

# STATE COURT DOCKET & RECORD COMPILATION

PEOPLE OF THE STATE OF ILLINOIS VS. EHAB ALLABABIDI

URGENT — Active Zero-Bond Warrant — Case No. 23 CF 1146 — 19th Judicial Circuit, Lake County, Illinois

## COMPREHENSIVE RECORD OF FILINGS, ORDERS, AND MINUTES

Chronologically Indexed and Mapped from June 14, 2023 to June 18, 2026

<b>CASE STYLE:</b>	People of the State of Illinois vs. Ehab Allababidi
<b>CASE NUMBER:</b>	23 CF 1146
<b>COURT:</b>	Circuit Court of the 19th Judicial Circuit, Lake County, Illinois
<b>JUDGE PRESIDING:</b>	Hon. Christopher R. Stride, Courtroom T-611
<b>PRO SE PARTY:</b>	Ehab Allababidi, Defendant-Petitioner, Pro Se 8516 W. Winona St., Chicago, IL 60656 defcon5ready@gmail.com   (773) 920-0030
<b>COMPILATION DATE:</b>	June 19, 2026
<b>RECORD STATUS:</b>	100% COMPLETE & AUDITED All 78 portal docket entries mapped to 78 native documents (Exhibit B).
<b>CONTENTS:</b>	Docket Index & Chronological Guide (Pages 2–5) Exhibit A: Portal Docket Sheet (Pages 6–10) Exhibit B: Chronological Case Files (Pages 11–316)

### SUMMARY OF COMPILATION:

This master document serves as the verified, complete record of the state court criminal proceedings in Case No. 23 CF 1146. It compiles and chronologically structures every single minute record, court order, prosecution discovery motion, and pro se defense filing in the case. Over a three-year span, the record tracks the inception of the case through the Grand Jury indictment, Defendant's pretrial release conditions, the plea and intensive probation sentence of September 8, 2025, and the subsequent post-conviction and revocation proceedings. All local files have been audited against the official Circuit Court Portal docket sheet (Exhibit A) and are attached in chronological order as Exhibit B. Typographical errors in filenames have been corrected and aligned with the official portal filing dates, ensuring a pristine evidentiary record for appellate and federal review.

# DOCKET INDEX & CASE FILE CHRONOLOGY

A Complete Guide Mapping the State Court Docket Sheet (Exhibit A) to the Verified Native Case Files (Exhibit B)

PAGE / BATES RANGE	DATE	PORTAL DOCKET ENTRY	NATIVE FILE & DETAILS
Pages 12–13 Bates 0012–0013	06/14/2023	Grand Jury Impaneling Certificate	File: 06-14-23 - Grand Jury Impaneling Certificate.pdf Clerk's Impaneling Certificate of the Grand Jury.
Pages 14–16 Bates 0014–0016	06/14/2023	Grand Jury Indictment	File: 06-14-23 - Grand Jury Indictment.pdf Grand Jury True Bill indictment charging Defendant with Aggravated Reckless Driving and Speeding.
Page 17 Bates 0017	09/05/2023	Indictment Warrant Service Return	File: 09-05-23 - Indictment Warrant Service Return.pdf Sheriff's service return verifying execution of the indictment warrant.
Pages 18–19 Bates 0018–0019	03/30/2024	Arrest Warrant Returned	File: 03-30-24 - Arrest Warrant Returned.pdf Executed arrest warrant returned to court showing arrest of the Defendant.
Page 20 Bates 0020	03/30/2024	First Appearance Order	File: 03-30-24 - First Appearance Order.pdf Court order from first appearance establishing pretrial release status.
Page 21 Bates 0021	03/30/2024	Pretrial Release Conditions Form	File: 03-30-24 - Pretrial Release Conditions Form.pdf Signed Conditions of Pretrial Release form outlining mandates.
Pages 22–23 Bates 0022–0023	03/30/2024	Pretrial Release Conditions Order	File: 03-30-24 - Pretrial Release Conditions Order.pdf Court minutes setting level 2 pretrial supervision with license conditions.
Page 24 Bates 0024	03/30/2024	Pretrial Release Original Order	File: 03-30-24 - Pretrial Release Original Order.pdf Original signed Pretrial Release Order entered at first appearance.
Page 25 Bates 0025	05/02/2024	Court Minutes	File: 05-02-24 - Court Minutes - Status of Attorney.pdf Minutes appointing Public Defender and setting arraignment.
Page 26 Bates 0026	05/14/2024	Court Minutes	File: 05-14-24 - Court Minutes - Arraignment.pdf Arraignment court minutes entering Not Guilty plea and discovery order.
Pages 27–28 Bates 0027–0028	06/12/2024	State Discovery Disclosure to Accused	File: 06-12-24 - State Discovery Disclosure to Accused.pdf Prosecution's pre-trial disclosure of witnesses, police reports, and evidence.
Page 29 Bates 0029	06/12/2024	State Motion for Discovery	File: 06-12-24 - State Motion for Discovery.pdf State's motion to compel reciprocal discovery disclosures.
Page 30 Bates 0030	06/20/2024	Court Order	File: 06-20-24 - Court Order - Discovery.pdf Written order directing reciprocal discovery exchange.
Page 31 Bates 0031	06/24/2024	Pretrial Supervision Status Report	File: 06-24-24 - Pretrial Supervision Status Report.pdf Status report showing compliance and recommending reduction of supervision.
Page 32 Bates 0032	06/25/2024	Court Minutes	File: 06-25-24 - Court Minutes - Pre-Trial.pdf Pre-trial status minutes.
Page 33 Bates 0033	07/24/2024	Court Minutes	File: 07-24-24 - Court Minutes - Pre-Trial.pdf Pre-trial status minutes (docketed July 24).
Page 34 Bates 0034	08/12/2024	State Supplemental Discovery Disclosure	File: 08-12-24 - State Supplemental Discovery Disclosure.pdf Supplemental discovery disclosure adding additional police/evidentiary reports.
Page 35 Bates 0035	08/22/2024	Court Minutes	File: 08-22-24 - Court Minutes - Pre-Trial.pdf Pre-trial status minutes (docketed August 22).

<b>Page 36</b> Bates 0036	<b>09/19/2024</b>	<b>Pretrial Supervision Violation Memo</b>	File: 09-19-24 - <i>Pretrial Supervision Violation Memo.pdf</i> Violation memorandum regarding Cook County arrest.
<b>Pages 37–38</b> Bates 0037–0038	<b>09/20/2024</b>	<b>Petition to Revoke Pretrial Release</b>	File: 09-20-24 - <i>Petition to Revoke Pretrial Release.pdf</i> Verified petition by State to revoke pretrial release.
<b>Page 39</b> Bates 0039	<b>09/24/2024</b>	<b>Court Minutes</b>	File: 09-24-24 - <i>Court Minutes - Pre-Trial.pdf</i> Pre-trial status minutes.
<b>Page 40</b> Bates 0040	<b>10/11/2024</b>	<b>Court Minutes</b>	File: 10-11-24 - <i>Court Minutes - Pre-Trial.pdf</i> Pre-trial status minutes.
<b>Page 41</b> Bates 0041	<b>10/29/2024</b>	<b>Court Minutes</b>	File: 10-29-24 - <i>Court Minutes - Pre-Trial.pdf</i> Pre-trial status minutes.
<b>Page 42</b> Bates 0042	<b>11/21/2024</b>	<b>Pretrial Supervision Violation Memo</b>	File: 11-21-24 - <i>Pretrial Supervision Violation Memo.pdf</i> Memo reporting failure to check in by phone for October.
<b>Page 43</b> Bates 0043	<b>11/26/2024</b>	<b>Court Minutes</b>	File: 11-26-24 - <i>Court Minutes - Pre-Trial.pdf</i> Pre-trial status minutes.
<b>Page 44</b> Bates 0044	<b>11/26/2024</b>	<b>Court Minutes</b>	File: 11-26-24 - <i>Court Minutes - Status.pdf</i> Status minutes regarding pretrial supervision.
<b>Page 45</b> Bates 0045	<b>01/03/2025</b>	<b>Court Minutes</b>	File: 01-03-25 - <i>Court Minutes - Pre-Trial.pdf</i> Minutes setting case for trial on Feb 18, 2025.
<b>Page 46</b> Bates 0046	<b>02/18/2025</b>	<b>Court Minutes</b>	File: 02-18-25 - <i>Court Minutes - Pre-Trial.pdf</i> Pre-trial status minutes.
<b>Page 47</b> Bates 0047	<b>02/18/2025</b>	<b>Court Minutes</b>	File: 02-18-25 - <i>Court Minutes - Status.pdf</i> Status minutes noting a positive alcohol/drug test result.
<b>Page 48</b> Bates 0048	<b>03/19/2025</b>	<b>Court Minutes</b>	File: 03-19-25 - <i>Court Minutes - Plea.pdf</i> Status minutes regarding plea negotiations.
<b>Page 49</b> Bates 0049	<b>03/25/2025</b>	<b>Defense Answer to Discovery</b>	File: 03-25-25 - <i>Defense Answer to Discovery.pdf</i> Written answer to the State's motion for discovery.
<b>Page 50</b> Bates 0050	<b>03/26/2025</b>	<b>Court Order</b>	File: 03-26-25 - <i>Court Order - Discovery Disclosure.pdf</i> Written order directing discovery exchange.
<b>Page 51</b> Bates 0051	<b>04/30/2025</b>	<b>Court Minutes</b>	File: 04-30-25 - <i>Court Minutes - Plea.pdf</i> Minutes continuing plea status.
<b>Page 52</b> Bates 0052	<b>06/12/2025</b>	<b>Court Minutes</b>	File: 06-12-25 - <i>Court Minutes - Plea.pdf</i> Minutes continuing plea status.
<b>Page 53</b> Bates 0053	<b>06/23/2025</b>	<b>Court Minutes</b>	File: 06-23-25 - <i>Court Minutes - Order Entered.pdf</i> Minutes ordering HIPAA forms.
<b>Pages 54–57</b> Bates 0054–0057	<b>06/23/2025</b>	<b>Subpoena Order</b>	File: 06-23-25 - <i>Subpoena Order.pdf</i> Subpoena order entered directing release of records.
<b>Page 58</b> Bates 0058	<b>06/27/2025</b>	<b>Court Minutes</b>	File: 06-27-25 - <i>Court Minutes - Status.pdf</i> Status minutes (docketed June 27).
<b>Page 59</b> Bates 0059	<b>07/23/2025</b>	<b>Court Minutes</b>	File: 07-23-25 - <i>Court Minutes - Pre-Trial.pdf</i> Pre-trial status minutes.
<b>Page 60</b> Bates 0060	<b>08/07/2025</b>	<b>Pretrial Supervision Status Report</b>	File: 08-07-25 - <i>Pretrial Supervision Status Report.pdf</i> Pretrial status report indicating compliance.
<b>Page 61</b> Bates 0061	<b>08/12/2025</b>	<b>Court Minutes</b>	File: 08-12-25 - <i>Court Minutes - Pre-Trial.pdf</i> Pre-trial status minutes.
<b>Page 62</b> Bates 0062	<b>08/26/2025</b>	<b>Court Minutes</b>	File: 08-26-25 - <i>Court Minutes - Plea.pdf</i> Minutes setting plea hearing date.

<b>Pages 63–64</b> Bates 0063–0064	09/08/2025	<b>Court Minutes</b>	File: 09-08-25 - <i>Court Minutes - Plea.pdf</i> Sentencing minutes: guilty plea, 30 months probation, 180 days jail stayed.
<b>Page 65</b> Bates 0065	09/08/2025	<b>Court Order</b>	File: 09-08-25 - <i>Court Order - Nolle Prosequi Count 2.pdf</i> Order dismissing Count 2 (Speeding 35+ MPH Over Limit).
<b>Pages 66–67</b> Bates 0066–0067	09/08/2025	<b>Financial Sentencing Order</b>	File: 09-08-25 - <i>Financial Sentencing Order.pdf</i> Order assessing fines, fees, and court costs.
<b>Pages 68–73</b> Bates 0068–0073	09/08/2025	<b>Order and Certificate of Intensive Felony Probation</b>	File: 09-08-25 - <i>Order and Certificate of Intensive Felony Probation.pdf</i> Sentencing order and conditions of 30-month intensive probation.
<b>Page 74</b> Bates 0074	09/08/2025	<b>Order for Restitution</b>	File: 09-08-25 - <i>Order for Restitution.pdf</i> Sentencing order directing restitution of \$2,670.86.
<b>Page 75</b> Bates 0075	09/08/2025	<b>Probation Referral Slip 1</b>	File: 09-08-25 - <i>Probation Referral Slip 1.pdf</i> Probation Services referral slip.
<b>Page 76</b> Bates 0076	09/08/2025	<b>Probation Referral Slip 2</b>	File: 09-08-25 - <i>Probation Referral Slip 2.pdf</i> Duplicate copy of the referral slip.
<b>Page 77</b> Bates 0077	09/08/2025	<b>Waiver of Trial</b>	File: 09-08-25 - <i>Waiver of Trial.pdf</i> Signed waiver of jury and bench trial by the Defendant.
<b>Page 78</b> Bates 0078	09/09/2025	<b>Report of Felony Conviction to Secretary of State</b>	File: 09-09-25 - <i>Report of Felony Conviction to Secretary of State.pdf</i> Certification of felony conviction to Secretary of State.
<b>Page 79</b> Bates 0079	10/02/2025	<b>Affidavit of Ehab Allababidi in Support of Motion to Stay</b>	File: 10-02-25 - <i>Affidavit of Ehab Allababidi in Support of Motion to Stay.pdf</i> Affidavit in support of motion to stay DL revocation.
<b>Pages 80–84</b> Bates 0080–0084	10/02/2025	<b>Motion to Stay Driver License Revocation</b>	File: 10-02-25 - <i>Motion to Stay Driver License Revocation.pdf</i> Pro se motion to stay license revocation.
<b>Pages 85–88</b> Bates 0085–0088	10/02/2025	<b>Notice of Court Date for Motion to Stay DL Revocation</b>	File: 10-02-25 - <i>Notice of Court Date for Motion to Stay DL Revocation.pdf</i> Notice of motion and court date for the stay motion.
<b>Page 89</b> Bates 0089	10/06/2025	<b>Court Minutes</b>	File: 10-06-25 - <i>Court Minutes - Motion of Defendant.pdf</i> Minutes denying motion to stay DL revocation.
<b>Pages 90–91</b> Bates 0090–0091	10/06/2025	<b>Notice of Appeal</b>	File: 10-06-25 - <i>Notice of Appeal.pdf</i> Notice of Appeal appealing the denial of stay.
<b>Pages 92–93</b> Bates 0092–0093	10/31/2025	<b>Appellate Court Docketing Order</b>	File: 10-31-25 - <i>Appellate Court Docketing Order.pdf</i> Appellate Court order setting docketing schedule.
<b>Pages 94–95</b> Bates 0094–0095	11/10/2025	<b>Adult Probation Fee Change Notification</b>	File: 11-10-25 - <i>Adult Probation Fee Change Notification.pdf</i> Notification from probation modifying fee schedule.
<b>Pages 96–100</b> Bates 0096–0100	11/12/2025	<b>Motion to Waive Transcript and Circuit Clerk Fees</b>	File: 11-12-25 - <i>Motion to Waive Transcript and Circuit Clerk Fees.pdf</i> Pro se motion to waive fees for the appeal.
<b>Pages 101–104</b> Bates 0101–0104	11/12/2025	<b>Notice of Court Date for Motion to Waive Transcript Fees</b>	File: 11-12-25 - <i>Notice of Court Date for Motion to Waive Transcript Fees.pdf</i> Notice of court date for fee waiver motion.
<b>Pages 105–106</b> Bates 0105–0106	11/17/2025	<b>Appellate Court Order</b>	File: 11-17-25 - <i>Appellate Court Order - Dismissing Appeal.pdf</i> Appellate Court order dismissing appeal as premature.
<b>Pages 107–131</b> Bates 0107–0131	11/25/2025	<b>Mail Exhibit Packet</b>	File: 11-25-25 - <i>Mail Exhibit Packet.pdf</i> Exhibit packet chronologies filed by mail.
<b>Pages 132–137</b> Bates 0132–0137	11/25/2025	<b>Petition for Relief</b>	File: 11-25-25 - <i>Petition for Relief.pdf</i> Pro se petition for relief from judgment under Section 2-1401.

<b>Pages 138–147</b> Bates 0138–0147	<b>12/08/2025</b>	<b>Combined Motion for Post-Conviction Discovery and Case Management</b>	File: <i>12-08-25 - Combined Motion for Post-Conviction Discovery and Case Management.pdf</i> Combined motion seeking post-conviction discovery and scheduling.
<b>Pages 148–213</b> Bates 0148–0213	<b>12/08/2025</b>	<b>Petition for Post-Conviction Relief</b>	File: <i>12-08-25 - Petition for Post-Conviction Relief - Exhibit Packet.pdf</i> Supporting exhibits for the post-conviction petition.
<b>Pages 214–219</b> Bates 0214–0219	<b>12/08/2025</b>	<b>Petition for Post-Conviction Relief</b>	File: <i>12-08-25 - Petition for Post-Conviction Relief.pdf</i> Petition seeking post-conviction relief.
<b>Page 220</b> Bates 0220	<b>12/11/2025</b>	<b>Court Minutes</b>	File: <i>12-11-25 - Court Minutes - Motion of Defense.pdf</i> Minutes continuing post-conviction motions.
<b>Page 221</b> Bates 0221	<b>01/26/2026</b>	<b>Court Minutes</b>	File: <i>01-26-26 - Court Minutes - Status.pdf</i> Minutes continuing post-conviction motions.
<b>Page 222</b> Bates 0222	<b>03/10/2026</b>	<b>Court Minutes</b>	File: <i>03-10-26 - Court Minutes - Status.pdf</i> Minutes striking defense motion for non-appearance.
<b>Page 223</b> Bates 0223	<b>04/08/2026</b>	<b>Probation Violation Memorandum</b>	File: <i>04-08-26 - Probation Violation Memorandum.pdf</i> Violation memorandum alleging violation of probation terms.
<b>Page 224</b> Bates 0224	<b>05/14/2026</b>	<b>Notice of Motion</b>	File: <i>05-14-26 - Notice of Motion - Petition for Revocation of Probation.pdf</i> Notice of motion and arraignment date for revocation.
<b>Pages 225–226</b> Bates 0225–0226	<b>05/14/2026</b>	<b>Petition for Revocation of Probation</b>	File: <i>05-14-26 - Petition for Revocation of Probation.pdf</i> State's petition to revoke Defendant's probation.
<b>Page 227</b> Bates 0227	<b>05/28/2026</b>	<b>Court Minutes</b>	File: <i>05-28-26 - Court Minutes - Arraignment on Petition to Revoke.pdf</i> Minutes ordering a bench warrant to issue.
<b>Pages 228–229</b> Bates 0228–0229	<b>05/28/2026</b>	<b>Warrant of Arrest</b>	File: <i>05-28-26 - Warrant of Arrest - Violation.pdf</i> Issued bench warrant for probation violation.
<b>Pages 230–312</b> Bates 0230–0312	<b>06/15/2026</b>	<b>Omnibus Filing</b>	File: <i>06-15-26 - Omnibus Filing.pdf</i> Defendant's pro se Omnibus Filing comprising an Emergency Notice of Motion, Special Appearance, Notice of Constructive Abandonment, and Motion to Quash Warrant.
<b>Page 313</b> Bates 0313	<b>06/15/2026</b>	<b>Public Defender Correspondence</b>	File: <i>06-15-26 - Public Defender Correspondence.pdf</i> Correspondence email from Bailey Russell confirming pro se status.
<b>Page 314</b> Bates 0314	<b>06/17/2026</b>	<b>Court Order</b>	File: <i>06-17-26 - Court Order - Discharging Public Defender.pdf</i> Order signed by Judge Stride retroactively discharging PD.
<b>Page 315</b> Bates 0315	<b>06/18/2026</b>	<b>Court Minutes</b>	File: <i>06-18-26 - Court Minutes - Public Defender Discharged.pdf</i> Minutes discharging counsel and denying motion to quash warrant.
<b>Page 316</b> Bates 0316	<b>06/18/2026</b>	<b>Court Order</b>	File: <i>06-18-26 - Court Order - Staying Jail Sentence Lifted.pdf</i> Order signed by Judge Stride lifting stay on jail term.

# EXHIBIT A

## STATE COURT PORTAL DOCKET SHEET

**PAGE RANGE: Pages 6–10**

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*Official 4-Page Case Action Page printed from the Lake County Portal on June 19, 2026*

### **SIGNIFICANCE AND PURPOSE:**

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*This docket sheet serves as the primary index and official court record of the case, docketing all 78 registered proceedings, orders, and minute sheets from the case's inception on June 14, 2023, through the stays lifted on June 18, 2026.*

### **KEY CONTENTS:**

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- Contains 78 formal docket entries with clerk dates and actions
- Serves as the master index to which all subsequent Exhibit B files correspond
- Documents the exact sequence of state court activity



# Circuit Court of the Nineteenth Judicial Circuit

Lake County, Illinois

23CF00001146 Warrant/Attach.After Sentence/Jdgmt

PEOPLE VS ALLABABIDI

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

[Parties](#)

[Charges/Dispositions/Sentences](#)

[Court Events](#)

[Documents Filed](#)

[Financial](#)

## Documents-Invite

[Add Proposed Order](#)

### Documents

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

Filed Date	Document Type	Document Action
11/17/2025	Order (appeal is dismissed)	Filed <a href="#">View</a>
11/12/2025	Notice	<a href="#">View</a>
11/12/2025	Motion	<a href="#">View</a>
11/10/2025	Notification of Changes to the Probation Fee Schedule	<a href="#">View</a>
10/31/2025	Order (due 12/8/25)	Filed <a href="#">View</a>
10/06/2025	Minute Record	<a href="#">View</a>
10/06/2025	Notice of Appeal - Criminal/Juvenile	Filed Issued <a href="#">View</a>
10/02/2025	Notice Of Motion	<a href="#">View</a>
10/02/2025	Motion To Stay DL Revocation	<a href="#">View</a>
10/02/2025	Affidavit	<a href="#">View</a>
09/09/2025	Report of Felony Conviction	<a href="#">View</a>
09/08/2025	Order	Filed <a href="#">View</a>
09/08/2025	Order	Filed <a href="#">View</a>
09/08/2025	Order	Filed <a href="#">View</a>
09/08/2025	Order	Filed <a href="#">View</a>
09/08/2025	Order- Nolle Prossed	Filed <a href="#">View</a>
09/08/2025	Minute Record	eMail eMail <a href="#">View</a>
09/08/2025	Adult Probation Court Referral Slip	eMail <a href="#">View</a>
09/08/2025	Adult Probation Court Referral Slip	eMail <a href="#">View</a>
08/26/2025	Minute Record	eMail eMail <a href="#">View</a>
08/12/2025	Minute Record	eMail eMail <a href="#">View</a>
08/07/2025	Pretrial PTBS Status Report	Filed <a href="#">View</a>
07/23/2025	Minute Record	eMail eMail <a href="#">View</a>
06/27/2025	Minute Record	eMail eMail <a href="#">View</a>
06/23/2025	Order	
06/23/2025	Order	<a href="#">View</a>
06/12/2025	Minute Record	eMail eMail <a href="#">View</a>
04/30/2025	Minute Record	eMail eMail <a href="#">View</a>
03/26/2025	Order	Filed <a href="#">View</a>

Filed Date	Document Type	Document Action
03/25/2025	Answer	Filed <a href="#">View</a>
03/19/2025	Minute Record	eMail eMail <a href="#">View</a>
02/18/2025	Minute Record	eMail eMail <a href="#">View</a>
02/18/2025	Minute Record	eMail eMail <a href="#">View</a>
01/03/2025	Minute Record	eMail eMail <a href="#">View</a>
11/26/2024	Minute Record	eMail eMail <a href="#">View</a>
11/26/2024	Minute Record	eMail eMail <a href="#">View</a>
11/21/2024	Memorandum	Filed <a href="#">View</a>
10/29/2024	Minute Record	eMail eMail <a href="#">View</a>
10/11/2024	Minute Record	eMail eMail <a href="#">View</a>
09/24/2024	Minute Record	eMail eMail <a href="#">View</a>
09/20/2024	Petition	Filed <a href="#">View</a>
09/20/2024	Petition	Filed <a href="#">View</a>
09/19/2024	Memorandum	Filed <a href="#">View</a>
08/22/2024	Minute Record	eMail eMail <a href="#">View</a>
08/12/2024	Disclosure To the Accused	Filed <a href="#">View</a>
07/24/2024	Minute Record	eMail eMail <a href="#">View</a>
06/25/2024	Minute Record	eMail eMail <a href="#">View</a>
06/24/2024	Pretrial PTBS Status Report	Filed <a href="#">View</a>
06/20/2024	Order	Filed <a href="#">View</a>
06/12/2024	Disclosure To the Accused	Filed <a href="#">View</a>
06/12/2024	Motion	Filed <a href="#">View</a>
05/14/2024	Minute Record	eMail eMail <a href="#">View</a>
05/02/2024	Minute Record	eMail eMail <a href="#">View</a>
03/30/2024	Conditions of Pretrial Release Order	Filed <a href="#">View</a>
03/30/2024	First Appearance Order 171-539	Filed <a href="#">View</a>
03/30/2024	Warrant (Returned)	<a href="#">View</a>
03/30/2024	Release	<a href="#">View</a>
03/30/2024	Minute Record	eMail eMail <a href="#">View</a>

Filed Date	Document Type	Document Action
06/14/2023	Indictment	Filed <a href="#">View</a>
06/14/2023	Certificate	Filed <a href="#">View</a>
06/14/2023	Warrant WT	Issued Served Returned
06/14/2023	Case Document Images MINUTE SHEET -	<a href="#">View</a>
xxxxx ACCESS DENIED xxxxx	xxxxx ACCESS DENIED xxxxx	

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# EXHIBIT B

## CHRONOLOGICAL NATIVE CASE FILES

**PAGE RANGE: Pages 11–316**

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*78 Verified court documents, certified minutes, and signed orders from the case file*

### **SIGNIFICANCE AND PURPOSE:**

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*This exhibit compiles the actual, verbatim court records in exact chronological order. Every portal entry has been reconciled to these documents, with filing dates corrected and draft documents matched to their official filing dates to establish a clean record.*

### **KEY CONTENTS:**

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- Chronologically structured from June 14, 2023 to June 18, 2026
- Includes all available state court minutes, orders, subpoenas, and pro se motions
- Contains all post-conviction filings and the recent June 2026 orders

**FILED**

**JUN 14 2023**

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

*Erin Cartwright Weinstein*  
**CIRCUIT CLERK**

**CERTIFICATE  
OF  
IMPANELING  
OF THE GRAND JURY**

I, **Erin Cartwright Weinstein** do hereby certify that I am the duly appointed, qualified and acting Clerk of the Nineteenth Judicial Circuit Court in and for the County of Lake, State of Illinois, that the following is true and correct as it appears from the records of my office now remaining.

