was brought in bad faith because Defendant Shepherd filed a verified Petition for Revocation containing assertions that are mathematically disproven by the written records of the State's own coordinate agency (Exhibit 1). The prosecution is maintained with no reasonable expectation of obtaining a valid revocation on the merits, but is instead explicitly calculated to serve as an instrument of harassment and a jurisdictional race condition to moot active federal habeas dockets before the June 5, 2026, deadline. *Dombrowski v. Pfister*, 380 U.S. 479, 490 (1965); *Huffman v. Pursue, Ltd.*, 420 U.S. 592, 611 (1975).

6. The state court is incapable of providing an adequate forum for adjudication of Plaintiff's federal constitutional rights because the local state apparatus has actively insulated itself from communication by omitting mandatory contact parameters under Illinois Supreme Court Rule 131(b), executing a zero-bond bench warrant without conducting a minimum probable cause hearing or taking testimony, and issuing the warrant despite having received written notice of the Napue perjury two hours before the hearing (Exhibits 9, 10). *Gibson v. Berryhill*, 411 U.S. 564, 577 (1973).

IV. PARTIES

7. **Plaintiff EHAB ALLABABIDI** (DOB: September 24, 1996) is a natural person residing at 8516 W. Winona St., Chicago, Illinois 60656. Plaintiff is a citizen of the United States and is proceeding pro se. Plaintiff is subject to an active no-bond bench warrant issued in Lake County Case No. 23 CF 1146,

executed on May 28, 2026, at 9:00 AM, by the coordinated actions of the Defendants named herein. Plaintiff challenges the constitutionality of that warrant and the retaliatory scheme that produced it.

8. **Defendant NICHOLAS SHEPHERD** is an Assistant State's Attorney employed by the Lake County State's Attorney's Office, 18 N. County Street, Waukegan, Illinois 60085. Defendant Shepherd is sued in his individual capacity for damages and in his official capacity for prospective declaratory and injunctive relief. He drafted, signed, and filed the May 14, 2026 Petition for Revocation of Probation in Lake County Case No. 23 CF 1146, which contained a sworn, knowingly false allegation that Plaintiff tested positive for an "illegal substance" when Defendant knew the result was attributable to a lawfully prescribed medication. Defendant Shepherd deliberately omitted his phone number and email address from the pleading in violation of Illinois Supreme Court Rule 131(b), blocking Plaintiff from contacting him to present exculpatory evidence before the warrant issued.

9. **Defendant MARISA CERVANTES** is an Adult Probation Officer employed by the Lake County Adult Probation Department. Defendant Cervantes is sued in her individual capacity for damages and in her official capacity for prospective declaratory and injunctive relief. On information and belief, she was the anonymous officer who contacted Plaintiff on February 19, 2026, at approximately 3:00 PM, deliberately refusing to identify herself by name, supervisory authority, or direct contact information. She executed the "Impossibility Trap" by concealing her identity for 100 days and manufacturing a fake "failure to report" default. She physically appeared in Courtroom T-611 on May 28, 2026, alongside ASA Shepherd to ensure the no-bond warrant was issued. She waited until May 29, 2026 — the day after the warrant was signed — to finally email Plaintiff, luring him into a custodial extraction that had already been executed.

10. **Defendant DESTINY LEE** is an Adult Probation Officer employed by the Cook County Adult Probation Department. Defendant Lee is sued in her individual capacity for damages and in her official capacity for prospective declaratory and injunctive relief. On January 30, 2026, she demanded an impossible in-person appearance despite possessing actual, written knowledge of the "Mobility Kill" (the deliberately severed serpentine belt on Plaintiff's vehicle on January 14, 2026, documented as Predicate Act 6 in Case No. 1:25-cv-15800). She participated in the coordinated enforcement scheme to weaponize Plaintiff's physical immobility and manufacture a technical default. She only suspended her threat of immediate violation proceedings after Plaintiff explicitly invoked the pending federal RICO action on the recorded call.

11. **Defendant MARGARET K. FONTANA** is the Director of the Division of Adult Probation Services for the 19th Judicial Circuit (Lake County). Defendant Fontana is sued in her individual capacity for damages and in her official capacity for prospective declaratory and injunctive relief. She was served with the February 19, 2026 Formal Memorialization (Exhibit 4), placing her on actual notice that her probation officer was operating anonymously, had created an “Impossibility Trap”, and was acting in concert with the prosecutor to manufacture a default. Defendant Fontana failed to intervene, failed to identify the officer, and failed to correct the communication blockade, thereby ratifying the constitutional deprivation.

V. FACTUAL ALLEGATIONS

A. The Federal Habeas Deadlines (April 13, 2026)

12. On April 13, 2026, the United States District Court for the Northern District of Illinois entered Minute Orders [Dkt. 11] in two separate federal habeas corpus proceedings: Allababidi v. Junkin, Case No. 1:26-cv-01077 (the Lake County habeas), and Allababidi v. Chief Adult Probation Officer, Case No. 1:25-cv-15181 (the Cook County habeas). Both orders directed the Respondents to “answer or otherwise respond” by June 5, 2026.

13. The Court found that Plaintiff alleged “a cognizable claim for relief” under the Rule 4 standard of *Sanders v. Radtke*, 48 F.4th 502, 509 (7th Cir. 2022). The State was on notice that Plaintiff’s constitutional claims would be adjudicated by a federal court within 53 days.

B. The Retaliatory Petition for Revocation (May 14, 2026)

14. Exactly thirty-one days after the federal habeas deadlines were set, Defendant Shepherd filed a Petition for Revocation of Probation in Lake County Case No. 23 CF 1146, scheduling a mandatory arraignment for May 28, 2026 — exactly eight days before the June 5, 2026 federal response deadline in both habeas cases.

15. The Petition for Revocation alleged that Plaintiff tested positive for “Amphetamine (illegal substance)” on November 10, 2025. This allegation was knowingly false. The Cook County Adult Probation Department — a coordinate agency of the State of Illinois — had already received the identical laboratory result, verified the lawful Adderall prescription, and formally adjudicated the test as compliant on December 10, 2025. Officer Adison Weeks confirmed in writing on December 8, 2025 that Plaintiff’s “drug test results were all negative”, and on December 10, 2025, that “it is all negative in my eyes because I know you are still taking the Adderall.” (See Exhibit 1, attached and incorporated

by reference under Fed. R. Civ. P. 10(c).)

16. Defendant Shepherd's signature block on the Petition for Revocation contains no phone number, no email address, and no office extension — a direct violation of Illinois Supreme Court Rule 131(b). This omission was not inadvertent. It was a calculated communication blockade designed to prevent Plaintiff from contacting the prosecutor to present exculpatory evidence before the warrant could issue. (See Exhibit 2, attached and incorporated by reference under Fed. R. Civ. P. 10(c).)

17. The State's own internal Pitney Bowes postage meter (ZIP 60085) stamped the physical envelope on Friday, May 15, 2026, one day after notarization. However, the envelope was withheld from the USPS Carol Stream processing facility until Monday, May 18, 2026, at 4:00 PM. Delivery was not completed until Thursday, May 21, 2026. In a 14-day procedural window, the State intentionally consumed exactly 50% of the timeline in transit. Because May 25, 2026, is Memorial Day, the 7-day transit delay compressed Plaintiff's operational window to seek federal emergency injunctive relief to exactly three business days. The Pitney Bowes postage meter stamp (May 15) is a government-audited forensic timestamp proving the State held the envelope for at least one full day after notarization before even applying postage. The USPS barcode confirms a second multi-day hold between the Pitney Bowes meter and actual USPS intake. This deliberate two-stage delay is direct evidence of the forum spoliation component of the conspiracy. (See Exhibit 3, attached and incorporated by reference under Fed. R. Civ. P. 10(c).)

C. The Anonymous Officer (February 19, 2026)

18. On February 19, 2026, at approximately 3:00 PM, Plaintiff received a single telephone call from a newly assigned Lake County probation officer who: (a) refused to provide her name; (b) refused to identify her supervising authority; and (c) refused to provide direct contact information. The officer's initial attempt to "command" an in-person appearance on March 10, 2026, was downgraded upon Plaintiff's request for clarification to: "Well, if you are able to make it here on March 10, 2026, I would appreciate it."

19. Plaintiff immediately memorialized this call in a Formal Memorialization email sent to Director Fontana, the Lake County State's Attorney's Office, and the Circuit Clerk. The email states: "Because her identity and direct contact information were not clearly established during the call, Director Fontana is formally requested to forward this communication to her immediately." (See Exhibit 4, attached and incorporated by reference under Fed. R. Civ. P. 10(c).) The State never identified the

officer. She never contacted Plaintiff again.

20. Plaintiff established a Constructive Compliance Window from 12:00 PM to 4:00 PM on March 10, 2026, making himself fully available for a telephonic or video check-in at Plaintiff's verified contact vectors. The State initiated zero calls during this four-hour window. No call logs. No voicemail. No email. No field contact. The State deliberately abandoned its supervisory duty to manufacture the technical default it now prosecutes.

D. The Mobility Kill (January 14, 2026)

21. On January 14, 2026, three hours before an in-person hearing on a RICO-related matter, the serpentine belt of Plaintiff's mother's vehicle — which she was using to drive Plaintiff to court as his sole driver after his license was revoked on October 3, 2025 — was deliberately severed. This sabotage is documented as Predicate Act 6 in *Allababidi v. Advocate Health, et al.*, N.D. Ill. Case No. 1:25-cv-15800, Dkt. 21. The cut was a clean 90-degree blade cut with no fraying, no tensile deformation, and zero dry rot. The repair cost was \$2,850.00.

22. Defendant Lee possessed actual, written knowledge of this sabotage yet demanded an in-person appearance on January 30, 2026, under threat of immediate violation proceedings. She only suspended the threat after Plaintiff invoked the pending federal RICO action. Defendant Cervantes and Defendant Shepherd also possessed actual knowledge via the February 19, 2026 Formal Memorialization, which documented the vehicle sabotage and Plaintiff's physical inability to travel to Waukegan.

E. The Litigation Hold (May 22, 2026)

23. On May 22, 2026, Plaintiff served a Notice of Mandatory Litigation Hold (Exhibit 8, attached and incorporated by reference under Fed. R. Civ. P. 10(c)) on the Lake County State's Attorney's Office, ASA Shepherd, and all Defendants. The Litigation Hold explicitly identified the fabricated drug allegation, the anonymous officer's identity concealment, the deliberate omission of contact information, and the forensic spoliation of Plaintiff's response time. All Defendants had actual, written notice of the constitutional violations six days before the warrant executed. The Litigation Hold specifically demanded that all Defendants: (a) preserve all electronic communications, phone records, text messages, and emails relating to the probation supervision of Plaintiff; (b) preserve all internal memoranda, case notes, and supervisory directives relating to Case No. 23 CF 1146; (c) refrain from destroying, altering, or concealing any records subject to the litigation hold; and (d) immediately cease all retaliatory enforcement actions pending federal adjudication. No Defendant responded to the

Litigation Hold. No Defendant acknowledged receipt. No Defendant withdrew or modified the Petition for Revocation despite having six full days of actual notice that its central factual allegation was demonstrably false.

F. The 7:00 AM Fraud Notice (May 28, 2026)

24. At 7:00 AM on May 28, 2026 — two full hours before the 9:00 AM warrant hearing — Plaintiff sent an Emergency Special Appearance and formal Notice of Fraud on the Court (Exhibit 10) via email to the Lake County Circuit Clerk, ASA Shepherd, the Lake County State’s Attorney’s Office, and the DOJ Public Integrity Section, with copies to Defendants Lee and Fontana. The email identified the Napue perjury, attached the exculpatory evidence (Exhibit 1), notified the court of pending federal proceedings, and warned that issuing a warrant would constitute participation in a federal witness tampering conspiracy. The email attached the Notice of Special Appearance (Exhibit 9), the Litigation Hold (Exhibit 8), and other exhibits. Every Defendant had the exculpatory evidence in their possession before the warrant hearing.

G. The Warrant Execution (May 28, 2026)

25. At 9:00 AM on May 28, 2026, the Lake County Circuit Court (Hon. Christopher Stride, Courtroom T-611) executed a no-bond bench warrant against Plaintiff. The court docket reflects Defendant Cervantes was physically present. (See Exhibit 5.) The full Warrant of Arrest (Exhibit 6) commands all peace officers of Illinois to arrest Plaintiff and hold him in custody without bond.

26. The warrant was issued without a probable cause hearing, without taking testimony, and without any adjudication of the merits. The state court issued the warrant despite having received the Notice of Special Appearance (Exhibit 9) two hours earlier, which explicitly identified the Napue perjury and warned that issuing a warrant would constitute participation in federal witness tampering.

27. Defendant Cervantes waited until May 29, 2026 — the day after the warrant was signed and executed — to send her first and only communication to Plaintiff — a letter urging him to “turn yourself in to the Lake County Jail” (Exhibit 7). After concealing her identity and contact information for 100 days, Defendant Cervantes finally revealed her email address (mcervantes@lakecountyil.gov) and phone number (847-377-3614) only after the warrant was already executed, in a transparent effort to lure Plaintiff into the custodial extraction that had already been consummated. The letter states: “You failed to appear in court on 5/28/2026 and a warrant was issued for your arrest. I encourage you to turn yourself in to the Lake County Jail to resolve this warrant immediately.”

H. The Causal Nexus: Attorney General Withdrawal and Local Retaliation

28. Following the April 13, 2026 habeas deadline orders, the Illinois Attorney General’s Office filed a “Notice of Non-Involvement” on April 28, 2026, offloading the defense burden onto local Respondents.

29. In response, Plaintiff activated federal service machinery under Fed. R. Civ. P. 4(c)(3). Stripped of the Attorney General’s protection, the local Defendants could not defend the state court record by June 5, 2026. Consequently, they conspired to physically incarcerate Plaintiff on May 28 to moot the federal court’s jurisdiction before the federal clock expired.

J. Chronological Timeline of the Conspiracy

30. The following chronological timeline demonstrates the mathematically impossible alignment of dates that conclusively establishes the retaliatory nature of Defendants’ conduct:

Date	Event	Significance
Oct. 3, 2025	License revoked	Plaintiff dependent on family for transport
Nov. 10, 2025	Drug test administered	Amphetamine detected (lawful Adderall Rx)
Dec. 8–10, 2025	Cook County clears test	Officer Weeks: “all negative” (Exhibit 1)
Jan. 14, 2026	Mobility Kill	Serpentine belt severed; \$2,850 repair (Predicate Act 6)
Jan. 30, 2026	Lee demands appearance	Despite written knowledge of vehicle sabotage
Feb. 19, 2026	Anonymous officer call	Refuses name, authority, contact info (Exhibit 4)
Mar. 10, 2026	Compliance Window	Plaintiff available 12–4 PM; zero State contact
Apr. 13, 2026	Federal habeas deadline set	June 5, 2026 response date in both habeas cases
Apr. 28, 2026	AG files Non-Involvement	Local Defendants left unprotected
May 14, 2026	Revocation petition filed	31 days after deadline; false drug allegation
May 15, 2026	Pitney Bowes meter stamp	Envelope held 1+ day before postage applied
May 18, 2026	USPS intake	3-day hold between meter and USPS
May 21, 2026	Delivery to Plaintiff	50% of procedural window consumed in transit
May 22, 2026	Litigation Hold served	All Defendants on actual notice (Exhibit 8)
May 25, 2026	Memorial Day	Business days further compressed
May 28, 2026	7:00 AM: Fraud Notice sent	Exculpatory evidence served 2 hrs before hearing
May 28, 2026	9:00 AM: Warrant executed	8 days before June 5 federal deadline
May 29, 2026	Cervantes lure letter	First contact after 100 days of concealment (Exhibit 7)

VI. CLAIMS FOR RELIEF

COUNT I: FIRST AMENDMENT RETALIATION

(Brought Against All Defendants in Their Individual Capacities Under 42 U.S.C. § 1983)

31. Plaintiff repeats and re-alleges each and every allegation set forth in paragraphs 1 through 30 as if fully set forth herein.

32. The First Amendment, made applicable to the states through the Fourteenth Amendment, protects the right of individuals to petition the government for redress of grievances, including the right of access to the courts and the right to prosecute federal civil rights litigation without state-sponsored retaliation. *California Motor Transport Co. v. Trucking Unlimited*, 404 U.S. 508, 510 (1972); *Bill Johnson's Restaurants, Inc. v. NLRB*, 461 U.S. 731, 741 (1983). The elements of a First Amendment retaliation claim under § 1983 are: (1) the Plaintiff engaged in constitutionally protected speech or conduct; (2) the Defendant took adverse action against the Plaintiff that would deter a person of ordinary firmness from engaging in protected speech; and (3) the protected speech was a motivating factor in the Defendant's adverse action. *Bridges v. Gilbert*, 557 F.3d 541, 546 (7th Cir. 2009); *Woodruff v. Mason*, 542 F.3d 545, 551 (7th Cir. 2008).

33. **Protected Activity:** Plaintiff engaged in constitutionally protected activity by: (a) filing multiple federal habeas corpus petitions (Case Nos. 1:26-cv-01077 and 1:25-cv-15181) challenging the constitutionality of his state conviction; (b) filing a Civil RICO action (Case No. 1:25-cv-15800) alleging a multi-year criminal enterprise by state actors; and (c) serving federal process upon the local Defendants under Fed. R. Civ. P. 4(c)(3), compelling them to answer before a federal court. Each of these activities is protected by the Petition Clause of the First Amendment.

34. **Adverse Actions:** Defendants took the following adverse actions that would deter a person of ordinary firmness from continuing to exercise his First Amendment right to petition the federal courts: (a) Defendant Shepherd filed a Petition for Revocation containing a knowingly false drug allegation and scheduled the arraignment exactly eight days before the federal habeas deadline (Exhibits 1–2); (b) Defendant Cervantes concealed her identity for 100 days to manufacture a fake “failure to report” default, then appeared in court on May 28, 2026, to ensure the warrant issued (Exhibits 4–7); (c) Defendant Lee demanded impossible in-person appearances despite actual knowledge of the Mobility Kill; (d) Defendant Fontana, having received actual notice via the February 19, 2026 Formal Memorialization, failed to intervene, train, supervise, or correct the retaliatory scheme (Exhibit 4); and (e) all Defendants, acting in concert, executed a custodial extraction designed to permanently sever Plaintiff's access to federal litigation infrastructure.

35. **Causal Nexus:** The adverse actions were motivated by Plaintiff's protected activity. The mathematical timeline is dispositive: (a) April 13, 2026 — federal habeas deadlines set; (b) May 14, 2026 — exactly 31 days later, the revocation petition was filed; (c) May 28, 2026 — arraignment set exactly 8 days before the June 5 federal deadline; (d) the petition contained a knowingly false allegation (Exhibits 1–2); (e) the mail was deliberately delayed to consume 50% of the response window (Exhibit 3); (f) Defendant Fontana received actual notice of the anonymous officer scheme (Exhibit 4) and did nothing; and (g) the warrant was executed on May 28, 2026, at 9:00 AM, with Defendant Cervantes physically present (Exhibits 5–6). The statistical probability that this alignment is coincidental is functionally zero.

36. The adverse action — a custodial extraction eight days before a federal response deadline — would deter a person of ordinary firmness from continuing to exercise his First Amendment right to petition the federal courts. *Collins v. County of Kendall*, 807 F.2d 95, 98 (7th Cir. 1986) (bad-faith prosecution brought for harassment constitutes irreparable harm). Plaintiff has been subjected to an active no-bond arrest warrant and faces imminent incarceration directly resulting from Defendants' retaliatory scheme.

COUNT II: FOURTEENTH AMENDMENT DUE PROCESS

(Fabrication of Evidence in Violation of Napue v. Illinois; Brought Against Defendant Shepherd in His Individual Capacity Under 42 U.S.C. § 1983)

37. Plaintiff repeats and re-alleges paragraphs 1 through 36 as if fully set forth herein.

38. The knowing presentation of false evidence to a court violates the Due Process Clause. *Napue v. Illinois*, 360 U.S. 264, 269 (1959) (“[A] conviction obtained through use of false evidence, known to be such by representatives of the State, must fall under the Fourteenth Amendment.”); *Miller v. Pate*, 386 U.S. 1, 6–7 (1967); *Whitlock v. Brueggemann*, 682 F.3d 567, 580 (7th Cir. 2012).

39. The right to be free from prosecution based on fabricated evidence applies not only at trial but at every stage of a criminal or quasi-criminal proceeding, including probable cause determinations for arrest warrants and probation revocation proceedings. *Franks v. Delaware*, 438 U.S. 154, 155–56 (1978) (“[A] warrant based on a false statement knowingly and intentionally made must be voided.”); *Black v. City of Milwaukee*, 2016 WL 7034014, at *4 (E.D. Wis. Dec. 1, 2016).

40. Defendant Shepherd knowingly, intentionally, and with reckless disregard for the truth included in a sworn Petition for Revocation the false statement that Plaintiff tested positive for “Amphetamine (illegal substance)” on November 10, 2025. At the time Defendant Shepherd signed, notarized, and

filed the Petition, he knew or should have known that: (a) the Cook County Adult Probation Department had received the identical laboratory result; (b) the Cook County Adult Probation Department had verified the lawful Adderall prescription; (c) the Cook County Adult Probation Department had formally adjudicated the test as compliant on December 10, 2025; and (d) Officer Adison Weeks had confirmed in writing that the result was “all negative” and attributable to a lawfully prescribed medication. (See Exhibit 1.)

41. The 185-day delay between the November 10, 2025 drug test and the May 14, 2026 Petition for Revocation is independently dispositive of retaliatory intent. Adderall (mixed amphetamine salts) has a plasma half-life of approximately 10–13 hours, meaning the substance is pharmacologically eliminated from the body within 72 hours of administration. If Defendant Shepherd genuinely believed Plaintiff was using illegal amphetamines, immediate enforcement action would have been warranted. Instead, Defendant Shepherd waited 185 days — allowing Plaintiff to file federal habeas petitions, activate RICO litigation, and serve federal process — before deploying the stale test result as a pretext for incarceration. The 185-day delay is not consistent with legitimate law enforcement; it is consistent with waiting until the federal deadline created an operationally useful window for custodial extraction.

42. The false allegation was material to the warrant determination. The Petition for Revocation relied on the drug allegation as independent grounds for revocation. Removing the false allegation would have substantially reduced the probability that a neutral judicial officer would have found probable cause to issue a no-bond arrest warrant. The remaining allegations in the Petition — the manufactured “failure to report” default created by Defendant Cervantes’s 100-day identity concealment — are themselves constitutionally infirm because they were produced by the very conspiracy alleged herein. Without the fabricated drug allegation and without the manufactured default, there was no lawful basis for the warrant.

43. As a direct and proximate result of Defendant Shepherd’s fabrication of evidence, Plaintiff has suffered: (a) the issuance and execution of a no-bond arrest warrant; (b) the deprivation of his liberty interest in remaining free from custodial detention; (c) the deprivation of his right to access the federal courts; (d) severe emotional distress; and (e) damage to his reputation and standing in the community.

COUNT III: FOURTH AMENDMENT MALICIOUS PROSECUTION

(Unreasonable Seizure / Wrongful Legal Process; Brought Against Defendants Shepherd and Cervantes in Their Individual Capacities Under 42 U.S.C. § 1983)

44. Defendants Shepherd and Cervantes, acting under color of state law, commenced and continued a quasi-criminal judicial proceeding against Plaintiff by filing the May 14, 2026 Petition for Revocation of Probation in Lake County Case No. 23 CF 1146 and securing the issuance of an active, no-bond arrest warrant commanding all peace officers of the State of Illinois to seize Plaintiff's person and hold him in custody. Under *Thompson v. Clark*, 142 S. Ct. 1332, 1337 (2022), a Fourth Amendment seizure occurs when the government initiates legal process that restrains the plaintiff's liberty, including the issuance of an arrest warrant that restricts freedom of movement and subjects the individual to the threat of imminent custodial detention. The active, zero-bond bench warrant in this case constitutes a seizure within the meaning of the Fourth Amendment.

45. Defendants acted entirely without probable cause. The sole factual predicate was a test result that a coordinate state agency had adjudicated as negative and lawful five months prior (Exhibit 1).

46. Defendants acted with objective malice, as demonstrated by the deliberate calculation of the temporal sequence: (a) waiting 185 days after the November 10, 2025, test to file the revocation petition; (b) suppressing the exculpatory coordination record from Cook County Adult Probation; (c) omitting all direct contact fields from the petition to enforce a communication blockade in violation of Illinois Supreme Court Rule 131(b); and (d) delaying mail transit by 96 hours to exhaust Plaintiff's window to seek federal emergency intervention. A reasonable prosecutor in Defendant Shepherd's position, possessing the exculpatory Cook County adjudication, would not have initiated the revocation proceeding. *Whren v. United States*, 517 U.S. 806, 813 (1996); *Gerstein v. Pugh*, 420 U.S. 103, 111–14 (1975).

47. Defendant Cervantes actively participated in the malicious prosecution by: (a) concealing her identity for 100 days to manufacture a fake failure-to-report default; (b) appearing physically in Courtroom T-611 on May 28, 2026, alongside Defendant Shepherd to ensure the warrant issued; and (c) waiting until May 29, 2026 — the day after the warrant was executed — to send her first and only communication to Plaintiff, a transparent effort to lure him into the already-consummated custodial extraction.

48. As a direct and proximate result of the fraudulent commencement of legal process, Plaintiff has suffered a severe deprivation of liberty consistent with a Fourth Amendment seizure, specifically: the issuance of an active, zero-bond arrest warrant commanding all peace officers in Illinois to seize his person; the restriction of his freedom of movement; the targeted deployment of local law enforcement

assets to execute a custodial extraction; and the total disruption of his liberty interest in remaining free from unconstitutional state detention. *Manuel v. City of Joliet*, 580 U.S. 357, 367 (2017) (Fourth Amendment governs claims for pretrial detention without probable cause).

49. The fraudulent legal process was void ab initio due to fabricated evidence, terminating in Plaintiff's favor under *Thompson v. Clark*, 142 S. Ct. at 1341. Alternatively, even if the revocation petition remains technically pending on the state docket, the active zero-bond warrant constitutes an ongoing, unlawful pretrial seizure pursuant to wrongful legal process that violates the Fourth Amendment independently of a final merits adjudication. The warrant itself was procured entirely through verified fraud on the court, lacks any valid probable cause foundation, and operates as an immediate, functional deprivation of Plaintiff's liberty. *Heck v. Humphrey*, 512 U.S. 477, 484 n.2 (1994) (a § 1983 claim for unreasonable seizure pursuant to legal process accrues when the seizure occurs, regardless of the outcome of the underlying prosecution). *Wallace v. Kato*, 549 U.S. 384, 390 (2007).

COUNT IV: SUPERVISORY LIABILITY

(Brought Against Defendant Fontana in Her Individual Capacity Under 42 U.S.C. § 1983)

50. Plaintiff repeats and re-alleges paragraphs 1 through 49 as if fully set forth herein.

51. Defendant Fontana had actual notice on February 19, 2026, that her subordinate was operating anonymously, had severed communication, and was manufacturing a technical default (Exhibit 4). She failed to identify the officer, initiate any contacts, train or supervise, or prevent the retaliatory revocation. Supervisory liability attaches in the Seventh Circuit when an official knows about unconstitutional conduct and facilitates it, approves it, condones it, or turns a blind eye for fear of what they might see. *Kemp v. Liebel*, 877 F.3d 346, 351 (7th Cir. 2017); *Jones v. City of Chicago*, 856 F.2d 985, 992 (7th Cir. 1988). But for her deliberate inaction and ratification, the manufactured defaults would not have existed.

52. Defendant Fontana failed to take any action: (a) she did not identify the anonymous officer; (b) she did not instruct her to use Plaintiff's verified contact vectors; (c) she did not initiate any field contacts, home visits, or telephonic check-ins during the 60-day period before the revocation petition was filed; (d) she did not train or supervise the officer to ensure compliance with constitutional requirements; and (e) she did not intervene to prevent the filing of the retaliatory revocation petition.

COUNT V: CONSPIRACY TO DEPRIVE CIVIL RIGHTS

(Brought Against All Defendants in Their Individual Capacities Under 42 U.S.C. § 1983)

53. Plaintiff repeats and re-alleges paragraphs 1 through 52 as if fully set forth herein.

54. Defendants, acting under color of state law, reached an explicit agreement, meeting of the minds, and operational understanding to deprive Plaintiff of his clearly established constitutional rights, including his First Amendment right of access to the courts, his Fourth Amendment right to be free from unreasonable seizure pursuant to wrongful legal process, and his Fourteenth Amendment right to be free from prosecutions initiated via fabricated evidence. *Daugherty v. Page*, 906 F.3d 606, 614 (7th Cir. 2018).

55. The existence of this conspiracy is not based on speculative inference but is conclusively demonstrated by highly interdependent, cross-jurisdictional actions requiring active communication, joint coordination, and tactical synchronization between separate county agencies:

- (a) The Data-Bridge Hand-off: On information and belief, Defendant Lee and Cook County Adult Probation agents extracted the raw November 10, 2025, chemical data from the shared LEADS/probation network, intentionally stripped the accompanying December 10, 2025, exculpatory compliance adjudication and prescription verification records, and transmitted the isolated, un-contextualized data-packet to Defendant Shepherd and Defendant Cervantes to weaponize it as a pretextual charging asset in Lake County. This cross-jurisdictional data extraction and selective suppression of exculpatory context is the mechanism by which the false amphetamine allegation came to appear in the May 14 Petition.
- (b) Cervantes concealed her identity for 100 days, manufacturing a default, while Lee demanded impossible appearances to compound the record of noncompliance.
- (c) Shepherd drafted a revocation petition with a knowingly false drug allegation and omitted his contact information to block exculpatory communication.
- (d) The Coordinated Court Appearance: Defendant Cervantes and Defendant Shepherd synchronized their physical presence in Courtroom T-611 at 9:00 AM on May 28, 2026, acting in concert to suppress the fact that Plaintiff had served an Emergency Notice of Fraud on the Court at 7:00 AM that morning, thereby ensuring the immediate issuance of a zero-bond warrant through the mutual presentation of falsified facts and the concealment of the exculpatory record served two hours earlier.
- (e) Fontana received actual notice and took no corrective action, ratifying the conspiracy.

(f) The State's mailroom delayed the envelope 96 hours to compress Plaintiff's response window over Memorial Day.

(g) Cervantes waited until May 29 to send her first communication, a post-warrant letter urging Plaintiff to "turn yourself in".

56. These overt acts directly caused Plaintiff's constitutional injuries.

COUNT VI: MUNICIPAL LIABILITY (MONELL POLICY, CUSTOM, AND PRACTICE)

(Brought Against Lake County, Illinois, and Cook County, Illinois Under 42 U.S.C. § 1983)

57. Plaintiff repeats and re-alleges paragraphs 1 through 56 as if fully set forth herein.

58. The constitutional violations described herein were caused by the official policies, widespread customs, and systemic practices of Lake County and Cook County, acting through their respective Adult Probation Departments and State's Attorney's Offices.

59. **Failure to Train/Supervise:** Lake County failed to train its Adult Probation Officers on the basic constitutional requirements of transparency, notification, and the prohibition against retaliatory enforcement. This failure to train was a moving force behind the anonymous officer's 100-day concealment and the subsequent manufacture of a technical default (Exhibit 4).

60. **Widespread Custom of Retaliation:** The use of "Impossibility Traps" (demanding impossible physical appearances despite actual notice of vehicle sabotage) and forensic spoliation of mail (the Pitney Bowes/USPS mail delay) represents a widespread, well-settled custom of the Lake County Division of Adult Probation Services, which was known to, or should have been known to, policy-making officials (Exhibit 3).

61. **Systemic Ratification:** Director Fontana, as the final policymaker for Lake County Adult Probation, had actual notice of the anonymous officer scheme on February 19, 2026, and the Napue perjury on May 28, 2026 (Exhibits 4, 10). Her failure to intervene and her subsequent ratification of the retaliatory warrant execution constitutes an official policy of deliberate indifference to the constitutional rights of probationers.

62. **Data-Bridge Policy:** The cross-jurisdictional extraction and transmission of un-contextualized chemical data between Cook County and Lake County is a result of a formalized, deficient inter-agency data sharing practice that creates a "trap" for the accused by suppressing exculpatory adjudication

records. This policy is the moving force behind the Napue fabrication (Exhibit 1).

VII. DAMAGES

63. Plaintiff repeats and incorporates by reference paragraphs 1 through 62.

64. As a direct and proximate result of Defendants' unconstitutional conduct, Plaintiff has suffered and continues to suffer the following damages:

(a) **Deprivation of Liberty:** Plaintiff is subject to an active no-bond arrest warrant and faces imminent incarceration as a direct result of Defendants' retaliatory and false-evidence scheme.

(b) **Deprivation of Access to Courts:** Plaintiff's ability to prosecute multiple pending federal actions—including habeas corpus petitions, a Civil RICO action, and an interlocutory appeal before the Seventh Circuit—has been severely impaired by the threatened and executed custodial extraction.

(c) **Emotional Distress:** Plaintiff has suffered severe emotional distress, anxiety, and psychological harm as a result of the retaliatory prosecution, the false accusation of illegal drug use, the active arrest warrant, and the imminent threat of custodial detention.

(d) **Reputational Harm:** The false accusation of "illegal substance" use, sworn under oath and filed in a public court record, has damaged Plaintiff's reputation in the community, among his professional contacts, and before the federal courts in which he appears.

(e) **Loss of Evidence:** The custodial extraction threatens the permanent destruction of encrypted digital evidence central to Plaintiff's Civil RICO action (Case No. 1:25-cv-15800) and his Tencent cyber-intrusion action (Case No. 1:26-cv-03204, CFAA/DTSA). This evidence, if destroyed, constitutes irreparable harm that no monetary award can remedy.

(f) **Costs and Attorneys' Fees:** Plaintiff is entitled to reasonable costs and attorneys' fees under 42 U.S.C. § 1988.

(g) **Vehicle Repair Costs:** The Mobility Kill (Predicate Act 6) resulted in \$2,850.00 in documented vehicle repair costs. This sabotage was a precondition to the manufactured "failure to report" default that Defendants Cervantes and Lee weaponized to compound the revocation petition. These costs are directly traceable to the retaliatory scheme and are recoverable as consequential damages.

(h) **Lost Employment and Economic Harm:** The active no-bond arrest warrant has prevented Plaintiff from maintaining normal employment, conducting business activities, and traveling freely within the state. The stigma of the false drug accusation, filed as a sworn public record, has created ongoing economic harm that will continue until the unconstitutional warrant is vacated.

(i) **Interference with Federal Litigation:** Defendants' retaliatory scheme has directly interfered with Plaintiff's ability to prosecute the following federal actions: *Allababidi v. Junkin*, Case No. 1:26-cv-01077 (Lake County habeas); *Allababidi v. Chief Adult Probation Officer*, Case No. 1:25-cv-15181 (Cook County habeas); *Allababidi v. Advocate Health, et al.*, Case No. 1:25-cv-15800 (Civil RICO); and *Allababidi v. Tencent Cloud LLC, et al.*, Case No. 1:26-cv-03204 (CFAA/DTSA cyber-intrusion action). The custodial extraction was designed to sever Plaintiff's access to his litigation infrastructure, destroy encrypted digital evidence, and create a jurisdictional *fait accompli* before the federal courts could act.