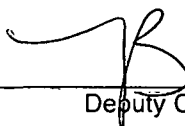
That a GRAND JURY, each member of which was heretofore summoned, drawn and certified by the Clerk of the Nineteenth Judicial Circuit Court according to law from an active jury list of qualified persons duly prepared by the Jury Commission of Lake County, reported into open Court and was impaneled, sworn and instructed as to its duties by a Judge of the Circuit Court and was a duly and lawfully constituted GRAND JURY of the County of Lake and State of Illinois.

That the said GRAND JURY returned into open Court an Indictment known as

	People of the State of Illinois	Case Number
Entitled as	vs	
	<u>EHAB ALLABABIDI</u>	<u>23CF1146</u>

IN WITNESS WHEREOF, I have hereunto set my hand and caused to be affixed the seal of my office at Waukegan, Illinois.

**Erin Cartwright Weinstein**  
Clerk of the Nineteenth Judicial Circuit

  
Deputy Circuit Clerk

**JUN 14 2023**  
Date

**FILED**

**JUN 14 2023**

**Evans County Jail Administration  
CIRCUIT CLERK**

STATE OF ILLINOIS )  
 ) SS  
COUNTY OF LAKE )

Gen. No.: 23CF 1146  
DCN: \_\_\_\_\_

FILED

JUN 14 2023

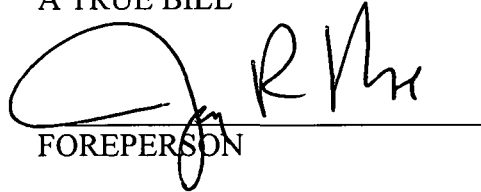
*Eric Cantagut Weinstein*  
CIRCUIT CLERK

OF THE APRIL 2023 TERM OF THE CIRCUIT COURT  
OF THE NINETEENTH JUDICIAL CIRCUIT COURT OF THE  
COUNTY OF LAKE IN THE STATE OF ILLINOIS

Count 1. That the Grand Jurors chosen, selected and sworn, in and for the County of Lake, in the State of Illinois, having been duly recalled, in the name and by authority of the People of the State of Illinois, upon their oaths present that **EHAB ALLABABIDI; DOB, 9/24/1996** hereinafter called the defendant, on or about 5/23/22 in the County of Lake and State of Illinois, committed the offense of **Aggravated Reckless Driving** in that the defendant drove a motor vehicle with willful and wanton disregard for persons or property, and caused a collision which resulted in great bodily harm to Christopher King, in violation of **625 ILCS 5/11-503(a)(1)(d)** contrary to the form of the Statutes in such case made and provided, and against the peace and dignity of the People of the State of Illinois.

Count 2. That the Grand Jurors chosen, selected and sworn, in and for the County of Lake, in the State of Illinois, having been duly recalled, in the name and by authority of the People of the State of Illinois, upon their oaths present that **EHAB ALLABABIDI; DOB, 9/24/1996** hereinafter called the defendant, on or about 5/23/22 in the County of Lake and State of Illinois, committed the offense of **Aggravated Speeding** in that the defendant drove a motor vehicle in 35 miles per hour or more in excess of the speed limit, in violation of **625 ILCS 5/11-601.5** contrary to the form of the Statutes in such case made and provided, and against the peace and dignity of the People of the State of Illinois.

A TRUE BILL



FOREPERSON

Circuit Court of Lake County

Gen.No.: 23CF 1146

April 2023 Term

Witness: Officer Ray, Lincolnshire Police Department

The People of the State of Illinois

v.

Ehab Allababidi; DOB 9/24/1996

Indictment for:

Count 1: Aggravated Reckless Driving (Class 4)  
Count 2: Aggravated Speeding (class A)

**FILED**

JUN 14 2023

*Eric Cartwright Weinstein*  
CIRCUIT CLERK

A True Bill

*[Signature]*  
Foreperson of the Grand Jury

Filed \_\_\_\_\_, 2023

*Eric Cartwright Weinstein*

Clerk of the Court

Bail: \$ 50,000

**ERIC RINEHART**

**LAKE COUNTY STATE'S ATTORNEY**

SEX: M RACE: U HT: 6'0" WT: 200 HAIR: Brown EYES: Brown  
DL#: A41120096272 ADDRESS: 8516 W. Winona St. Chicago, IL 60656

TM

REPORT : P31

LAKE COUNTY CIRCUIT CLERK  
COURT CALENDAR WORKSHEET FOR COURT CLERK  
08/14/2023  
COURTROOM 611

DATE: 08/10/2023  
PAGE: 35

CASE NUMBER TITLE FILED STATUS TOTAL DUE

23CF00001146 PEOPLE VS ALLABABIDI 06/14/2023 ACTIVE WITH WARRANT OUTSTANDING DOB: 09/24/1996  
ASSIGNED JUDGE STRIDE, CHRISTOPHER R. ARRESTING AGENCY LINCOLNSHIRE  
CHARGE/DISP/SENTENCE COUNT 1 AGG RECKLESS DRVG/BODILY HARM CLASS: 4 625 ILCS 5/11-503(A)(1)

PARTY/ATTY ALLABABIDI, EHAB  
LAST CT APPRS 06/14/2023  
ATTENDEES LEVITT, MARK L. PRESIDING JUDGE  
SCHELLER, STEPHEN J. STATE'S ATTORNEY

EVENTS RETURN INDICTMENT YES ABSENT  
ISSUE WARRANT YES ABSENT  
10% OF \$50,000.00  
RETURNED BY THE APRIL 2023 GRAND JURY  
CUR CT APPRS 08/14/2023 07:30A  
EVENTS STATUS OF WARRANT SET

Warto.

STATE OF ILLINOIS  
IN THE CIRCUIT COURT OF THE 19TH JUDICIAL CIRCUIT  
LAKE COUNTY

THE PEOPLE OF THE STATE OF ILLINOIS

CASE NUMBER(S)

23CF1146

VS

EHAB ALLABABIDI

FILED

MAR 30 2024

Evil Court Clerk  
CIRCUIT CLERK

WARRANT OF ARREST

TO ALL PEACE OFFICERS OF THE STATE OF ILLINOIS:

YOU ARE HEREBY COMMANDED TO ARREST

EHAB ALLABABIDI

8516 W. WINONA ST.  
CHICAGO, IL 60656

AND BRING SAID PERSON WITHOUT UNNECESSARY DELAY BEFORE THE JUDGE SITTING IN BOND COURT IN THE CIRCUIT COURT OF THE 19TH JUDICIAL CIRCUIT, LAKE COUNTY, ILLINOIS, TO ANSWER A CHARGE MADE AGAINST SAID PERSON FOR THE OFFENSE(S):

AGG RECKLESS DRVG/BODILY HARM

SPEEDING 35+ MPH OVER LIMIT

THE AMOUNT OF THE BOND IS SET AT: \$50,000.00

ISSUED AT LAKE COUNTY, ILLINOIS ON JUNE 14, 2023

  
JUDGE MARK L. LEVITT

ARRESTING AGENCY:  
LINCOLNSHIRE

T611 - TUES OR WED



Warrant No.	Bond			
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. #		

FILED  
 DEPT. OF CLERK  
 JUDGE OF SUPERIOR COURT  
 COUNTY OF LAKE, ILLINOIS

(In) Book \_\_\_\_\_ Tube \_\_\_\_\_ Date 10-16-23 By DK  
 (Out) Book \_\_\_\_\_ Tube \_\_\_\_\_ Date \_\_\_\_\_ By \_\_\_\_\_

W 24C 9385  
 W 324038037 11/015 EXT

IN LEADS  Date 10-16-23 By DK  
 IN N CIC  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 EHAB ALLABABIDI  
 this 1<sup>st</sup> day of APRIL 20 24 at 11 o'clock A .M., as

I am herin commanded \_\_\_\_\_  
 Sheriff By \_\_\_\_\_

Fee \$ 180<sup>00</sup>

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

**FILED**

~~FILED~~ ~~FILED~~ ~~FILED~~

PEOPLE OF THE STATE OF ILLINOIS )  
)  
vs. )  
)  
EHAB ALLABABIDI )  
Defendant )

CASE NO: 23CF00001146

**Cartwright Weinstein**  
**Clerk of the Court**  
**Lake County, Illinois**

**FIRST APPEARANCE ORDER**

This matter coming before the Court for First Appearance hearing.

THE COURT FINDS that:

1. The defendant appears before the court:

- due to an outstanding warrant
- due to a new arrest and the court finds probable cause.
- due to a new arrest and the court finds no probable cause.

2. The offense(s) charged:

- by statute is not detainable and
  - the defendant is released from custody
    - and ordered to comply with pretrial conditions. (see *Conditions of Pretrial Release order*).
    - without pretrial conditions.

by statute is detainable and

- the State has elected to not file a Petition to Detain
  - the defendant is released from custody.
    - The defendant is ordered to comply with pretrial conditions (see *Conditions of Pretrial Release order*).
    - The defendant is not ordered to comply with pretrial conditions

the State has filed a Petition to Detain on \_\_\_\_\_ at \_\_\_\_\_ and the defendant

- does not object to detention and waives the detention hearing.
- the  state  defense  both parties agree to a continuance.
- Pending the resolution of the Petition to Detain the defendant shall
  - be held in the custody of the Lake County Sheriff.
  - be released to Conditions of Pretrial Release (see *Conditions of Pretrial Release order*).

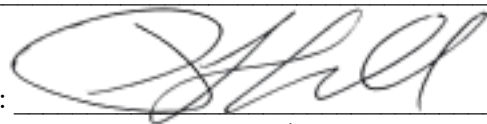
3. The matter is set on 5/2/24 at 9am in T611 for:

- arraignment  pretrial  case management  petition to revoke hearing  detention hearing
- other: Status of attorney

Entered:

Date: March 30th, 2024

Signature: \_\_\_\_\_



Judge

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

FILED

~~FILED~~ ~~FILED~~ ~~FILED~~

PEOPLE OF THE STATE OF ILLINOIS )  
)  
vs. )  
)  
EHAB ALLABABIDI )  
Defendant )

CASE NO: 23CF00001146

Erin Cartwright Weinstein  
Clerk of the Court  
Lake County, Illinois

CONDITIONS OF PRETRIAL RELEASE

This matter coming before the Court, the COURT FINDS:

- The defendant is not charged with a detention-eligible offense pursuant to 725 ILCS 5/110-6.1(a)(1) through (8).
- The defendant is charged with a detention-eligible offense, but the State has not filed a petition to detain.
- Following the detention hearing, the Court denied the State's Petition to Detain.
- Following a revocation or sanctions hearing, the Court ordered a modification of the defendant's release conditions.

IT IS HEREBY ORDERED that:

1. The defendant shall be released with the following statutorily mandated conditions pursuant to 725 ILCS 5/110 (a):
  1. Appear in court for every court date.
  2. Not violate any criminal statute of any jurisdiction.
  3. File written notice with the clerk of the court within 24 hours after a change of address.
  4. The defendant shall also be subject to other relevant mandatory conditions pursuant to 725 ILCS 5/110-10(a), (c), or (d). (See *Supplemental Conditions of Pretrial Release Order* entered on today's date.)
2. Further, having reviewed all relevant factors and standards pursuant to 725 ILCS 5/110-2 and 110-5, and making an individualized decision, the Court finds that the following additional conditions are necessary to reasonably assure: the defendant's appearance in court, the defendant does not commit any criminal offense while on pretrial release, and/or the defendant's compliance with all conditions of pretrial release: (Check those that apply)

- Report to Pretrial Services and comply with their reporting requirements of Level  1  2  3  4
- Not leave the State of Illinois without permission of the Court
- Refrain from possessing a firearm or other dangerous weapon
- Curfew of \_\_\_\_\_ to \_\_\_\_\_ or as directed by Pretrial Services
- Have no contact directly or indirectly with the following individuals and/or places until further order of court:

Electronic Monitoring. The Court orders:  Scram Device  GPS  other:

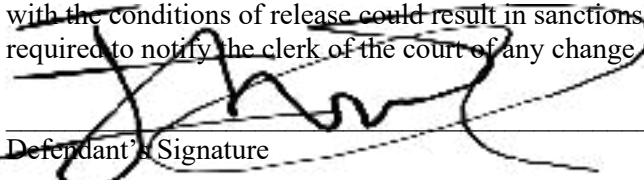
other conditions:  
No driving without valid driver's license

3. The court finds the following conditions are necessary pursuant to 725 ILCS 5/110-10(b)(9):
  - no consumption of  alcohol  illegal substances
  - other:
4. Pursuant to 725ILCS 5/110-5(g), the Court finds that no less restrictive condition of release or combination of less restrictive conditions of release would reasonably ensure the appearance of the defendant for later hearings or protect an identifiable person or persons from imminent threat of serious physical harm.
5. The case is continued to 5/2/24, at 9am in Courtroom T611

Entered: Date: March 30th, 2024

Signature:   
Judge

I acknowledge these conditions of release and affirm that I will comply with each condition. I understand that failure to comply with the conditions of release could result in sanctions and/or revocation of my pretrial release. I further understand that I am required to notify the clerk of the court of any change of address within 24 hours.

  
Defendant's Signature

March 30th, 2024  
Date



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

	)	
	)	
People	)	
	)	Case No. 23CF00001146
Plaintiff,	)	Location: Courtroom 020
v.	)	Event Date: March 30, 2024 9:00 AM
	)	Event Type: First Appearance
PEOPLE VS ALLABABIDI	)	
Defendant.	)	
<hr/>		Clerk: Sarah P

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Outstanding  
Warrant/60+ Days 08/14/2023

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Outstanding  
Warrant/60+ Days 08/14/2023

**Criminal/Traffic - Minutes**

ECR Specialist, Lake County Court Reporters  
Emma Smoler, States Attorney  
Patricia L Cornell, Judge  
Gregory R Ticsay, Public Defender

**Present in Court**

ALLABABIDI, EHAB, Defendant present in person

**Nature of Proceedings:**

Event Result: Heard 03/30/2024.  
Defendant present in custody.  
of Lake County Sheriff's Office  
Appoint Public Defender  
Set Conditions of Pretrial Release  
Pretrial Release is ordered.  
Report to Pretrial-Level 2  
Other Conditions of Release No driving without a valid license  
Order for Conditions of Pretrial Release Entered  
Public Defender Discharged

**The matter is set for Status Of Attorney on 05/02/2024 at 9:00 AM in Courtroom 611.**

Defendant Advised of Right to Appeal  
Released to Pretrial



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

CLERK OF THE CIRCUIT COURT  
LAKE COUNTY, ILLINOIS  
RELEASE

FILED

MAR 30 2024

*Ena Cantagut Weinstein*  
CIRCUIT CLERK

ORIGINAL X MODIFIED \_\_\_\_\_

DATE: 3-30-24 A.M. X P.M. \_\_\_\_\_

Name: (last, first) Allaba bidi, Ehab

JUDGE: Cornell

CASE NO. 23CF1146 CHARGE: Agg Reckless Driving

CASE NO. \_\_\_\_\_ CHARGE: \_\_\_\_\_

CASE NO. \_\_\_\_\_ CHARGE: \_\_\_\_\_

CASE NO. \_\_\_\_\_ CHARGE: \_\_\_\_\_

CASE NO. \_\_\_\_\_ CHARGE: \_\_\_\_\_

CASE NO. \_\_\_\_\_ CHARGE: \_\_\_\_\_

BOND AMOUNT: \$ \_\_\_\_\_ Recognizance

Next Court Date: AMND 5-2-24 Time: 9:00 A.M. X P.M. Courtroom: T611

CONDITIONS OF RELEASE

- Release to Pretrial Bond Supervision
- Release to: \_\_\_\_\_
- Curfew: \_\_\_\_\_
- No Drugs
- No Alcohol
- Random Testing
- No Contact With: \_\_\_\_\_
- Must Reside at: \_\_\_\_\_
- \_\_\_\_\_
- Nolle Prossed
- Other Information: \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

Deputy Clerk Smp Courtroom T020



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

	)		
	)		
People	)	Case No.	23CF00001146
	)	Location:	Courtroom 611
Plaintiff,	)	Event Date:	May 2, 2024 9:00 AM
v.	)	Event Type:	Status Of Attorney
	)		
PEOPLE VS ALLABABIDI	)	Clerk:	Johanna B
Defendant.	)		

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**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Outstanding  
Warrant/60+ Days 08/14/2023

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Outstanding  
Warrant/60+ Days 08/14/2023

**Criminal/Traffic - Minutes**

Christopher R Stride, Judge  
Francis P Derosa, States Attorney  
ECR Specialist, Lake County Court Reporters

**Present in Court**

ALLABABIDI, EHAB, Defendant present in person

**Nature of Proceedings:**

Event Result: Heard 05/02/2024.

Appoint Public Defender

The Court orders this matter set as follows: Arraignment on 05/14/2024 at 09:00 AM in T611

Pretrial Release Shall Continue



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

	)	
	)	
People	)	
	)	Case No. 23CF00001146
Plaintiff,	)	Location: Courtroom 611
v.	)	Event Date: May 14, 2024 9:00 AM
	)	Event Type: Arraignment
PEOPLE VS ALLABABIDI	)	
Defendant.	)	Clerk: Johanna B

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**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Outstanding  
Warrant/60+ Days 08/14/2023

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Outstanding  
Warrant/60+ Days 08/14/2023

**Criminal/Traffic - Minutes**

Francis P Derosa, States Attorney  
Christopher R Stride, Judge  
ECR Specialist, Lake County Court Reporters  
Justin Malec, Public Defender

**Present in Court**

ALLABABIDI, EHAB, Defendant present in person

**Nature of Proceedings:**

Event Result: Heard 05/14/2024.  
Advised of Mandatory Supervised Release  
Not Guilty Plea  
Motion for Discovery.  
14 DAYS  
Reciprocal discovery ordered.  
14 DAYS  
Motion of Defense  
The Court orders this matter set as follows: Pre-Trial on 06/25/2024 at 09:00 AM in T611  
By Agreement  
Pretrial Release Shall Continue

STATE OF ILLINOIS )  
 ) SS  
COUNTY OF LAKE )

**FILED**

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

Erin Cartwright Weinstein  
Clerk of the Court  
Lake County, Illinois

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
VS. ) GENERAL NO. 23CF1146  
 )  
 )

**EHAB ALLABABIDI**

**DISCLOSURE TO THE ACCUSED**

Now come the People of the State of Illinois by ERIC F. RINEHART, State's Attorney, in and for the County of Lake, State of Illinois, by Assistant State's Attorney, pursuant to Supreme Court Rule 412 disclose the following response to Defendant's motion for pre-trial disclosure:

1. The names of persons whom the State intends, at this time, to call at the time of hearing or trial appear on the attached list of witnesses.

To the extent that said witnesses prepared relevant written or recorded statements or memoranda containing substantially verbatim reports of oral statements by them exist, the same are contained in the attached reports labeled 23CF1146-FPD00001-00003-23CF1146-FPD00122-00125, 2 discs containing squad video, and photos.

2. Written statements of the accused, or co-defendant, if any, recorded statements of the accused, or co-defendant, if any, and the substance or oral statements of the accused or the co-defendant, if any, are contained in the attachments hereto. The witnesses to the making of written or oral statements of the accused are included in the attached list of witnesses.

3. Grand Jury minutes, if any, will be furnished through Supplemental Discovery.

4. The reports of experts, if any, are contained in the attachments hereto.

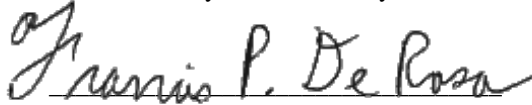
5. Books, papers, documents, photographs or tangible objects which the State intends to use at hearing or trial or which were obtained from or belong to the accused, may be examined at the State's Attorney's Office upon reasonable notice during business hours.

6. The People are not aware of any record of prior criminal convictions which may be use for impeachment of persons whom the People intend to call as witnesses at hearing or trial other than may be contained herein.

7. Electronic surveillance, if any, is contained in the attached reports.

8. Material or information within the possession or control of the People tending to negate the guilt of defendant as to the offenses charged or tending to reduce his punishment, therefore, if any, is contained within the attached reports.

ERIC F. RINEHART  
State's Attorney of Lake County

  
Assistant State's Attorney

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**

**LIST OF WITNESS**

The People disclose the following as a list of witnesses to be called at trial. Additionally, the people reserve the right to call as witness any persons referenced in any disclosure of materials to the defendant.

**WITNESSES**

- Gurnee Officer Murray
- Lincolnshire Detective Forkes
- Lincolnshire Officer Plotke
- Lincolnshire Officer Temple
- Lincolnshire Community Service Officer Kanter
- Lincolnshire Officer Skrobot
- Lincolnshire Detective Petrick
- Lincolnshire Officer Beale
- Lincolnshire Sergeant Zange
- Illinois State Police Trooper Nebelski
- Riverwoods Officer Durkin
- Christopher King
- Manuel Rojo
- Asad Khan
- Adam Heald
- Gary Gutierrez
- James Howard
- Condell Phlebotomist Stacy Rietschel
- Any Other Person Mentioned in the Reports

STATE OF ILLINOIS )  
 )  
COUNTY OF LAKE )

SS

**FILED**

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

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

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
VS. )  
 )

GENERAL NO: 23CF1146

**EHAB ALLABABIDI**

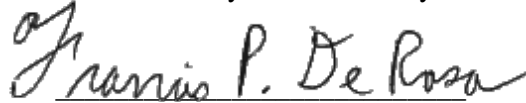
**PEOPLE'S MOTION FOR DISCOVERY**

NOW COME the People of the State of Illinois, by ERIC F. RINEHART, State's Attorney, in and for the County of Lake, State of Illinois, by and through, Assistant State's Attorney, and request the following as discovery from the defendant, pursuant to Supreme Court Rule 413 and under the Local Rules of the Nineteenth Judicial Circuit, Part 9.00, Sub-Part C, 9.16:

1. The names and last known addresses of persons whom the defendant intends to call as witnesses, together with their relevant written or recorded statements, including memoranda reporting or summarizing their oral statements, and any record of prior criminal convictions of said witnesses known to the defendant or counsel;
2. Any written or recorded statements, including memoranda reporting or summarizing the oral statements of any person listed by the State as potential witnesses;
3. Any books, papers, documents, photographs or tangible objects which the defendant intends to use as evidence or for impeachment at a hearing or at trial;
4. If the defendant intends to establish an alibi, specific information as to the place where the defendant maintains he/she was at the time of the alleged offense;
5. The title of any and all Affirmative Defenses that he intends to assert at a hearing or at trial.
6. Any reports or results of physical or mental examinations or of scientific tests, experiments or comparisons, or any other reports or statements of experts which defense counsel has in his possession or control, including a statement of the qualifications of such experts, except that those portions of the reports containing statements made by the defendant may be withheld if defense does not intend to use any of the material contained in the report at a hearing or trial.

WHEREFORE, the People request that the above discovery materials be tendered to the People within 14 days of this Motion.

ERIC F. RINEHART  
State's Attorney of Lake County



Assistant State's Attorney

STATE OF ILLINOIS )  
 )  
 ) SS  
COUNTY OF LAKE )

**FILED**

~~DELEG AUF~~

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

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

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
 ) VS. )  
 )

GENERAL NO: 23CF1146

**EHAB ALLABABIDI**

**ORDER**

Upon Motion of the People of the State of Illinois, by ERIC F. RINEHART, State’s Attorney, for County of Lake, by and through, Assistant State’s Attorney,

IT IS HEREBY ORDERED that counsel for the defendant in the above-captioned cause shall inform the State of any defenses which the defendant intends to make at a hearing or trial, including affirmative defenses, non-affirmative defenses, alternate and inconsistent defenses;

IT IS FURTHER ORDERED that counsel for the defendant shall furnish the State with the following materials and information within counsel’s possession or control or within the possession or control of the defendant:

1. The names and last known addresses of persons the defendant intends to call as witnesses, together with their relevant written or recorded statements, including memoranda reporting or summarizing their oral statements and any record of prior criminal convictions of said witnesses known to the defendant or counsel;
2. Any written or recorded statements, including memoranda reporting or summarizing the oral statements of any person listed by the State as potential witnesses;
3. Any books, documents, photographs or tangible objects said defendant intends to use as evidence or for impeachment;
4. Any reports or statements of experts, made in connection with this case, including results of physical or mental examinations, and of scientific tests, experiments or comparisons, except that those portions of reports containing statements made by the defendant may be withheld if defense counsel does not intend to use any of the material contained in the report at a hearing or trial; oral reports or statements of experts shall be reduced to writing by said experts;

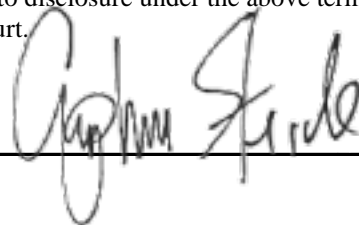
IT IS FURTHER ORDERED that if said defendant intends to establish an alibi, said defendant shall disclose to the State specific information as to the place where the defendant maintains he was located at the time of the alleged offense;

IT IS FURTHER ORDERED that counsel for the defendant shall comply with the aforesaid order **within 14 days** hereof at a time and place and in a manner mutually agreeable to said counsel and the Office of the State’s Attorney whereby said material and information may be inspected, obtained, tested, copied or photographed. If the parties cannot agree on a time, place, and manner of compliance with this order, defense counsel shall notify the State that the aforesaid material and information may be inspected, obtained, tested, copied or photographed during specified reasonable times and at places reasonably accessible to the State’s Attorney or his designated Assistant.

IT IS FURTHER ORDERED that, if subsequent to compliance with this Order, the defendant or counsel discover additional material or information which is subject to disclosure under the above terms, such information or material shall be promptly disclosed to the State and this Court.

Dated at Waukegan, Illinois, on 06/20/2024.

ENTERED: \_\_\_\_\_



# ADMINISTRATIVE OFFICE OF THE NINETEENTH JUDICIAL CIRCUIT



Division of Adult Probation Services

Lake County, Illinois

Pretrial Services Unit  
301 Washington Street  
Waukegan, IL 60085-5533  
TDD: 847.625-2783  
Fax: 847.782-6024  
Phone: 847.377-4506

## STATUS REPORT

### PRETRIAL SUPERVISION

DATE: June 18, 2024

TO: Honorable CHRISTOPHER R. STRIDE

FROM: XOCHILT TAPIA, PROBATION OFFICER

RE: ALLABABIDI, EHAB

COURT DATE: 06/25/2024

TIME: 9:00 AM

ROOM: T-611

CHARGE :  
AGG RECKLESS DRVG/BODILY HARM (cl 4)  
SPEEDING 35+ MPH OVER LIMIT (cl A)

CASE#: 2023CF00001146

The defendant was released to Pretrial Supervision on 3/30/2024, with the following conditions:

Level 2 - Conditions Include: Mandated and Statutory Conditions; Court reminder calls/text before each court date; Check in by phone one time per month.