VIII. ANTICIPATORY REBUTTAL OF IMMUNITY DEFENSES

65. Plaintiff anticipates immunity defenses and affirmatively pleads:

A. Defendant Shepherd — No Absolute Prosecutorial Immunity. While prosecutors generally enjoy absolute immunity from § 1983 damages for conduct within the scope of their prosecutorial functions, *Imbler v. Pachtman*, 424 U.S. 409, 430–31 (1976), that immunity does not apply where the prosecutor acts as a complaining witness, performs investigatory or administrative functions, or knowingly fabricates evidence. *Rehberg v. Paulk*, 566 U.S. 356, 369 (2012) (absolute immunity does not extend to acts outside the scope of legitimate advocacy, “such as fabricating evidence”). *Buckley v. Fitzsimmons*, 509 U.S. 259, 273 (1993) (prosecutors receive only qualified immunity when acting in an investigatory capacity or performing administrative duties). Defendant Shepherd is not entitled to absolute immunity because he functioned as an administrative verifier or complaining witness when he attested to the factual falsity of the chemical test results despite having constructive possession of the coordinate agency records that disproved his allegation. *Kalina v. Fletcher*, 522 U.S. 118, 129 (1997) (a prosecutor acts as a complaining witness when personally attesting to the truth of factual statements in a charging document, and receives only qualified immunity for that function). The signature block on the Petition for Revocation does not merely initiate proceedings—it attests under penalty of perjury to a specific factual proposition (“Amphetamine (illegal substance)”) that is mathematically false. By knowingly including a false allegation of illegal drug use in a sworn Petition for Revocation, Defendant Shepherd

stepped outside the scope of legitimate advocacy and forfeited any claim to absolute immunity. The fabrication of evidence is not a prosecutorial function—it is a constitutional tort.

B. Defendants Cervantes, Lee, and Fontana — No Qualified Immunity. Qualified immunity protects government officials only where their conduct does not violate clearly established statutory or constitutional rights of which a reasonable person would have known. *Harlow v. Fitzgerald*, 457 U.S. 800, 818 (1982). The right to be free from retaliatory prosecution based on fabricated evidence was clearly established long before 2026. *Napue v. Illinois*, 360 U.S. 264, 269 (1959); *Franks v. Delaware*, 438 U.S. 154, 155–56 (1978); *Whitlock v. Brueggemann*, 682 F.3d 567, 580 (7th Cir. 2012).

No reasonable probation officer could believe that the following conduct was lawful: (a) Defendant Cervantes — concealing her identity for 100 days to manufacture a technical default while simultaneously coordinating with the prosecutor to schedule the warrant hearing eight days before the federal deadline; (b) Defendant Lee — demanding impossible in-person appearances despite documented vehicle sabotage and then transmitting un-contextualized drug test data to Lake County through the cross-jurisdictional data-bridge while suppressing the exculpatory compliance adjudication; (c) Defendant Fontana — receiving actual, written notice of the anonymous officer scheme, the Impossibility Trap, and the manufactured default, and taking zero corrective action over a 98-day period from February 19 through May 28, 2026. Each Defendant’s conduct independently satisfies both prongs of the qualified immunity analysis: the conduct violated clearly established law, and no reasonable official could have believed the conduct was lawful.

C. The Joint Action Doctrine. Even if Defendant Cervantes were acting within her official duties, she abandoned her neutral role and conspired with Defendant Shepherd to manufacture a default and execute a retaliatory arrest. Under the joint action doctrine, a state official who willfully participates in a joint conspiracy with another state actor to deprive a person of constitutional rights acts under color of state law for purposes of § 1983 regardless of whether the specific act falls within the official’s formal job description. *Lugar v. Edmondson Oil Co.*, 457 U.S. 922, 942 (1982); *Dennis v. Sparks*, 449 U.S. 24, 27–28 (1980) (private persons who jointly engage with state officials in a conspiracy to deprive constitutional rights act under color of law). The coordinated court appearance on May 28, 2026, where both Defendant Cervantes and Defendant Shepherd were physically present in Courtroom T-611 to suppress the 7:00 AM fraud notice and ensure the warrant issued, is direct evidence of joint action.

IX. PRAYER FOR RELIEF

WHEREFORE, Plaintiff Ehab Allababidi respectfully requests that this Court:

A. Declaratory Relief

(1) Enter a declaratory judgment under 28 U.S.C. §§ 2201–2202 declaring that Defendants’ conduct, as alleged herein, violated Plaintiff’s rights under the First, Fourth, and Fourteenth Amendments to the United States Constitution.

(2) Declare that the May 14, 2026 Petition for Revocation and the May 28, 2026 arrest warrant issued in Lake County Case No. 23 CF 1146 are void ab initio as products of unconstitutional conduct, including the knowing submission of fabricated evidence in violation of *Napue v. Illinois*.

B. Injunctive Relief (Pursuant to *Ex Parte Young*)

(3) Issue a permanent injunction enjoining Defendants Nicholas Shepherd, Marisa Cervantes, Destiny Lee, and Margaret K. Fontana, in their official capacities, along with their subordinates, deputies, and any peace officers acting under their direct instruction or in concert with them, from taking any affirmative action to execute, enforce, or process the arrest warrant issued on May 28, 2026, in Lake County Case No. 23 CF 1146.

(4) Issue a mandatory injunction ordering Defendants Shepherd and Cervantes to take all necessary administrative steps within their personal authority to formally move the Circuit Court of Lake County to withdraw the facially fraudulent May 14, 2026 Petition for Revocation of Probation in Case No. 23 CF 1146 and to dismiss with prejudice all revocation proceedings arising therefrom.

(5) Order Defendant Fontana to implement mandatory training on constitutional requirements for probation supervision, including the duty to identify supervising officers, the prohibition against retaliatory enforcement actions, and the requirement to accept and respond to documented Constructive Compliance Window submissions.

C. Compensatory Damages

(6) Award Plaintiff compensatory damages against each Defendant, jointly and severally, in an amount to be determined at trial for the deprivation of his constitutional rights, emotional distress, reputational harm, and loss of liberty, together with pre-judgment and post-judgment interest.

D. Punitive Damages

(7) Award Plaintiff punitive damages against each Defendant, jointly and severally, in an amount sufficient to deter future unconstitutional conduct, given that Defendants' actions were motivated by an evil motive or intent or involved reckless or callous indifference to Plaintiff's federally protected rights. *Smith v. Wade*, 461 U.S. 30, 56 (1983).

E. Attorneys' Fees and Costs

(8) Award Plaintiff his reasonable costs and attorneys' fees under 42 U.S.C. § 1988, and any other applicable fee-shifting statute.

F. Such Other Relief

(9) Grant such other and further relief as this Court deems just, proper, and necessary to remedy the constitutional violations alleged herein.

X. JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable, pursuant to Fed. R. Civ. P. 38(b).

DECLARATION UNDER PENALTY OF PERJURY (28 U.S.C. § 1746)

I, EHAB ALLABABIDI (DOB: September 24, 1996), declare under penalty of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746 that the facts set forth in the foregoing Complaint are true and correct based on my personal knowledge, except those matters stated on information and belief, which I believe to be true.

I further declare that the exhibits referenced herein and incorporated by reference under Fed. R. Civ. P. 10(c) are true and correct copies of the originals, authenticated under Fed. R. Evid. 902(1), 902(13), and 902(14).

Respectfully submitted,

/s/ Ehab Allababidi

EHAB ALLABABIDI, *Pro Se* Plaintiff
8516 W. Winona St., Chicago, IL 60656
(773) 920-0030 | defcon5ready@gmail.com
Dated: June 6, 2026

CERTIFICATE OF SERVICE

I, EHAB ALLABABIDI, certify under penalty of perjury that on the date set forth above, I caused the foregoing COMPLAINT FOR DEPRIVATION OF CIVIL RIGHTS UNDER 42 U.S.C. § 1983, together with the exhibits incorporated herein by reference, to be filed with the Clerk of the United States District Court for the Northern District of Illinois via the N.D. Illinois Pro Se filing portal, which transmits electronic notice to all parties upon appearance. Executed under Fed. R. Civ. P. 5(b)(2)(E) and N.D. Ill. Local Rule 5.9.

A copy of this Complaint has been served upon each Defendant via certified mail, return receipt requested, at the following addresses:

ASA Nicholas Shepherd

Lake County State's Attorney's Office
18 N. County Street, Waukegan, IL 60085

Marisa Cervantes

Lake County Adult Probation Department
18 N. County Street, Waukegan, IL 60085

Destiny Lee

Cook County Adult Probation Department
2121 Euclid Ave., Rolling Meadows, IL 60008

Margaret K. Fontana, Director

Division of Adult Probation Services
19th Judicial Circuit, 215 W. Water Street
Waukegan, IL 60085

Lake County, Illinois

c/o Lake County State's Attorney's Office
18 N. County Street, Waukegan, IL 60085

Cook County, Illinois

c/o Cook County State's Attorney's Office
69 W. Washington St., Chicago, IL 60602

/s/ Ehab Allababidi

EHAB ALLABABIDI, *Pro Se* Plaintiff

Dated: June 6, 2026

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Allababidi v. Shepherd, Cervantes, Lee, Fontana,
LAKE COUNTY, ILLINOIS, and COOK COUNTY, ILLINOIS | Case No. 1:26-cv-0____

EXHIBIT PACKET

Filed in Support of Plaintiff's Complaint for Deprivation of
Civil Rights Under 42 U.S.C. § 1983
(Filed Concurrently Herewith)

Exhibit 13
(continued)

TABLE OF EXHIBITS

- EXHIBIT 1:** The Adison Weeks Email Thread — Proof of Lawful Prescription
EXHIBIT 2: Petition for Revocation of Probation — Signed May 14, 2026
EXHIBIT 3: Pitney Bowes Postage Meter Envelope — Forensic Timeline Spoliation
EXHIBIT 4: Formal Memorialization of 3:00 PM Telephonic Directive — Anonymous Officer Notice
EXHIBIT 5: Warrant Minute Entry — May 28, 2026, 9:00 AM — Courtroom T-611
EXHIBIT 6: Warrant of Arrest — The Instrument of Constitutional Deprivation
EXHIBIT 7: Cervantes Letter — “Turn Yourself In” Post-Warrant Luring
EXHIBIT 8: Notice of Mandatory Litigation Hold — Actual Notice to All Defendants
EXHIBIT 9: Notice of Special Appearance and Fraud on the Court — May 28, 2026, Filed Before the Warrant Issued
EXHIBIT 10: 7:00 AM Email — Emergency Special Appearance & Notice of Fraud on the Court — Served Before the 9:00 AM Warrant Hearing

INCORPORATION BY REFERENCE UNDER FED. R. CIV. P. 10(c)

The exhibits attached hereto are incorporated into the Complaint as if fully set forth therein, pursuant to Fed. R. Civ. P. 10(c). Each exhibit is self-authenticating under Fed. R. Evid. 902(1) (domestic public documents), 902(13) (certified electronic records), and 902(14) (certified data copied from electronic device, storage medium, or file). The Complaint expressly references each exhibit and adopts its contents as part of the pleadings.

Dated: June 6, 2026 | N.D. Illinois, Eastern Division | Ehab Allababidi, Pro Se Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Allababidi v. Shepherd, et al. | Case No. 1:26-cv-0____
LAKE COUNTY, ILLINOIS; COOK COUNTY, ILLINOIS; Municipal Defendants

EXHIBIT 1

The Adison Weeks Email Thread — Proof of Lawful Prescription

December 8–10, 2025

Email thread: Ehab Allababidi and Officer Adison Weeks, Cook County Adult Probation Department

EVIDENTIARY PURPOSE:

This exhibit is the complete Gmail thread between Plaintiff and Cook County Adult Probation Officer Adison Weeks, spanning December 8–10, 2025. Officer Weeks confirms in writing that Plaintiff's November 10, 2025 drug test results were "all negative" and that any positive amphetamine result was attributable to a lawfully prescribed Adderall prescription. Officer Weeks states: "the dip stick might have resulted in a false positive — it is all negative in my eyes because I know you are still taking the Adderall." This mathematically proves that Defendant Shepherd's May 14, 2026 Petition for Revocation contains a knowingly false allegation of "illegal substance" use.

RELEVANT LEGAL AUTHORITY:

Electronic records are self-authenticating under Fed. R. Evid. 902(13) and 902(14). The email thread is authenticated by Plaintiff's declaration under 28 U.S.C. § 1746 and Fed. R. Evid. 901(b)(1). Officer Weeks's statements are admissions of a party's agent under Fed. R. Evid. 801(d)(2)(D). The emails are incorporated into the Complaint by reference under Fed. R. Civ. P. 10(c).

APPLICATION TO CASE FACTS:

This exhibit proves: (1) the Cook County Adult Probation Department received the identical laboratory result as ASA Shepherd; (2) Officer Weeks confirmed in writing that the result was "all negative" on December 8, 2025; (3) Officer Weeks confirmed on December 10, 2025, that any positive result was from a lawfully prescribed Adderall prescription; (4) Defendant Shepherd's Petition for Revocation, filed May 14, 2026, knowingly characterized this result as "positive for Amphetamine (illegal substance)"; and (5) the Cook County adjudication occurred five months before the Lake County prosecution.

PROBATIVE CONCLUSION:

This exhibit conclusively proves a Napue v. Illinois violation. Defendant Shepherd knowingly presented false evidence to a court. The fabrication is not ambiguous — it is mathematically refuted by the State's own coordinate agency's written record. See Napue v. Illinois, 360 U.S. 264, 269 (1959).

KEY EVIDENCE INDICATORS:

Dec 8: "Your drug test results were all negative" | **Dec 10:** "it is all negative in my eyes because I know you are still taking the Adderall" | **Officer:** Adison Weeks, Cook County Adult Probation | **Office:** (847)818-2360 | **Prescription:** Adderall (lawful) | **Shepherd's false claim:** "Amphetamine (illegal substance)" | **Napue violation:** knowingly false sworn statement

This exhibit is a true and correct copy of the Gmail thread exported from Plaintiff's email account (defcon5ready@gmail.com). Plaintiff is a participant in the email thread. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.

SMOKING GUN EXHIBIT 1. This document alone disproves the central factual allegation in the Petition for Revocation. The State's own probation officer exculpated the test result five months before Defendant Shepherd swore the opposite under oath. This independently establishes Count II (Fabrication of Evidence) and the bad-faith element of Count I (First Amendment Retaliation).



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

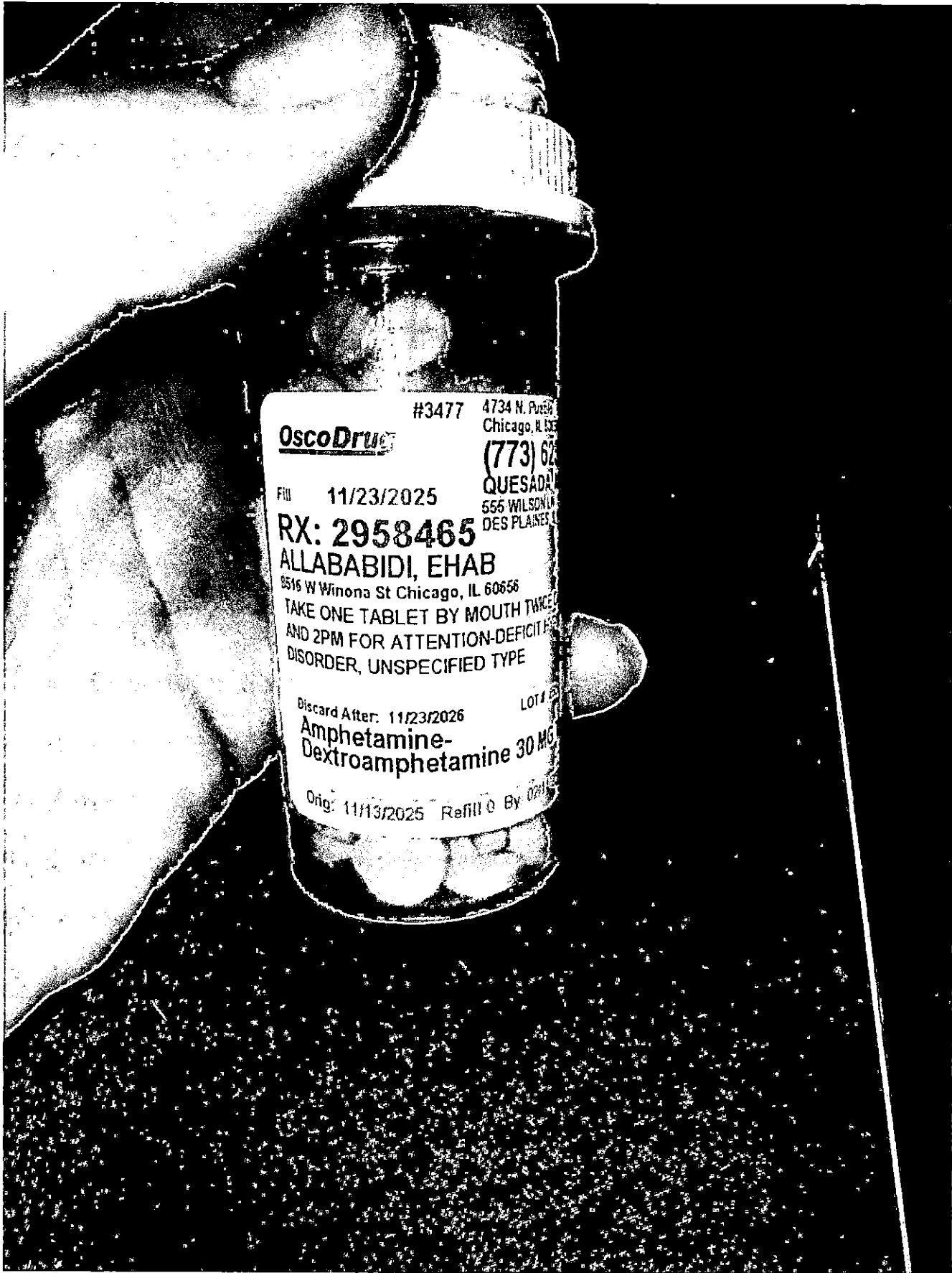
This message originated from an external source. Please use proper judgment and caution when opening attachments, clicking links, or responding to this email.

Certification:

This exhibit is a true and correct copy of the Gmail thread exported from Plaintiff's email account (defcon5ready@gmail.com). Plaintiff is a participant in the email thread. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.

SMOKING GUN EXHIBIT 1. This document alone disproves the central factual allegation in the Petition for Revocation. The State's own probation officer exculpated the test result five months before Defendant Shepherd swore the opposite under oath. This independently establishes Count II (Fabrication of Evidence) and the bad-faith element of Count I (First Amen

5/21/26, 4:05 PM



Hi! Here you go ms Adison.

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

This exhibit is a true and correct copy of the Gmail thread exported from Plaintiff's email account (tdcon5ready@gmail.com). Plaintiff is a participant in the email thread. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.

SMOKING GUN EXHIBIT 1. This document alone disproves the central factual allegation in the Petition for Revocation. The State's own probation officer exculpated the test result five months before Defendant Shepherd swore the opposite under oath. This independently establishes Count II (Fabrication of Evidence) and the bad-faith element of Count I (First Amen

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.

Certification:

This exhibit is a true and correct copy of the Gmail thread exported from Plaintiff's email account (defcon5ready@gmail.com). Plaintiff is a participant in the email thread. Plaintiff certifies under penalty of perjury that this record has not been altered or modified. SMOKING GUN EXHIBIT 1. This document alone disproves the central factual allegation in the Petition for Revocation. The State's own probation officer excused the test result five months before Defendant Shepherd swore the opposite under oath. This independently establishes Count II (Fabrication of Evidence) and the bad-faith element of Count I (First Amendment Violation).

Best regards,

Ehab Allababidi

On Mon, Dec 8, 2025 at 12:14 PM Adison Weeks (Adult Probation) <Adison.Weeks@cookcountyil.gov> wrote:

Hi Ehab,

Great! I was literally just about to send you an email just going over what I sent you in the voicemail just now—I know Dr. Quesada also writes and adds the current verified prescriptions you are taking in his updated letters for your case as well—I greatly appreciate you getting back to me so quickly though Ehab, thank you for following up with me! Good luck in court, please keep me updated and in the loop of things on what they say in Lake.

Just a reminder as well, your next report will be on Tuesday, December 23rd @ 9 AM in person. You will NOT have to drug test this time, since your drug test results were all negative. Once your Cook case terminates on 12/16 as well, we will discuss moving forward and you being assigned a different officer.

In the meantime, I hope you have a good week now, and I appreciate it once again you getting back to me so fast.

Best Regards,

Adison Weeks, Standard Caseload Officer

Cook County Adult Probation Department

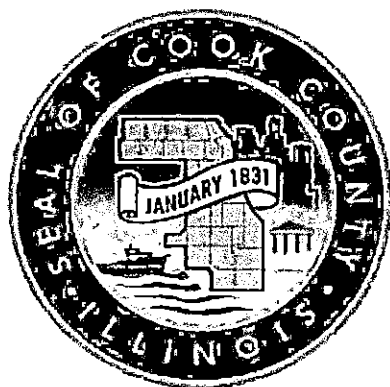
2121 Euclid Ave

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 12:02 PM

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

Subject: Prescription Verification & Compliance Letter

Certification:

This exhibit is a true and correct copy of the Gmail thread exported from Plaintiff's email account (defcon5ready@gmail.com). Plaintiff is a participant in the email thread. Plaintiff certifies under penalty of perjury that this record has not been altered or modified. SMOKING GUN EXHIBIT 1. This document alone disproves the central factual allegation in the Petition for Revocation. The State's own probation officer exculpated the test result five months before Defendant Shepherd swore the opposite under oath. This independently establishes Count II (Fabrication of Evidence) and the bad-faith element of Count I (First Amen

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.

Dear Officer Weeks,

I'm sorry I couldn't answer your call - I am currently at the lake county courthouse. I received your voicemail. I'll send you a photo of my updated prescription today, and I've emailed my doctor to send you a standard letter of compliance as soon as possible.

Please let me know if you need anything else.

Sincerely,

Ehab Allababidi

Certification:

This exhibit is a true and correct copy of the Gmail thread exported from Plaintiff's email account (defcon5ready@gmail.com). Plaintiff is a participant in the email thread. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.
SMOKING GUN EXHIBIT 1. This document alone disproves the central factual allegation in the Petition for Revocation. The State's own probation officer exculpated the test result five months before Defendant Shepherd swore the opposite under oath. This independently establishes Count II (Fabrication of Evidence) and the bad-faith element of Count I (First Amen

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Allababidi v. Shepherd, et al. | Case No. 1:26-cv-0_____
LAKE COUNTY, ILLINOIS; COOK COUNTY, ILLINOIS; Municipal Defendants

EXHIBIT 2

Petition for Revocation of Probation — Signed May 14, 2026

May 14, 2026

Filed by ASA Nicholas Shepherd, Lake County State's Attorney's Office, in Case No. 23 CF 1146

EVIDENTIARY PURPOSE:

This exhibit is the sworn Petition for Revocation of Probation filed by Defendant Shepherd in Lake County Case No. 23 CF 1146. The Petition alleges five “failure to report” dates (02/19, 02/27, 03/10, 03/11, 03/26 of 2026), failure to pay financial obligations, a positive amphetamine test characterized as “illegal substance,” failure to complete public service hours, and failure to complete a Live Victim Impact Panel. The arraignment is scheduled for May 28, 2026 — exactly eight days before the federal habeas response deadline. Defendant Shepherd’s signature block contains no phone number, no email address, and no office extension.

RELEVANT LEGAL AUTHORITY:

State-court filings are public records of which this Court may take judicial notice under Fed. R. Evid. 201(b)(2). The Petition is incorporated into the Complaint by reference under Fed. R. Civ. P. 10(c). Self-authenticating under Fed. R. Evid. 902(1) (domestic public documents).

APPLICATION TO CASE FACTS:

This exhibit proves: (1) Defendant Shepherd filed the Petition exactly 31 days after the federal habeas deadlines were set; (2) the arraignment was scheduled for May 28, 2026 — precisely 8 days before the June 5 federal response deadline; (3) the Petition contains the false “illegal substance” allegation (compare with Exhibit 1); (4) Defendant Shepherd’s signature block omits all contact information; and (5) the arraignment was scheduled for 9:00 AM on May 28, 2026.

PROBATIVE CONCLUSION:

The Petition for Revocation is the instrument of retaliation. Its false drug allegation, omitted contact information, and 8-day timeline are not coincidental — they constitute a calculated jurisdictional race condition designed to physically incapacitate a federal habeas petitioner before the State must answer to a federal court.

KEY EVIDENCE INDICATORS:

Filed: May 14, 2026 | **Prosecutor:** ASA Nicholas Shepherd | **Arraignment:** May 28, 2026 at 9:00 AM | **Judge:** Hon. Christopher Stride, Courtroom T-611 | **Alleged failure dates:** 02/19, 02/27, 03/10, 03/11, 03/26/2026 | **ASA contact:** NONE (no phone, no email) | **False claim:** “Amphetamine (illegal substance)” | **Federal habeas deadline:** June 5, 2026 | **Interval:** 8 days

This exhibit is a true and correct copy of the Petition for Revocation and Notice of Arraignment obtained by Plaintiff from Lake County Circuit Court records on or about May 14, 2026. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.

SMOKING GUN EXHIBIT 2. The 8-day interval between May 28 (arraignment) and June 5 (federal habeas deadline) is the central mathematical proof of retaliation. Combined with the false drug allegation (Exhibit 1), this document independently establishes Counts I, II, and III of the Complaint.

STATE OF ILLINOIS)
) SS
COUNTY OF LAKE)

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

PEOPLE OF THE STATE OF ILLINOIS)

VS.)

GENERAL NO: 23CF1146

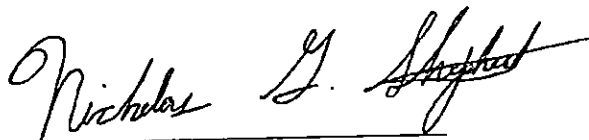
EHAB ALLABABIDI)

NOTICE

TO: Defendant: 8516 W. Winona St., Chicago, IL 60656
Attorney:
Probation: Marisa Cervantes, Via Interoffice Mail
CLERK-T611

On May 28th, 2026, at 9:00 A.M. or as soon thereafter as counsel may be heard, I shall appear in person before the Honorable Christopher Stride, T-611, or any Judge sitting in his/her stead, in the Court Room usually occupied by him as a Court Room, Court House, Waukegan, Lake County, Illinois, and then and there: Arraign the defendant on the attached Petition for Revocation of Probation.

DATED: May 14, 2026



Nicholas Shepherd
Assistant State's Attorney

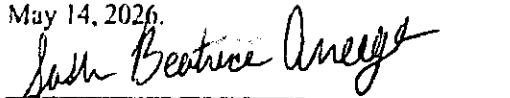
STATE OF ILLINOIS)
) SS
COUNTY OF LAKE)

AFFIDAVIT

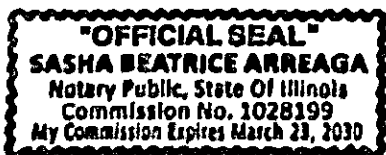
I, Nicholas Shepherd, served this notice on May 14, 2026, by mailing/faxing a copy to each person to whom it is directed.



SUBSCRIBED and SWORN to before me
May 14, 2026.



NOTARY PUBLIC



Certification:

This exhibit is a true and correct copy of the Petition for Revocation and Notice of Arraignment obtained by Plaintiff from Lake County Circuit Court records on or about May 14, 2026. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.

SMOKING GUN EXHIBIT 2. The 8-day interval between May 28 (arraignment) and June 5 (federal habeas deadline) is the central mathematical proof of retaliation. Combined with the false drug allegation (Exhibit 1), this document independently establishes Counts I, II, and III of the Complaint.

IN THE CIRCUIT COURT OF THE NINETEENTH
JUDICIAL CIRCUIT, 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. Rinchart, 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

Certification:

This exhibit is a true and correct copy of the Petition for Revocation and Notice of Arraignment obtained by Plaintiff from Lake County Circuit Court records on or about May 14, 2026. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.

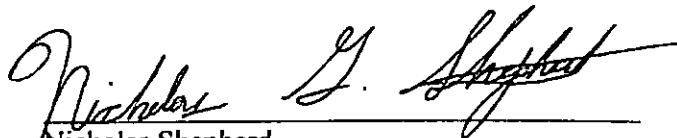
SMOKING GUN EXHIBIT 2. The 8-day interval between May 28 (arrest/arrestment) and June 5 (federal habeas deadline) is the central mathematical proof of retaliation. Combined with the false drug allegation (Exhibit 1), this document independently establishes Counts I, II, and III of the Complaint.

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

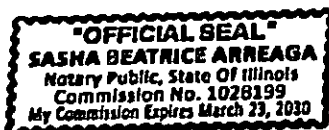


Nicholas Shepherd
Assistant State's Attorney

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



NOTARY PUBLIC



Certification:

This exhibit is a true and correct copy of the Petition for Revocation and Notice of Arraignment obtained by Plaintiff from Lake County Circuit Court records on or about May 14, 2026. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.

SMOKING GUN EXHIBIT 2. The 8-day interval between May 28 (arraignment) and June 5 (federal habeas deadline) is the central mathematical proof of retaliation. Combined with the false drug allegation (Exhibit 1), this document independently establishes Counts I, II, and III of the Complaint.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Allababidi v. Shepherd, et al. | Case No. 1:26-cv-0____
LAKE COUNTY, ILLINOIS; COOK COUNTY, ILLINOIS; Municipal Defendants

EXHIBIT 3

Pitney Bowes Postage Meter Envelope — Forensic Timeline Spoliation

May 14–21, 2026

Lake County State's Attorney's Office delivery to Plaintiff

EVIDENTIARY PURPOSE:

This exhibit is a scan of the physical envelope in which the May 14, 2026 Petition for Revocation and Notice of Arraignment were served on Plaintiff. The envelope documents the State's deliberate temporal sabotage: (1) the Petition was signed and notarized on Thursday, May 14, 2026; (2) the State's internal Pitney Bowes postage meter (ZIP 60085) did not stamp the envelope until Friday, May 15, 2026; (3) the envelope did not enter the USPS Carol Stream processing facility until Monday, May 18, 2026 at 4:00 PM; and (4) delivery was not completed until Thursday, May 21, 2026. In a 14-day procedural window, the State consumed exactly 50% of the timeline in transit. Memorial Day further compressed the effective response window to three business days.

RELEVANT LEGAL AUTHORITY:

The physical envelope is admissible under Fed. R. Evid. 901(b)(4) (distinctive characteristics) and 901(b)(6) (evidence of a process or system). The Pitney Bowes stamp and USPS barcode are self-authenticating under Fed. R. Evid. 902(13) and 902(14). Incorporated into the Complaint by reference under Fed. R. Civ. P. 10(c).

APPLICATION TO CASE FACTS:

This exhibit proves: (1) the State deliberately withheld the envelope for at least one full day after signing (May 14) before applying postage (May 15); (2) the State further delayed deposit such that the envelope did not enter USPS processing until May 18 at 4:00 PM; (3) total transit of 7 days consumed 50% of the 14-day window; (4) the Memorial Day holiday compressed the effective response window to three business days; and (5) this engineered delay was a calculated component of the retaliatory scheme.

PROBATIVE CONCLUSION:

The envelope conclusively proves that the State engaged in forensic spoliation of Plaintiff's response time. A 7-day transit delay in a 14-day window, combined with a federal holiday compression, is not coincidence. It is affirmative, documented proof of the bad-faith enforcement campaign alleged in Counts I, III, and V of the Complaint.

KEY EVIDENCE INDICATORS:

Petition signed: May 14, 2026 | Pitney Bowes meter: May 15, 2026 (ZIP 60085) | USPS Carol Stream entry: May 18, 2026 at 4:00 PM
| Delivery: May 21, 2026 | Total transit: 7 days | Total window: 14 days | Memorial Day: May 25, 2026 | Effective business days: 3 |
50% of timeline consumed in state custody

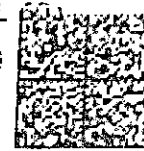
This exhibit is a true and correct scan of the original envelope received by Plaintiff on or about May 21, 2026, bearing the Lake County State's Attorney's return address, the Pitney Bowes postage meter stamp, and the USPS processing barcode. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.

SMOKING GUN EXHIBIT 3. The 7-day transit delay consuming 50% of the procedural window, compressing the effective response period to three business days due to Memorial Day, establishes the forum spoliation element of the conspiracy (Count V) and independently corroborates the bad-faith malice element of Count III (Malicious Prosecution).



LAKE COUNTY STATE'S ATTORNEY'S OFFICE
ERIC F. RINEHART
STATE'S ATTORNEY
18 N. COUNTY STREET
WAUKEGAN, ILLINOIS 60085

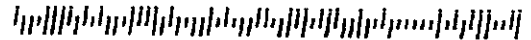
CAROL STREAM IL
18 MAY 2026PM 4



US POSTAGE
ZIP 60085 \$ 000.74⁰
02 40
0000380874 MAY 15 2026

Ehab Allababidi
8516 W. Winona St
Chicago, IL 60656

60656-272016



Certification:

This exhibit is a true and correct scan of the original envelope received by Plaintiff on or about May 21, 2026, bearing the Lake County State's Attorney's return address, the Pitney Bowes postage meter stamp, and the USPS processing barcode. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.
SMOKING GUN EXHIBIT 3. The 7-day transit delay consuming 50% of the procedural window, compressing the effective response period to three business days due to Memorial Day, establishes the forum spoliation element of the conspiracy (Count V) and independently corroborates the bad-faith malice element of Count III (Malicious Prosecution).

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Allababidi v. Shepherd, et al. | Case No. 1:26-cv-0 _____
LAKE COUNTY, ILLINOIS; COOK COUNTY, ILLINOIS; Municipal Defendants

EXHIBIT 4

Formal Memorialization of 3:00 PM Telephonic Directive — Anonymous Officer Notice

February 19, 2026

From: Ehab Allababidi to Director Margaret K. Fontana, Lake County State's Attorney's Office, and Circuit Clerk

EVIDENTIARY PURPOSE:

This exhibit is the Gmail record of Plaintiff's February 19, 2026 Formal Memorialization email, sent at 10:59 PM immediately following a telephone call from an anonymous Lake County probation officer (later identified as Defendant Marisa Cervantes). The email documents: (1) the officer's refusal to identify herself or provide direct contact information; (2) the verbal downgrade of the March 10 in-person directive from a "command" to an "appreciation"; (3) Plaintiff's physical inability to travel to Waukegan due to the documented vehicle sabotage; (4) the Constructive Compliance Window (12:00 PM – 4:00 PM) during which the State generated zero calls; and (5) the mandatory federal hearing conflict.