Additional Conditions include: No driving without a valid driver's license.

To date, the defendant has been in full compliance with his Pretrial release conditions. At this time, the Court may wish to consider reducing the level of supervision or removal from Pretrial Services.

XOCHILT TAPIA, PROBATION OFFICER  
Pretrial Services Officer



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

	)		
	)		
People	)		
	)	Case No.	23CF00001146
Plaintiff,	)	Location:	Courtroom 611
v.	)	Event Date:	June 25, 2024 9:00 AM
	)	Event Type:	Pre-Trial
PEOPLE VS ALLABABIDI	)		
Defendant.	)	Clerk:	Amy B
_____	)		

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Outstanding  
Warrant/60+ Days 08/14/2023

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Outstanding  
Warrant/60+ Days 08/14/2023

**Criminal/Traffic - Minutes**

Christopher R Stride, Judge  
Justin Malec, Public Defender  
ECR Specialist, Lake County Court Reporters  
Francis P De Rosa IV, States Attorney

**Present in Court**

ALLABABIDI, EHAB, Defendant present in person

**Nature of Proceedings:**

Event Result: Heard and Continued 06/25/2024.

The Court orders this matter set as follows: Pre-Trial on 07/23/2024 at 09:00 AM in T611

By Agreement

Pretrial Release Shall Continue



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

	)		
	)		
People	)	Case No.	23CF00001146
	)	Location:	Courtroom 611
Plaintiff,	)	Event Date:	July 23, 2024 9:00 AM
v.	)	Event Type:	Pre-Trial
	)		
PEOPLE VS ALLABABIDI	)	Clerk:	Amy B
Defendant.	)		
_____	)		

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Outstanding  
Warrant/60+ Days 08/14/2023

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Outstanding  
Warrant/60+ Days 08/14/2023

**Criminal/Traffic - Minutes**

Francis P De Rosa IV, States Attorney  
ECR Specialist, Lake County Court Reporters  
Christopher R Stride, Judge  
Justin Malec, Public Defender

**Present in Court**

ALLABABIDI, EHAB, Defendant present in person

**Nature of Proceedings:**

Event Result: Heard and Continued 07/23/2024.  
Motion of Defense

**The matter is set for Pre-Trial on 08/20/2024 at 9:00 AM in Courtroom 611. .**  
Pretrial Release Shall Continue





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

	)		
	)		
People	)	Case No.	23CF00001146
	)	Location:	Courtroom 611
Plaintiff,	)	Event Date:	August 20, 2024 9:00 AM
v.	)	Event Type:	Pre-Trial
	)		
PEOPLE VS ALLABABIDI	)	Clerk:	Amy B
Defendant.	)		

---

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Outstanding  
Warrant/60+ Days 08/14/2023

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Outstanding  
Warrant/60+ Days 08/14/2023

**Criminal/Traffic - Minutes**

ECR Specialist, Lake County Court Reporters  
Francis P De Rosa IV, States Attorney  
Christopher R Stride, Judge  
Justin Malec, Public Defender

**Present in Court**

ALLABABIDI, EHAB, Defendant present via video

**Nature of Proceedings:**

Event Result: Heard and Continued 08/20/2024.

**The matter is set for Pre-Trial on 09/24/2024 at 9:00 AM in Courtroom 611. MUST APPEAR IN PERSON.**  
Pretrial Release Shall Continue

# ADMINISTRATIVE OFFICE OF THE NINETEENTH JUDICIAL CIRCUIT

Division of Adult Probation Services

FILED

JUDGE



Erin Cartwright  
Clerk of the Court  
Lake County, Illinois

Pretrial Services Unit  
301 S Washington Street  
Waukegan, IL 60085-5534  
Phone: 847.377.4506  
TDD: 847.625.2783  
Fax: 847.984.5798

Courtroom: T-611  
Time: 9:00 AM  
Court Date: September 24, 2024

## MEMORANDUM

To: Assistant State's Attorney

From: XOCHILT TAPIA, PROBATION OFFICER

Date: 9/19/2024

Charge: AGG RECKLESS DRVG/BODILY HARM  
(cl 4)

SPEEDING 35+ MPH OVER LIMIT (cl A)

Re: ALLABABIDI, EHAB

Case#: 23CF00001146

This memo will serve to inform the court of the following violation(s):

Curfew  Positive Drug/Alcohol Screen  Police Contact  Absconded  SCRAM  Other

The defendant was released to Pretrial Supervision on 4/10/2024, with the following conditions: Level 2 - Conditions Include: Mandated and Statutory Conditions; Court reminder calls/text before each court date; Check in by phone one time per month.

Additional conditions include: No driving without a valid driver's license.

Per Leads, on 8/30/24 the defendant was arrested by the Chicago Police Department for Possession, Poss Amt Con (cl 4), Drive w/o Headlight/Cyc (cl P) and Fail to Signal (cl P, 24111164501). The next court date is scheduled for 10/11/2024.

cc: Judge  
Defense Attorney  
File

Approved by: /s/Philip Ksiezak  
Philip Ksiezak, Unit Manager  
Pretrial Services

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

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

PEOPLE OF THE STATE OF ILLINOIS

vs.

**EHAB ALLABABIDI**

GEN. NO. 23CF00001146

**PEOPLE’S VERIFIED PETITION TO REVOKE PRE-TRIAL RELEASE**

The People of the State of Illinois, through State’ Attorney Eric Rinehart, bring this Petition to Revoke Pre-Trial Release pursuant to 725 ILCS 5/110-6(a) and respectfully requests that this Honorable Court, order the detention of the Defendant named in the above caption until disposition of this matter or other order of Court.

1. Defendant was arrested for the offense(s):

**AGG RECKLESS DRVG/BODILY HARM (Class 4 Felony)** in violation of **625 ILCS 5/11-503(a)(1)(d)** and **SPEEDING 35+ MPH OVER LIMIT (Class A Misdemeanor)** in violation of **625 ILCS 5/11-601.5**. The Defendant was released after his or her original arrest pending the outcome of that case.

2. Since that release on March 20, 2024, the Defendant committed:

A Class 4 Felony, being the offense of Unlawful Possession of a Controlled Substance. Said case being People v. Ehab Allababidi, pending in the Circuit Court of Cook County.

3. There is clear and convincing evidence that detention is needed because there are no conditions or combination of conditions that will:

reasonably ensure the Defendant does not commit another Class A misdemeanor or felony.

4. In further support of this Petition, the State alleges on information and belief:

Per Leads, on 8/30/24, the defendant was arrested by the Chicago Police Department for Unlawful Possession of a Controlled Substance (Class 4), Drive without Headlight/Cyc (Class P) and Fail to Signal (Class P, 24111164501). The next court date is scheduled for 10/11/2024.

WHEREFORE, the State requests that this Honorable Court revoke the Defendant’s pre-trial release and detain the Defendant pending the outcome of this case.

Respectfully submitted,

---

Francis P DeRosa  
Assistant State's Attorney

Under penalties provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this Petition to Detain are true and correct, except as to matters herein stated to be upon information and belief and as to such matters, the undersigned certifies as aforesaid that he/she verily believes the same to be true.

Respectfully submitted,

---

Francis P DeRosa  
Assistant State's Attorney



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

	)	
	)	
People	)	
	)	Case No. 23CF00001146
Plaintiff,	)	Location: Courtroom 611
v.	)	Event Date: September 24, 2024 9:00 AM
	)	Event Type: Pre-Trial
PEOPLE VS ALLABABIDI	)	MUST APPEAR IN PERSON
Defendant.	)	Clerk: Johanna B

---

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Outstanding  
Warrant/60+ Days 08/14/2023

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Outstanding  
Warrant/60+ Days 08/14/2023

**Criminal/Traffic - Minutes**

Francis P Derosa, States Attorney  
Justin Malec, Public Defender  
Christopher R Stride, Judge  
ECR Specialist, Lake County Court Reporters

**Present in Court**

ALLABABIDI, EHAB, Defendant present in person

**Nature of Proceedings:**

Event Result: Heard and Continued 09/24/2024.

DEF SENT TO TEST FOR PRETRIAL - MUST COME BACK IF POSITIVE

The Court orders this matter set as follows: Pre-Trial on 10/11/2024 at 09:00 AM in T611

Pretrial Release Shall Continue



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

	)		
	)		
People	)	Case No.	23CF00001146
	)	Location:	Courtroom 611
Plaintiff,	)	Event Date:	October 11, 2024 9:00 AM
v.	)	Event Type:	Pre-Trial
	)		
PEOPLE VS ALLABABIDI	)	Clerk:	Sarah P
Defendant.	)		

---

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Outstanding  
Warrant/60+ Days 08/14/2023

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Outstanding  
Warrant/60+ Days 08/14/2023

**Criminal/Traffic - Minutes**

Justin Malec, Public Defender  
Christopher R Stride, Judge  
Francis P Derosa, States Attorney  
ECR Specialist, Lake County Court Reporters

**Present in Court**

ALLABABIDI, EHAB, Defendant present in person

**Nature of Proceedings:**

Event Result: Heard and Continued 10/11/2024.

Admonish

Def not to consume or possess any alcohol or drugs - comply with pretrial conditions

The Court orders this matter set as follows: Pre-Trial on 10/29/2024 at 09:00 AM in T611

Pretrial Release Shall Continue



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

	)	
	)	
People	)	
	)	Case No. 23CF00001146
Plaintiff,	)	Location: Courtroom 611
v.	)	Event Date: October 29, 2024 9:00 AM
	)	Event Type: Pre-Trial
PEOPLE VS ALLABABIDI	)	
Defendant.	)	Clerk: Amy B

---

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Outstanding  
Warrant/60+ Days 08/14/2023

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Outstanding  
Warrant/60+ Days 08/14/2023

**Criminal/Traffic - Minutes**

Justin Malec, Public Defender  
Christopher R Stride, Judge  
Francis P De Rosa IV, States Attorney  
ECR Specialist, Lake County Court Reporters

**Present in Court**

ALLABABIDI, EHAB, Defendant present in person

**Nature of Proceedings:**

Event Result: Heard and Continued 10/29/2024.

Motion of State

Petition Withdrawn

- STATE'S MOTION TO WITHDRAW PETITION TO REVOKE PRETRIAL RELEASE IS GRANTED AND  
PETITION IS WITHDRAWN

Motion of Defense

No Objection by the State

**The matter is set for Pre-Trial on 11/26/2024 at 9:00 AM in Courtroom 611. - MUST APPEAR IN PERSON.**

Pretrial Release Shall Continue

# ADMINISTRATIVE OFFICE OF THE NINETEENTH JUDICIAL CIRCUIT

Division of Adult Probation Services

FILED

FFD FDSG /TG/NT



Erin Cartwright  
Clerk of the Court  
Lake County, Illinois

Pretrial Services Unit  
301 S Washington Street  
Waukegan, IL 60085-5534  
Phone: 847.377.4506  
TDD: 847.625.2783  
Fax: 847.984.5798

Courtroom: T-611  
Time: 9:00 AM  
Court Date: November 26, 2024

## MEMORANDUM

To: Assistant State's Attorney

From: XOCHILT TAPIA, PROBATION OFFICER

Date: 11/21/2024

Charge: AGG RECKLESS DRVG/BODILY HARM  
(cl 4)  
SPEEDING 35+ MPH OVER LIMIT (cl A)

Re: ALLABABIDI, EHAB

Case#: 23CF00001146

This memo will serve to inform the court of the following violation(s):

Curfew  Positive Drug/Alcohol Screen  Police Contact  Absconded  SCRAM  Other

The defendant was released to Pretrial Supervision on 4/10/2024, with the following conditions: Level 2 - Conditions Include: Mandated and Statutory Conditions; Court reminder calls/text before each court date; Check in by phone one time per month.

Additional conditions include: No driving without a valid driver's license; Not to consume or possess any alcohol or drugs.

A standard condition of Level 2 Supervision is to check in with Pretrial Services by phone once a month. The defendant failed to check in for the month of October.

cc: Judge  
Defense Attorney  
File

Approved by: /s/Philip Ksiezak  
Philip Ksiezak, Unit Manager  
Pretrial Services



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

	)		
	)		
People	)		
	)	Case No.	23CF00001146
Plaintiff,	)	Location:	Courtroom 611
v.	)	Event Date:	November 26, 2024 9:00 AM
	)	Event Type:	Pre-Trial
PEOPLE VS ALLABABIDI	)	- MUST APPEAR IN PERSON	
Defendant.	)	Clerk:	Amy B
	)		

---

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Outstanding  
Warrant/60+ Days 08/14/2023

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Outstanding  
Warrant/60+ Days 08/14/2023

**Criminal/Traffic - Minutes**

Christopher R Stride, Judge  
Justin Malec, Public Defender  
ECR Specialist, Lake County Court Reporters  
Francis P De Rosa IV, States Attorney

**Present in Court**

ALLABABIDI, EHAB, Defendant present in person

**Nature of Proceedings:**

Event Result: Heard 11/26/2024.  
Defendant Sent to Pre-Trial Services or Probation for Testing.  
Advised of Failure to Appear  
- THIS CASE WILL BE HEARD LATER TODAY



**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: November 26, 2024 9:32 AM  
Event Type: Status  
Clerk: Amy B

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Outstanding  
Warrant/60+ Days 08/14/2023  
Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Outstanding  
Warrant/60+ Days 08/14/2023

**Criminal/Traffic - Minutes**

Christopher R Stride, Judge  
Justin Malec, Public Defender  
ECR Specialist, Lake County Court Reporters  
Francis P De Rosa IV, States Attorney

**Present in Court**

ALLABABIDI, EHAB, Defendant present in person

**Nature of Proceedings:**

Event Result: Heard 11/26/2024.  
Defendant Tested Negative.  
Admonish  
- DEFENDANT MUST FOLLOW ALL CONDITIONS OF PRETRIAL SUPERVISION - MUST CHECK IN  
AND REPORT AS DIRECTED BY PRETRIAL  
Motion of Defense

**The matter is set for Pre-Trial on 01/03/2025 at 9:00 AM in Courtroom 611. .**  
Pretrial Release Shall Continue



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

	)		
	)		
People	)	Case No.	23CF00001146
	)	Location:	Courtroom 611
Plaintiff,	)	Event Date:	January 3, 2025 9:00 AM
v.	)	Event Type:	Pre-Trial
	)		
PEOPLE VS ALLABABIDI	)	Clerk:	Amy B
Defendant.	)		

---

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Outstanding  
Warrant/60+ Days 08/14/2023

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Outstanding  
Warrant/60+ Days 08/14/2023

**Criminal/Traffic - Minutes**

ECR Specialist, Lake County Court Reporters  
Christopher R Stride, Judge  
Francis P Derosa, States Attorney  
Justin Malec, Public Defender

**Present in Court**

ALLABABIDI, EHAB, Defendant present in person

**Nature of Proceedings:**

Event Result: Heard and Continued 01/03/2025.  
Motion of State

**The matter is set for Pre-Trial on 02/18/2025 at 9:00 AM in Courtroom 611. / STAT. OF DISCOVERY OF  
MEDICAL RECORDS.**

Pretrial Release Shall Continue



**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: February 18, 2025 9:00 AM

Event Type: Pre-Trial

/ STAT. OF DISCOVERY OF MEDICAL  
RECORDS

Clerk: Amy B

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Outstanding  
Warrant/60+ Days 08/14/2023

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Outstanding  
Warrant/60+ Days 08/14/2023

**Criminal/Traffic - Minutes**

ECR Specialist, Lake County Court Reporters

Emma Smoler, States Attorney

Christopher R Stride, Judge

Bailey Russell, Public Defender

**Present in Court**

ALLABABIDI, EHAB, Defendant present in person

**Nature of Proceedings:**

Event Result: Heard 02/18/2025.

Motion of Defense

**The matter is set for Plea on 03/19/2025 at 9:00 AM in Courtroom 611. - ON ZOOM.**

Admonish

- DEFENDANT ORDERED TO REPORT AND TEST AT PRETRIAL DIRECTLY AFTER COURT

Pretrial Release Shall Continue



**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: February 18, 2025 10:53 AM  
Event Type: Status  
Clerk: Amy B

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Outstanding  
Warrant/60+ Days 08/14/2023

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Outstanding  
Warrant/60+ Days 08/14/2023

**Criminal/Traffic - Minutes**

ECR Specialist, Lake County Court Reporters  
Emma Smoler, States Attorney  
Christopher R Stride, Judge  
Bailey Russell, Public Defender

**Present in Court**

ALLABABIDI, EHAB, Defendant present in person

**Nature of Proceedings:**

Event Result: Heard 02/18/2025.  
Defendant Tested Positive.  
- FOR ALCOHOL - SIGNED ADMISSION OF USE (ON 2/16/25)  
Continue to previously set date on 03/19/25  
Pretrial Release Shall Continue



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

	)		
	)		
People	)	Case No.	23CF00001146
	)	Location:	Courtroom 611
Plaintiff,	)	Event Date:	March 19, 2025 9:00 AM
v.	)	Event Type:	Plea
	)	- ON ZOOM	
PEOPLE VS ALLABABIDI	)	Clerk:	Amy B
Defendant.	)		

---

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Outstanding  
Warrant/60+ Days 08/14/2023

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Outstanding  
Warrant/60+ Days 08/14/2023

**Criminal/Traffic - Minutes**

ECR Specialist, Lake County Court Reporters  
Christopher R Stride, Judge  
Francis P De Rosa IV, States Attorney  
Bailey Russell, Public Defender

**Present in Court**

ALLABABIDI, EHAB, Defendant present via video

**Nature of Proceedings:**

Event Result: Heard and Continued 03/19/2025.

**The matter is set for Plea on 04/30/2025 at 9:00 AM in Courtroom 611. - IN PERSON.**  
Pretrial Release Shall Continue

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

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

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
 vs. )  
 )  
 EHAB ALLABABIDI )

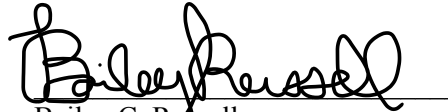
CASE NO: 23CF1146

**ANSWER TO STATE'S MOTION FOR DISCOVERY**

The Defendant, by his attorney, Bailey C. Russell, Assistant Public Defender, answers the State's Motion for Discovery as follows:

1. The defense will rely upon the presumption of innocence and the State's inability to prove guilt beyond a reasonable doubt.
2. The defense may call as witnesses any of those persons named in the police reports, transcripts and other documents tendered by the State to the defendant.
3. The defense has no knowledge of any reports, test results or testimony of physical or mental examinations or of scientific tests or of any other comparisons of reports of experts.
4. The only documents the defense may or may not use for impeachment purposes at hearing or trial are documents previously tendered to the defense by the State.
5. Pursuant to Illinois Supreme Court Rule 415(b), additional discovery shall be provided to the State as it becomes available; investigation continues.

Respectfully submitted,



Bailey C. Russell  
Assistant Public Defender  
Attorney for the Defendant

Office of the Lake County Public Defender  
15 South County Street  
Waukegan, Illinois 60085  
(847) 377-3360 telephone  
(847) 984-5753 facsimile

PEOPLE OF THE STATE OF ILLINOIS )

v. )

GEN. NO. 23CF1146 )

Erin Cartwright Weinstein  
Clerk of the Court  
Lake County, Illinois

EHAB ALLABABIDI )

**ORDER**

Upon motion of Bailey C. Russell, Assistant Public Defender, attorney for the above named Defendant,  
*IT IS HEREBY ORDERED THAT* the State shall, pursuant to Supreme Court Rule 412, disclose to the attorney for the Defendant the following material and information within its possession or control:

1. the names and last known addresses of persons whom the State intends to call as witnesses, together with their relevant written or recorded statements, memoranda containing substantially verbatim reports of their oral statements, and a list of memoranda reporting or summarizing their oral statements. Upon written motion of defense counsel memoranda reporting or summarizing oral statements shall be examined by the court in camera and if found to be substantially verbatim reports of oral statements shall be disclosed to defense counsel;
2. any written or recorded statements and the substance of any oral statements made by the accused or by a co-defendant, and a list of witnesses to the making and acknowledgment of such statements;
3. a transcript of those portions of grand jury minutes containing testimony of the accused and relevant testimony of persons whom the prosecuting attorney intends to call as witnesses at the hearing or trial;
4. any reports or statements of experts, made in connection with the particular case, including results of physical or mental examinations and of scientific tests, experiments, or comparisons, and a statement of qualifications of the expert;
5. any books, papers, documents, photographs or tangible objects which the prosecuting attorney intends to use in the hearing or trial or which were obtained from or belong to the accused; and
6. any record of prior criminal convictions, which may be used for impeachment, of persons whom the State intends to call as witnesses at the hearing or trial.

If the State has obtained from the Defendant pursuant to Supreme Court Rule 413(d) information regarding defenses the Defendant intends to make, it shall provide to Defendant not less than seven (7) days before the date set for the hearing or trial, or at such other time as the court may direct, the names and addresses of witnesses the state intends to call in rebuttal, together with the information required to be disclosed in connection with other witnesses by paragraphs 1, 3 and 6, above, and a specific statement as to the substance of the testimony such witnesses will give at the trial of the cause.

The State shall inform defense counsel if there has been any electronic surveillance (including wiretapping) of conversations to which the accused was a party, or of his premises.

Except as is otherwise provided in the Supreme Court Rules as to protective orders, the State shall disclose to defense counsel any material or information within its possession or control which tends to negate the guilt of the accused as to the offense charged or would tend to reduce his punishment therefor.

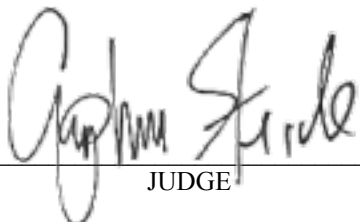
The State shall perform its obligations within seven (7) days.

The State may perform these obligations in any manner mutually agreeable to itself and defense counsel or by:

- (i) notifying defense counsel that material and information, described in general terms, may be inspected, obtained, tested, copied, or photographed, during specified reasonable times; and
- (ii) making available to defense counsel at the time specified such materials and information, and suitable facilities or other arrangements for inspection, testing, copying and photographing of such material and information.

The State should ensure that a flow of information is maintained between the various investigative personnel and its office sufficient to place within its possession or control all material and information relevant to the accused and the offense charged.

*IT IS FURTHER ORDERED THAT*, pursuant to Supreme Court Rule 415(b), if subsequent to compliance with the above order, the State discovers additional material or information which is subject to disclosure under the terms of this order, the State shall promptly disclose such material or information and also notify the court of its existence.

  
\_\_\_\_\_  
JUDGE



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

	)		
	)		
People	)	Case No.	23CF00001146
	)	Location:	Courtroom 611
Plaintiff,	)	Event Date:	April 30, 2025 9:00 AM
v.	)	Event Type:	Plea
	)	- IN PERSON	
PEOPLE VS ALLABABIDI	)	Clerk:	Johanna B
Defendant.	)		

---

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Outstanding  
Warrant/60+ Days 08/14/2023

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Outstanding  
Warrant/60+ Days 08/14/2023

**Criminal/Traffic - Minutes**

Francis P Derosa, States Attorney  
Bailey Russell, Public Defender  
Christopher R Stride, Judge  
ECR Specialist, Lake County Court Reporters

**Present in Court**

ALLABABIDI, EHAB, Defendant present via video

**Nature of Proceedings:**

Event Result: Heard and Continued 04/30/2025.

**The matter is set for Plea on 06/12/2025 at 9:00 AM in Courtroom 611. MUST APPEAR - IN PERSON.**  
Pretrial Release Shall Continue



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

	)	
	)	
People	)	
	)	Case No. 23CF00001146
Plaintiff,	)	Location: Courtroom 611
v.	)	Event Date: June 12, 2025 9:00 AM
	)	Event Type: Plea
PEOPLE VS ALLABABIDI	)	MUST APPEAR - IN PERSON
Defendant.	)	Clerk: Amy B

---

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Outstanding  
Warrant/60+ Days 08/14/2023

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Outstanding  
Warrant/60+ Days 08/14/2023

**Criminal/Traffic - Minutes**

Christopher R Stride, Judge  
Bailey Russell, Public Defender  
Francis P De Rosa IV, States Attorney  
ECR Specialist, Lake County Court Reporters

**Present in Court**

ALLABABIDI, EHAB, Defendant present in person

**Nature of Proceedings:**

Event Result: Case Called 06/12/2025.  
Motion of Defense

**The matter is set for Pre-Trial on 07/23/2025 at 9:00 AM in Courtroom 611. .**

Pretrial Release Shall Continue



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

	)		
	)		
People	)	Case No.	23CF00001146
	)	Location:	Courtroom 611
Plaintiff,	)	Event Date:	June 23, 2025 9:00 AM
v.	)	Event Type:	Order Entered
	)		
PEOPLE VS ALLABABIDI	)	Clerk:	Johanna B
Defendant.	)		
_____	)		

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Outstanding  
Warrant/60+ Days 08/14/2023

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Outstanding  
Warrant/60+ Days 08/14/2023

**Criminal/Traffic - Minutes**

Christopher R Stride, Judge  
Francis P Derosa, States Attorney

**Present in Court**

**Nature of Proceedings:**

Event Result: Heard 06/23/2025.  
HIPPA FORMS



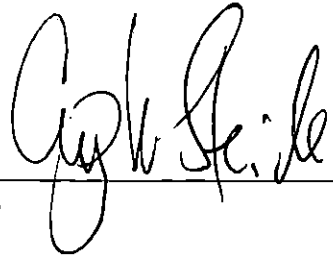
limited to, health information, including sensitive material, including demographic information, relating to either, (a) the past, present, or future physical or mental condition of an individual, (b) the provision of care to an individual, or (c) the payment for care provided to an individual, which identifies the individual or which reasonably could be expected to identify the individual.

3. All "covered entities" (as defined by 45 CFR 160.103) are hereby authorized to disclose PHI pertaining to CHRISTOPHER R. KING, DOB: 03/21/1977, to all attorneys now of record in this matter or who may become of records in the future of this litigation.
4. The parties and their attorneys shall be permitted to use the PHI pertaining CHRISTOPHER R. KING, DOB: 03/21/1977, in any manner that is reasonably connected with the above captioned litigation. This includes, but is not limited to, disclose to the parties, their attorneys of records, the attorneys' firms (i.e. attorneys, support staff, agents, and consultants), the parties' insurers, experts, consultants, court personnel, court reporters, copy services, trial consultants, jurors, venire members, and other entities involved in the litigation process.
5. At the conclusion of the litigation which shall be defined as the point at which final orders disposing of the entire case have been entered, or the time at which all trial and appellate proceedings have been exhausted any person or entity in possession of PHI received pursuant to this order shall destroy any and all copies of PHI pertaining to CHRISTOPHER R. KING, DOB: 03/21/1977.
6. This order shall not control or limit the use of protected health information pertaining to CHRISTOPHER R. KING, DOB: 03/21/1977, that comes in possession of any party or any party's attorney from a source other than a "covered entity", (as that term is defined in 45 CFR 160.103).
7. Nothing in this order relieves any party from complying with the requirement of the Illinois Mental Health and Development Disabilities Confidentiality Act (740 ILCS 110/1 et seq.), the Aids Confidentiality Act (410 ILCS 35/1, et seq) or state and federal law that protects certain drug and alcohol records (20 ILCS 301/30-5, 42 USC 290dd-3 and 290ee-3, and 42 CFR Part 2).