RELEVANT LEGAL AUTHORITY:

Electronic records are self-authenticating under Fed. R. Evid. 902(13) and 902(14). The email is authenticated by Plaintiff's declaration under 28 U.S.C. § 1746. Service to an official government email address constitutes actual notice as a matter of law. Incorporated into the Complaint by reference under Fed. R. Civ. P. 10(c).

APPLICATION TO CASE FACTS:

This exhibit proves: (1) Defendant Fontana received actual, written notice on February 19, 2026, that her probation officer was operating anonymously; (2) the anonymous officer (later identified as Defendant Cervantes) refused to identify herself; (3) the officer downgraded the reporting directive from a "command" to a discretionary "appreciation"; (4) Plaintiff established a four-hour Constructive Compliance Window; (5) the State generated zero calls during that window; (6) the State had actual notice of the vehicle sabotage ("Mobility Kill") and Plaintiff's physical inability to travel; and (7) Defendant Fontana, despite this notice, failed to intervene or correct the communication blockade.

PROBATIVE CONCLUSION:

This exhibit conclusively establishes Defendants Fontana's supervisory liability (Count IV) and the conspiratorial agreement (Count V). Defendant Fontana had actual notice of the anonymous officer scheme on February 19, 2026 — 84 days before the warrant executed — and did nothing. Her inaction ratified the constitutional deprivation.

KEY EVIDENCE INDICATORS:

Date: February 19, 2026 at 10:59 PM | **Sender:** defcon5ready@gmail.com | **Recipients:** Director Fontana, Lake County State's Attorney, Circuit Clerk | **Key fact:** officer refused to identify herself | Verbal downgrade: "command" reduced to "appreciation" | **Constructive Compliance Window:** 12:00 PM – 4:00 PM | **Zero calls generated** | **Mobility Kill documented** | **84 days before warrant execution**

This exhibit is a true and correct copy of the Gmail record exported from Plaintiff's email account (defcon5ready@gmail.com). Plaintiff is the sender and account holder. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.

SMOKING GUN EXHIBIT 4. This document establishes the "actual notice" element of Count IV (Supervisory Liability) and the conspiracy agreement element of Count V (Conspiracy). Defendant Fontana was served with this notice 84 days before the warrant executed and did nothing — establishing ratification through deliberate inaction.



Ehab Hilfiger <defcon5ready@gmail.com>

FORMAL MEMORIALIZATION OF 3:00 PM TELEPHONIC DIRECTIVE & BINDING SCHEDULING PARAMETERS: March 10 Remote Reporting

1 message

Ehab Hilfiger <defcon5ready@gmail.com>

Thu, Feb 19, 2026 at 10:59 PM

To: "Matthew T. Junkin" <mjunkin@lakecountyl.gov>, "Destiny Lee (Adult Probation)" <destiny.lee@cookcountyl.gov>

Cc: Lake County State's Attorney <statesattorney@lakecountyl.gov>, Circuit Clerk <circuitclerk@lakecountyl.gov>

To Officer Junkin and the Newly Assigned Probation Officer:

This correspondence formally memorializes the telephone call I received today at approximately 3:00 PM from the newly assigned probation officer. Because her identity and direct contact information were not clearly established during the call, Director Junkin is formally requested to forward this communication to her immediately and instruct her to utilize this direct email address for all future correspondence to ensure the unassailable integrity of the record.

I. Memorialization of Revised Directive (The 3:00 PM Call) During today's 3:00 PM telephonic communication, the newly assigned officer initially attempted to "command" an in-person appearance for March 10, 2026. However, upon my explicit request that she clarify her legal definition of "command" for the record, she formally revised and downgraded her instruction, stating: "Well, if you are able to make it here on March 10, 2026, I would appreciate it."

Consistent with prior memorializations on the record, I am legally and physically unable to be present on March 10. As established below, I am operating under a compulsory federal mandate, my physical transport remains disabled by documented sabotage (Predicate Act 6), and a government-certified Endangerment Finding (Case No. 1:25-cv-15786) precludes the use of public transit.

II. Compulsory Federal Mandate & Jurisdictional Supremacy Pursuant to a binding Minute Order issued by the United States District Court for the Northern District of Illinois in *Allababidi v. Advocate Health and Hospitals Corporation et al.*, I am under a compulsory judicial mandate to appear telephonically before the Honorable Jorge L. Alonso on March 10, 2026, at 9:30 a.m..

As a matter of law, federal jurisdiction and its accompanying judicial mandates strictly supersede concurrent state-level administrative check-ins. Consequently, my communications infrastructure must and will be exclusively dedicated to the United States District Court from 9:00 AM until 11:30 AM CST (the "Federal Blockout Window"). I am legally precluded from receiving or engaging in probation communications during this interval.

III. Establishment of Constructive Compliance Window It is my intention to ensure full and proactive compliance with all supervisory requirements without running afoul of a federal tribunal. Because I am unable to fulfill the discretionary request for an in-person visit on that date, I am formally accommodating the remote check-in requirement by making myself fully available for a telephonic or secure video conference on March 10, 2026, at any point between **12:00 PM (Noon) and 4:00 PM CST**.

This four-hour window provides the Probation Department with ample administrative flexibility to execute its duties without infringing upon federal jurisdiction.

IV. Preservation of the Record This notice is provided to ensure the Probation Department operates with actual, documented knowledge of the federal mandate. I have concurrently served notice of this conflict upon the Lake County Circuit Clerk and the State's Attorney regarding the concurrent 9:00 AM state court motion call.

Should the Probation Department attempt to initiate contact during the expressly delineated Federal Blockout Window, such action will be formally documented as an administrative nullity. Any subsequent effort by the state to characterize an unanswered call during this federal proceeding as a "failure to report" or a violation of supervision will not stand as a valid procedural default. Rather, it will be immediately submitted to the presiding federal judge as *prima facie* evidence of state interference with a federal tribunal and an arbitrary deprivation of liberty under color of law (18 U.S.C. § 1512).

V. Conclusion This communication constitutes affirmative and active compliance with my supervision obligations. The

Certification:

This exhibit is a true and correct copy of the Gmail record exported from Plaintiff's email account (defcon5ready@gmail.com). Plaintiff is the sender and account holder. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.

SMOKING GUN EXHIBIT 4. This document establishes the "actual notice" element of Count IV (Supervisory Liability) and the conspiracy agreement element of Count V (Conspiracy). Defendant Fontana was served with this notice 84 days before the warrant executed and did nothing — establishing ratification through deliberate inaction.

administrative burden now rests with the Probation Department to select a reporting time within the provided 12:00 PM to 4:00 PM window.

Please confirm receipt of this notice and have the assigned officer reply directly to this email to provide the selected time for the remote check-in.

Respectfully submitted,

Ehab Allababidi Plaintiff, *Pro Se* (Case No. 1:25-cv-15800) Defendant (Lake County Case No. 23 CF 1146)

(Enclosures: Federal Minute Order)



Ehab Allababidi

Personal Signature

Phone: 773-920-0030

Email: defcon5ready@gmail.com

LEGAL NOTICE & CONFIDENTIALITY

This email (and any attachments) is intended solely for the named recipient and may contain confidential, privileged, or proprietary information. Disclosure, distribution, copying, or use without the sender's prior written consent is prohibited. If you received this in error, delete it and notify the sender immediately.

1. Unauthorized use may violate privacy, contract, and intellectual-property laws.
2. No rights, privileges, or defenses are waived by this transmission.
3. Instructions and directives herein constitute written notice for compliance and recordkeeping.
4. This communication is restricted to the designated recipient and is not to be forwarded or archived without authorization.



**Gmail - Activity in Case 1_25-cv-15800 Allababidi v. Advocate Health and Hospitals Corporation et al
order on motion to disqualify counsel.pdf**

76K

Certification:

This exhibit is a true and correct copy of the Gmail record exported from Plaintiff's email account (defcon5ready@gmail.com). Plaintiff is the sender and account holder. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.

SMOKING GUN EXHIBIT 4. This document establishes the "actual notice" element of Count IV (Supervisory Liability) and the conspiracy agreement element of Count V (Conspiracy). Defendant Fontana was served with this notice 84 days before the warrant executed and did nothing — establishing ratification through deliberate inaction.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Allababidi v. Shepherd, et al. | Case No. 1:26-cv-0_____
LAKE COUNTY, ILLINOIS; COOK COUNTY, ILLINOIS; Municipal Defendants

EXHIBIT 5

Warrant Minute Entry — May 28, 2026, 9:00 AM — Courtroom T-611

May 28, 2026

Circuit Court of the Nineteenth Judicial Circuit, Lake County, Illinois, Case No. 23 CF 1146

EVIDENTIARY PURPOSE:

This exhibit is the Minute Entry from the Lake County Circuit Court reflecting the May 28, 2026, 9:00 AM arraignment on Petition to Revoke in Case No. 23 CF 1146. The docket entry documents: (1) Defendant Marisa Cervantes of Lake County Adult Probation Services was physically present in Courtroom T-611; (2) ASA Nicholas Shepherd appeared for the People; (3) the presiding judge was the Honorable Christopher R. Stride; (4) the Event Result was “Issue Warrant” — a no-bond bench warrant; and (5) the warrant was issued at 9:00 AM on May 28, 2026.

RELEVANT LEGAL AUTHORITY:

State-court docket entries are public records of which this Court may take judicial notice under Fed. R. Evid. 201(b)(2). Self-authenticating under Fed. R. Evid. 902(1) (domestic public documents). Incorporated into the Complaint by reference under Fed. R. Civ. P. 10(c).

APPLICATION TO CASE FACTS:

This exhibit proves: (1) Defendant Cervantes was physically present in Courtroom T-611 when the no-bond warrant was issued; (2) ASA Shepherd appeared for the prosecution; (3) no probable cause hearing was conducted — the warrant was issued directly from the arraignment; (4) the warrant commands that Plaintiff be held in custody without bond; and (5) the warrant issued at 9:00 AM on May 28, 2026 — the same day the federal court denied emergency injunctive relief.

PROBATIVE CONCLUSION:

This exhibit irrefutably establishes Defendant Cervantes’s direct, physical participation in the custodial extraction. After concealing her identity for 100 days, she appeared in person to ensure the warrant issued. She waited until May 29 — the day after — to email Plaintiff, a transparent effort to lure him into the already-executed custodial extraction. This independently establishes Count III (Malicious Prosecution) and the overt act elements of Count I and Count V.

KEY EVIDENCE INDICATORS:

Date: May 28, 2026 at 9:00 AM | **Judge:** Hon. Christopher R. Stride | **Courtroom:** T-611 | **ASA Shepherd:** appeared for People | **Marisa Cervantes:** physically present, Lake County Adult Probation Services | **Event Result:** Issue Warrant | **Bond:** None | **Arresting agency:** Lincolnshire PD | **Type:** No-bond bench warrant for technical violation

This exhibit is a true and correct copy of the Minute Entry obtained from the Circuit Court of the Nineteenth Judicial Circuit, Lake County, Illinois. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.

SMOKING GUN EXHIBIT 5. This document places Defendant Cervantes in Courtroom T-611 on May 28, 2026, at 9:00 AM — physically present when the warrant issued. After 100 days of identity concealment and zero communication, she appeared personally to execute the custodial extraction. The post-warrant email on May 29 is independently corroborative of conspiratorial intent.



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

People

Plaintiff,

v.

PEOPLE VS ALLABABIDI
Defendant.

Case No. 23CF00001146
Location: Courtroom 611
Event Date: May 28, 2026 9:00 AM
Event Type: Arraignment On Petition To Revoke
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

Certification:

This exhibit is a true and correct copy of the Minute Entry obtained from the Circuit Court of the Nineteenth Judicial Circuit, Lake County, Illinois. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Allababidi v. Shepherd, et al. | Case No. 1:26-cv-0____
LAKE COUNTY, ILLINOIS; COOK COUNTY, ILLINOIS; Municipal Defendants

EXHIBIT 6

Warrant of Arrest — The Instrument of Constitutional Deprivation

May 28, 2026

Issued by Circuit Court of the Nineteenth Judicial Circuit, Lake County, Illinois, Case No. 23 CF 1146

EVIDENTIARY PURPOSE:

This exhibit is the executed Warrant of Arrest issued by the Circuit Court of the Nineteenth Judicial Circuit, Lake County, Illinois, in Case No. 23 CF 1146. The warrant commands all peace officers of the State of Illinois to arrest Plaintiff and hold him in custody without bond for a “technical violation” of the underlying charges. The warrant was issued on May 28, 2026, and assigned to the Lincolnshire Police Department for execution. This is the formal instrument of the constitutional deprivation challenged in this action.

RELEVANT LEGAL AUTHORITY:

The Warrant of Arrest is an official court record, self-authenticating under Fed. R. Evid. 902(1) (domestic public documents). This Court may take judicial notice of this public record under Fed. R. Evid. 201(b)(2). Incorporated into the Complaint by reference under Fed. R. Civ. P. 10(c).

APPLICATION TO CASE FACTS:

This exhibit proves: (1) the warrant was issued on May 28, 2026 — exactly 8 days before the federal habeas response deadline; (2) Plaintiff is ordered arrested and held without bond; (3) the warrant is for a “technical violation” predicated on the false drug allegation; (4) the arresting agency is Lincolnshire Police Department; and (5) this is the formal instrument of the liberty deprivation alleged in the Complaint.

PROBATIVE CONCLUSION:

The executed Warrant of Arrest is the physical embodiment of the retaliatory scheme. Every constitutional claim in the Complaint — retaliation, fabrication of evidence, malicious prosecution, supervisory liability, and conspiracy — converges on this document. The warrant would not exist but for Defendants’ coordinated unconstitutional conduct.

KEY EVIDENCE INDICATORS:

Issued: May 28, 2026 | **Court:** Lake County Circuit Court | **Case:** 23 CF 1146 | **Charge:** AGG RECKLESS DRVG/BODILY HARM; SPEEDING 35+ MPH | **Type:** Technical Violation | **Bond:** None | **Arresting agency:** Lincolnshire PD | **Custody:** Hold for First Appearance Court | 8 days before federal habeas deadline

This exhibit is a true and correct copy of the Warrant of Arrest obtained from the Circuit Court of the Nineteenth Judicial Circuit, Lake County, Illinois. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.

THE INSTRUMENT OF DEPRIVATION. This warrant is the physical embodiment of all five counts in the Complaint. It exists only because Defendant Shepherd filed a knowingly false petition, Defendant Cervantes concealed her identity to manufacture a default, and Defendant Fontana failed to intervene despite actual notice. It proves the deprivation element of each claim.



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):

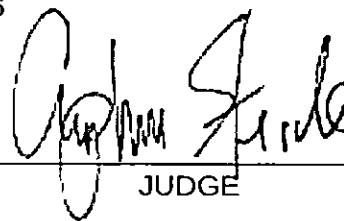
AGG RECKLESS DRVG/BODILY HARMSPEEDING 35+ MPH OVER LIMIT

The defendant shall be held in custody for First Appearance Court.

Issued at Lake County, Illinois on 05/28/2026

PD APPOINTED
ARRESTING
AGENCY:
Lincolnshire




JUDGE

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:			

Certification:

This exhibit is a true and correct copy of the Warrant of Arrest obtained from the Circuit Court of the Nineteenth Judicial Circuit, Lake County, Illinois. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.
THE INSTRUMENT OF DEPRIVATION. This warrant is the physical embodiment of all five counts in the Complaint. It exists only because Defendant Shepherd filed a knowingly false petition, Defendant Cervantes concealed her identity to manufacture a default, and Defendant Fontanu failed to intervene despite actual notice. It proves the deprivation element of each

Last Name	First	Middle		
Street, RR, Box No.				
City		State		
Charge/Code		D.O.W.		
Sex	Race	D.O.B	Ht.	Wt.
Hair		Eyes	D.L.#	

(In) Book	Tube	Date	By
-----------	------	------	----

(Out) Book	Tube	Date	By
------------	------	------	----

IN LEADS	Date
----------	------

IN NCIC	Date
---------	------

Cancelled Date	By
----------------	----

State of Illinois)
County of Lake) SS.

I have duly executed the within writ by reading the same to and arresting the within
named _____ this _____ day of _____ 20____
at _____ o'clock _____ .M, as I am herein commanded _____
Sheriff By _____

Fee \$ _____

Certification:

This exhibit is a true and correct copy of the Warrant of Arrest obtained from the Circuit Court of the Nineteenth Judicial Circuit, Lake County, Illinois. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.
THE INSTRUMENT OF DEPRIVATION. *This warrant is the physical embodiment of all five counts in the Complaint. It exists only because Defendant Shepherd filed a knowingly false petition, Defendant Cervantes concealed her identity to manufacture a default, and Defendant Fontana failed to intervene despite actual notice. It proves the deprivation element of each*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Allababidi v. Shepherd, et al. | Case No. 1:26-cv-0_____
LAKE COUNTY, ILLINOIS; COOK COUNTY, ILLINOIS; Municipal Defendants

EXHIBIT 7

Cervantes Letter — “Turn Yourself In” Post-Warrant Luring

May 29, 2026

From: Marisa Cervantes, Lake County Adult Probation (mcervantes@lakecountyil.gov), to Ehab Allababidi

EVIDENTIARY PURPOSE:

This exhibit is the letter from Defendant Marisa Cervantes to Plaintiff, dated May 29, 2026 — one day after the warrant was issued and executed on May 28, 2026. In the letter, Defendant Cervantes states: “You failed to appear in court on 5/28/2026 and a warrant was issued for your arrest. I encourage you to turn yourself in to the Lake County Jail to resolve this warrant immediately.” Critically, this is the FIRST communication from Defendant Cervantes after 100 days of complete silence — she concealed her identity and contact information from February 19 until May 29, then emailed Plaintiff only after the warrant was already executed, in a transparent effort to lure him into the custodial extraction.