Questions regarding this Court order should be directed to Lake County State's Attorney's Office, Assistant State's Attorney Francis DeRosa, at (847) 377-3525.

DATE: 6/23/2025

JUDGE

A handwritten signature in black ink, appearing to read "C. P. DeRosa", is written over a horizontal line. The signature is cursive and somewhat stylized.

Order Prepared by:  
Francis P. DeRosa  
Asst. State's Attorney  
Office of the Lake County State's Attorney  
18 N. County St.  
Waukegan, IL 60085

**FILED**

**JUN 23 2025**

**CLERK OF SUPERIOR COURT**



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

	)		
	)		
People	)	Case No.	23CF00001146
	)	Location:	Courtroom 611
Plaintiff,	)	Event Date:	June 23, 2025 9:00 AM
v.	)	Event Type:	Order Entered
	)		
PEOPLE VS ALLABABIDI	)	Clerk:	Johanna B
Defendant.	)		
_____	)		

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Outstanding  
Warrant/60+ Days 08/14/2023

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Outstanding  
Warrant/60+ Days 08/14/2023

**Criminal/Traffic - Minutes**

Christopher R Stride, Judge  
Francis P Derosa, States Attorney

**Present in Court**

**Nature of Proceedings:**

Event Result: Heard 06/23/2025.  
HIPPA FORMS



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

	)		
	)		
People	)		
	)	Case No.	23CF00001146
Plaintiff,	)	Location:	Courtroom 611
v.	)	Event Date:	July 23, 2025 9:00 AM
	)	Event Type:	Pre-Trial
PEOPLE VS ALLABABIDI	)		
Defendant.	)	Clerk:	Johanna B
	)		

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**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Outstanding  
Warrant/60+ Days 08/14/2023

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Outstanding  
Warrant/60+ Days 08/14/2023

**Criminal/Traffic - Minutes**

Francis P Derosa, States Attorney  
Bailey Russell, Public Defender  
Christopher R Stride, Judge  
ECR Specialist, Lake County Court Reporters  
Nicholas Shepherd, States Attorney

**Present in Court**

ALLABABIDI, EHAB, Defendant present in person

**Nature of Proceedings:**

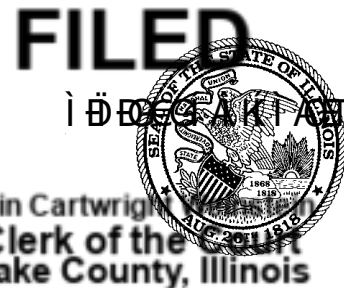
Event Result: Heard and Continued 07/23/2025.

Admonish

ADVISAL AND RIGHT TO A 402 CONFERENCE CONSET TO A 402 CONFERENCE  
402 conference.

The Court orders this matter set as follows: Pre-Trial on 08/12/2025 at 09:00 AM in T611  
Pretrial Release Shall Continue

# ADMINISTRATIVE OFFICE OF THE NINETEENTH JUDICIAL CIRCUIT



Division of Adult Probation Services

Lake County, Illinois

Pretrial Services Unit  
301 Washington Street  
Waukegan, IL 60085-5533  
TDD: 847.625-2783  
Fax: 847.782-6024  
Phone: 847.377-4506

## STATUS REPORT

### PRETRIAL SUPERVISION

DATE: August 7, 2025

TO: Honorable Christopher R Stride

FROM: XOCHILT TAPIA, PROBATION OFFICER

RE: ALLABABIDI, EHAB

COURT DATE: 08/12/2025

TIME: 9:00 AM

ROOM: T-611

CHARGE: AGG RECKLESS DRVG/BODILY HARM (cl 4)  
SPEEDING 35+ MPH OVER LIMIT (cl 4)

CASE#: 23CF00001146

The defendant was released to Pretrial Supervision on 3/30/2024, with the following conditions:  
Level 2 - Conditions Include: Mandated and Statutory Conditions; Court reminder calls/text before each court date; Check in by phone one time per month.

Additional Conditions include: No driving without a valid driver's license; Not to consume or possess any alcohol or drugs.

To date, the defendant has been in full compliance with his Pretrial release conditions. At this time, the Court may wish to consider reducing the level of supervision or removal from Pretrial Services.

XOCHILT TAPIA, PROBATION OFFICER  
Pretrial Services Officer



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

	)		
	)		
People	)		
	)	Case No.	23CF00001146
Plaintiff,	)	Location:	Courtroom 611
v.	)	Event Date:	August 12, 2025 9:00 AM
	)	Event Type:	Pre-Trial
PEOPLE VS ALLABABIDI	)	FINAL	
Defendant.	)	Clerk:	Johanna B
<hr/>			

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Outstanding  
Warrant/60+ Days 08/14/2023

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Outstanding  
Warrant/60+ Days 08/14/2023

**Criminal/Traffic - Minutes**

Bailey Russell, Public Defender  
Francis P Derosa, States Attorney  
Christopher R Stride, Judge  
ECR Specialist, Lake County Court Reporters

**Present in Court**

ALLABABIDI, EHAB, Defendant present in person

**Nature of Proceedings:**

Event Result: Heard 08/12/2025.

The Court orders this matter set as follows: Plea on 08/26/2025 at 09:00 AM in T611

Pretrial Release Shall Continue



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

	)		
	)		
People	)	Case No.	23CF00001146
	)	Location:	Courtroom 611
Plaintiff,	)	Event Date:	August 26, 2025 9:00 AM
v.	)	Event Type:	Plea
	)	FINAL	
PEOPLE VS ALLABABIDI	)	Clerk:	Johanna B
Defendant.	)		

---

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Outstanding  
Warrant/60+ Days 08/14/2023

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Outstanding  
Warrant/60+ Days 08/14/2023

**Criminal/Traffic - Minutes**

Nicholas Shepherd, States Attorney  
Christopher R Stride, Judge  
ECR Specialist, Lake County Court Reporters  
Bailey Russell, Public Defender

**Present in Court**

ALLABABIDI, EHAB, Defendant present in person

**Nature of Proceedings:**

Event Result: Heard and Continued 08/26/2025.

The Court orders this matter set as follows: Plea on 09/08/2025 at 09:00 AM in T611

Pretrial Release Shall Continue



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

	)		
	)		
People	)		
	)	Case No.	23CF00001146
Plaintiff,	)	Location:	Courtroom 611
v.	)	Event Date:	September 8, 2025 9:00 AM
	)	Event Type:	Plea
PEOPLE VS ALLABABIDI	)	FINAL	
Defendant.	)	Clerk:	Amy 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  
Bailey Russell, Public Defender  
Francis P De Rosa IV, States Attorney  
ECR Specialist, Lake County Court Reporters

**Present in Court**

ALLABABIDI, EHAB, Defendant present in person

**Nature of Proceedings:**

Event Result: Heard 09/08/2025.  
Withdraw Not Guilty Plea  
Arrestment  
Advised of Mandatory Supervised Release  
Advised Of Nature Of Charge Sentence  
Advised of Right to Trial by Jury or Court  
Trial Waived  
Enter Negotiated Plea Of Guilty  
Nolle Prosequi  
- COUNT 2 ONLY  
Effects, Consequences Explained, Persisted.  
Unconditionally Accepted by Court  
Waive Pre-Sentence Investigation  
Judgment on Plea  
Sentencing  
Election of Financial Sentencing  
Order Entered



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

- RESTITUTION ORDER ENTERED: \$2,670.86 TO O'BREIN LANDSCAPE - ALL MONEY PAID SHALL APPLY TO RESTITUTION FIRST.

Defendant Advised of Right to Appeal

It is hereby ordered:

**Charge(s):**

*1 - Count 1 625 ILCS 5/11-503(a)(1): AGG RECKLESS DRVG/BODILY HARM (Original) - Guilty*

*09/08/2025 Costs and Fees - \$549.00 - Imposed*

*09/08/2025 Fine - \$75.00 - Ordered*

*09/08/2025 Probation Special Conditions - 30.0 Month - Ordered*

*Additional Sentence Information*

*09/08/2025 Conditional Assessment - State's Attorney-CV or TR - \$2.00 - Ordered*

*09/08/2025 Probation Service Fee - \$1,500.00 - Ordered*

*Additional Sentence Information*

*09/08/2025 Public Defender Fee Felony - \$100.00 - Ordered*

*09/08/2025 Testing (Service Provider Cost) - \$125.00 - Ordered*

*Alcohol & Drug*

*09/08/2025 Employment - Ordered*

*09/08/2025 Not Possess Illegal Drug - Ordered*

*Additional Sentence Information*

*09/08/2025 No Cannabis - Ordered*

*09/08/2025 No Alcohol Consumed - Ordered*

*09/08/2025 Nowhere Alcohol Sold - Ordered*

*09/08/2025 No Driving - Ordered*

*Do Not Drive Without Valid Driver's License*

*09/08/2025 No Possess Firearm/Weapon - Ordered*

*09/08/2025 Abide by Order of Protection - Ordered*

*09/08/2025 Administrative Sanctions Program - Ordered*

*09/08/2025 Jail - 180.0 Day - Stayed*

*Additional Sentence Information*

*09/08/2025 Public Service - 240.0 Hour - Ordered*

*Additional Sentence Information*

*09/08/2025 No Contact - Ordered*

*Additional Sentence Information*

*09/08/2025 Attend Program - Ordered*

*03/07/2028 Victim Impact-Live*

*09/08/2025 Attend Program - Ordered*

*03/07/2028 8 Hour Defensive Driving*

*09/08/2025 Evaluation - Ordered*

*Rehab Assessment & Serv*

*2 - Count 2 625 ILCS 5/11-601.5(b): SPEEDING 35+ MPH OVER LIMIT (Original) - Nolle Prosequi*

***The matter is set for Terminate on 03/07/2028 at 9:00 AM in Courtroom 611. \* SEE SENTENCING ORDER FOR TERM CONDITIONS.***

*Release*

STATE OF ILLINOIS )  
 )SS  
COUNTY OF LAKE )

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

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

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
 vs. )  
 )  
EHAB ALLABABIDI )

General No. 23CF00001146, count 2  
only

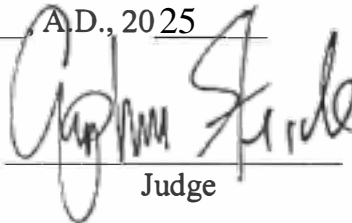
**ORDER**

**ON MOTION OF THE STATE'S ATTORNEY**, Attorney for the People of the State of Illinois;  
leave given the State's Attorney to Nolle Prosequi the above entitled cause;

Cause Nolle Prossed, defendant discharged;

Surety on the bond released.

Dated at Waukegan, Illinois, this 8th day of September, A.D., 2025

ENTERED:   
Judge

- Pursuant to a hearing held in this matter, a Public Defender Fee in the amount of \$\_\_\_\_\_ is hereby ordered.
- Pursuant to a hearing held in this matter, it has been determined that no Public Defender Fee shall be assessed.

THE PEOPLE OF THE STATE OF ILLINOIS, )  
City or Village of \_\_\_\_\_ )  
 )  
vs. )  
 )  
Ehab Allababidi )  
\_\_\_\_\_ )  
(Defendant) )

General Number 23CF1146

Erin Cartwright Weinstein  
Clerk of the Court  
Lake County, Illinois

**FINANCIAL SENTENCING ORDER**

The Defendant has appeared before this court and  plead guilty  was found guilty of the offenses listed in paragraph 1 below.  
 Defendant has been admonished of his/her right to be sentenced under the law in effect at the time of the offense or the time of sentencing:

In addition to any other sentences imposed in the case, the Defendant is ordered to pay the following fines and assessments:

**1. Fine(s) (705 ILCS 105/27.3b-1 and 730 ILCS 5/4-4.5-5 sets forth the minimum fine):**

- a. Offense: Aggravated Reckless Driving/Great Bodily Harm \$ 75
  - b. Offense: \_\_\_\_\_ \$ \_\_\_\_\_
  - c. Offense: \_\_\_\_\_ \$ \_\_\_\_\_
- Total fine(s):** \$ 75

**2. Fine Credits:**

- Credit for time served: \_\_\_\_\_ days x \$30.00 per day credit \$ ( \_\_\_\_\_ )

**Balance of fines less fine credit(s):** \$ 75

**3. Criminal Assessments (One per case. Check the highest-class offense only.)**

Offense:

- a. Schedule 1: Generic Felony (705 ILCS 135/15-5) \$ 549 \$ 549
- b. Schedule 2: Felony DUI/OUI (705 ILCS 135/15-10) \$1,709 \$ \_\_\_\_\_
- c. Schedule 3: Felony Drug Offense (705 ILCS 135/15-15) \$2,215 \$ \_\_\_\_\_
- d. Schedule 4: Felony Sex Offense (705 ILCS 135/15-20) \$1,314 \$ \_\_\_\_\_
- e. Schedule 5: Generic Misdemeanor Offense (705 ILCS 135/15-25) \$ 439 \$ \_\_\_\_\_
- f. Schedule 6: Misdemeanor DUI/OUI (705 ILCS 135/15-30) \$1,381 \$ \_\_\_\_\_
- g. Schedule 7: Misdemeanor Drug Offense (705 ILCS 135/15-35) \$ 905 \$ \_\_\_\_\_
- h. Schedule 8: Misdemeanor Sex Offense (705 ILCS 135/15-40) \$1,184 \$ \_\_\_\_\_
- i. Schedule 9: Major Traffic Offense (705 ILCS 135/15-45) \$ 325 \$ \_\_\_\_\_
- j. Schedule 10: Minor Traffic Offense (705 ILCS 135/15-50) \$ 226 \$ \_\_\_\_\_
- k. Schedule 10.5: Truck Weight/Load Offense (705 ILCS 135/15-52) \$ 260 \$ \_\_\_\_\_
- l. Schedule 11: Conservation Offense (705 ILCS 135/15-55) \$ 195 \$ \_\_\_\_\_
- m. Schedule 13: Non-Traffic Violation (705 ILCS 135/15-65) \$ 100 \$ \_\_\_\_\_

**Subtotal-Criminal Assessment:** \$ 549

**4. Offsets of Assessments**

- a.  Public/Community Service (1 hour x current Illinois minimum wage subtracted from Criminal Assessment - Section 3 – only) (705 ILCS 135/5-20(b))  
Number of Hours \_\_\_\_\_ x \$ \_\_\_\_\_ per hour \$ ( \_\_\_\_\_ )
- b.  Substance Abuse Treatment Program Credit (subtracted from Criminal Assessment – Section 3 – only) (705 ILCS 135/5-10(c-5)) \$ ( \_\_\_\_\_ )

**Total Additional Offsets:** \$ ( \_\_\_\_\_ )

**Total Balance of Criminal Assessments:** \$ \_\_\_\_\_

**5. Conditional Assessment(s) (Check all that apply)**

Offense:

- a. Arson/Residential/Aggravated Arson (705 ILCS 135/15-70(1)) \$500 per conviction \$ \_\_\_\_\_
- b. Child Pornography (705 ILCS 135-15-70(2))  
 State Police  Other Arresting Agency \$500 per conviction \$ \_\_\_\_\_
- c. Crime lab drug analysis (705 ILCS 135/15-70(3)) \$ 100 \$ \_\_\_\_\_
- d. DNA analysis (705 ILCS 135/15-70(4)) \$ 250 \$ \_\_\_\_\_
- e. DUI analysis (705 ILCS 135/15-70(5)) \$ 150 \$ \_\_\_\_\_

_____	f.	<input type="checkbox"/>	Street Value – Drug-related offense, possession/delivery (705 ILCS 135/15-70(6))	\$	_____
_____	g.	<input type="checkbox"/>	Street Value – Methamphetamine, possession/manufacture (705 ILCS 135/15-70(7))	\$	_____
_____	h.	<input type="checkbox"/>	Order of protection violation (705 ILCS 135/15-70(8))	\$200 per conviction	\$ _____
_____	i.	<input type="checkbox"/>	Order of protection violation (705 ILCS 135/15-70(9))	\$ 25 per violation	\$ _____
_____	j.	<input type="checkbox"/>	State’s Attorney petty or business offense (705 ILCS 135/15-70(10)(A))	\$ 4	\$ _____
_____	k.	<input checked="" type="checkbox"/>	State’s Attorney conservation or traffic offense (705 ILCS 135/15-70(10)(B))	\$ 2	\$ <u>2</u>
_____	l.	<input type="checkbox"/>	Speeding in a construction zone (705 ILCS 135/15-70(11))		
		<input type="checkbox"/>	<b>Interstate Highway</b>	<input type="checkbox"/>	<b>County</b>
_____	m.	<input type="checkbox"/>	Supervision disposition under Vehicle Code (705 ILCS 135/15-70(12))	\$ 0.50	\$ _____
_____	n.	<input type="checkbox"/>	Guilty plea or no contest, specified offense against family member		
		<input type="checkbox"/>	<b>Sentencing offense is Sexual Assault</b> (705 ILCS 135/15-70(13))	\$ 200	\$ _____
_____	o.	<input type="checkbox"/>	EMS response reimbursement, vehicle/snowmobile/boat violation (DUI/OUI) (705 ILCS 135/15-70(14))	Max. Amt. is \$1,000	\$ _____
_____	p.	<input type="checkbox"/>	EMS response reimbursement, controlled substances violation (705 ILCS 135/15-70(15))	\$1,000	\$ _____
_____	q.	<input type="checkbox"/>	EMS response reimbursement, reckless driving/aggravated reckless driving/speed in excess 26 mph violation (705 ILCS 135/15-70(16))	Max. Amt. is \$1,000	\$ _____
_____	r.	<input type="checkbox"/>	Human Trafficking, Sex Offender Registration, or Soliciting a Sexual Act Violation (705 ILCS 135/15-70(17));	Not less than \$350 for each offense sentenced	\$ _____
			This amount shall be the minimum amount of the fine, which shall be distributed pursuant to this act		
_____	s.	<input type="checkbox"/>	Weapons Violation, Trauma Center Fund (705 ILCS 135/15-70(18))	\$100 per conviction	\$ _____
_____	t.	<input type="checkbox"/>	Scott’s Law (705 ILCS 135/15-70(19))	<input type="checkbox"/>	<b>State Police</b> <input type="checkbox"/>
				\$ 250	\$ _____
			<b>Subtotal – Conditional Assessment Amount:</b> \$ _____		
			<b>TOTAL CRIMINAL AND CONDITIONAL ASSESSMENTS:</b> \$ <u>551.00</u>		

**6. Assessment waiver (only applies to financial obligations under sections 3 and 5):**

- a.  Waiver of Criminal Court Assessment granted \_\_\_\_\_ (does not apply to fines or IVC)  
 \_\_\_\_\_ (Date)  
 100%     75%     50%     25%    Waiver amount: \$ (\_\_\_\_\_)
   
**Balance of assessments and conditional assessments after credits are applied:** \$ \_\_\_\_\_

**7. Other Assessments:**

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

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

**SEE EXHIBIT A** **BALANCE OF ALL FINES AND ASSESSMENTS MINUS BOND:** \$ 2,251.00

I am the Defendant in the above case and I have read and understand this Financial Sentencing Order.

Dated: September 8, 2025

\_\_\_\_\_  
 Defendant's Signature

\_\_\_\_\_  
 Judge Signature

Entered this date: 09/08/2025, 20 \_\_\_\_\_

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
 )  
 vs )  
 )  
 )  
 Ehab Allababdi )

Case No. 23CF1146

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

**ORDER AND CERTIFICATE OF**  
 **FELONY PROBATION** /  **INTENSIVE PROBATION** /  **CONDITIONAL DISCHARGE** /  
 **PROBATION PURSUANT TO SECTION 550/10 AND 570/410 OF CHAPTER 720 OF THE ILLINOIS COMPILED**  
**STATUTES**

This cause coming on for sentencing, pursuant to a:  finding of guilty  negotiated plea of guilty  open plea of guilty, Defendant having been adjudged guilty of Agg Reckless Driving/Great Bodily Harm, being a Class 4 Felony.

The Court after conducting a hearing or having accepted a negotiated plea, and after considering the factors and the nature and circumstances of the offense, and the history, character, and condition of the offender, and after considering Defendant's financial ability to pay the amount hereinafter assessed,

**ORDERS:**

Defendant is hereby sentenced to a term of 30 months probation/conditional discharge, the conditions of which are that Defendant shall:

- 1. Not violate any laws or ordinances of any jurisdiction, including traffic regulations;
- 2. Pay all fines, fees, court costs, assessments and restitution set forth on **Exhibit A** through the Office of the Clerk of the Circuit Court in equal monthly installments by the first of each month to be paid in full not later than 90 days before the termination date unless the Court orders otherwise;
- 3. Obtain/continue employment and/or attend educational programs unless otherwise ordered by the Court;
- 4. Not use or be in possession of any illegal substance or prescription medication of another, or use any substance designed to have the effects of an illegal substance, or be in the presence of anyone using or in possession of such substances;
- 5. Appear in Court on the oral or written notice of the Circuit Clerk, Compliance Officer, Probation Officer, State's Attorney, or the Court;
- 6. Unless otherwise ordered by this Court, not less than 90 days prior to the termination of this case, provide proof of completion of all terms and conditions of sentence to the Compliance Unit if sentenced to conditional discharge or the Lake County Adult Probation Services Division if sentenced to probation;
- 7. Strictly comply with the terms and provisions of any and all Orders of Protection;
- 8. Not operate a motorized vehicle without a valid driver's license;
- 9. Upon a violation of any term or condition of this Order, the Lake County Adult Probation Services Division may invoke any sanctions from the list of intermediate sanctions adopted by the Chief Judge;
- 10. Submit a sample for DNA indexing as required by law;
- 11. Not possess any firearm or other dangerous weapon. Defendant is to surrender his or her Firearm Owner's Identification (FOID) Card to the Lake County Sheriff, Babcox Justice Center, 25 S Martin Luther King Jr. Ave., Waukegan, Illinois 60085, within 24 hours of the entry of this Order;
- 12. The following conditions apply to all Defendants sentenced to felony probation.
  - Defendant shall appear immediately in person before the Lake County Adult Probation Services Division at 215 W. Water Street, Waukegan, Illinois 60085, or if in custody immediately upon release from custody, to have an intake interview and thereafter report as often as directed by the Probation Officer;
  - Comply with a curfew of 6:00 P.M. to 6:00 A.M. daily requiring Defendant to be in his/her residence except when performing probation obligations, attending treatment, working at employment approved by Probation Officer, attending court, or attending to other specific activities which have been approved in advance by

his/her Probation Officer. The Defendant's Probation Officer may lessen or reinstate this curfew based upon Defendant's compliance and performance.

- Defendant shall not leave the State without the consent of the Court; however, upon verification and approval of the Probation Officer, the Defendant may leave the State for work, school, vacation, treatment, family emergencies and \_\_\_\_\_

- 
- Defendant shall notify the Probation Officer of home address and telephone contact information and notify Probation Officer immediately of any changes of home address or telephone contact information;
  - Defendant shall notify the Probation Officer within 24 hours of any new arrests and/or the issuance of a citation for any violation of law including traffic tickets;
  - Defendant shall permit the Probation Officer to visit Defendant at home or elsewhere to the extent necessary to discharge probation duties;
  - Defendant shall consent to and submit to searches of his/her person, residence, papers, automobiles, computers, any device capable of accessing the internet or storing electronic data, and/or other personal or real property accessible to Defendant at any time such requests are made by a Probation Officer. Defendant consents to the use of anything located, found or seized as evidence in any court proceeding and consents to the destruction of any contraband seized;
  - Defendant shall provide executed releases and execute such releases as requested by the Probation Officer including but not limited to all medical treatment, psychological, substance abuse, employment, financial, military, governmental, disability, phone records, internet provider, media, social network or other probation and criminal justice system records;
  - Defendant shall provide such proof of Defendant's details of employment, income, job search and/or attendance at educational programs as directed by the Probation Officer;
  - Defendant shall submit to random testing of urine and/or breathalyzer and/or blood testing, submitting a sample at such time and place as directed by a Probation Officer and pay the assessed fees;
  - Defendant shall not change present place of residence or move outside the County or the State without prior permission of the Court or Probation Officer;
  - Defendant shall upon request, provide the Probation Officer with immediate access to any e-mail, text or messaging services, internet chat rooms, blogs, and social media websites Defendant uses to communicate with anyone, as well as any electronic devices including but not limited to telephones, cellphones, smartphones, computer tablets and computers with internet capability.

13. The following conditions apply to all Defendants sentenced to Conditional Discharge.

- Defendant shall report immediately to the Compliance Unit located on the 1<sup>st</sup> floor of the Tower, or if in custody within 24 hours of the first workday following release from custody.
- Defendant shall not leave the State without the consent of the court; however, the Defendant may leave the State for the following purposes \_\_\_\_\_

- 
- Defendant shall notify the Compliance Officer of home address and telephone contact information and notify Compliance Unit within 72 hours of any changes of home address or telephone contact information.
  - Defendant shall not move outside the State without prior permission of the Court.
  - Defendant shall notify the Compliance Officer within 24 hours of any new arrests and/or the issuance of a citation for any violation of law including traffic tickets.
  - No less than 90 days prior to the completion of the termination of this case, Defendant shall serve upon the Clerk of the Circuit Court written evidence of completion of all primary treatment.
  - Any Defendant residing outside the State must immediately report to the Compliance Unit prior to returning to their home state.

**IF CHECKED, THE FOLLOWING PROVISIONS APPLY**

14. Defendant shall register as required by law as a sex offender arsonist child murderer other \_\_\_\_\_

Defendant shall submit to such testing as required by law or specifically required by separate order.

15. Defendant is sentenced to a determinate term of 180 days in the custody of the County Sheriff.  
 No good time shall be awarded as injury resulted from offense. Stayed pending compliance

16. Defendant shall serve a term of periodic imprisonment to be confined for twenty-four (24) hours, seven (7) days each week for a period of \_\_\_\_\_ months in the Sheriff's Community Based Corrections Center (CBCC) and shall follow all rules of the CBCC program, or if eligible, through the Adult Probation Electronic Home Monitoring program (EHM) and shall follow all rules of the EHM program as outlined in **Exhibit B**.

17. Defendant shall serve a term in the County Work Release Program for a period of \_\_\_\_\_ months, which does not exceed the statutory term of 12 months, as required by 730 ILCS 5/5-7-1(d).

18. Defendant shall pay a fee for room and board electronic home monitoring at the rate established by Lake County Board Ordinance with the concurrence of the Chief Judge pursuant to statute.

19. Defendant shall perform 240 hours of public service at a minimum rate of 12 hours per month and report immediately to and register with the Public Service Unit of the Lake County Adult Probation Services Division. Defendant shall perform this service at the time and places directed and shall comply with all Public Service Unit protocols and shall serve upon the Public Service Unit written evidence of completion of the public service hours at least 90 days prior to the termination of this sentence.

20. Good cause having been shown, Defendant shall perform \_\_\_\_\_ hours of community service at a minimum rate of \_\_\_\_\_ hours per month and report immediately to and register with the Compliance Unit (if sentenced to conditional discharge) or the Lake County Adult Probation Services Division (if sentenced to probation). Defendant shall perform this service at a self-selected not-for-profit organization, public body, religious institution, charitable organization, or individual agreeing to accept community service from offenders as verified by the Compliance Unit or the Lake County Adult Probation Services Division and shall serve upon the Compliance Unit or the Lake County Adult Probation Services Division written evidence of completion of the community service hours at least 90 days prior to the termination of this sentence.

21. Defendant shall complete all requirements for high school graduation GED other \_\_\_\_\_

22. Defendant shall:  
 reside at \_\_\_\_\_  
 not reside at \_\_\_\_\_  
 not engage in any abusive, violent, or harassing conduct of any kind with \_\_\_\_\_

not be present at \_\_\_\_\_

not have any contact of any kind directly or indirectly with members of street gangs and drug users or dealers and not wear clothing associated with any street gang, communicate or exhibit gang signs

not have any contact of any kind directly or indirectly with \_\_\_\_\_  
 Christopher King, Manuel Rojo, O'Brien Landscape or Smith Printing

23. Defendant shall comply with the following evaluations, treatment recommendations, educational or vocational requirements by approved providers including the payment of fees:

- |   |   |
|---|---|
| <input type="checkbox"/> The Cognitive Program, "Thinking for a Change" | <input checked="" type="checkbox"/> Live victim impact panel      |
| <input type="checkbox"/> Mental health/psychiatric treatment            | <input type="checkbox"/> Substance abuse evaluation and treatment |
| <input type="checkbox"/> Parenting classes                              | <input type="checkbox"/> Sex offender evaluation and treatment    |

White-Original Green-Client Canary – Probation/Compliance Pink – State's Attorney Goldenrod – Defense

- |  |   |
|--|---|
| <input type="checkbox"/> Repatriate Project  | <input type="checkbox"/> Domestic violence evaluation and treatment |
| <input type="checkbox"/> Physician/psychiatrist/psychologist treatment plans   | <input type="checkbox"/> DCFS Service/Safety Plan                   |
| <input type="checkbox"/> Victim impact panel   | <input type="checkbox"/> TASC                                       |
| <input type="checkbox"/> Comply with medication plan as directed by physician, taking medications only as prescribed   |   |
| <input type="checkbox"/> DUI Project: <input type="checkbox"/> Level 1 <input type="checkbox"/> Level 2 Moderate <input type="checkbox"/> Level 2 Significant <input type="checkbox"/> Level 3 |   |

Other: Defendant to take 8hr DDC course

Defendant must take all prescribed medication as directed by court treating physician and sign any waivers for probation.

Defendant shall obtain all required evaluations or be actively engaged or enrolled in treatment, educational or vocational programs as ordered above within 45 days of today's date or, if in custody, within 45 days of release date, providing proof of same to the Compliance Unit (if sentenced to conditional discharge) or the Lake County Adult Probation Services Division (if sentenced to probation). Defendant shall meet all program and treatment schedules as set by the Compliance Unit or the Lake County Adult Probation Services Division and provide proof as required in Paragraph 6 of this order. Defendant must follow all programs/treatment/class rules, participate in a respectful, cooperative and constructive manner and complete all requirements.

24. Pursuant to 730 ILCS 5/5-6-3(n), the Court finds that the Defendant shall not consume alcohol or cannabis during the time between sentencing and the completion of a validated clinical assessment, provided that such order shall not exceed 30 days and shall be terminated if the clinical treatment plan does not recommend abstinence or testing, or both.

The testing fee shall be waived pursuant to 730 ILCS 5/5-6-3(g).

25. Defendant shall be assessed for all risk factors and criminogenic needs by the Lake County Adult Probation Services Division at the time of his / her initial in-take interview as well as periodically throughout the term of probation, and based upon these assessments (which must include consideration of Defendant's criminal, psychological, intellectual, behavioral and social history), Defendant shall undergo all further assessments and evaluations including but not limited to, medical, psychological, psychiatric, substance abuse, anger management, domestic violence, sexual offender, educational and vocational, and successfully complete all necessary classes, programs, and treatment relating to the nature of the offense, or the rehabilitation of Defendant, or the protection of the public, or that may be beneficial to Defendant ("Rehabilitative Assessment and Services") as directed by the Lake County Adult Probation Services Division. This process requires Defendant to comply with all program and treatment schedules as set by the Lake County Adult Probation Services Division and provide proof of successful completion as set forth in Paragraph 6. Defendant must follow all programs/treatment/class rules, participate in a respectful, cooperative and constructive manner and complete all requirements including the payment of all fees.

26. Upon the approval of the receiving State, pursuant to the Interstate Compact Rules, Defendant may reside in \_\_\_\_\_ . Defendant is required to pay a \$125.00 processing fee prior to submission of a transfer request. The Lake County Adult Probation Service Division fees will be assessed up to the date a transfer is accepted by the receiving State, and waived thereafter. Defendant will be required to pay supervision fees imposed by the receiving State. Any subsequent out-of-state transfers must obtain the approval from the 19th Judicial Circuit Court, prior to the relocation. Defendant will continue to remain under the jurisdiction of this Court and must continue to comply with all the Lake County Adult Probation Services Division requests and directives.

27. Upon the approval of the Lake County Adult Probation Services Division and acceptance of the probation supervision by another circuit of Illinois, Defendant may reside in a county (Cook) within that circuit. Defendant is responsible for all the Lake County Adult Probation Services Division fees incurred up to the date a transfer is accepted by the receiving circuit and waived thereafter. Defendant will be required to pay probation fees imposed by the receiving circuit. Defendant will continue to remain under the jurisdiction of this Court and must continue to comply with all the Lake County Adult Probation Services Division requests and directives.

28. Defendant shall follow and comply with all of the additional terms and conditions of the following specialized probation supervision units as set forth in **Exhibit B** which is attached hereto and incorporated by reference:
- Intensive Probation Supervision (IPS)
  - Domestic Violence Unit
  - Sex Offender Unit
  - DUI Unit

29. Defendant shall follow and comply with all of the additional terms and conditions of the following Therapeutic Intensive Monitoring (TIM) Court specialized probation set forth in **Exhibit B** which is attached hereto and incorporated by reference:
- TIM Drug Court
  - TIM Mental Health Court
  - TIM Veterans Treatment and Assistance Court

Additionally, Defendant must follow, comply and complete all of the obligations undertaken by him/her in the Specialty Court Contract which is attached to and incorporated into both **Exhibit B** and this Probation Order by reference.

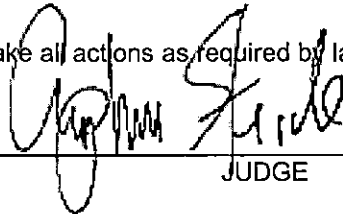
30. Defendant shall also comply with **OTHER** requirements as follows:
- No drugs, alcohol, bars, cannabis or weapons; No driving w/o a valid license or permit
- 
- n/p: (Count 2) Agg Speeding (Class A); Resitution to be paid to CW in the amount of \$2,670.86
- 
- Should the Defendant have no violations during his probation, then the plea of guilty to Count 1 in the indictment, Agg Reckless Driving/Bodily Harm (Class 4), shall be amended to a Reckless Driving (Class A ) misdemeanor.
- 

31. Upon the successful completion of Defendant's probation pursuant to 720 ILCS 570/410 or 720 ILCS 550/10, Defendant shall be discharged and the charges dismissed without further order of the Court.

32. Probation/conditional discharge will terminate and the Circuit Clerk shall transfer the case to closed status on March 7, 2028 unless there is pending an unresolved petition to revoke probation or this order has been otherwise modified or extended.

33. The Clerk of this Court is directed to make all notifications and take all actions as required by law.

ENTER:

  
 \_\_\_\_\_  
 JUDGE

Dated this 4 day of September, 2025

Order prepared by Bailey C. Russell

I, the above-named Defendant, acknowledge reading and receipt of this document.

I understand and have been advised in open court that if I am not a citizen of the United States, that a conviction or a sentence of supervision or probation for the offense for which I have been charged may have the consequences of deportation, exclusion from admission to the United States, or denial of naturalization under the laws of the United States.

I understand that any individual convicted of domestic battery may be subject to federal criminal penalties for possessing, transporting, shipping, or receiving any firearm or ammunition in violation of the federal Gun Control Act of 1968 [18 U.S.C. 922(g)(8) and (9)].

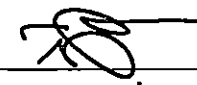
I understand that upon a finding of any violation of a condition contained in this Order or accompanying Exhibits, and after due notice and hearing, the Court may revoke this sentence, enter judgment of conviction and impose any penalty originally provided for by applicable statute or ordinance including a jail sentence.

I UNDERSTAND THAT FAILURE TO APPEAR IN COURT WHEN REQUIRED CONSTITUTES A **WAIVER OF MY RIGHT TO CONFRONT WITNESSES AGAINST ME, AND A HEARING TO REVOKE MY SENTENCE CAN PROCEED IN MY ABSENCE AND RESULT IN RE-SENTENCING WITHOUT MY BEING PRESENT.**

Street Address: 8516 West Winona St.

Date of Birth: September 24, 1996

City/State/Zip: Chicago, IL 60656

  
 \_\_\_\_\_  
 Defendant

Telephone No.: (773)-920-0030

**FILED**

**SEP 08 2025**

*Emi Carbayat Weinstein*  
**CIRCUIT CLERK**

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

Erin Cartwright Weinstein  
Clerk of the Court  
Lake County, Illinois

	)	
	)	
<b>State of Illinois</b>	)	
	)	
	)	
	)	
Plaintiff(s)	)	
vs.	)	General No. <b>23CF1146</b>
	)	
	)	
<b>Ehab Allababidi</b>	)	
	)	
Defendant(s)	)	

**ORDER FOR RESTITUTION**

This cause coming to be heard before this Honorable Court, the parties being duly represented, and the Court being fully apprised, it is hereby ordered that Restitution be paid as follows:

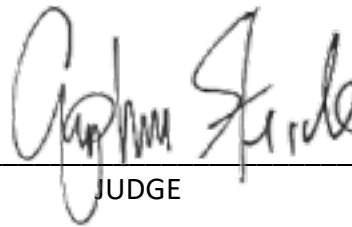
Restitution shall be paid to:

Name O'Brien Landscape  
 Address 5700 Howard St.  
 City, Skokie State, IL Zip 60077

In the total amount of \$2,670.86 to be paid through the Circuit Clerk's office.

- All money paid shall apply to restitution first.
- Joint and several with \_\_\_\_\_ case number \_\_\_\_\_

ENTER:




---

JUDGE

Dated this 8 day of September , 2025 .

Prepared by:

Name: Bailey C. Russell  
 Address: 15 S. County St.  
 City: Waukegan State: IL  
 Phone: Zip Code:  
 Fax:  
 ARDC: 6340962

**ADULT PROBATION SERVICES REFERRAL SLIP**

ATTENTION: IMMEDIATELY AFTER THIS COURT APPEARANCE  
You are **REQUIRED** to take this slip to  
ADULT PROBATION SERVICES  
215 WEST WATER STREET  
WAUKEGAN, ILLINOIS

Name: EHAB ALLABABIDI

Case Number: 23CF00001146

Address: 8516 W. WINONA ST.

Phone: (773) 920-0030

City: CHICAGO

Email:

State: IL

Zip: 60656

Approve text messaging  
correspondence

DOB: 09/24/1996

Charge: AGG RECKLESS DRVG/BODILY HARM

In Custody: No

Interpreter Required: [ ] Yes [X] No

Language:

**DEFENDANT SENTENCED TO:**

[X] Probation Special Conditions 30 Month Amount

[X] Lake County Jail 180 Day Amount

[X] Public Service 240 Hour Amount

**DEFENDANT IS REFERRED BY COURT FOR THE FOLLOWING:**

**Next Court Date:** 03/07/2028

**Time:** 9:00 a.m.

**Courtroom:** Courtroom 611

**Judge:**

**ADULT PROBATION SERVICES REFERRAL SLIP**

ATTENTION: IMMEDIATELY AFTER THIS COURT APPEARANCE  
You are **REQUIRED** to take this slip to  
ADULT PROBATION SERVICES  
215 WEST WATER STREET  
WAUKEGAN, ILLINOIS

Name: EHAB ALLABABIDI

Case Number: 23CF00001146

Address: 8516 W. WINONA ST.

Phone: (773) 920-0030

City: CHICAGO

Email:

State: IL

Zip: 60656

Approve text messaging  
correspondence

DOB: 09/24/1996

Charge: AGG RECKLESS DRVG/BODILY HARM

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**DEFENDANT IS REFERRED BY COURT FOR THE FOLLOWING:**

**Next Court Date:** 03/07/2028

**Time:** 9:00 a.m.

**Courtroom:** Courtroom 611

**Judge:**

PEOPLE OF THE STATE OF ILLINOIS

vs.

**Ehab Allababidi**

DEFENDANT

**23CF1146**

Case No. \_\_\_\_\_

Erin Cartwright Weinstein  
Clerk of the Court  
Lake County, Illinois

**WAIVER OF TRIAL**

I, Ehab Allababidi, the Defendant, acknowledge that I have been advised and understand I have a constitutional right to a trial to determine the facts and whether I am guilty of the charge(s) against me. I further acknowledge that I have been advised and understand that I have a constitutional right to decide whether the trial would be either by a jury, which would consist of twelve (12) people chosen from the community where the verdict must be unanimous, or a bench trial heard by a judge only, and that if I waive my right to trial there will not be a trial by jury or a judge at any time.

I further acknowledge that I have been advised and understand that when I waive my constitutional rights, I also waive my rights during trial, which include:

1. The right to plead not guilty or persist in a previous plea of not guilty;
2. The right to be presumed innocent of the charge(s) against me;
3. The right to require the prosecution to prove my guilt beyond a reasonable doubt;
4. The right not to be compelled to incriminate myself including the right to choose whether to testify on my own behalf;
5. The right to see and hear the witnesses and evidence of the prosecution in open court and to question or cross-examine those witnesses; and
6. The right to present evidence and witnesses of my own and have the court require such witnesses to be in court.

I also acknowledge that I have been advised and understand the nature of the charge(s); the minimum and maximum sentence prescribed by law, including any possible extended or consecutive sentences; and that I have a right to counsel and, if indigent, to have counsel appointed for me by the court.

I further acknowledge that I have been advised and understand that if I am not a citizen of the United States, conviction of the offense(s) to which I am pleading guilty may have the consequences of deportation, exclusion from admission to the United States, or denial of naturalization under the laws of the United States.

I HAVE READ THE ABOVE AND KNOWINGLY, VOLUNTARILY, AND UNDERSTANDINGLY WAIVE MY RIGHT TO TRIAL, AND STATE THAT, OTHER THAN IN A PLEA AGREEMENT MADE KNOWN TO THE COURT, NO PROMISES, THREATS, OR FORCE WERE USED TO OBTAIN THIS WAIVER.

September 8, 2025

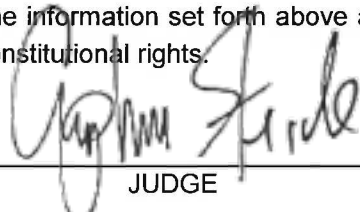
DATE

  
DEFENDANT

The Court has conveyed to the Defendant personally in open court the information set forth above and finds that the Defendant knowingly, voluntarily, and understandingly waives these constitutional rights.

09/08/2025

DATE

  
JUDGE

**Report of Felony Conviction**

**Circuit Court, Lake County, Nineteenth Judicial District**

[X] Involving a motor vehicle as referenced in section 6-205(a)3 of the Illinois Vehicle Code  
[ ] Mandatory Insurance as referenced in section 7-603 of the Illinois Vehicle Code

Driver's License Number: A41120096272

Licensing State: IL

License

Licensing State:

Plates:

Name: EHAB ALLABABIDI

Address: 8516 W. WINONA ST.  
CHICAGO, IL 60656

County:

CDL:

Classification: 4

Sex: Male

Date of Birth: 09/24/1996

Case Number/Docket Number: 23CF00001146

Ticket Number: 001146

Offense Date: 05/23/2022

Conviction Date: 09/08/2025

Description of Offense: AGG RECKLESS DRVG/BODILY HARM

Violation of: 625 ILCS 5/11-503(a)(1)

Operating a Commercial Motor Vehicle

Operating a Placarded Hazmat Vehicle

Operating a 16 or More Passengers Vehicle

Charge or Disposition Amended to:

Violation of:

I certify that a motor vehicle was used in the commission of the above identified felony.



\_\_\_\_\_  
Signature of Judge or State's Attorney

I hereby certify that the information on this report of felony conviction is a true abstract of this court, as required by the Illinois Vehicle Code.

*Eva Cartwright Weinstein*

\_\_\_\_\_  
Signature of Circuit Clerk

Date mailed to the  
Secretary of State 09/09/2025

Mail to: Secretary of State  
Driver Services Department  
2701 South Dirksen Parkway  
Springfield, Illinois 62723

**For Office Use Only**

Court Code

County of Residence

Law

Section

Subsection

IN THE CIRCUIT COURT FOR THE 19th JUDICIAL CIRCUIT  
LAKE COUNTY, ILLINOIS

FILED

OCT 02 2025

*Eva Cantagut Weinstein*  
CIRCUIT CLERK

People of the State of Illinois,  
Plaintiff,  
v.  
Ehab Allababidi,  
Defendant.

Case No. 23CF1146

### AFFIDAVIT

I, Ehab Allababidi, being first duly sworn, state under oath:

1. I received notice from the Illinois Secretary of State that my driver's license revocation will take effect on October 3, 2025.
2. I did not receive this notice until recently, and I have not yet been able to retain an attorney.
3. I currently earn approximately \$15,000 per year and face significant financial hardship. I live with my mother, who has limited income, and I am responsible for transporting her to medical appointments two to three times each week and for grocery shopping and household support.
4. I am also a student at the University of Illinois at Chicago, and I rely on my ability to drive in order to attend classes. I have already missed classes due to my inability to arrange alternative transportation.
5. Without a stay, the revocation will cause serious hardship to my family and to my education.

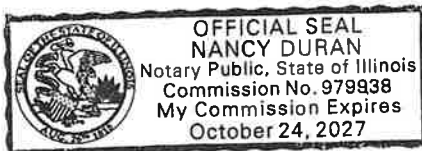
I respectfully request that the Court grant a stay of the revocation for sixty (60) to ninety (90) days, or such period as the Court deems just, so that I may retain counsel and responsibly address this matter.

EA  
~~Signature~~ EA  
~~10-02-2025~~ EA  
 Signature Date

Name: Ehab Allababidi  
Pro Se  
Address: 8516 W. Winona St, Chicago, IL 60656  
Telephone: 773-920-0030

SUBSCRIBED AND SWORN TO BEFORE ME this 02 day of October, 2025

*Nancy Duran*  
Notary Public



FILED

OCT 02 2025

Eric Cantagut Weinstein  
CIRCUIT CLERK



**MOTION**

IN THE STATE OF ILLINOIS, CIRCUIT COURT

COUNTY: Lake   
*County Where You Are Filing the Case*

*Enter the case information as it appears on your other court documents.*

PLAINTIFF/PETITIONER OR IN RE: People of the State of Illinois  
*Who started the case. First, Middle, and Last Name, or Business Name*

DEFENDANTS/RESPONDENTS: Ehab Allakabidi  
*Who the case was filed against.*  
  
  
*First, Middle, and Last Name, or Business Name*

23CF1146  
Case Number

**1. MOTION TITLE**

*Explain in a few words what you are asking the judge to do. This should match the title you write in 1 on the Notice of Court Date for Motion.*

Motion to: Stay drivers License Revocation Pending Retention of Counsel

**2. PERSON FILING THE MOTION**

*Check one box. The Plaintiff/Petitioner is the person who started the case. The Defendant/Respondent is the person or business the case was filed against.*

I am filing the Motion. I am the:

Plaintiff/Petitioner  Defendant/Respondent

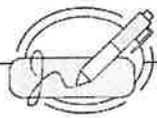
**3. MOTION**

*Explain what you are asking the judge to do and the reasons why the judge should agree with you.*

I am asking the judge to:

I request a temporary stay of drivers license revocation that is to take effect October 3 2025, I only recently received official notice of this action and I need time to retain counsel. I respectfully request a stay of 60-90 days or for such shorter periods that the court finds appropriate to allow me to secure an attorney, manage my financial responsibilities, and continue caring for my mother who relies on me to transport her to hospital multiple times a week. I am also a student at UIC and losing my ability to drive makes it impossible to attend class.

I need more room to explain, and I have filled out and attached an Additional Page for Motion form.



**SIGN**

Under Illinois Supreme Court Rule 137, my signature means that:

1) I read the document, 2) I have been informed and believe it is true and correct, and 3) I am not filing it to cause delay or for another bad reason.

If you are filling out this form online, sign your name by typing it. If you are filling out this form by hand, sign and print your name.

Signature /s/ [Handwritten Signature] Print Name Ehab Allababidi

I am completing this form for myself

Phone Number 773 920 0030 Email (if you have one) Defcon5Ready@gmail.com

Your Address 8514 W WINONA ST Chicago IL 60656  
Street, Apt. # City State Zip Code

Be sure to check your email every day so you do not miss important information, court dates, or documents from other parties.

I am a lawyer completing this form on behalf of a client (Client name): \_\_\_\_\_

Lawyer Name \_\_\_\_\_ Attorney Number \_\_\_\_\_

Lawyer Phone Number \_\_\_\_\_ Law Firm \_\_\_\_\_

Lawyer Email \_\_\_\_\_

Address \_\_\_\_\_  
Street, Apt. # City State Zip Code

**PROOF (EXPLANATION) OF DELIVERY**

This tells the judge how and when you will send your documents to the other people in the case under Rule 11. If a person in the case has a lawyer, you must send your documents to their lawyer. File this form with the Circuit Clerk, but do not list the Clerk below as a person you are sending your documents to.

A. I am sending this Proof of Delivery and the following court documents:

Motion to stay Drivers License Revocation  
Name of Documents

To: Ehab Allababidi  
Full Name or Law Firm Name

B. I am sending the documents:

By email to this email address: \_\_\_\_\_

Through an approved e-filing website (EFSP) to this email address: \_\_\_\_\_



You must send documents electronically (by email or through an EFSP) if you and the person you are sending documents to have an email address. If you or the person you are sending to do not have an email address, or if you have permission from the judge, you may send documents using the options below.

I am sending the documents to this address:  
Lake County State's Attorney Office  
Street, Apt. # City State Zip Code

By (check all that apply):

Personal hand delivery.

*You can only deliver to the person, person's family member over 13 at person's residence, person's lawyer, or the lawyer's office.*

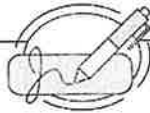
Mail or third-party carrier (FedEx, UPS, etc.) to the address listed above, with postage or delivery prepaid.

Location of mailbox or third-party carrier: \_\_\_\_\_  
Address or Intersection City State

Mail from a prison or jail: \_\_\_\_\_  
Name and Address of Prison or Jail

C. The documents will be sent on: Date: \_\_\_\_\_ Time: \_\_\_\_\_  
Month, Day, Year Include AM or PM

I am sending the document to more than 1 person and have completed an additional Proof of Delivery form.



**SIGN**

Under 735 ILCS 5/1-109, my signature means that:

- 1) Everything in this document is true and correct, or I have been informed or I believe it to be true and correct, and
- 2) I understand that making a false statement on this form is perjury and has penalties provided by law.

If you are filling out this form online, sign your name by typing it. If you are filling out this form by hand, sign and print your name.

Signature /s/ [Handwritten Signature] Print Name Emb Alhabibi

I am completing this form for myself

Phone Number 773 920 0030 Email (if you have one) DefconsReady@gmail.com

Address 8516 W WILSONA ST Chicago IL 60656  
Street, Apt. # City State Zip Code

Be sure to check your email every day so you do not miss important information, court dates, or documents from other parties.

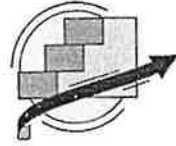
I am a lawyer completing this form on behalf of a client (Client name): \_\_\_\_\_

Lawyer Name \_\_\_\_\_ Attorney Number \_\_\_\_\_

Lawyer Phone Number \_\_\_\_\_ Law Firm \_\_\_\_\_

Lawyer Email \_\_\_\_\_

Address \_\_\_\_\_  
Street, Apt. # City State Zip Code



## WHAT'S NEXT

### **NEXT STEP FOR PERSON FILLING OUT THIS FORM:**

If you do not already have a court date for your *Motion*, you will need to get one and file a *Notice of Court Date for Motion*. When you file your *Motion*, ask the Circuit Clerk if you have to schedule a court date or if one will be scheduled automatically. In some counties, you may get the court date when you e-file. Include the court date on your *Notice*.

After you fill out your forms, file them with the Circuit Clerk's office in the county where your case is taking place. Then, send your forms to the other people in the case. Find your Circuit Clerk: [ilcourts.info/clerks](http://ilcourts.info/clerks).



Learn more about each step in the process and how to file in our Instructions:  
[ilcourts.info/how-to-motion](http://ilcourts.info/how-to-motion).

### **NEXT STEP FOR PERSON RECEIVING THIS DOCUMENT:**

For more information about going to court including how to fill out and file forms, call or text **Illinois Court Help** at 833-411-1121 or go to [ilcourthelp.gov](http://ilcourthelp.gov).

If there are any words or terms that you do not understand, please **visit Illinois Legal Aid Online** at [ilao.info/glossary](http://ilao.info/glossary). You may also find more information, resources, and the location of your local legal self-help center at: [ilao.info/lshc-directory](http://ilao.info/lshc-directory).



# ADDITIONAL PAGE FOR MOTION

IN THE STATE OF ILLINOIS, CIRCUIT COURT

COUNTY: Lake  
*County Where You Are Filing the Case*

*Enter the case information as it appears on your other court documents.*

PLAINTIFF/PETITIONER OR IN RE: People of State of Illinois  
*Who started the case. First, Middle, and Last Name, or Business Name*

DEFENDANTS/RESPONDENTS: Abub Alakabadi  
*Who the case was filed against.*  
\_\_\_\_\_  
*First, Middle, and Last Name, or Business Name*

Case Number \_\_\_\_\_

Use this only if you run out of space in **section 3** on your *Motion* form. This document becomes an additional page of your *Motion* and should be filed with your *Motion*.