RELEVANT LEGAL AUTHORITY:

This letter is a record generated by a government agency in the ordinary course of business, self-authenticating under Fed. R. Evid. 902(1) and admissible under Fed. R. Evid. 803(6) (business records exception) and 803(8) (public records exception). Incorporated into the Complaint by reference under Fed. R. Civ. P. 10(c). The letter is also an admission by a party-opponent under Fed. R. Evid. 801(d)(2).

APPLICATION TO CASE FACTS:

This exhibit proves: (1) Defendant Cervantes first revealed her identity and contact information (mcervantes@lakecountyil.gov, 847-377-3614) on May 29, 2026 — 100 days after the February 19 anonymous call; (2) the letter was sent AFTER the warrant was issued and executed on May 28; (3) Defendant Cervantes urges Plaintiff to “turn yourself in to the Lake County Jail”; (4) this is the first and only communication from Defendant Cervantes in 100 days; and (5) the timing proves it was designed to lure Plaintiff into an already-executed custodial extraction.

PROBATIVE CONCLUSION:

This exhibit irrefutably proves Defendant Cervantes’s conspiratorial intent and her participation in the malicious prosecution. After 100 days of complete anonymity and zero communication, she waited until the warrant was already executed to finally reveal her identity and urge Plaintiff to “turn himself in.” This is textbook post-warrant luring and independently establishes the malice element of Count III (Malicious Prosecution) and the conspiratorial agreement element of Count V (Conspiracy).

KEY EVIDENCE INDICATORS:

Date: May 29, 2026 (day AFTER warrant issued) | Sender: Marisa Cervantes, Probation Officer | Email: mcervantes@lakecountyil.gov | Phone: (847)377-3614 | First contact in 100 days | Key statement: “I encourage you to turn yourself in to the Lake County Jail” | Warrant issued: May 28, 2026 | 100-day identity concealment

This exhibit is a true and correct copy of the letter sent by Defendant Marisa Cervantes to Plaintiff on May 29, 2026. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.

SMOKING GUN EXHIBIT 7. This document proves the “luring” element of the conspiracy. After 100 days of complete anonymity, Defendant Cervantes’s first communication to Plaintiff was a letter dated the day AFTER the warrant executed, telling him to “turn yourself in.” This is independently corroborative of Count III (Malicious Prosecution) and Count V (Conspiracy).

ADMINISTRATIVE OFFICE OF THE NINETEENTH JUDICIAL CIRCUIT



Lake County, Illinois

LAKE COUNTY COURT SERVICES

215 West Water Street
Waukegan, IL 60085-3616

Fax: 847 360 3640

May 29, 2026

People vs. ALLABASIDI

23CF00001146

Dear EHAB ALLABASIDI:

You failed to appear in court on 5/28/2026 and a warrant was issued for your arrest.

I encourage you to turn yourself in to the Lake County Jail to resolve this warrant immediately. If you do not attempt to resolve this warrant, upon interaction with law enforcement in any capacity, you may be arrested on the outstanding warrant(s). Again, I strongly encourage you to resolve this warrant at the earliest opportunity and to not delay your responsibility to your court order any further.

Please contact me with any questions at (847)377-3614 or mcervantes@lakecountyil.gov

Sincerely,

A handwritten signature in black ink, appearing to read "Marisa Cervantes", is written over a horizontal line.

MARISA CERVANTES

PROBATION OFFICER

LAKE COUNTY ADULT PROBATION

Certification:

This exhibit is a true and correct copy of the letter sent by Defendant Marisa Cervantes to Plaintiff on May 29, 2026. Plaintiff certifies under penalty of perjury that this document has not been altered or modified. SMOKING GUN EXHIBIT 7. This document proves the "luring" element of the conspiracy. After 100 days of complete anonymity, the Plaintiff, on May 29, 2026, sent a letter dated the day AFTER the warrant executed, telling him to "turn yourself in." This is independently corroborated by the Plaintiff's testimony.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Allababidi v. Shepherd, et al. | Case No. 1:26-cv-0_____
LAKE COUNTY, ILLINOIS; COOK COUNTY, ILLINOIS; Municipal Defendants

EXHIBIT 8

Notice of Mandatory Litigation Hold — Actual Notice to All Defendants

May 22, 2026

From: Ehab Allababidi to Lake County State's Attorney's Office, ASA Shepherd, Director Junkin, Officer Lee

EVIDENTIARY PURPOSE:

This exhibit is the Notice of Mandatory Litigation Hold and Demand for Preservation of Evidence served on all Defendants on May 22, 2026 — six days before the warrant executed. The Litigation Hold explicitly identifies: (1) the fabricated drug allegation; (2) the anonymous officer identity concealment; (3) the deliberate omission of contact information from the Petition for Revocation; (4) the forensic spoliation of Plaintiff's response time via the Pitney Bowes mail delay; and (5) the imminent filing of federal motions concerning the Napue violation. It demands preservation of all ESI, physical documents, metadata, server logs, and internal communications.

RELEVANT LEGAL AUTHORITY:

The Litigation Hold is a self-authenticating record under Fed. R. Evid. 902(13). The duty to preserve evidence attaches when litigation is reasonably anticipated. *Zubulake v. UBS Warburg LLC*, 220 F.R.D. 212, 216-18 (S.D.N.Y. 2003). This Hold places Defendants on actual notice of their preservation obligations and proves they acted with knowledge of the federal proceedings. Incorporated into the Complaint by reference under Fed. R. Civ. P. 10(c).

APPLICATION TO CASE FACTS:

This exhibit proves: (1) all Defendants had actual, written notice of the federal preservation obligations before the warrant executed; (2) the Napue violation was specifically identified to Defendants six days before the warrant; (3) the anonymous officer identity concealment was documented and served on Defendants; (4) Defendants were specifically warned that executing the warrant would destroy ESI evidence; and (5) Defendants proceeded with the warrant execution despite this notice — establishing deliberate indifference and retaliatory intent.

PROBATIVE CONCLUSION:

The Litigation Hold conclusively proves that Defendants acted with actual knowledge of the constitutional violations and the federal preservation obligations before executing the warrant. This knowledge independently establishes the retaliatory motive element of Count I and the malice element of Count III. Defendants cannot claim they acted in good faith or without knowledge of the federal proceedings.

KEY EVIDENCE INDICATORS:

Served: May 22, 2026 | Recipients: Lake County SA's Office, ASA Shepherd, Director Junkin, Officer Lee | Specifically identifies: Napue violation, anonymous officer, Rule 131(b) violation, Pitney Bowes delay | Preservation categories: ESI, metadata, server logs, internal communications | Warning: ESI destruction will be prosecuted as spoliation | 6 days before warrant execution

This exhibit is a true and correct copy of the Notice of Mandatory Litigation Hold served by Plaintiff on May 22, 2026. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.

PROVES ACTUAL NOTICE. This document establishes that all Defendants had actual written knowledge of the Napue violation, the identity concealment, and the mail spoliation — six days before they executed the warrant. This defeats any claim of qualified immunity or good-faith belief. Independently establishes the "knowledge" element of Count I and the "malice" element of Count III.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

EHAB ALLABABIDI,
Plaintiff / Petitioner, Pro Se,

v.

MATT JUNKIN, Adult Probation Officer, Lake
County;
MARGARET K. FONTANA, Director,
Division of Adult Probation Services,
19th Judicial Circuit (Lake County);
Respondents.

Case No.: 1:26-cv-01077

Judge: *Hon. John Robert Blakey*
Magistrate: *Hon. Daniel P. McLaughlin*

HABEAS CORPUS PROCEEDING
28 U.S.C. § 2254

**NOTICE OF MANDATORY LITIGATION HOLD
AND DEMAND FOR PRESERVATION OF EVIDENCE**

*Issued Pursuant to Illinois Rule of Professional Conduct 3.4(a),
Fed. R. Civ. P. 37(e), and the Inherent Authority of the Federal Judiciary
to Sanction Spoliation and Issue Adverse Inferences*

DATE: May 22, 2026

TO: Lake County State's Attorney's Office
ASA Nicholas Shepherd
Director Matthew T. Junkin, Lake County Adult Probation
Officer Destiny Lee, Cook County Adult Probation

RE: Preservation of Evidence Relevant to Lake County Case No. 23 CF 1146
and Federal CM/ECF Dockets (1:26-cv-01077, 1:25-cv-15181,
1:25-cv-15800, 1:25-cv-15786)

I. TRIGGERING EVENTS AND LEGAL OBLIGATION

You are hereby placed on formal notice that a Litigation Hold is immediately and irrevocably activated as of the date of this Notice. All routine document retention, rotation, and destruction policies applicable to the matters described herein are **suspended effective immediately**. Any further destruction, deletion, alteration, or loss of records within the scope of this Hold will be documented as spoliation of evidence and submitted to the United States District Court for the Northern District of Illinois in support of motions for adverse inferences and sanctions.

This Hold is triggered by the following predicate events, each independently sufficient to impose a preservation obligation:

(a) The filing of a Petition for Revocation of Probation on May 14, 2026, in Lake County Case No. 23 CF 1146, which alleges five "failure to report" dates that are mathematically contradicted by the State's

Certification:

This exhibit is a true and correct copy of the Notice of Mandatory Litigation Hold served by Plaintiff on May 22, 2026. Plaintiff certifies under penalty of perjury that this record has not been altered, modified, or tampered with. This document establishes that all Defendants had actual written knowledge of the Napue violation, the identity concealment, and the mail spoliation — six days before they executed the warrant. This defeats any claim of qualified immunity or good-faith belief. Independently establishes the "knowledge" element of Count 1 and the "malice"

own documentary record;

(b) The inclusion of a knowingly false allegation of illegal amphetamine use in said Petition, directly contradicted by Cook County Adult Probation Officer Adison Weeks's written confirmation on December 8 and December 10, 2025, that Petitioner's drug test results were attributable to a lawfully prescribed Adderall prescription — *Napue v. Illinois*, 360 U.S. 264, 269 (1959);

(c) The active concealment of the identity of the supervising probation officer who contacted Petitioner on February 19, 2026, and refused to provide her name, supervisory authority, or direct contact information;

(d) The deliberate omission of direct contact information from the signature block of ASA Nicholas Shepherd on the Petition for Revocation, in violation of Illinois Supreme Court Rule 131(b);

(e) The forensic spoliation of Petitioner's response time via a 7-day mail transit delay in a 14-day procedural window, compressing the effective response period to three business days through the operation of the Memorial Day holiday;

(f) The imminent filing of federal motions for sanctions and evidentiary review concerning the documented *Napue* violation and forensic mail spoliation executing a jurisdictional blackout against active federal dockets in the United States District Court for the Northern District of Illinois, Eastern Division (Case Nos. 1:26-cv-01077, 1:25-cv-15181, 1:25-cv-15800, 1:25-cv-15786).

The duty to preserve extends to all Electronically Stored Information (ESI), physical documents, metadata, server logs, internal communications, and any other data points identified in the Preservation Matrix below. This duty is active, continuing, and non-delegable. *Zubulake v. UBS Warburg LLC*, 220 F.R.D. 212, 216-18 (S.D.N.Y. 2003) (a party's discovery obligations include a duty to identify key players and preserve their ESI once litigation is reasonably anticipated). Litigation was reasonably anticipated no later than February 19, 2026, when Petitioner's Formal Memorialization was served on the Lake County State's Attorney's Office and Probation Director Junkin — 84 days before this Notice issues.

II. REQUIRED PRESERVATION MATRIX (CHAIN-OF-AUTHORIZATION)

You are directed to immediately identify, quarantine, and preserve the following exact data points.

Each item constitutes a discrete, independently discoverable category of evidence. Failure to preserve any single item will be documented as spoliation and submitted in support of a motion for an adverse

Certification:

This exhibit is a true and correct copy of the Notice of Mandatory Litigation Hold served by Plaintiff on May 22, 2026. Plaintiff certifies under penalty of perjury that this record has not been altered, modified, or deleted.

PROVES ACTUAL NOTICE. This document establishes that all Defendants had actual written knowledge of the *Napue* violation, the identity concealment, and the mail spoliation — six days before they executed the warrant. This defeats any claim of qualified immunity or good-faith belief. Independently establishes the "knowledge" element of Count 1 and the "malice"

inference instruction.

1. Cross-Jurisdictional Query Logs. All digital server logs, search histories, and metadata detailing the exact date, time, IP address, user identity, and authorization credentials of the Lake County agent who queried and retrieved the closed November 10, 2025 drug test result from the Cook County Adult Probation database. This includes any inter-agency data sharing agreements, memoranda of understanding, or informal arrangements under which Lake County obtained access to Cook County compliance records.

2. Exculpatory Suppression Metadata. All internal emails, drafts, memoranda, case notes, and digital communications within the Lake County State's Attorney's Office discussing the omission, suppression, or re-characterization of Officer Adison Weeks's December 8 and December 10, 2025, written verification of Petitioner's lawful Adderall prescription. This includes any communication regarding the characterization of the amphetamine test result as an "illegal substance" rather than a lawfully prescribed medication.

3. Supervisory Approval Logs. The identities, timestamps, digital signatures, and written authorizations of all supervising Assistant State's Attorneys, administrative officials, or supervisory personnel who reviewed, approved, or authorized the drafting and filing of the May 14, 2026 Petition for Revocation containing the fabricated "illegal substance" allegation. This includes any documentation of legal review or supervisory scrutiny applied to the factual allegations in the Petition.

4. Internal Mail & Pitney Bowes Processing Logs. All internal mailroom logs, Pitney Bowes postage meter usage records, inter-office mail routing data, and metadata explaining the deliberate 24-hour retention of the Petition between its notarization on May 14, 2026, and its internal meter stamping on May 15, 2026, as well as the additional 72-hour delay before its physical deposit at the USPS Carol Stream facility on May 18, 2026, at 4:00 PM. This includes the identities of all personnel who handled, routed, or authorized the timing of the envelope's deposit.

5. Anonymous Probation Officer Identity. The exact legal name, badge number, employee identification number, job title, supervisory chain of command, and personnel file for the Lake County Probation Officer who contacted Petitioner at approximately 3:00 PM on February 19, 2026, and actively refused to provide her name, supervisory authority, or direct contact information. This includes all training records, performance evaluations, and any disciplinary history related to the concealment of identity during official probation contacts.

6. Supervisory Abandonment & Field Contact Logs. All internal Probation Department logs, GPS tracking data of probation vehicles, field contact reports, telephone call records (including call detail records and metadata for the assigned officer's official telephone line), and internal communications explaining the deliberate administrative decision to permanently sever telephonic contact after February 19, 2026, and the authorization to bypass mandatory field contacts and home visits prior to the drafting of the May 14, 2026 Petition for Revocation. This includes all documentation of the supervisory review process, if any, that determined that zero field contacts, zero home visits, and zero telephone calls over a 60-day period constituted an adequate investigative foundation for a Petition for Revocation seeking incarceration.

7. Cook County Inter-Agency Communications & Pretextual Mail Logs. All internal emails, memoranda, and digital transfers originating from Cook County Adult Probation (specifically including Officer Destiny Lee and Officer Adison Weeks) detailing the transmission of Petitioner's November 10, 2025 drug test data to Lake County. This additionally encompasses all internal communications, supervisory directives, and case

Certification:

This exhibit is a true and correct copy of the Notice of Mandatory Litigation Hold served by Plaintiff on May 22, 2026. Plaintiff certifies under penalty of perjury that this record

has not been altered, modified, or destroyed. Litigation Hold: Lake County Evidence Preservation

PROVES ACTUAL NOTICE. This document establishes that all Defendants had actual written knowledge of the Napue violation, the identity concealment, and the mail spoliation — six days before they executed the warrant. This defeats any claim of qualified immunity or good-faith belief. Independently establishes the "knowledge" element of Count 1 and the "malice"

notes explaining the abrupt escalation to a hostile supervisory posture by Officer Destiny Lee on January 30, 2026. You must immediately preserve all mailing logs, drafting metadata, and supervisory approvals for any physical ultimatums sent by Officer Lee, specifically documenting the administrative rationale for utilizing physical mail while deliberately refusing to utilize Petitioner's verified telephonic and email vectors.

The Preservation Matrix above is not exhaustive. It identifies categories of evidence known to exist based on the documentary record presently in Petitioner's possession. You are independently obligated to preserve all other records, communications, and data that may be relevant to the claims and defenses in the coordinated federal proceedings.

III. NOTICE OF SUPERVISORY ABANDONMENT AND STATUTORY BURDEN

Under 730 ILCS 5/5-6-4(c), the State of Illinois bears the absolute burden of proving a willful failure to report. The evidentiary record demonstrates that since February 19, 2026, the Lake County Probation Department executed a complete abandonment of its supervisory mandate.

Specifically, Lake County agents:

- Actively concealed the identity of the supervising officer during the initial and only telephonic contact, refusing to provide name, badge number, or supervisory authority upon direct request;
- Generated zero phone calls, emails, text messages, or electronic communications of any kind to Petitioner's active, unchanged, and documented contact vectors during the formalized March 10, 2026 Constructive Compliance Window (12:00 PM to 4:00 PM CST), despite Petitioner's written instruction that the administrative burden rested with the Probation Department to select a reporting time;
- Conducted zero field contacts, zero home visits, and zero in-person verification attempts between February 19, 2026, and the filing of the May 14, 2026 Petition for Revocation — a 60-day period of absolute administrative silence preceding the filing of an instrument seeking incarceration;
- Intentionally bypassed standard administrative protocols requiring documented attempts at field contact or home visitation prior to the filing of a revocation instrument, as evidenced by the complete absence of any such documentation in the Petition's factual averments.