### Additional explanation continued from my Motion:

This stay will give me the opportunity to handle this matter responsibly and without further harm to my family.

It would be a substantial hardship if the stay was not granted because I earn approximately 15,000 per year and do not have the financial ability to immediately hire counsel or pay for additional costs. I also live with my mother who has limited income and medical needs and I am responsible for driving her to the hospital and for household errands and groceries. Without driving privileges, my mother's care and my education at UIC are severely affected.



File this form with your *Motion*.



# NOTICE OF COURT DATE FOR MOTION

IN THE STATE OF ILLINOIS, CIRCUIT COURT

COUNTY: Lake  
*County Where You Are Filing the Case*

Enter the case information as it appears on your other court documents.  
PLAINTIFF/PETITIONER OR IN RE: Peade vs State of Illinois  
*Who started the case. First, Middle, and Last Name, or Business Name*

DEFENDANTS/RESPONDENTS: Elab Allabadi  
*Who the case was filed against.*  
  
*First, Middle, and Last Name, or Business Name*

# FILED

OCT 02 2025

*Eva Cantagut Weinstein*  
CIRCUIT CLERK

23CF1146  
Case Number



## 1. MOTION TITLE

Explain in a few words what you are asking the judge to do. This should match the title you write in 1 on the Motion.

Motion to: Stay Drivers License Revocation pending retention of counsel

## 2. COURT DATE INFORMATION

Information about getting a court date and how to attend is available from the Circuit Clerk. You can find their contact information at [ilcourts.info/clerks](http://ilcourts.info/clerks). If you are e-filing in Cook County, you may get the court date when you e-file.

a. The court date for the Motion I filed is scheduled on:  
October 6, 2025 at 900  a.m.  p.m. in T611  
*Month, Day, Year Time Courtroom Number*

Court dates may be scheduled in-person, remotely, or a combination of in-person and remotely. Find out how your court date will be scheduled and provide that information here. Add the Clerk's phone number and website.

b. Attend court in any of the ways checked:  
 In person at: 310 Washington St Wkgn R 260085  
*Courtroom Address Courtroom Number*

Remotely (video or telephone option)  
By video conference at: \_\_\_\_\_  
*Video Conference Website*

Log-in information: \_\_\_\_\_  
*Video Conference Log-in Information, Meeting ID, Password, etc.*

By telephone at: \_\_\_\_\_  
*Call-in Number for Telephone Remote Appearance*

To find out more about remote court options:

Phone: \_\_\_\_\_ or Website: \_\_\_\_\_  
*Circuit Clerk's Phone Number Website URL*



**SIGN**

Under Illinois Supreme Court Rule 137, my signature means that:

1) I read the document, 2) I have been informed and believe it is true and correct, and 3) I am not filing it to cause delay or for another bad reason.

If you are filling out this form online, sign your name by typing it. If you are filling out this form by hand, sign and print your name.

Signature /s/ EAM Print Name Ehab Alhabib

I am completing this form for myself

Phone Number 773 920 0030 Email (if you have one) Debra.Rady@gmail.com

Your Address 8516 W Wiltona St Chicago IL 60656  
*Street, Apt. # City State Zip Code*

Be sure to **check your email every day** so you do not miss important information, court dates, or documents from other parties.

I am a lawyer completing this form on behalf of a client (Client name): \_\_\_\_\_

Lawyer Name \_\_\_\_\_ Attorney Number \_\_\_\_\_

Lawyer Phone Number \_\_\_\_\_ Law Firm \_\_\_\_\_

Lawyer Email \_\_\_\_\_

Address \_\_\_\_\_  
*Street, Apt. # City State Zip Code*

**PROOF (EXPLANATION) OF DELIVERY**

This tells the judge how and when you will send your documents to the other people in the case under Rule 11. If a person in the case has a lawyer, you must send your documents to their lawyer. File this form with the Circuit Clerk, but do not list the Clerk below as a person you are sending your documents to.

A. I am sending this Proof of Delivery and the following court documents:

I am sending two proof of Delivery and the following court documents  
*Name of Documents*  
To: State attorney  
*Full Name or Law Firm Name*

B. I am sending the documents:

By email to this email address: \_\_\_\_\_

Through an approved e-filing website (EFSP) to this email address: \_\_\_\_\_



You must send documents electronically (by email or through an EFSP) if you and the person you are sending documents to have an email address. If you or the person you are sending to do not have an email address, or if you have permission from the judge, you may send documents using the options below.

I am sending the documents to this address:  
18 N County St 3rd floor Wkgn IL 60085  
*Street, Apt. # City State Zip Code*

By (check all that apply):

- Personal hand delivery.  
*You can only deliver to the person, person's family member over 13 at person's residence, person's lawyer, or the lawyer's office.*
- Mail or third-party carrier (FedEx, UPS, etc.) to the address listed above, with postage or delivery prepaid.

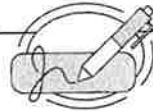
Location of mailbox or third-party carrier: \_\_\_\_\_  
*Address or Intersection City State*

Mail from a prison or jail: \_\_\_\_\_  
*Name and Address of Prison or Jail*

C. The documents will be sent on: Date: \_\_\_\_\_ Time: \_\_\_\_\_  
*Month, Day, Year Include AM or PM*

I am sending the document to more than 1 person and have completed an additional *Proof of Delivery* form.

**SIGN**



Under 735 ILCS 5/1-109, my signature means that:

- 1) Everything in this document is true and correct, or I have been informed or I believe it to be true and correct, and
- 2) I understand that making a false statement on this form is perjury and has penalties provided by law.

If you are filling out this form online, sign your name by typing it. If you are filling out this form by hand, sign and print your name.

Signature /s/ [Handwritten Signature] Print Name Chab Alababid

I am completing this form for myself

Phone Number 7739200030 Email (if you have one) DefendantRevey@gmail.com  
Address 8516 W WINDYNA ST Chicago IL 60656  
*Street, Apt. # City State Zip Code*

Be sure to **check your email every day** so you do not miss important information, court dates, or documents from other parties.

I am a lawyer completing this form on behalf of a client (Client name): \_\_\_\_\_

Lawyer Name \_\_\_\_\_ Attorney Number \_\_\_\_\_

Lawyer Phone Number \_\_\_\_\_ Law Firm \_\_\_\_\_

Lawyer Email \_\_\_\_\_

Address \_\_\_\_\_  
*Street, Apt. # City State Zip Code*



# WHAT'S NEXT

## NEXT STEP FOR PERSON FILLING OUT THIS FORM:

After you fill out your *Motion* and *Notice of Court Date for Motion*, file them with the Circuit Clerk's office in the county where your case is taking place. Then, send your forms to the other people in the case. Find your Circuit Clerk here: [ilcourts.info/clerks](http://ilcourts.info/clerks).



Learn more about each step in the process and how to file in our Instructions:  
[ilcourts.info/how-to-motion](http://ilcourts.info/how-to-motion).

## NEXT STEP FOR PERSON RECEIVING THIS DOCUMENT:

For more information about responding to a case and going to court, call or text **Illinois Court Help** at 833-411-1121 or go to [ilcourthelp.gov](http://ilcourthelp.gov).

If there are any words or terms used in these instructions that you do not understand, please **visit Illinois Legal Aid Online** at [ilao.info/glossary](http://ilao.info/glossary). You may also find more information, resources, and the location of your local legal self-help center at: [ilao.info/lshc-directory](http://ilao.info/lshc-directory).



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

	)		
	)		
People	)	Case No.	23CF00001146
	)	Location:	Courtroom 611
Plaintiff,	)	Event Date:	October 6, 2025 9:00 AM
v.	)	Event Type:	Motion Of Defendant
	)		
PEOPLE VS ALLABABIDI	)	Clerk:	Amy B
Defendant.	)		

---

**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  
Bailey Russell, Public Defender  
Francis P De Rosa IV, States Attorney  
Scott C Pechter, Public Defender  
Nicholas Shepherd, States Attorney  
Mary K. Herbst, Lake County Court Reporters

**Present in Court**

ALLABABIDI, EHAB, Appellant, Defendant present in person

**Nature of Proceedings:**

Event Result: Heard 10/06/2025.  
Defendant Proceeds Pro Se  
Motion of Defendant  
- TO STAY THE RESCISION OF DRIVING  
Motion denied  
Continue to previously set date on 03/07/2028  
Release

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

People of the State of Illinois,

Plaintiff-Appellee,

v.

Ehab Allababidi,

Defendant-Appellant.

Case No. 23CF1146

FILED

OCT 06 2025

*Eva Cantor*  
CIRCUIT CLERK

NOTICE OF APPEAL

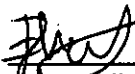
Now comes the Defendant-Appellant, Ehab Allababidi, and hereby gives notice of appeal to the Illinois Appellate Court, Second District, from the final judgment of conviction entered on September 8, 2025, in the Circuit Court of Lake County, Illinois, before the Honorable Judge Christopher R. Stride, in Case No. 23CF1146.

Appellant's address for service of notices is:

8516 W Winona St

Chicago, IL 60656

Respectfully submitted,



Ehab Allababidi

Defendant-Appellant, pro se

Date: 10/6/2025

To: Clerk of the Circuit Court of Lake County, Waukegan, Illinois  
and the People of the State of Illinois, Plaintiff-Appellee.

2nd Circuit Clerk  
Circuit Clerk

OCT 06 2023

FILED

U.S. District Court  
Southern District of New York  
New York, New York

IN RE: [Illegible]  
[Illegible]  
[Illegible]

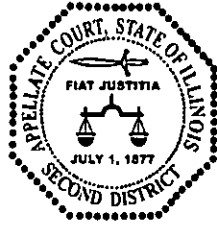
**NOTICE OF APPEARANCE**

[Illegible]

[Illegible]

CS 23-1111

IN THE CIRCUIT COURT OF THE UNITED STATES FOR THE  
SOUTHERN DISTRICT OF NEW YORK



FILED

OCT 31 2025

ILLINOIS APPELLATE COURT  
SECOND DISTRICT

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

October 31, 2025

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

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

The docketing statement in the above cause has been filed. The following due dates pertain to the preparation and filing of the record on appeal.

Report of proceedings, bystander's report, or agreed statement of facts due to be filed in the trial court (Ill. S. Ct. R. 323): 11/24/2025

Record on appeal due to be filed in the appellate court (Ill. S. Ct. Rs. 325, 326): 12/08/2025

Jeffrey H. Kaplan  
Clerk of the Court

cc: Edward Randall Psenicka  
Lake County Circuit Court

**FILED**

**OCT 31 2025**

**Ena. Courtney Weinger  
CIRCUIT CLERK**

Client PIN: 227568

In the Circuit Court of the 19<sup>th</sup> Judicial Circuit  
Lake County, Illinois

**FILED**

**NOV 10 2025**

In Re: Probation Supervision of EHAB ALLABABIDI  
{Defendant's Name}

Case No.

Address: 8516 W Winona St., Chicago, IL 60656

Date of Birth: 09/24/1996

**Adult Notification of Changes to the Probation Fee Schedule**

Sentencing Information: Original Jurisdiction: Lake County

Original Case Number: 23CF00001146

Original Sentencing Date: 09/08/2025

Length of Original Probation Sentence: 30 MONTHS

Probation Fees Ordered at Sentencing: \$ 50 /month for 30 months

**You are hereby notified of the following change(s) in the aforementioned defendant's probation fee schedule pursuant to 730 ILCS 5/5-6-3 and 730 ILCS 5/5-6-3.1:**

1. The defendant's probation supervision has been transferred from Lake County and accepted by Cook County as of 10/1/2025. The defendant has been assessed a probation fee of \$ 50 /month for 2 months and has paid a total of \$ 0 prior to acceptance of transfer. The defendant is in arrears \$ 100.00 to Lake County. —
2. The defendant's probation supervision has been transferred from \_\_\_\_\_ County, and accepted by \_\_\_\_\_ County as of   /  /  . The defendant has been assessed a probation fee of \$    /month and elected to pay probation fees due in a "lump sum" of \$    leaving a balance of \$    prior to acceptance of transfer.
3. Future probation fee payments will be paid to the Clerk of the Circuit Court in the receiving county of    in the amount of \$    /month for    months. —
4. The probation department has re-evaluated the defendant's ability to pay, and the defendant's probation fee has been adjusted from \$    per month to \$    per month as of   /  /  , and notice of such adjustment has been given to the defendant. The adjusted total probation fees due is \$   .

**Signed:** \_\_\_\_\_ **Date:**   /  /    
{Defendant's Signature}

5. Other (please explain) \_\_\_\_\_

Printed: \_\_\_\_\_

Signed: \_\_\_\_\_ Date: 10/1/2025  
{Director of Court Services/Chief Probation Officer/Designee}

c:    Court File    Probation Case File    Defendant

AOIC Form (Rev)-12/21

FILED

NOV 10 2025

2025

11



# MOTION

IN THE STATE OF ILLINOIS, CIRCUIT COURT

**FILED**

NOV 12 2025

Eni. Courtney Weinstein  
CIRCUIT CLERK

**COUNTY:** Lake  
*County Where You Are Filing the Case*

*Enter the case information as it appears on your other court documents.*

**PLAINTIFF/PETITIONER OR IN RE:** People of the State of Illinois  
*Who started the case. First, Middle, and Last Name, or Business Name*

**DEFENDANTS/RESPONDENTS:** Ehab Allababidi  
*Who the case was filed against.*  
  
  
*First, Middle, and Last Name, or Business Name*

23CF1146  
Case Number

### 1. MOTION TITLE

*Explain in a few words what you are asking the judge to do. This should match the title you write in 1 on the Notice of Court Date for Motion.*

Motion to: Waive All Court Reporting Transcript fees & Waive all fees

### 2. PERSON FILING THE MOTION

*Check one box. The Plaintiff/Petitioner is the person who started the case. The Defendant/Respondent is the person or business the case was filed against.*

I am filing the *Motion*. I am the:

Plaintiff/Petitioner     Defendant/Respondent

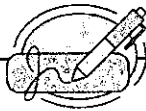
### 3. MOTION

*Explain what you are asking the judge to do and the reasons why the judge should agree with you.*

I am asking the judge to:

I ask the Court to: (1) waive all Court Reporting Services transcript fees for the following dates and direct preparation forthwith: Sept 8, 2025 (plea/sentencing) and any additional dates set on the record; (2) waive all Circuit Clerk fees for preparation, certification, and transmission of the Record on Appeal and provide me a litigant copy (searchable PDF) at no cost; (3) enter a Rule 415(c) direct-access order authorizing defendant copies in native formats of discovery previously disclosed or to be disclosed or to be disclosed (including BWC/dash video + player/audit logs; 911/CAD audio + logs; photo originals + EXIF; EDR .CDRX + exports; crash-reconstruction files), subject to protective terms (litigation-only use; no public posting); and (4) order former counsel (Public Defender) to surrender my complete client file and any necessary viewing software within 14 days.

I need more room to explain, and I have filled out and attached an *Additional Page for Motion* form.

**SIGN**

Under Illinois Supreme Court Rule 137, my signature means that:

1) I read the document, 2) I have been informed and believe it is true and correct, and 3) I am not filing it to cause delay or for another bad reason.

If you are filling out this form online, sign your name by typing it. If you are filling out this form by hand, sign and print your name.

Signature /s/ Ehab AllababidiPrint Name Ehab Allababidi I am completing this form for myselfPhone Number (773) 920-0030Email (if you have one) defcon5ready@gmail.comYour Address: 8516 w winona st chicago IL 60656

Street, Apt. #

City

State

Zip Code

Be sure to check your email every day so you do not miss important information, court dates, or documents from other parties.

 I am a lawyer completing this form on behalf of a client (Client name): \_\_\_\_\_

Lawyer Name \_\_\_\_\_

Attorney Number \_\_\_\_\_

Lawyer Phone Number \_\_\_\_\_

Law Firm \_\_\_\_\_

Lawyer Email \_\_\_\_\_

Address \_\_\_\_\_

Street, Apt. #

City

State

Zip Code

**PROOF (EXPLANATION) OF DELIVERY**

This tells the judge how and when you will send your documents to the other people in the case under Rule 11. If a person in the case has a lawyer, you must send your documents to their lawyer. File this form with the Circuit Clerk, but do not list the Clerk below as a person you are sending your documents to.

**A. I am sending this Proof of Delivery and the following court documents:**\_\_\_\_\_  
Name of Documents

To: \_\_\_\_\_

Full Name or Law Firm Name

**B. I am sending the documents:** By email to this email address: \_\_\_\_\_ Through an approved e-filing website (EFSP) to this email address: \_\_\_\_\_

You must send documents electronically (by email or through an EFSP) if you and the person you are sending documents to have an email address. If you or the person you are sending to do not have an email address, or if you have permission from the judge, you may send documents using the options below.

 I am sending the documents to this address:18 N County St, Waukegan, IL 60085

Street, Apt. #

City

State

Zip Code

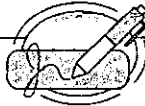
By (check all that apply):

 Personal hand delivery.*You can only deliver to the person, person's family member over 13 at person's residence, person's lawyer, or the lawyer's office.* Mail or third-party carrier (FedEx, UPS, etc.) to the address listed above, with postage or delivery prepaid.Location of mailbox or third-party carrier: 18 N County St, Waukegan, IL 60085*Address or Intersection**City**State* Mail from a prison or jail: \_\_\_\_\_*Name and Address of Prison or Jail*

C. The documents will be sent on: Date: \_\_\_\_\_

*Month, Day, Year*

Time: \_\_\_\_\_

*Include AM or PM* I am sending the document to more than 1 person and have completed an additional *Proof of Delivery* form.**SIGN**Under 735 ILCS 5/1-109, my signature means that:

- 1) Everything in this document is true and correct, or I have been informed or I believe it to be true and correct, and
- 2) I understand that making a false statement on this form is perjury and has penalties provided by law.

If you are filling out this form online, sign your name by typing it. If you are filling out this form by hand, sign and print your name.

Signature /s/ Ehab AllababidiPrint Name Ehab Allababidi I am completing this form for myselfPhone Number (773) 920-0030Email (if you have one) defcon5ready@gmail.comAddress 8516 w winona st chicago IL 60656*Street, Apt. #**City**State**Zip Code*Be sure to **check your email every day** so you do not miss important information, court dates, or documents from other parties. I am a lawyer completing this form on behalf of a client (Client name): \_\_\_\_\_

Lawyer Name \_\_\_\_\_

Attorney Number \_\_\_\_\_

Lawyer Phone Number \_\_\_\_\_

Law Firm \_\_\_\_\_

Lawyer Email \_\_\_\_\_

Address \_\_\_\_\_

*Street, Apt. #**City**State**Zip Code*



# ADDITIONAL PAGE FOR MOTION

IN THE STATE OF ILLINOIS, CIRCUIT COURT

COUNTY: Lake  
*County Where You Are Filing the Case*

*Enter the case information as it appears on your other court documents.*

PLAINTIFF/PETITIONER OR IN RE: People of the State of Illinois  
*Who started the case. First, Middle, and Last Name, or Business Name*

DEFENDANTS/RESPONDENTS: Ehab Allababidi  
*Who the case was filed against.*  
  
*First, Middle, and Last Name, or Business Name*

23CF1146  
**Case Number**



Use this only if you run out of space in section 3 on your *Motion* form. This document becomes an additional page of your *Motion* and should be filed with your *Motion*.

### Additional explanation continued from my Motion:

Reasons: Needed to perfect App. No. 2-25-0440; appellate fee waiver does not cover trial-court transcript/record costs; discovery copies are reasonably required for post-judgment/appeal; former counsel declined without court order. Proposed order(s) available at hearing.

Multiple horizontal lines for additional text input.



File this form with your *Motion*.

FILED

NOV 12 2025

Eric Cantor  
CIRCUIT CLERK



# NOTICE OF COURT DATE FOR MOTION

IN THE STATE OF ILLINOIS, CIRCUIT COURT

COUNTY: Lake  
*County Where You Are Filing the Case*

*Enter the case information as it appears on your other court documents.*

PLAINTIFF/PETITIONER OR IN RE: People of the State of Illinois  
*Who started the case. First, Middle, and Last Name, or Business Name*

DEFENDANTS/RESPONDENTS: Ehab Allababidi  
*Who the case was filed against.*  
  
*First, Middle, and Last Name, or Business Name*

23CF1146  
**Case Number**

**FILED**  
NOV 12 2025  
Circuit Clerk



## 1. MOTION TITLE

*Explain in a few words what you are asking the judge to do. This should match the title you write in 1 on the Motion.*

Motion to: Waive All Court Reporting Transcript fees & Waive all fees

## 2. COURT DATE INFORMATION

*Information about getting a court date and how to attend is available from the Circuit Clerk. You can find their contact information at [ilcourts.info/clerks](http://ilcourts.info/clerks). If you are e-filing in Cook County, you may get the court date when you e-file.*

a. The court date for the *Motion* I filed is scheduled on:

\_\_\_\_\_ at \_\_\_\_\_  a.m.  p.m. in \_\_\_\_\_  
*Month, Day, Year Time Courtroom Number*

*Court dates may be scheduled in-person, remotely, or a combination of in-person and remotely. Find out how your court date will be scheduled and provide that information here. Add the Clerk's phone number and website.*

b. Attend court in any of the ways checked:

In person at: \_\_\_\_\_  
*Courtroom Address Courtroom Number*

Remotely (video or telephone option)

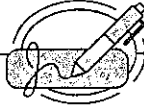
By video conference at: \_\_\_\_\_  
*Video Conference Website*

Log-in information: \_\_\_\_\_  
*Video Conference Log-in Information, Meeting ID, Password, etc.*

By telephone at: \_\_\_\_\_  
*Call-in Number for Telephone Remote Appearance*

To find out more about remote court options:

Phone: \_\_\_\_\_ or Website: \_\_\_\_\_  
*Circuit Clerk's Phone Number Website URL*



**SIGN**

Under Illinois Supreme Court Rule 137, my signature means that:

1) I read the document, 2) I have been informed and believe it is true and correct, and 3) I am not filing it to cause delay or for another bad reason.

If you are filling out this form online, sign your name by typing it. If you are filling out this form by hand, sign and print your name.

Signature /s/ Ehab Allababidi Print Name Ehab Allababidi

I am completing this form for myself

Phone Number (773) 920-0030 Email (if you have one) defcon5ready@gmail.com

Your Address 8516 w winona st chicago illinois 60656  
*Street, Apt. # City State Zip Code*

Be sure to check your email every day so you do not miss important information, court dates, or documents from other parties.

I am a lawyer completing this form on behalf of a client (Client name): \_\_\_\_\_

Lawyer Name \_\_\_\_\_ Attorney Number \_\_\_\_\_

Lawyer Phone Number \_\_\_\_\_ Law Firm \_\_\_\_\_

Lawyer Email \_\_\_\_\_

Address \_\_\_\_\_  
*Street, Apt. # City State Zip Code*

**PROOF (EXPLANATION) OF DELIVERY**

*This tells the judge how and when you will send your documents to the other people in the case under Rule 11. If a person in the case has a lawyer, you must send your documents to their lawyer. File this form with the Circuit Clerk, but do not list the Clerk below as a person you are sending your documents to.*

**A. I am sending this Proof of Delivery and the following court documents:**

\_\_\_\_\_  
*Name of Documents*

To: \_\_\_\_\_  
*Full Name or Law Firm Name*

**B. I am sending the documents:**

By email to this email address: \_\_\_\_\_

Through an approved e-filing website (EFSP) to this email address: \_\_\_\_\_



You **must** send documents electronically (by email or through an EFSP) if you and the person you are sending documents to have an email address. If you or the person you are sending to do not have an email address, or if you have permission from the judge, you may send documents using the options below.

I am sending the documents to this address:

18 N County St, Waukegan, IL 60085  
*Street, Apt. # City State Zip Code*

By (check all that apply):

Personal hand delivery.

*You can only deliver to the person, person's family member over 13 at person's residence, person's lawyer, or the lawyer's office.*

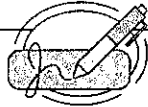
Mail or third-party carrier (FedEx, UPS, etc.) to the address listed above, with postage or delivery prepaid.

Location of mailbox or third-party carrier: Cumberland and Argyle Norridge Illinois  
Address or Intersection City State

Mail from a prison or jail: \_\_\_\_\_  
Name and Address of Prison or Jail

C. The documents will be sent on: Date: \_\_\_\_\_ Time: \_\_\_\_\_  
Month, Day, Year Include AM or PM

I am sending the document to more than 1 person and have completed an additional *Proof of Delivery* form.



**SIGN**

Under 735 ILCS 5/1-109, my signature means that:

- 1) Everything in this document is true and correct, or I have been informed or I believe it to be true and correct, and
- 2) I understand that making a false statement on this form is perjury and has penalties provided by law.

If you are filling out this form online, sign your name by typing it. If you are filling out this form by hand, sign and print your name.

Signature /s/ Ehab Allababidi Print Name Ehab Allababidi

I am completing this form for myself

Phone Number (773) 920-0030 Email (if you have one) defcon5ready@gmail.com

Address 8516 w winona st chicago Illinois 60656  
Street, Apt. # City State Zip Code

Be sure to check your email every day so you do not miss important information, court dates, or documents from other parties.

I am a lawyer completing this form on behalf of a client (Client name): \_\_\_\_\_

Lawyer Name \_\_\_\_\_ Attorney Number \_\_\_\_\_

Lawyer Phone Number \_\_\_\_\_ Law Firm \_\_\_\_\_

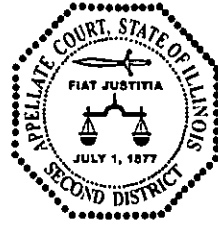
Lawyer Email \_\_\_\_\_

Address \_\_\_\_\_  
Street, Apt. # City State Zip Code

FILED

NOV 12 2025

Eric Campbell Winston  
CIRCUIT CLERK



FILED

NOV 17 2025

ILLINOIS APPELLATE COURT  
SECOND DISTRICT

*Ehab Allababidi*  
Circuit Court

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

November 17, 2025

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

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

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

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

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

Jeffrey H. Kaplan  
Clerk of the Court

cc: Edward Randall Psenicka  
Lake County Circuit Court

**FILED**

**NOV 17 2025**

*Eni Cantongat Usinosa*  
**CIRCUIT CLERK**

F 11

# Exhibit Packet Index

## I. Exhibit A – Chronology (Reconstruction and Discovery)

Encl. Chronology  
CIRCUIT

**Packet Pages:** pp. 4–15 (Ex. A-1 through Ex. A-5)

**Purpose:** Establishes a timeline proving that (1) the State had internal doubt about a core DUI-drugs charge, and (2) the indictment alleging great bodily harm lacked medical records.

Exhibit	Document	Packet p.	Fact Proven
A-1	Chronology of reconstruction, toxicology, indictment, QPO, subpoenas, plea, and post-plea requests	4	Lists key events (May 27 2022 Bosch download; Aug 11 2022 internal email; Jun 14 2023 indictment; Jul 2024 QPO & subpoena; Oct 22 2025 native-format request).
A-2	Aug 11 2022 internal email from Detective Paul Petrick	5	Notes that the lab report lacked quantitative drug levels and states: "I believe it would be hard pressed to prove DUI drugs."
A-3	Jun 14 2023 court minutes	6	Contemporaneous notes at true-bill indictment asking "WHAT ARE INJURIES?" and recording "Nothing in file – NO med recs," proving that the indictment for aggravated reckless driving (great bodily harm) was returned without injury documentation.
A-4	Bosch Crash Data Retrieval table – deployment #2	10	Shows the Driver's Belt Switch Circuit Status as <b>BUCKLED</b> , contradicting assumptions that the driver was

<b>Exhibit</b>	<b>Document</b>	<b>Packet p.</b>	<b>Fact Proven</b>
A-5	Bosch CDR disclaimer on raw data	9	unrestrained. States that the original .CDRx raw file must be preserved in its native format and retranslated with the latest software; failure to do so may corrupt the data.

**II. Exhibit B – FOIA Correspondence (Request and Response)**

**Packet Pages:** pp. 16–18 (Ex. B-1 through Ex. B-2)

**Purpose:** Shows that the State acknowledged possessing, and then withheld, internal analyses and witness materials under work-product theories.

<b>Exhibit</b>	<b>Document</b>	<b>Packet p.</b>	<b>Fact Proven</b>
B-1	FOIA request (Oct 7 2025)	17	Seeks crash reports, EDR analyses, witness statements, internal memos, and discovery inventories.
B-2	State’s FOIA response (Oct 22 2025)	18	Admits responsive records exist but withholds “felony review screening documents” under FOIA § 7(1)(m) and Supreme Court Rule 412(j)(i).

**III. Exhibit C – Post-Plea Native-Format Discovery Request**

**Packet Pages:** pp. 19–21 (Ex. C-1)

**Purpose:** Demonstrates post-plea diligence and identifies the native EDR image and videos that counsel failed to obtain pre-plea.

<b>Exhibit</b>	<b>Document</b>	<b>Packet p.</b>	<b>Fact Proven</b>
C-1	Oct 22 2025 post-plea email requesting raw .CDRx file, native body- and dash-cam files with audit logs, and a privilege log	20	Shows that new counsel immediately sought technical evidence necessary to challenge the State’s reconstruction and speed estimates.

**IV. Exhibit D – July 2024 QPO and Subpoena Examples**

**Packet Pages:** pp. 22–26 (Ex. D-1 through Ex. D-2)

**Purpose:** Proves that discovery on the “great bodily harm” element was ongoing more than a year after the indictment.

<b>Exhibit</b>	<b>Document</b>	<b>Packet p.</b>	<b>Fact Proven</b>
D-1	Jul 1 2024 Qualified Protective Order to Condell Medical Center	23	Orders production of any and all medical records for treatment on or about May 23 2022; demonstrates that medical-injury evidence was still being obtained thirteen months after indictment.
D-2	Jul 2024 subpoena to Lincolnshire-Riverwoods Fire Protection District	24	Commands production of protected health information and EMS records; further shows that injury documentation was still being pursued well after the indictment.

## **Exhibit A-1**

### ***Chronology of Reconstruction, Toxicology, Charging, and Discovery Events***

**Offered to show:** the sequence of events demonstrating that reconstruction and toxicology analyses were ongoing when the case was indicted; that investigators harbored serious doubt about a DUI-drugs charge; that the indictment for aggravated reckless driving (great bodily harm) was returned without medical records; and that discovery into injuries continued long after charging.

This exhibit provides a narrative timeline showing the May 27 2022 Bosch CDR download; the Aug 11 2022 internal email expressing doubt about proving DUI-drugs; the Jun 14 2023 indictment with no medical records; the July 2024 Qualified Protective Order and subpoena seeking medical and EMS records; and the Oct 22 2025 post-plea request for raw technical data. These facts collectively demonstrate that the State lacked a factual basis for the charge and suppressed exculpatory material.

## Exhibit A-1 Chronology of Reconstruction, Investigation & Discovery

This timeline summarizes key events demonstrating the evolving investigation and charging decisions in **People v. Ehab Allababidi**, Lake County Case No. 23CF1146. It shows that reconstruction and toxicology analyses were ongoing while serious doubts about a DUI-drugs charge existed, and that the indictment for aggravated reckless driving (great bodily harm) was returned without any medical records. Discovery into the “great bodily harm” element continued well after the indictment.

- **May 27 2022** – The Bosch Crash Data Retrieval (CDR) report was downloaded from the Lexus. The CDR report recorded the driver’s belt status as **buckled**, and the manufacturer’s disclaimer required preserving the raw **.CDRx** file for translation with the latest software.
- **Aug 11 2022** – Detective **Paul Petrick** emailed ASA Benjamin Dillon stating that the toxicology report listed only “Amphetamine and Benzodiazepines” and concluded: “*I believe it would be hard pressed to prove DUI drugs.*” This internal doubt was never disclosed to the defense.
- **May 23 2023** – Crash reconstruction continued; police and MCAT analysts prepared speed estimates ranging from 116–125 mph using partial video and EDR data.
- **Jun 14 2023** – The grand jury returned a **true-bill indictment** charging aggravated reckless driving (great bodily harm). Contemporaneous court minutes ask “**WHAT ARE INJURIES?**” and note “**Nothing in file – NO med recs etc.**”, showing that no medical records supported the “great bodily harm” element.
- **Jul 1 2024** – The State obtained a **Qualified Protective Order** requiring **Condell Medical Center** to release *any and all* health records relating to the crash. This occurred over a year after the indictment.
- **Jul 2 2024** – A subpoena issued to **Lincolnshire-Riverwoods Fire Protection District** commanding production of all protected health information and EMS records, further demonstrating that injury documentation was still being sought.
- **Oct 22 2025** – Post-plea counsel requested the raw **.CDRx** image file with checksum values, native body-cam and dash-cam video files with audit logs, and a privilege log for withheld items. This request underscores prior counsel’s failure to obtain critical technical evidence before advising the plea.

This chronology supports the due process and *Brady* claims by showing that (1) key exculpatory and impeachment material (internal doubts about DUI-drugs) was suppressed, (2) the “great bodily harm” element lacked factual basis when charged, and (3) counsel failed to obtain the raw technical data necessary to verify the reconstruction.

## **Exhibit A-2 – Internal Email (Aug. 11 2022)**

Detective Paul Petrick's August 11 2022 email to fellow investigators notes that the laboratory report lists only "**Amphetamine and Benzodiazepines**" with no specific amounts. He concludes that it would be "**hard pressed to prove DUI drugs.**" This internal assessment of weakness in the DUI-drugs charge was not disclosed prior to the plea.

## Dillon, Benjamin

---

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

---

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

---

Mr. Dillon,

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

Our lab report also did not specify amounts.

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

Thank you.

**Detective Paul J. Petrick**  
Village of Lincolnshire  
Police Department

O: 847-913-2349  
[ppetrick@lincolnshireil.gov](mailto:ppetrick@lincolnshireil.gov)



VILLAGE OF  
LINCOLNSHIRE

### CONFIDENTIAL COMMUNICATION

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

## **Exhibit A-3 – Indictment Court Minutes (June 14 2023)**

Handwritten notes on the June 14 2023 grand-jury court minutes, recorded at the time the indictment was returned, ask **“WHAT ARE INJURIES?”** and note **“Nothing, in file – NO med RECS etc.”** This shows that the felony charge of aggravated reckless driving causing great bodily harm was authorized without medical records or injury documentation.

**COURT MINUTES**

**DATE: JUNE 14, 2023**

**CASE NUMBER: 23CF 1146**

**DEFENDANT(S): EHAB ALLABABIDI**

**JUDGE: SHANES**

**ASA: STEVE SCHELLER**

**CT REPORTER: \_\_\_\_\_**

**ACTION TAKEN: True Bill Indictment returned in open court.**

Court sets bond in the amount of \$ 50,000 BW

\_\_\_\_\_ Bond Posted.

Warrant to Issue Instantly. 50K

\_\_\_\_\_ Warrant to Issue but stayed until next court date.

\_\_\_\_\_ Case is set for arraignment on \_\_\_\_\_ / \_\_\_\_\_ / 2023 at 9:00 a.m. / 1:30 p.m.

510 as assigned

610 BOORAS

611 STRIDE

612 SHANES

710 ROSSETTI

812 STRICKLAND

Court orders that the State notify the defendant and attorney of date.

**NOTE TO FELONY SECRETARY: SEND NOTICE/NOTIFY ATTORNEY BY PHONE**

\_\_\_\_\_ Remand to be issued to the Sheriff for above date.

\_\_\_\_\_ Indictment is sealed until arrest or \_\_\_\_\_ days, whichever is first.

\_\_\_\_\_ Defendant to appear in Preliminary Hearing Court but setting of hearing vacated.

Case is assigned to Judge \_\_\_\_\_ for all further proceedings.

Arraignment to be held in that courtroom \_\_\_\_\_

(NOTES: WHAT ARE \_\_\_\_\_ INJURIES??

Nothing in file - no med recs etc.  
Per RTO Patrick: "broken bones"  
"compound fx"

## **Exhibit A-4 – CDR System Status Table (EDR Data)**

A table from the Bosch Crash Data Retrieval report lists the driver's belt-switch circuit status as **BUCKLED** at the deployment associated with the crash. This contradicts any narrative that the driver was unrestrained and undermines aggravating inferences about recklessness.

**System Status At Deployment #2**

Ignition Cycles At Investigation	17377
SIR Warning Lamp Status	ON
SIR Warning Lamp ON/OFF Time Continuously (seconds)	0
Number of Ignition Cycles SIR Warning Lamp was ON/OFF Continuously	0
Ignition Cycles At Event	17376
Ignition Cycles Since DTCs Were Last Cleared	255
Driver's Roll Switch Circuit Status	BUCKLED
Passenger Air Bag Indicator Status at Event Enable	Undefined
Passenger SIR Suppression Switch Circuit Status	Air Bag Suppressed
Diagnostic Trouble Codes at Event, fault number: 1	B0052-00
Diagnostic Trouble Codes at Event, fault number: 2	N/A
Diagnostic Trouble Codes at Event, fault number: 3	N/A
Diagnostic Trouble Codes at Event, fault number: 4	N/A
Diagnostic Trouble Codes at Event, fault number: 5	N/A
Diagnostic Trouble Codes at Event, fault number: 6	N/A
Diagnostic Trouble Codes at Event, fault number: 7	N/A
Diagnostic Trouble Codes at Event, fault number: 8	N/A
Diagnostic Trouble Codes at Event, fault number: 9	N/A
Driver 1st Stage Time From Algorithm Enable to Deployment Command Criteria Met (msec)	N/A
Driver 2nd Stage Time From Algorithm Enable to Deployment Command Criteria Met (msec)	N/A
Passenger 1st Stage Time From Algorithm Enable to Deployment Command Criteria Met (msec)	N/A
Passenger 2nd Stage Time From Algorithm Enable to Deployment Command Criteria Met (msec)	N/A
Driver Side or Roof Rail/Head Curtain Time From Algorithm Enable to Deployment Command Criteria Met (msec)	N/A
Passenger Side or Roof Rail/Head Curtain Time From Algorithm Enable to Deployment Command Criteria Met (msec)	N/A
Crash Record Locked	Yes
Deployment Event Recorded in the Non-Deployment Record	Yes
Vehicle Event Data (Pre-Crash) Associated With This Event	No
Time Between Events (sec)	0.0
Event Recording Complete	Yes
Driver First Stage Deployment Loop Commanded	No
Passenger First Stage Deployment Loop Commanded	No
Driver Second Stage Deployment Loop Commanded	No
Driver 2nd Stage Deployment Loop Commanded for Disposal	No
Passenger Second Stage Deployment Loop Commanded	No
Passenger 2nd Stage Deployment Loop Commanded for Disposal	No
Driver Pretensioner Deployment Loop Commanded (If Equipped)	No
Passenger Pretensioner Deployment Loop Commanded (If Equipped)	No
Driver Side Deployment Loop Commanded (If Equipped)	No
Passenger Side Deployment Loop Commanded (If Equipped)	No
Second Row Left Side Deployment Loop Commanded (If Equipped)	No
Second Row Right Side Deployment Loop Commanded (If Equipped)	No
Driver (Initiator 1) Roof Rail/Head Curtain Loop Commanded (If Equipped)	No
Passenger (Initiator 1) Roof Rail/Head Curtain Loop Commanded (If Equipped)	No
Driver (Initiator 2) Roof Rail/Head Curtain Loop Commanded (If Equipped)	No
Passenger (Initiator 2) Roof Rail/Head Curtain Loop Commanded (If Equipped)	No
Driver (Initiator 3) Roof Rail/Head Curtain Loop Commanded (If Equipped)	No
Passenger (Initiator 3) Roof Rail/Head Curtain Loop Commanded (If Equipped)	No
Driver Knee Deployment Loop Commanded (If Equipped)	No
Passenger Knee Deployment Loop Commanded (If Equipped)	No
Second Row Left Pretensioner Deployment Loop Commanded (If Equipped)	No
Second Row Right Pretensioner Deployment Loop Commanded (If Equipped)	No
Second Row Center Pretensioner Deployment Loop Commanded (If Equipped)	No



## **Exhibit A-5 – Bosch/PCS Vendor Disclaimer**

The Bosch Crash Data Retrieval documentation instructs investigators to preserve the original raw **.CDRx** image file and to re-translate that file using the latest approved software. This highlights the need for the raw image file and supports the claim that competent counsel would have obtained it before recommending a plea.

IMPORTANT NOTICE: Robert Bosch LLC and the manufacturers whose vehicles are accessible using the CDR System urge end users to use the latest production release of the Crash Data Retrieval system software when viewing, printing or exporting any retrieved data from within the CDR program. Using the latest version of the CDR software is the best way to ensure that retrieved data has been translated using the most current information provided by the manufacturers of the vehicles supported by this product.

CDR File Information

Table with 2 columns: Field Name and Value. Fields include User Entered VIN, User (P.MURRAY 120), Case Number (MCAT 22-22), EDR Date Imaging Date (05/27/2022), Crash Date (05/23/2022), Filename, Saved on (Friday, May 27, 2022 at 11:37:40), Imaged with CDR version (Crash Data Retrieval Tool 21.5.1), Imaged with Software Licensed to (Company Name) (MCAT), Reported with CDR version (Crash Data Retrieval Tool 21.5.1), Reported with Software Licensed to (Company Name) (MCAT), EDR Device Type (Airbag Control Module Deployment Deployment #2), and Event(s) recovered.

Comments

Inspection location: ERNIES WRECKER SERVICE
Individuals present: P.MURRAY 120

Observed visible restraint deployment(s): YES

Imaging conducted pursuant to search warrant (warrant details) (Y/N)? N
Imaging conducted pursuant to owner consent (Y/N)? Y
Imaging conducted pursuant to civil discovery (Y/N)? N

Ignition key or fob available and its position at the start of the inspection: NOT PRESENT
Odometer reading/units: UNKNOWN
Recommended tire size (sticker): LT245/75R16E
Tire size(s) (actual): LT245/75R16E
For GM vehicles, were RPOs documented (i.e.: photo)? N UNABLE TO ACCESS

Imaging completed by DLC or direct-to-module access: D2M
"Re-powering" required (Y/N)? Y
Additional power-up used: VETRONIX AC/DC ADAPTER 02002435

Other notes:

Disclaimer

I have accessed and retrieved data from CDR Tool accessible system(s) from or in the vehicle identified by the applied VIN in which potential Event Data Recorder (EDR) may be found. The retrieved data may be related to a crash or other physical event. The successful retrieval of the data and production of this report is an indication that the procedure(s) necessary to properly access and retrieve the data have been followed and the data was properly imaged/downloaded.

I have or will provide the appropriate party(s) a copy of the original, raw data file - the underlying CDR System file - for discovery and/or later re-printing as necessary. This file will be named using the vehicle's Vehicle Identification Number (VIN) and identified by the \*.CDRx file extension. This file should only be opened and viewed with the latest version of the Bosch Crash Data Retrieval System Software; improper use of a "text viewer" may corrupt the CDRx file which would prevent it from being opened again in the CDR Tool software and generating a data translation report.

The raw data as found in the CDRx file might be compared to a photographic negative and it is a direct image or copy of the data stored on/in the module(s) accessed using the CDR Tool. The CDRx file should be preserved in its native format, unedited, and should be shared in that format where it may be viewed at a later date using a licensed copy of the CDR Tool software or using the "free reader" version of the CDR Tool software in the latest production release of that software. Prior to any analytical use of this data or legal proceeding, the original \*.CDRx file should be reopened and the raw data translated in the latest production version of the CDR software to ensure the most recent, complete translation of the data is used as

## **Exhibit B-1 – FOIA Request**

The defense's October 2025 Freedom of Information Act request asks for crash reconstruction reports, electronic data recorder analyses, internal correspondence, witness statements and felony-review screening documents that were missing from criminal discovery. The request reflects diligence in seeking the State's internal analysis and witness material.

Act request has been sent and will be processed as soon as possible.

Your request has been given the reference number R005581-100725 for tracking purposes.

Records Requested: Records Requested:

Pursuant to the Illinois Freedom of Information Act (5 ILCS 140), I request copies of all records relating to People v. Ehab Allababidi, Lake County Case No. 23CF1146, including but not limited to:

- All police and crash investigation reports, supplemental narratives, field notes, and diagrams.
- All photographs, video recordings (body-worn camera, dash camera, and traffic camera), 911 audio, and CAD dispatch logs.
- Any Bosch Crash Data Report or other event-data-recorder (EDR / “black box”) downloads or analyses for my vehicle or any other involved vehicle (including the truck).
- Accident-reconstruction reports, analyses, and related technical data.
- Witness statements, interview transcripts, and summary reports.
- All correspondence, emails, memoranda, or internal notes between the Lake County State’s Attorney’s Office and any law enforcement agencies related to this case or evidence.
- The discovery inventory list or logs showing what materials were provided to the defense.

I request that all records be provided in electronic format (PDFs, audio, or video) and sent to defcon5ready@gmail.com

If any portion of this request is denied, please cite each specific FOIA exemption authorizing the denial and provide the non-exempt material.

I am the defendant in this matter and request these materials for my own legal recordkeeping and post-conviction review.

Your request will be reviewed by a FOIA officer who will contact you about the availability of the records you have requested.

PLEASE NOTE: The Freedom of Information Act is designed to allow you to inspect or receive copies of records. It is not designed to require a public body to create new records or answer questions. To the extent that you wish to ask questions, please contact the appropriate department directly.

## **Exhibit B-2 – State’s FOIA Response**

In its written response, the State acknowledges responsive records but withholds “**felony review screening documents**” under FOIA § 7(1)(m) (attorney work product) and Supreme Court Rule 412(j)(i) (opinions and theories of staff). This shows the existence of undisclosed internal charging analyses and witness material.

furnished only by a confidential source, or persons who file complaints with or provide information to administrative, investigative, law enforcement or penal agencies." 5 ILCS 140/7(1)(d)(iv) (West 2012). *Watkins v. Johnson*, 2016 IL App (1st) 152958, ¶ 39. *Perry v. Dep't of Fin. & Prof'l Regulation*, 2017 IL App (1st) 161780, ¶ 9

Felony review screening documents were withheld pursuant to Section 7(1)(m) of FOIA which exempts documents that would not be subject to disclosure in litigation, including attorney work-product. Pursuant to Illinois Supreme Court Rule 412(j)(i), disclosure "shall not be required of legal research or of records, correspondence, reports or memoranda to the extent that they contain the opinions, theories or conclusions of the State or members of its legal or investigative staffs, or of defense counsel or his staff." *People v. Sutherland*, 223 Ill. 2d 187, 276-77, 860 N.E.2d 178, 235 (2006); *People v. Harper*, 279 Ill. App. 3d 801, 810-11, 665 N.E.2d 474, 482-83 (1996); *People v. Elzey*, 203 Ill. App. 3d 153, 158-59, 560 N.E.2d 1107, 1112-13 (1990).

To the extent any portion of this response is construed as a denial, you have a right to have the denial of your request reviewed by the Public Access Counselor (PAC) at the Office of the Illinois Attorney General. 5 ILCS 140/9.5(a).

You can file your Request for Review with the PAC by writing to:

Public Access Counselor  
Office of the Attorney General  
500 South 2nd Street  
Springfield, Illinois 62701  
Phone: 877-299-3642  
E-mail: [Public.Access@ilag.gov](mailto:Public.Access@ilag.gov)

You also have the right to seek judicial review of your denial by filing a lawsuit in the State circuit court. 5 ILCS 140/11.

If you choose to file a Request for Review with the PAC, you must do so within 60 calendar days of the date of this denial. 5 ILCS 140/9.5(a). Please note that you must include a copy of your original FOIA request and this denial letter when filing a Request for Review with the PAC.

If you have any questions about this response or need additional information, please respond to this email.

Sincerely,

Melanie Nelson  
Chief Deputy, Civil Trial Division  
State's Attorney's Office

## **Exhibit C-1 – Post-Plea Native-Format Discovery Request**

A post-plea email dated October 22 2025 requests the raw **.CDRx** image file with checksum, native body-worn and dash-cam video files with complete audit logs, and a privilege log for any items withheld as privileged or work product. This demonstrates diligence after the plea and identifies the technical evidence that prior counsel failed to secure before the plea.

---

**Subject: People v. Allababidi (23CF1146) — Complete Client File & Native Discovery (IRPC 1.16(d))**

1 message

---

**Ehab Hilfiger** <defcon5ready@gmail.com>  
To: Bailey Russell <BRussell@lakecountyil.gov>

Wed, Oct 22, 2025 at 11:52 PM

Dear Ms. Russel,

I was your client in **People v. Ehab Allababidi, Case No. 23CF1146**.Please treat this as my formal request for my **entire client file** under **Illinois Rule of Professional Conduct 1.16(d)** and my rights as a former client.I have personally reviewed the **382-page discovery packet** in my case. Based on that review, several categories appear incomplete or missing in **native format**. Please produce the following within **14 days**:**Items to Produce (native formats where applicable)**

- **All Rule 412 discovery** and all supplements/cover letters.
- **Reports & photos:** incident/supplemental reports; scene diagrams; **original photo files + photo logs**.
- **Crash reconstruction / MCAT:** total-station or other **raw measurement files**, notes, drafts, calculations, and final reports.
- **Vehicle EDR:** the **raw .CDRX image**, all Bosch exports/decodes, and any associated metadata or **checksums**.
- **Video:** all body-worn and dash-cam videos in their **original containers** with **timestamp/audit** files and any proprietary player/readme.
- **911/ETSB:** CAD event logs, **911 audio**, radio/dispatch traffic, run cards.
- **Tow/impound:** tow sheets, inventory, and **chain-of-custody** (physical & digital).
- **Medical/EMS/hospital** materials relied upon by the State, including labs/toxicology.
- **Correspondence:** to/from the State and agencies (MCAT/ISP/local PD/ETSB/911/hospitals), and any **Rule 412 certificates**.
- **Court records:** all filings and **orders** (including any protective orders/qualified HIPAA orders) and any record subpoenas.
- **Plea/negotiation materials:** offer letters/emails, any Rule 402 notes, plea paperwork, and communications reflecting advice provided and my decision timeline.
- **Media inventories:** indexes of all CD/DVD/USB media with **MD5/SHA-256** hashes if available.
- **Docketing/calendaring/task entries** reflecting discovery flow and deadlines.

If any item is not in your possession, please **identify the current custodian** and the last date you requested/received it. If you withhold anything as privileged/work product, please provide a **privilege/work-product log** (date, author, general description).**Delivery:** A **secure download link** is preferred. I can also provide an **encrypted USB** for pickup or drop-off.**Preservation:** Please preserve all originals and **do not alter or overwrite** any native media pending transfer.

Kindly confirm receipt of this request today and advise when I can expect the download link or pickup time.

You can reach me at (773) 920-0030 and [defcon5ready@gmail.com](mailto:defcon5ready@gmail.com).Mailing address: **8516 W Winona St, Chicago**.

Thank you for your prompt attention.

Sincerely,  
**Ehab Allababidi**



**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.

## **Exhibit D-1 – Qualified Protective Order (July 1 2024)**

This July 1 2024 qualified protective order authorizes Advocate Condell Medical Center to release **“any and all health information and medical records”** relating to the case. Entered more than a year after the June 14 2023 indictment, the order proves that discovery on the element of great bodily harm was still ongoing.

**FILED**

**JUL 01 2024**

STATE OF ILLINOIS )  
 ) SS  
COUNTY OF LAKE )

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT, LAKE COUNTY, ILLINOIS  
*Helen Cartwright Weinstein*  
CIRCUIT CLERK

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
VS. ) General No. 23CF1146  
 )  
EHAB ALLABABIDI )

**CERTIFIED MEDICAL RECORDS RELEASE AND QUALIFIED PROTECTIVE ORDER PURSUANT TO HIPPA**

This matter coming to be heard on Motion of the People of the State of Illinois, the court having jurisdiction and being fully advised in the premises:

**IT IS HEREBY ORDERED:**

CONDELL MEDICAL CENTER is ordered to submit any and all health information and medical records, including sensitive information, pertaining to the patient of [REDACTED] treated on or about MAY 23, 2022 THROUGH DATE OF DISCHARGE. Said records shall be accompanied by a **CERTIFICATION** from the Keeper of Records, signed under the penalty of perjury.

CONDELL MEDICAL CENTER must comply with this Qualified Protection Order Pursuant to HIPPA by mailing legible copies within two weeks to the Honorable Judge Stride, Courtroom T611, 18 North County Street, Waukegan, Illinois.

1. The current parties (and their attorneys) and any future parties (and their attorneys) to the above captioned matter are hereby authorized to receive, subpoena, and transmit "protected health information" (also referred to herein as "PHI") pertaining to [REDACTED] treated on or about MAY 23, 2022 THROUGH DATE OF DISCHARGE, to the extent and subject to the conditions outlined herein.
2. For the purposes of this Qualified Protective Order, "PHI" or "protected health information" shall have the same scope and definition as set forth in 45 CFR 160.103 and 160.501. Without limiting the generality of the foregoing, "PHI" includes, but is not limited to, health information, including sensitive material, including demographic information, relating to either, (a) the past, present, or future physical or mental condition of an individual, (b) the provision of care to an individual, or (c) the payment for care provided to an individual, which identifies the individual or which reasonably could be expected to identify the individual.