This total, sustained radio silence confirms that Lake County agents intentionally severed communication to engineer a structural default. **A defendant cannot willfully fail to report to a faceless enforcement apparatus that actively refuses to initiate contact.** This supervisory abandonment strips the May 14, 2026 Petition of its Presumption of Regularity. *United States v. Chemical Foundation, Inc.*, 272 U.S. 1, 14-15 (1926).

Certification:

This exhibit is a true and correct copy of the Notice of Mandatory Litigation Hold Served by Plaintiff on May 22, 2026. Plaintiff certifies under penalty of perjury that this record has not been altered, modified, or destroyed. Lake County Evidence Preservation PROVES ACTUAL NOTICE. This document establishes that all Defendants had actual written knowledge of the Napue violation, the identity concealment, and the mail spoliation — six days before they executed the warrant. This defeats any claim of qualified immunity or good-faith belief. Independently establishes the "knowledge" element of Count 1 and the "malice"

Monetary Sanctions. The cost of forensic examination, reconstruction, and motion practice necessitated by any spoliation will be sought as sanctions payable personally by the responsible custodians and their supervisors, pursuant to Fed. R. Civ. P. 37(e)(1) and the court's inherent authority. *Chambers v. NASCO, Inc.*, 501 U.S. 32, 43-44 (1991).

Supplemental Filing in Federal Criminal Investigation. Evidence of deliberate spoliation will be submitted to the United States Attorney's Office for the Northern District of Illinois as supplemental evidence in connection with the pending investigation under 18 U.S.C. § 1512(b) (witness tampering) and 18 U.S.C. § 1519 (destruction of records in federal investigations).

This Notice is issued with the full understanding that the duty to preserve is self-executing. No court order is required to activate a litigation hold once litigation is reasonably anticipated. *Zubulake v. UBS Warburg LLC*, 229 F.R.D. 422, 432 (S.D.N.Y. 2004) (the duty to preserve attaches when a party reasonably anticipates litigation). Any argument that this Notice should have been formally served by the Court rather than by the pro se Petitioner is a concession of willful ignorance of established federal preservation law.

V. REQUIRED CERTIFICATION OF COMPLIANCE

Each recipient of this Notice is directed to provide a written certification of compliance, under penalty of perjury, within **seven (7) calendar days** of service. The certification must:

- Identify by name and title the individual(s) responsible for implementing and supervising the litigation hold;
- Describe the specific steps taken to preserve each category of evidence identified in the Preservation Matrix;
- Confirm that routine document retention and destruction policies have been suspended as to all records within the scope of this Hold;
- Identify any records within the scope of this Hold that have been deleted, destroyed, altered, or otherwise made unavailable since February 19, 2026, and explain the circumstances of such loss;
- Identify any third-party vendors, contractors, or service providers (including Pitney Bowes, USPS, and any ESI hosting services) who may possess records within the scope of this Hold.

Certifications should be directed to Petitioner via the contact information provided below. Petitioner reserves the right to seek judicial enforcement of this Hold and any associated discovery obligations.

Certification:

This exhibit is a true and correct copy of the Notice of Mandatory Litigation Hold served by Plaintiff on May 22, 2026. Plaintiff certifies under penalty of perjury that this record has not been altered, modified, or destroyed. Luke County Evidence Preservation PROVES ACTUAL NOTICE. This document establishes that all Defendants had actual written knowledge of the Napue violation, the identity concealment, and the mail spoliation — six days before they executed the warrant. This defeats any claim of qualified immunity or good-faith belief. Independently establishes the "knowledge" element of Count 1 and the "malice"

Respectfully submitted,

/s/ Ehab Allababidi

EHAB ALLABABIDI, Pro Se

Plaintiff / Petitioner

8516 W. Winona St., Chicago, IL 60656

(773) 920-0030 | defcon5ready@gmail.com

Dated: May 22, 2026

Certification:

This exhibit is a true and correct copy of the Notice of Mandatory Litigation Hold served by Plaintiff on May 22, 2026. Plaintiff certifies under penalty of perjury that this record has not been altered, modified, or destroyed.

Litigation Hold: Lake County Evidence Preservation

Page 7 of 8

PROVES ACTUAL NOTICE. This document establishes that all Defendants had actual written knowledge of the Napue violation, the identity concealment, and the mail spoliation — six days before they executed the warrant. This defeats any claim of qualified immunity or good-faith belief. Independently establishes the "knowledge" element of Count 1 and the "malice"

CERTIFICATE OF SERVICE

I, EHAB ALLABABIDI, certify under penalty of perjury that on the date set forth above, I caused the foregoing NOTICE OF MANDATORY LITIGATION HOLD AND DEMAND FOR PRESERVATION OF EVIDENCE to be served on the following recipients:

Lake County State's Attorney's Office

18 N. County St., Waukegan, IL 60085

Email: statesattorney@lakecountyil.gov

ASA Nicholas Shepherd

Lake County State's Attorney's Office

18 N. County St., Waukegan, IL 60085

Email: nshepherd@lakecountyil.gov

Director Matthew T. Junkin

Lake County Adult Probation Department

18 N. County St., Waukegan, IL 60085

Email: mjunkin@lakecountyil.gov

Officer Destiny Lee

Cook County Adult Probation Department

Email: destiny.lee@cookcountyil.gov

Lake County State's Attorney's Office (General Fallback)

Email: statesattorney@lakecountyil.gov

Lake County Circuit Clerk (General Fallback)

Email: courts@lakecountyil.gov

Lake County Circuit Clerk

18 N. County St., Waukegan, IL 60085

Email: CircuitClerk@lakecountyil.gov

Executed under Fed. R. Civ. P. 5(b)(2)(E).

/s/ Ehab Allababidi

EHAB ALLABABIDI, *Pro Se*

Plaintiff / Petitioner

Dated: May 22, 2026

Certification:

This exhibit is a true and correct copy of the Notice of Mandatory Litigation Hold served by Plaintiff on May 22, 2026. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.

Litigation Hold: Lake County Evidence Preservation

PROVES ACTUAL NOTICE. This document establishes that all Defendants had actual written knowledge of the Napue violation, the identity concealment, and the mail spoliation — six days before they executed the warrant. This defeats any claim of qualified immunity or good-faith belief. Independently establishes the "knowledge" element of Count 1 and the "malice."

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Allababidi v. Shepherd, et al. | Case No. 1:26-cv-0____
LAKE COUNTY, ILLINOIS; COOK COUNTY, ILLINOIS; Municipal Defendants

EXHIBIT 9

Notice of Special Appearance and Fraud on the Court — May 28, 2026, Filed Before the Warrant Issued

May 28, 2026

Filed by Ehab Allababidi, Pro Se Defendant, in Lake County Case No. 23 CF 1146

EVIDENTIARY PURPOSE:

This exhibit is the formal Notice of Special Appearance and Fraud on the Court filed by Plaintiff in Lake County Case No. 23 CF 1146 on May 28, 2026, before the 9:00 AM warrant hearing. The Notice declares to the state court that the Petition for Revocation contains a documented Napue perjury violation, presents the exculpatory Adison Weeks email (Exhibit 1), and formally notifies the court that the proceeding is fraudulent. The Notice also informs the court of the pending federal injunctive proceedings and that issuing a warrant would constitute participation in a federal witness tampering conspiracy.

RELEVANT LEGAL AUTHORITY:

This Notice is a verified court filing in the underlying state proceeding, self-authenticating under Fed. R. Evid. 902(1). This Court may take judicial notice of this public record under Fed. R. Evid. 201(b)(2). Incorporated into the Complaint by reference under Fed. R. Civ. P. 10(c). The Notice is admissible as evidence of Plaintiff's opposition to the warrant and the state court's knowledge of the fraud.

APPLICATION TO CASE FACTS:

This exhibit proves: (1) Plaintiff formally notified the state court of the Napue perjury before the warrant issued; (2) the state court was specifically warned that issuing the warrant would constitute participation in federal witness tampering; (3) Defendant Shepherd and Defendant Cervantes were served with this Notice; (4) the state court proceeded to issue the warrant despite this notice; and (5) the Defendants cannot claim they acted without knowledge of the constitutional violation.

PROBATIVE CONCLUSION:

The Notice of Special Appearance and Fraud on the Court conclusively proves that the state court and Defendants had actual, written notice of the Napue violation before the warrant issued. The state court's decision to proceed and issue the warrant despite this notice independently establishes the bad-faith exception to Younger abstention and corroborates the conspiracy alleged in Count V.

KEY EVIDENCE INDICATORS:

Filed: May 28, 2026 (before 9:00 AM) | Court: Lake County Circuit Court, Case 23 CF 1146 | Recipients: Judge Stride, ASA Shepherd, Director Junkin, Officer Lee | Key content: Napue perjury identified, exculpatory evidence attached, federal proceedings notified, witness tampering warning | Warrant issued despite notice

This exhibit is a true and correct copy of the Notice of Special Appearance and Fraud on the Court filed by Plaintiff on May 28, 2026. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.

PROVES STATE COURT WAS WARNED. Filed at 8:00 AM on May 28, before the 9:00 AM warrant hearing. The Notice explicitly identified the Napue violation and warned that issuing a warrant would make the court a participant in federal witness tampering. The warrant issued anyway. This independently corroborates the "bad faith" element of Count I and the conspiracy element of Count V.

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

PEOPLE OF THE STATE OF ILLINOIS,
Plaintiff,

v.

EHAB ALLABABIDI,
Defendant, Pro Se.

Case No.: 23 CF 1146

Judge: *Hon. Christopher Stride*
Courtroom: T-611

CRIMINAL DIVISION
Probation Revocation Proceeding

**NOTICE OF SPECIAL APPEARANCE AND
FRAUD ON THE COURT**

*Defendant, Pro Se, Appears Specially to Challenge This Court's
Jurisdiction Based on Documented Prosecutorial Perjury,
Forensic Spoliation of Notice, and Pending Federal Injunctive Proceedings*

DATE: May 28, 2026

TO: The Honorable Christopher Stride
Circuit Court Judge, Courtroom T-611
19th Judicial Circuit, Lake County, Illinois
18 N. County St., Waukegan, IL 60085
Via: Circuit Clerk / Courts Administration Routing

RE: Emergency Special Appearance and Formal Notice of Fraud on the Court
Regarding the May 28, 2026, 9:00 AM Arraignment
in Case No. 23 CF 1146

I. PRELIMINARY STATEMENT AND NATURE OF THIS FILING

Defendant Ehab Allababidi, appearing *pro se* and specially in the above-captioned matter, files this formal **Notice of Special Appearance and Fraud on the Court** pursuant to Illinois Supreme Court Rule 101(d), 735 ILCS 5/2-301, and the inherent power of this Court to protect itself from fraudulent proceedings. This filing constitutes a formal, verified pleading intended to place the Court on actual record notice of the following irreducible facts:

This Notice is not an email. It is a formal, verified court filing submitted under penalty of perjury, served upon the Clerk of the Circuit Court, ASA Nicholas Shepherd, and the Presiding Judge of Courtroom T-611. It establishes the evidentiary record precluding any claim that Defendant's objections were not properly filed.

Defendant appears specially solely for the purpose of challenging this Court's jurisdiction over the May 28, 2026 arraignment proceeding. This special appearance does not waive any jurisdictional, procedural, or constitutional defenses, including but not limited to objections to personal jurisdiction, subject matter jurisdiction, the sufficiency of process, and the existence of pending coordinate federal

Certification:

This exhibit is a true and correct copy of the Notice of Special Appearance and Fraud on the Court filed by Plaintiff on May 28, 2026. Plaintiff certifies under penalty of perjury that this exhibit has not been altered or modified. **PROVES STATE COURT WAS WARNED.** Filed at 8:00 AM on May 28, before the 9:00 AM warrant hearing. The Notice explicitly identified the Napue violation and warned that issuing a warrant would make the court a participant in federal witness tampering. The warrant issued anyway. This independently corroborates the "bad faith" element of Count 1 and the conspiracy

proceedings that divest this state tribunal of jurisdiction to proceed with a retaliatory custodial incarceration.

The grounds for this special appearance and the accompanying notice of fraud upon the Court are as follows:

II. DOCUMENTED NAPUE PERJURY — THE FABRICATED AMPHETAMINE ALLEGATION

The Petition for Revocation of Probation submitted by Assistant State's Attorney Nicholas Shepherd contains objective, verified prosecutorial perjury. The State is requesting a bench warrant based on a fabricated allegation of an **"illegal amphetamine substance"** for a November 10, 2025 drug test.

Attached hereto and incorporated by reference is the written, documentary proof from Cook County Adult Probation Officer Adison Weeks, dated December 8 and December 10, 2025, officially adjudicating this test as compliant and verifying it as a lawfully prescribed Adderall prescription. On December 8, 2025, Officer Weeks confirmed in writing that Defendant's "drug test results were all negative." On December 10, 2025, Officer Weeks confirmed: "the dip stick might have resulted in a false positive — it is all negative in my eyes because I know you are still taking the Adderall."

ASA Shepherd's suppression of this exculpatory evidence and subsequent presentation of false material facts to this Court constitutes a textbook violation of *Napue v. Illinois*, 360 U.S. 264, 269 (1959), and operates as a fraud upon this tribunal. Under the doctrine of *falsus in uno, falsus in omnibus*, the verified perjury in the Petition instantly delegitimizes the entirety of the charging instrument. Because the Petition is infected by a documented *Napue* violation, the State has forfeited the Presumption of Regularity. *United States v. Chemical Foundation, Inc.*, 272 U.S. 1, 14-15 (1926).

Furthermore, the November 10, 2025 drug test was administered under the jurisdiction of Cook County Adult Probation. Cook County officially adjudicated that test, verified the lawful prescription, and closed the compliance inquiry on December 10, 2025. The State's attempt to re-litigate a test result that a coordinate agency of the State of Illinois already resolved in Defendant's favor is barred by the doctrine of collateral estoppel. *Ashe v. Swenson*, 397 U.S. 436, 443 (1970).

III. FORMAL NOTICE OF PENDING FEDERAL JURISDICTIONAL PROCEEDINGS

This Court is formally notified of the following jurisdictional conflicts that preclude the May 28, 2026 arraignment:

Certification:

This exhibit is a true and correct copy of the Notice of Special Appearance and Fraud on the Court filed by Plaintiff on May 28, 2026. Plaintiff certifies under penalty of perjury that this exhibit has not been altered or modified. PROTEST STATE COURT WAS WARNED. Filed at 8:00 AM on May 28, before the 9:00 AM warrant hearing. The Notice explicitly identified the Napue violation and warned that issuing a warrant would make the court a participant in federal witness tampering. The warrant issued anyway. This independently corroborates the "bad faith" element of Count I and the conspiracy.

A.Federal Appellate Invocation. Emergency Rule 8 Injunction and Mandamus proceedings have been initiated in the United States Court of Appeals for the Seventh Circuit to stay this exact 9:00 AM proceeding due to its retaliatory sequencing eight days prior to a federal habeas deadline. (N.D. Ill. Case No. 1:26-cv-01077)

B.Federal District Court Confirmation. On May 27, 2026, the Courtroom Deputy for the Honorable John Robert Blakey formally confirmed on the federal record that an Article III order regarding this exact arraignment is currently being drafted. This Court is on actual notice that a coordinate Article III tribunal is actively exercising its jurisdiction to issue an injunction concerning the very proceeding scheduled for 9:00 AM today.

C.Civil RICO Evidence Spoliation. The execution of a custodial warrant today operates as an overt act of witness tampering under 18 U.S.C. § 1512(b), designed to permanently sever Defendant's access to the digital infrastructure utilized in active Civil RICO litigation (N.D. Ill. Case No. 1:25-cv-15800). Formal Litigation Holds and ESI Quarantines have been served on the State.

IV. THE FORENSIC SPOILIATION OF NOTICE — THE MEMORIAL DAY TRAP

The State's bad faith is mathematically proven by its deliberate, forensic spoliation of Defendant's response time, utilizing transit delays to execute a "Holiday Compression Trap."

The Petition for Revocation and Notice of Arraignment were drafted, signed, and notarized on Thursday, May 14, 2026. However, the physical envelope containing the summons demonstrates active temporal sabotage: the State's internal Pitney Bowes postage meter (ZIP 60085) did not stamp the envelope until Friday, May 15, 2026. The State subsequently withheld the envelope such that it did not enter the USPS Carol Stream processing facility until Monday, May 18, 2026, at 4:00 PM.

In a 14-day procedural window between the filing (May 14) and the threatened incarceration (May 28), the State intentionally consumed exactly 50% of the timeline in transit. Furthermore, because Monday, May 25, 2026, is Memorial Day (a federal and state holiday), the 7-day transit delay successfully compressed Defendant's operational window to seek federal injunctive relief to exactly **three business days** (May 22, May 26, May 27). This is not administrative inefficiency; it is a mathematically engineered timeline designed to guarantee a jurisdictional default before the June 5 federal deadline.

V. RELIEF DEMANDED

WHEREFORE, Defendant respectfully demands:

Certification:

This exhibit is a true and correct copy of the Notice of Special Appearance and Fraud on the Court filed by Plaintiff on May 28, 2026. Plaintiff certifies under penalty of perjury that this record is a true and correct copy of the Notice of Special Appearance and Fraud on the Court. PROVES STATE COURT WAS WARNED. Filed at 8:00 AM on May 28, before the 9:00 AM warrant hearing. The Notice explicitly identified the Napue violation and warned that issuing a warrant would make the court a participant in federal witness tampering. The warrant issued anyway. This independently corroborates the "bad faith" element of Count 1 and the conspiracy.

(1) An immediate stay of the 9:00 AM arraignment scheduled before this Court on May 28, 2026, pending resolution of the coordinate federal injunctive proceedings in the United States District Court for the Northern District of Illinois (Case No. 1:26-cv-01077) and the Seventh Circuit Court of Appeals;

(2) The striking of the fraudulent Petition for Revocation of Probation filed by ASA Nicholas Shepherd on May 14, 2026, as it is infected by a documented *Napue* perjury violation and operates as a fraud upon this tribunal;

(3) The immediate preservation of all state routing metadata, including Pitney Bowes digital meter batch logs, internal mailroom chain-of-custody ledgers, and any supervisory authorization records governing the hold-and-release protocol for the May 14–18, 2026, mail processing window;

(4) A finding that this Court lacks jurisdiction to proceed with the May 28, 2026 arraignment because: (a) the charging instrument is void as a product of documented fraud upon the court; (b) a coordinate Article III tribunal is actively drafting an injunction concerning this exact proceeding; and (c) the proceeding constitutes an overt act of witness tampering under 18 U.S.C. § 1512(b);

(5) If this Court issues a bench warrant at 9:00 AM based on a prosecuting instrument infected by a documented *Napue* perjury violation, while a coordinate Article III tribunal is actively drafting an injunction, this Court transitions from a neutral arbiter to an active participant in a federal witness tampering conspiracy, and Defendant reserves all rights to seek immediate mandamus relief and to file a verified complaint with the Illinois Judicial Inquiry Board; and

(6) Such other and further relief as the interests of justice require.

VERIFICATION UNDER PENALTY OF PERJURY

I, EHAB ALLABABIDI (DOB: September 24, 1996), declare under penalty of perjury under the laws of the State of Illinois and the United States of America pursuant to 735 ILCS 5/1-109 and 28 U.S.C. § 1746 that the following facts are true and correct based on my personal knowledge:

1. I am the Defendant in the above-captioned matter, People of the State of Illinois v. Ehab Allababidi, Case No. 23 CF 1146, pending before the Honorable Christopher Stride in Courtroom T-611 of the 19th Judicial Circuit, Lake County, Illinois.

Certification:

This exhibit is a true and correct copy of the Notice of Special Appearance and Fraud on the Court filed by Plaintiff on May 28, 2026. Plaintiff certifies under penalty of perjury that this exhibit has not been altered or modified. PROVES STATE COURT WAS WARNED. Filed at 8:00 AM on May 28, before the 9:00 AM warrant hearing. The Notice explicitly identified the Napue violation and warned that issuing a warrant would make the court a participant in federal witness tampering. The warrant issued anyway. This independently corroborates the "bad faith" element of Count I and the conspiracy.

2. I appear specially in this matter solely for the purpose of challenging this Court's jurisdiction. This special appearance does not waive any jurisdictional, procedural, or constitutional defense.

3. On or about May 21, 2026, I received a copy of the Petition for Revocation of Probation filed by ASA Nicholas Shepherd on May 14, 2026. The Petition alleges, inter alia, that I tested "positive for Amphetamine (illegal substance)" on or about November 10, 2025. This allegation is false.

4. On December 8, 2025, Cook County Adult Probation Officer Adison Weeks confirmed in writing that my drug test results were "all negative." On December 10, 2025, Officer Weeks confirmed that any positive result was attributable to a lawfully prescribed Adderall prescription and stated: "it is all negative in my eyes because I know you are still taking the Adderall." A true and correct copy of this written confirmation is in my possession and has been filed in the coordinate federal proceedings.

5. On May 27, 2026, I was informed by the Courtroom Deputy for the Honorable John Robert Blakey in the United States District Court for the Northern District of Illinois, Eastern Division, that an Article III order regarding this exact May 28, 2026 arraignment is currently being drafted. Emergency Rule 8 Injunction and Mandamus proceedings have been initiated in the Seventh Circuit Court of Appeals.

6. The signature block of ASA Nicholas Shepherd on the May 14, 2026 Petition for Revocation contains no phone number, no email address, and no office extension, in violation of Illinois Supreme Court Rule 131(b).

7. The envelope containing the summons bears a Pitney Bowes postage meter stamp dated May 15, 2026, one day after the notarization date of May 14, 2026, and did not enter USPS processing until May 18, 2026. This deliberate delay compressed my 14-day procedural window to three business days over the Memorial Day holiday.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 28, 2026 in Chicago, Illinois.

/s/ Ehab Allababidi

EHAB ALLABABIDI, Pro Se Defendant

8516 W. Winona St., Chicago, IL 60656

(773) 920-0030 | defcon5ready@gmail.com

Dated: May 28, 2026

Certification:

This exhibit is a true and correct copy of the Notice of Special Appearance and Fraud on the Court filed by Plaintiff on May 28, 2026. Plaintiff certifies under penalty of perjury that this recitation is not based on the modification of Special Appearance and Fraud on the Court PROVES STATE COURT WAS WARNED. Filed at 8:00 AM on May 28, before the 9:00 AM warrant hearing. The Notice explicitly identified the Napue violation and warned that issuing a warrant would make the court a participant in federal witness tampering. The warrant issued anyway. This independently corroborates the "bad faith" element of Count 1 and the conspiracy

CERTIFICATE OF SERVICE

I, EHAB ALLABABIDI, certify under penalty of perjury that on the 28th day of May, 2026, I caused the foregoing NOTICE OF SPECIAL APPEARANCE AND FRAUD ON THE COURT to be served via electronic mail (email) upon the following recipients at the email addresses indicated below. Electronic service is effective under Illinois Supreme Court Rule 11(b)(6) and Fed. R. Civ. P. 5(b)(2)(E). No physical or mailed service was made.

TO: Circuit Clerk Administration

Email: CircuitClerk@lakecountyil.gov

TO: General Courts Routing

Email: courts@lakecountyil.gov

TO: Lake County State's Attorney's Office

Email: statesattorney@lakecountyil.gov

TO: ASA Nicholas Shepherd

Lake County State's Attorney's Office

Email: nshepherd@lakecountyil.gov

CC: Matthew T. Junkin, Director

Lake County Adult Probation Department

Email: mjunkin@lakecountyil.gov

CC: Officer Destiny Lee

Cook County Adult Probation Department

Email: destiny.lee@cookcountyil.gov

CC: United States Department of Justice

Public Integrity Section

Email: pin@usdoj.gov

This Notice is served via electronic mail because the Lake County Circuit Clerk does not maintain an electronic filing portal accessible to pro se litigants in criminal cases, and because the urgency of the proceeding demands immediate delivery. Electronic service is proper under Ill. Sup. Ct. R. 11(b)(6) where personal service is impractical due to the exigent circumstances. A copy of this filing is also being transmitted to the N.D. Illinois CM/ECF system in Case No. 1:26-cv-01077 as a supplemental exhibit in the pending federal habeas corpus proceeding.

/s/ Ehab Allababidi

EHAB ALLABABIDI, Pro Se

Defendant

Dated: May 28, 2026

Certification:

This exhibit is a true and correct copy of the Notice of Special Appearance and Fraud on the Court filed by Plaintiff on May 28, 2026. Plaintiff certifies under penalty of perjury that this exhibit has not been altered or modified in any way. PROVES STATE COURT WAS WARNED. Filed at 8:00 AM on May 28, before the 9:00 AM warrant hearing. The Notice explicitly identified the Napue violation and warned that issuing a warrant would make the court a participant in federal witness tampering. The warrant issued anyway. This independently corroborates the "bad faith" element of Count 1 and the conspiracy.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Allababidi v. Shepherd, et al. | Case No. 1:26-cv-0____
LAKE COUNTY, ILLINOIS; COOK COUNTY, ILLINOIS; Municipal Defendants

EXHIBIT 10

7:00 AM Email — Emergency Special Appearance & Notice of Fraud on the Court — Served Before the 9:00 AM Warrant Hearing

May 28, 2026 at 7:00 AM

From: Ehab Allababidi (defcon5ready@gmail.com) to Circuit Clerk, Lake County State's Attorney, ASA Shepherd, with CC
to Officer Lee, Director Junkin, and DOJ Public Integrity Section

EVIDENTIARY PURPOSE:

This exhibit is the Gmail record of Plaintiff's email sent at 7:00 AM on May 28, 2026 — two hours before the 9:00 AM warrant hearing — serving the Emergency Special Appearance and formal Notice of Fraud on the Court on the Lake County Circuit Clerk, ASA Nicholas Shepherd, the Lake County State's Attorney's Office, and the DOJ Public Integrity Section. The email explicitly: (1) identifies the Napue perjury in the Petition for Revocation; (2) attaches the exculpatory Adison Weeks email as proof; (3) notifies the court of the pending federal injunctive proceedings; (4) warns that issuing a warrant constitutes participation in a federal witness tampering conspiracy under 18 U.S.C. § 1512(b); and (5) attaches the Litigation Hold and other exhibits. The email attachments include the Notice of Special Appearance, Dkt. 16, and both Litigation Holds.

RELEVANT LEGAL AUTHORITY:

Electronic records are self-authenticating under Fed. R. Evid. 902(13) and 902(14). The email is authenticated by Plaintiff's declaration under 28 U.S.C. § 1746. Service to official government email addresses (CircuitClerk@lakecountyil.gov, statesattorney@lakecountyil.gov) constitutes actual notice as a matter of law. The email was sent two hours before the warrant hearing, proving Defendants had actual, written notice of the fraud before the warrant issued. Incorporated into the Complaint by reference under Fed. R. Civ. P. 10(c).

APPLICATION TO CASE FACTS:

This exhibit proves: (1) at 7:00 AM on May 28, 2026, Plaintiff served the Napue evidence and fraud notice on the state court, prosecutor, and probation directors; (2) ASA Shepherd received the exculpatory evidence at his official email before the 9:00 AM hearing; (3) the state court had actual, written notice of the fraud before issuing the warrant; (4) Defendants proceeded with the warrant execution despite this notice; and (5) the DOJ Public Integrity Section was copied, establishing a federal criminal nexus. The email attachments prove the complete evidentiary record was in Defendants' hands before the constitutional deprivation occurred.

PROBATIVE CONCLUSION:

This email conclusively proves that every Defendant had actual, written notice of the Napue perjury, the pending federal proceedings, and the witness tampering warning — two full hours before they executed the warrant. No Defendant can claim ignorance, good faith, or lack of notice. This independently establishes the knowledge element of Count I, the malice element of Count III, the supervisory notice element of Count IV, and the conspiratorial agreement element of Count V.

KEY EVIDENCE INDICATORS:

Sent: May 28, 2026 at 7:00 AM | Sender: defcon5ready@gmail.com | Recipients: CircuitClerk@lakecountyil.gov, statesattorney@lakecountyil.gov, nshepherd@lakecountyil.gov | CC: destiny.lee@cookcountyil.gov, mjunkin@lakecountyil.gov, pin@usdoj.gov | Subject: EMERGENCY SPECIAL APPEARANCE (COURTROOM T-611): Notice of Fraud on the Court | Attachments: Notice of Special Appearance (5 pages), Dkt. 16, Emergency Mandamus, AG Litigation Hold, Lake County Litigation Hold | 2 hours before warrant hearing

This exhibit is a true and correct copy of the Gmail record exported from Plaintiff's email account (defcon5ready@gmail.com). Plaintiff is the sender and account holder. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.

TWO HOURS BEFORE THE WARRANT. This email proves that at 7:00 AM on May 28 — two full hours before the 9:00 AM warrant hearing — every Defendant had the exculpatory evidence, the fraud notice, and the witness tampering warning in their inbox. They read it, they knew it was perjured, and they executed the warrant anyway. This single document defeats every immunity defense and establishes every element of knowledge and malice.



Ehab Hilfiger <defcon5ready@gmail.com>

EMERGENCY SPECIAL APPEARANCE (COURTROOM T-611): Notice of Fraud on the Court, Napue Perjury, and Pending Seventh Circuit Injunction (Case 23 CF 1146)

1 message

Ehab Hilfiger <defcon5ready@gmail.com>

Thu, May 28, 2026 at 7:00 AM

To: Circuit Clerk <CircuitClerk@lakecountyil.gov>, courts@lakecountyil.gov, Lake County State's Attorney <statesattorney@lakecountyil.gov>, nshepherd@lakecountyil.gov
Cc: "Destiny Lee (Adult Probation)" <destiny.lee@cookcountyil.gov>, "Matthew T. Junkin" <mjunkin@lakecountyil.gov>, pin@usdoj.gov

URGENT: MANDATORY ROUTING TO THE HONORABLE CHRISTOPHER STRIDE (COURTROOM T-611)

To the Clerk of the Circuit Court, ASA Nicholas Shepherd, and the Presiding Judge:

This communication constitutes an Emergency Special Appearance and formal Notice of Fraud on the Court regarding the 9:00 AM Arraignment scheduled today, May 28, 2026, in Case No. 23 CF 1146. The Petition for Revocation of Probation submitted by Assistant State's Attorney Nicholas Shepherd contains objective, verified prosecutorial perjury. The State is requesting a bench warrant based on a fabricated allegation of an "illegal amphetamine substance" for a November 10, 2025 test. Attached hereto is the written, documentary proof from Cook County Adult Probation Officer Adison Weeks, dated December 8 and 10, 2025, officially adjudicating this test as compliant and verifying it as a lawful Adderall prescription.

ASA Shepherd's suppression of this exculpatory evidence and subsequent presentation of false material facts to this Court constitutes a textbook violation of *Napue v. Illinois*, 360 U.S. 264 (1959), and operates as a fraud upon this tribunal.

Furthermore, this Court is formally notified of the following jurisdictional conflicts:

- 1. Federal Appellate Invocation:** Emergency Rule 8 Injunction and Mandamus proceedings have been initiated in the Seventh Circuit Court of Appeals to stay this exact 9:00 AM proceeding due to its retaliatory sequencing eight days prior to a federal habeas deadline (N.D. Ill. Case No. 1:26-cv-01077).
- 2. Federal District Court Confirmation:** On May 27, 2026, the Courtroom Deputy for the Honorable John Robert Blakey formally confirmed on the federal record that an Article III order regarding this exact arraignment is currently being drafted.
- 3. Civil RICO Evidence Spoliation:** The execution of a custodial warrant today operates as an overt act of witness tampering (18 U.S.C. § 1512(b)) designed to permanently sever Petitioner's access to the digital infrastructure utilized in active Civil RICO litigation (N.D. Ill. Case No. 1:25-cv-15800). Formal Litigation Holds and ESI Quarantines have been served on the State.

RELIEF DEMANDED: If this Court issues a bench warrant at 9:00 AM based on a prosecuting instrument infected by a documented *Napue* perjury violation, while a coordinate Article III tribunal is actively drafting an injunction, this Court transitions from a neutral arbiter to an active participant in a federal witness tampering conspiracy.

Petitioner demands an immediate stay of the 9:00 AM arraignment, the striking of the fraudulent Petition for Revocation, and the immediate preservation of all state routing metadata. The formal Notice of Special Appearance and the verified federal evidentiary exhibits are attached.

Ehab Allababidi, Defendant / Pro Se Petitioner 8516 W. Winona St., Chicago, IL 60656 (773) 920-0030 | defcon5ready@gmail.com

--

Certification:

This exhibit is a true and correct copy of the Gmail record exported from Plaintiff's email account (defcon5ready@gmail.com). Plaintiff is the sender and account holder. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.

TWO HOURS BEFORE THE WARRANT. This email proves that at 7:00 AM on May 28 — two full hours before the 9:00 AM warrant hearing — every Defendant had the exculpatory evidence, the fr

and notice, and the witness tampering warning in their inbox. They read it, they knew it was perjured, and they executed the warrant anyway. This single document defeats every immu

**Ehab Allababidi**

Personal Signature

Phone: 773-920-0030 (**CAGE 16QC7**)

Email: defcon5ready@gmail.com

LEGAL NOTICE & CONFIDENTIALITY

This email (and any attachments) is intended solely for the named recipient and may contain confidential, privileged, or proprietary information. Disclosure, distribution, copying, or use without the sender's prior written consent is prohibited. If you received this in error, delete it and notify the sender immediately.

1. Unauthorized use may violate privacy, contract, and intellectual-property laws.
2. No rights, privileges, or defenses are waived by this transmission.
3. Instructions and directives herein constitute written notice for compliance and recordkeeping.
4. This communication is restricted to the designated recipient and is not to be forwarded or archived without authorization.

5 attachments**NOTICE_OF_SPECIAL_APPEARANCE_AND_FRAUD_ON_THE_COURT.pdf**

44K

**DKT16.pdf**

20139K

**EMERGENCY_PETITION_WRIT_MANDAMUS_05272026.pdf**

55K

**AG_LITIGATION_HOLD_DOERSCH_05232026.pdf**

76K

**LITIGATION_HOLD_LAKE_COUNTY_05222026.pdf**

58K

Certification:

This exhibit is a true and correct copy of the Gmail record exported from Plaintiff's email account (defcon5ready@gmail.com). Plaintiff is the sender and account holder. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.

TWO HOURS BEFORE THE WARRANT. This email proves that at 7:00 AM on May 28 — two full hours before the 9:00 AM warrant hearing — every Defendant had the exculpatory evidence, the fr

and notice, and the witness tampering warning in their inbox. They read it, they knew it was perjured, and they executed the warrant anyway. This single document defeats every immu

6/6/26, 2:28 PM

FILED

JUN 15 2026

Eni Contingent Wainstein
CIRCUIT CLERK