## **Exhibit D-2 – Subpoena to Lincolnshire-Riverwoods Fire Protection District (July 24 2024)**

The subpoena dated July 24 2024 commands the Lincolnshire-Riverwoods Fire Protection District to produce all EMS records and protected health information related to the crash. This further confirms that injury and causation evidence necessary to support the felony charge was still being sought long after the indictment.

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

PEOPLE OF THE STATE OF ILLINOIS )  
 ) NO.: 23CF1146  
 V. ) AGENCY NO:  
 )  
 )  
 )  
 EHAB ALLABABIDI )

SUBPOENA

TO: LINCOLNSHIRE-RIVERWOODS FIRE PROTECTION DISTRICT  
SUBPOENA COMPLIANCE  
115 SCHELTER RD.,  
LINCOLNSHIRE, IL 60069

YOU ARE COMMANDED TO APPEAR AND TESTIFY BEFORE THE HONORABLE CHRISTOPHER STRIDE AT 18 NORTH COUNTY STREET WAUKEGAN, IL 60085, IN COURTROOM T-611 ON JULY 24<sup>TH</sup>, 2024, AT 9:00 AM.

YOU ARE COMMANDED ALSO TO BRING OR DO THE FOLLOWING:

PROVIDE ALL PROTECTED HEALTH INFORMATION AND MEDICAL RECORDS INCLUDING ANY AND ALL SENSITIVE INFORMATION INCLUDING BUT NOT LIMITED TO INFORMATION RELATING TO MENTAL HEALTH AND/OR ALCOHOL/DRUG ABUSE CONCERNING [REDACTED] [REDACTED] FOR TREATMENT RECEIVED FROM ADVOCATE CONDELL MEDICAL CENTER ON OR ABOUT THE DATE OF 05/23/2022.  
RECORDS ARE RETURNABLE TO THE HONORABLE JUDGE CHRISTOPHER STRIDE: 18 N. COUNTY ST, COURTROOM T-611, WAUKEGAN, IL 60085.  
ANY CHARGES OR FEES ASSOCIATED WITH THIS REQUEST SHOULD BE SUBMITTED TO THE LINCOLNSHIRE POLICE DEPARTMENT: 1 OLDE HALF DAY RD., LINCOLNSHIRE, IL 60069.

**PLEASE CONTACT, ASA FRANCIS P. DEROSA, AT 847 377-3000, UPON RECEIPT OF THIS SUBPOENA.**

YOUR FAILURE TO APPEAR IN RESPONSE TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF THIS COURT.

Witness, JULY 2<sup>ND</sup>, 2024.



[REDACTED]

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

I SERVED THIS SUBPOENA BY EMAILING/MAILING/FAXING A COPY TO \_\_\_\_\_ ON \_\_\_\_\_, 20\_\_\_\_. I PAID THE WITNESS \$ \_\_\_\_\_ FOR WITNESS AND MILEAGE FEES.

FILED  
NOV 25 2005

Eric C. ...  
L. CIRCUIT

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

PEOPLE OF THE STATE OF ILLINOIS,  
Plaintiff,

v.

No. 23 CF 1146  
EHAB ALLABABIDI,  
Defendant.

FILED

NOV 25 2025

Eric Cantagut Weinstock  
CIRCUIT CLERK

**PETITION FOR POST-CONVICTION RELIEF**

*(725 ILCS 5/122-1 ET SEQ.) – PRO SE*

NOW COMES the Petitioner, **EHAB ALLABABIDI**, pro se, and pursuant to the Illinois Post-Conviction Hearing Act, 725 ILCS 5/122-1 et seq., respectfully petitions this Court to vacate the judgment of conviction and sentence entered against him in Lake County case number 23 CF 1146, and in support states as follows:

***I. PARTIES AND JURISDICTION***

1. Petitioner is the defendant in *People v. Allababidi*, Lake County case number 23 CF 1146. On or about September 8, 2025, Petitioner entered a guilty plea in this case and the Court entered judgment and imposed sentence.

2. Petitioner is currently subject to the sentence and judgment in this case and his liberty is restrained thereby, within the meaning of 725 ILCS 5/122-1(a).

3. This is Petitioner's first petition for post-conviction relief under 725 ILCS 5/122-1 et seq..

4. Petitioner previously pursued direct review. He filed a notice of appeal on October 6, 2025, and the Illinois Appellate Court, Second District, opened Appeal No. 2-25-0440. On November 17, 2025, the Appellate Court entered an order denying Petitioner's motion for a limited remand under Supreme Court Rule 604(d) and dismissed the appeal solely on the basis that Petitioner had not filed a Rule 604(d) motion in the trial court.

5. This petition is timely under 725 ILCS 5/122-1(c). It is being filed within three (3) years of the judgment entered on or about September 8, 2025. Any delay is not due to his culpable negligence but to the pendency of his direct appeal, his pro se status, and his ongoing efforts to obtain discovery and records through the Freedom of Information Act (FOIA).

6. Petitioner brings this action because, in the proceedings that resulted in his conviction, there were substantial deprivations of his rights under the United States Constitution and the Illinois Constitution, including his rights to due process of law, the effective assistance of counsel, a knowing and intelligent guilty plea, and a meaningful right to appeal.

## **II. FACTUAL BACKGROUND**

7. The charges in 23 CF 1146 arise from a motor vehicle incident in Lake County, Illinois, in which the State alleged that Petitioner drove under the influence of drugs. The Aggravated Reckless Driving indictment alleged that the collision “resulted in great bodily harm” to a victim.

8. The State’s theory of guilt relied heavily on toxicology results. However, internal State communications dated August 11, 2022, revealed that a Lincolnshire Detective informed the State’s Attorney’s Office (SAO) that the emergency room lab report lacked specific amounts of Amphetamine and Benzodiazepines, leading the detective to state: “I believe it would be hard pressed to prove DUI drugs”. This communication reflecting material doubt was never disclosed to the defense.

9. Throughout the pendency of the criminal case, discovery was incomplete and materially misleading, thereby corrupting the guilty plea entered on September 8, 2025. Among the critical omissions:

- *Factual Basis Lacking at Indictment:* The indictment alleging great bodily harm was returned on June 14, 2023. Yet, the court minutes from that same date contain handwritten notes asking “WHAT ARE INJURIES?” and recording “NothiNg, in file – NO med RECS EtE”.
- *Ongoing Discovery:* Clerk-issued subpoenas and Qualified Protective Orders (QPOs) were still being issued as late as July 2024 to Advocate Condell Medical Center and the Lincolnshire-Riverwoods Fire Protection District, proving the State was actively securing core medical and EMS records thirteen months after indictment and shortly before plea discussions. This confirms discovery was “not complete when appellant entered his plea”.
- *Active Suppression Post-Plea:* In October 2025 FOIA responses, Petitioner learned for the first time that the State acknowledged possessing but withheld entire categories of materials, including “felony-review screening documents” and internal correspondence/memoranda, citing attorney work-product under Illinois Supreme Court Rule 412(j)(i).

10. The suppression of the internal doubt email and the concealment of felony-review documents and the incomplete medical records created a misleading picture of the evidence.

11. Petitioner’s decision to plead guilty on September 8, 2025, was based on this incomplete and inaccurate discovery. Had Petitioner known about the internal doubts regarding the ability to prove DUI-drugs, the existence of undisclosed medical, EMS, felony-review, and internal documents, he would not have pled guilty and would have insisted on going to trial.

12. Petitioner's subsequent direct appeal was dismissed on procedural grounds on November 17, 2025, based on his failure to file a Rule 604(d) motion. The Appellate Court stated that Petitioner did not offer the "only excuse that is legally actionable," which is the failure to give proper Rule 605 admonishments. Petitioner, being pro se, did not understand the requirement to file the Rule 604(d) motion as a jurisdictional precondition to appeal.

### **III. CONSTITUTIONAL CLAIMS FOR RELIEF**

#### **COUNT I – DUE PROCESS VIOLATIONS (BRADY AND INVOLUNTARY PLEA)**

13. Petitioner realleges and incorporates paragraphs 1–12 as though fully set forth herein.

14. The State failed to disclose material exculpatory and impeachment evidence, including but not limited to:

a. *Internal Doubt Email*: An August 11, 2022, email in which law enforcement acknowledged the emergency room lab report lacked specific amounts of controlled substances and concluded the State would be "hard pressed to prove DUI drugs".

b. *Factual Basis Flaw*: June 14, 2023, court minutes noting "Nothing in file – NO med RECS etc." at the time of the indictment alleging "great bodily harm".

c. *Active Suppression Post-Plea*: October 2025 FOIA responses acknowledging but withholding "felony-review screening documents," witness statements, and internal correspondence under Supreme Court Rule 412(j)(i).

d. *Incomplete Medical Discovery*: Judicial orders and subpoenas from July 2024 demonstrating that essential medical and EMS records related to the element of "great bodily harm" were still being secured well over a year after indictment.

15. This suppression violated Petitioner's right to due process of law under *Brady v. Maryland*. The evidence is material because it directly undermines the viability of the DUI-drugs charge and impeaches the State's case strength.

16. Petitioner's plea was not knowing, intelligent, or voluntary because it was entered without knowledge of this suppressed, material evidence. Had Petitioner known the true state of the evidence, he would not have pled guilty.

#### **COUNT II – INEFFECTIVE ASSISTANCE OF COUNSEL (IAC)**

17. Petitioner realleges and incorporates paragraphs 1–16 as though fully set forth herein.

18. Petitioner was denied the effective assistance of counsel guaranteed by the Sixth Amendment to the United States Constitution and article I, section 8 of the Illinois Constitution, in that trial counsel failed to perform an objectively reasonable investigation and failed to protect Petitioner's rights.

19. Specifically, counsel's deficient performance included:

a. *Failure to Secure Complete Discovery*: Counsel failed to ensure discovery was complete before the September 8, 2025, plea, evidenced by the fact that the State was still issuing QPOs

and subpoenas for medical/EMS records in July 2024.

b. *Failure to Investigate Key Evidence*: Counsel failed to investigate or obtain the August 11, 2022, internal communication acknowledging that the State would be “hard pressed” to prove DUI-drugs without quantitative toxicology.

c. *Failure to Challenge Technical Data*: Counsel failed to pursue native digital evidence (e.g., the raw .CDRX image, audit logs, and metadata requested on October 22, 2025) necessary to independently verify the State’s critical speed estimate of 116–120 mph segment speed and 124–125 mph EDR peak.

d. *Failure to Preserve Appellate Rights*: Counsel failed to file a timely, written Rule 604(d) motion to withdraw the guilty plea, which directly resulted in the dismissal of Petitioner’s appeal on November 17, 2025.

20. But for counsel’s deficient performance, there is a reasonable probability that Petitioner would not have pled guilty or, at minimum, would have had meaningful appellate review.

### ***COUNT III – DENIAL OF MEANINGFUL RIGHT TO DIRECT APPEAL***

21. Petitioner realleges and incorporates paragraphs 1–20 as though fully set forth herein.

22. Petitioner was not properly admonished under Supreme Court Rule 605(c) concerning his obligation to file a Rule 604(d) motion as a precondition to appeal.

23. Because of deficient Rule 605 admonishments and counsel's failure to file a 604(d) motion, the Appellate Court summarily dismissed his direct appeal on November 17, 2025. The Appellate Court expressly cited *People ex rel. Alvarez v. Skryd* and refused to acknowledge any excuse other than defective Rule 605 admonishments.

24. This combination deprived Petitioner of his due process right to a meaningful direct appeal and to the effective assistance of counsel through the first tier of appellate review. Petitioner has never had judicial review of his claims of suppression and incomplete discovery that corrupted his plea.

### ***IV. REQUEST FOR EVIDENTIARY HEARING***

25. Petitioner’s claims rely on substantial evidence outside the trial record, including internal State emails (August 11, 2022), FOIA responses (October 2025), subpoenas (July 2024), and court minutes (June 14, 2023). These claims require factual development and an evidentiary hearing.

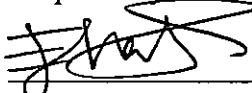
26. Petitioner requests that this Court advance this petition to second and third stages, appoint counsel if required by law, and conduct an evidentiary hearing.

### ***V. PRAYER FOR RELIEF***

WHEREFORE, Petitioner, EHAB ALLABABIDI, respectfully prays that this Honorable Court:

- A. Find that the Petitioner has made a substantial showing that his constitutional rights were violated in the proceedings leading to his conviction in case 23 CF 1146;
- B. Vacate the judgment of conviction and sentence, allow Petitioner to withdraw his guilty plea, and restore the case to a pre-plea posture;
- C. In the alternative, grant an evidentiary hearing, further discovery, or modification of sentence; and
- D. Grant any additional relief that this Court deems just and proper.

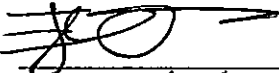
Respectfully submitted,



EHAB ALLABABIDI, Petitioner, pro se  
8516 W. Winona Street  
Chicago, Illinois 60656  
Phone: (773) 920-0030  
Email: defcon5ready@gmail.com

#### VERIFICATION

I, EHAB ALLABABIDI, certify under penalty of perjury pursuant to 735 ILCS 5/1-109 that I have read this Petition for Post-Conviction Relief and that the facts stated herein are true and correct to the best of my knowledge, information, and belief.



Date: 11/19/2025  
EHAB ALLABABIDI

#### CERTIFICATE OF SERVICE

I, EHAB ALLABABIDI, certify that on \_\_\_\_\_, 2025, I served a copy of this PETITION FOR POST-CONVICTION RELIEF by depositing it in the United States mail, postage prepaid, or by other authorized method of service, addressed to:

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

FILED

NOV 25 2025

U.S. COURT OF APPEALS  
CIRCUIT CLERK

DEC 08 2025

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

*Eric Cantorget Weinstein*  
CIRCUIT CLERK

PEOPLE OF THE STATE OF ILLINOIS, )  
Plaintiff, )  
 )  
v. )  
 )  
EHAB ALLABABIDI, )  
Defendant/Petitioner. )

No. 23 CF 1146

**COMBINED MOTION**

To Compel Production of Client File and Native Discovery; For Preparation and Access to Transcripts;  
For Evidence Preservation; and for Coordinated, Expedited Management of Petitioner’s First  
Post-Conviction Petition

NOW COMES Defendant/Petitioner, **Ehab Allababidi** (“Petitioner”), pro se, and respectfully moves this Court for limited, record-building and preservation orders in aid of his first Petition for Post-Conviction Relief under **725 ILCS 5/122-1 et seq.** In support, Petitioner states as follows:

**RELIEF REQUESTED**

Petitioner seeks the following narrow, case-management orders to ensure that his first post-conviction petition is evaluated on a fair and complete record:

1. **Client File / Native Discovery.** Order Petitioner’s former trial/public defender to produce Petitioner’s complete client file and native-format discovery, or make the same reasonably available for inspection and copying within a short, specified time.
2. **Transcripts.** Direct preparation and filing of critical transcripts and, recognizing Petitioner’s indigent status, make them reasonably available for his use and for the Illinois Supreme Court proceedings related to **People v. Allababidi, No. 132495.**
3. **Preservation.** Enter a litigation-hold-style order requiring preservation of EDR raw data, native video/audio, reconstruction datasets, medical/EMS materials received, and internal charging/FOIA-referenced communications.
4. **Coordinated Handling of First Post-Conviction Petition.** Acknowledge the filing of Petitioner’s first post-conviction petition and set an expedited status framework ensuring the Court’s first-stage review under **725 ILCS 5/122-2.1** is not forced to proceed on an incomplete record controlled by former counsel and agencies.

**I. PROCEDURAL POSTURE**

Petitioner is the defendant in **People v. Allababidi**, Lake County Case No. **23 CF 1146.**

On or about **September 8, 2025**, Petitioner entered a negotiated guilty plea to aggravated reckless driving (great bodily harm) and related charges and was sentenced that same day.

On **October 6, 2025**, Petitioner filed a notice of appeal in **Appeal No. 2-25-0440.** Aware that no Supreme Court Rule 604(d) motion had been filed in the circuit court, Petitioner also filed in the appellate court a **Motion to Stay Appeal and Remand for Limited Rule 604(d)**

## **Proceedings.**

On **November 17, 2025**, the Appellate Court, Second District, denied the stay/remand request and dismissed the appeal on the ground that no Rule 604(d) motion had been filed in the trial court.

Petitioner thereafter filed a **Petition for Leave to Appeal** under Supreme Court Rule 315 in the Illinois Supreme Court, **People v. Allababidi, No. 132495**, attaching a detailed chronology, internal emails, indictment minutes, Bosch CDR materials, and related documents. The stamped PLA and exhibit packet are attached to Petitioner's post-conviction petition as **Group Exhibit A**.

On **November 7, 2025**, Petitioner filed a civil FOIA action, **Ehab Allababidi v. Lake County State's Attorney's Office**, Lake County Chancery Case No. **2025CH00000277**, alleging violations of the Illinois Freedom of Information Act for the State's refusal to produce witness statements, felony-review screening documents, and internal emails bearing on causation, impairment, and charging decisions. The stamped FOIA complaint is attached to Petitioner's post-conviction petition as **Group Exhibit B**.

Petitioner has now filed in this Court a detailed **first** Petition for Post-Conviction Relief asserting constitutional claims that include, but are not limited to:

- Use of unverified "great bodily harm" allegations where contemporaneous minutes reflect "**Nothing in file – NO med RECS etc.**" and "**WHAT ARE INJURIES?**";
- Suppression of material exculpatory evidence, including an internal email expressing doubt about DUI-drugs, withheld felony-review documents, and unrevealed EDR details showing Petitioner braked and was belted;
- Ineffective assistance of counsel related to failure to obtain and review native EDR data, challenge reconstruction claims, and preserve appellate rights; and
- Loss of direct appellate review through defective admonitions and the Rule 604(d) framework.

In connection with these matters, Petitioner previously filed: (a) a motion to compel his trial/public defender to produce his client file and discovery; and (b) motions related to transcript preparation and transmittal to the Illinois Supreme Court. Those motions are set for hearing on **December 11, 2025**.

This Combined Motion is intended to unify, clarify, and streamline the limited relief Petitioner seeks so that the Court may manage the post-conviction matter on a single, coherent framework.

## **II. AUTHORITY AND NEED FOR LIMITED RECORD-BUILDING ORDERS**

This Court has inherent authority to enter reasonable ancillary orders necessary to ensure that post-conviction proceedings are meaningful, not illusory, particularly where the petition is supported by documentary exhibits and raises substantial constitutional issues.

This is Petitioner's **first** post-conviction petition. First-stage review under **725 ILCS 5/122-2.1** is meant to screen only those petitions that are frivolous or patently without merit—not to penalize a petitioner who cannot attach critical record materials because those materials are controlled by former counsel or custodial agencies.

Petitioner's request is narrow: he seeks access to his **own client file**, preparation of routine transcripts necessary to identify and prove record-based claims, and preservation of digital evidence that may be subject to routine deletion policies.

Granting these requests will not broaden the State's obligations beyond preservation and orderly record completion. It will simply allow the Court to evaluate Petitioner's constitutional claims on an accurate and complete record.

### **III. REQUEST 1: COMPLETE CLIENT FILE AND NATIVE DISCOVERY**

#### **A. Materials Requested**

On and after **October 22, 2025**, Petitioner requested that his former trial/public defender provide his complete client file and native-format discovery, including but not limited to:

- All discovery produced under Supreme Court Rule 412 and supplements;
- The raw Bosch **.CDRx** image (and any related EDR raw files) from the **May 27, 2022** download;
- All crash-reconstruction datasets, native files, spreadsheets, and the final MCAT collision-reconstruction report;
- All body-worn camera and dash-camera videos in their original digital containers, with any audit logs or metadata;
- CAD reports, 911 audio, and associated logs;
- All medical and EMS records obtained by counsel; and
- Counsel's correspondence with the State related to discovery and reconstruction.

#### **B. Counsel's Refusal**

Petitioner has been informed that former trial/public defender counsel takes the position that she has no obligation to provide the client file or native discovery post-judgment.

#### **C. Why Native Format Matters**

The preserved raw Bosch image is essential. Vendor documentation associated with CDR systems treats raw images as the primary source that must be preserved for accurate later translation and re-analysis.

The Bosch system-status materials reflected in Petitioner's exhibits record the driver's seat-belt switch as **BUCKLED** at deployment and show the identified pattern of evasive braking seconds before impact. These data points are central to Petitioner's causation, mens rea, and ineffective-assistance claims.

Without access to the native discovery and his own client file, Petitioner cannot meaningfully litigate constitutional claims that revolve around what evidence existed, what was withheld, and what counsel did or did not obtain and review.

#### **D. Narrow Order Proposed**

Petitioner respectfully requests an order directing former trial/public defender counsel to:

- Produce the complete client file and native-format discovery to Petitioner; or
- In the alternative, make the complete file reasonably available for inspection and copying at a designated time and location; and
- State on the record whether any of the categories listed above were never obtained.

### **IV. REQUEST 2: PREPARATION AND ACCESS TO TRANSCRIPTS**

#### **A. Transcripts Required**

Petitioner has requested preparation of transcripts that are essential to his post-conviction claims, including at minimum:

- The **September 8, 2025** plea and sentencing hearing;
- Any hearings addressing discovery, protective orders, or the July 1–2, 2024 subpoenas for medical/EMS records; and
- Any hearings where the Court or counsel addressed reconstruction, EDR, or medical evidence bearing on causation and injury.

#### **B. Indigency and Record-Based Claims**

Petitioner is indigent and was represented by appointed counsel in the underlying proceedings.

The claims in Petitioner’s post-conviction petition hinge on what was and was not said and done in the record—especially regarding plea admonitions, discovery completeness, and counsel’s performance.

#### **C. Narrow Order Proposed**

Petitioner respectfully requests that the Court:

- Direct the clerk and appropriate court reporters to prepare and file the transcripts identified above; and
- Recognize Petitioner’s indigent status and provide copies to Petitioner without cost or otherwise make them reasonably available in a form he can use for his post-conviction litigation and for Supreme Court Case No. **132495**.

### **V. REQUEST 3: EVIDENCE PRESERVATION ORDER**

#### **A. Risk of Routine Deletion**

There is a substantial risk that critical digital evidence may be overwritten, deleted, or altered as part of routine retention schedules now that direct appeal has been dismissed.

The at-risk categories include, but are not limited to:

- Raw Bosch **.CDRx** images and any derivative EDR raw files;
- Native body-cam and dash-cam video files with audit logs and metadata;
- Crash-reconstruction datasets used to generate any MCAT or related reports;
- CAD reports, 911 audio, dispatch logs, and associated metadata;
- Medical and EMS records received by the State or obtained in the investigation; and
- Felony-review screening documents, internal emails, and witness statements referenced in Petitioner’s FOIA correspondence and FOIA complaint.

#### **B. Narrow Hold Order Proposed**

Petitioner respectfully requests a preservation order directing the State, investigating agencies, and any agents or vendors acting at their direction to preserve the categories listed above pending resolution of:

- Petitioner’s FOIA action (2025CH00000277); and
- Petitioner’s first post-conviction petition in this cause.

### **VI. REQUEST 4: COORDINATED, EXPEDITED MANAGEMENT OF FIRST POST-CONVICTION PETITION**

This is Petitioner's **first** petition under the Post-Conviction Hearing Act. Because Petitioner's direct appeal was dismissed without merits review, post-conviction proceedings are effectively his primary remaining vehicle for constitutional review.

Petitioner's petition is supported by substantial documentary materials, including:

- The stamped Illinois Supreme Court PLA and internal exhibits (**Group Exhibit A**);
- The stamped FOIA complaint (**Group Exhibit B**);
- Documentary evidence indicating medical records did not exist at the time of indictment despite "great bodily harm" allegations;
- Internal communications expressing doubt about DUI-drugs;
- Bosch CDR materials reflecting seat-belt status and braking; and
- Post-plea FOIA events showing that significant categories of potentially exculpatory evidence remained undisclosed.

Petitioner does not ask the Court to prejudge the merits. He asks only that the Court's first-stage review not be forced to proceed on an avoidably incomplete record where former appointed counsel continues to withhold the client file and native discovery.

A short, structured status timetable after production of the file and transcripts will allow efficient management and reduce confusion across parallel proceedings.

## **VII. PRAYER FOR RELIEF**

WHEREFORE, Petitioner respectfully requests that this Court enter an order:

- **A.** Granting this Combined Motion and treating it as a clarification and supplement to Petitioner's previously filed motions concerning production of the client file and transcripts;
- **B.** Directing Petitioner's former trial/public defender to produce Petitioner's complete client file and native-format discovery (including, but not limited to, EDR raw data, native video files, reconstruction datasets, CAD/911 materials, and medical/EMS records obtained), or to make them reasonably available for inspection and copying, within **fourteen (14) days** of the Court's order, and to state on the record if specific categories of discovery were never obtained;
- **C.** Directing preparation and filing of transcripts of at minimum the **September 8, 2025** plea and sentencing hearing and any relevant prior discovery- or evidence-related hearings, and recognizing Petitioner's indigent status, to provide such transcripts to Petitioner without cost or otherwise make them reasonably available for use in this post-conviction matter and for Supreme Court case no. **132495**;
- **D.** Entering a preservation order requiring the State, investigating agencies, and their agents and vendors to preserve all EDR raw files (.CDRx or equivalent), native video files and associated logs, reconstruction datasets, CAD/911/dispatch materials, medical/EMS records received in the investigation, and felony-review/internal communications referenced in Petitioner's FOIA correspondence, pending resolution of the FOIA action and post-conviction petition;
- **E.** Acknowledging on the record that Petitioner's first Petition for Post-Conviction Relief has been filed in Case No. **23 CF 1146**, and: (i) either finding that the petition states at least the gist of constitutional claims sufficient to proceed and docketing the matter for second-stage proceedings with counsel to be appointed under 725 ILCS 5/122-4; or (ii) at

minimum setting an expedited status date following compliance with the limited record-building and preservation relief requested herein; and (iii) deferring any summary dismissal under 725 ILCS 5/122-2.1 until after these narrow, threshold record items are addressed;

- **F. Hearing this Combined Motion together with Petitioner’s previously noticed motions on December 11, 2025, or such other date as the Court deems appropriate; and**
- **G. Granting such other and further relief as this Court deems just and proper.**

Respectfully submitted,

**/s/ Ehab Allababidi**

**Ehab Allababidi, Defendant/Petitioner, pro se**

8516 W Winona St

Chicago, IL 60656

Telephone: (773) 920-0030

Email: ehabhilfiger@gmail.com

Dated: \_\_\_\_\_, 2025

**CERTIFICATE OF SERVICE**

I, **Ehab Allababidi**, certify that on \_\_\_\_\_, 2025, I served a copy of the foregoing Combined Motion to Compel Production of Client File and Native Discovery, for Preparation and Access to Transcripts, for Evidence Preservation, and for Coordinated, Expedited Handling of First Post-Conviction Petition by placing it in the U.S. Mail, with proper postage prepaid, addressed to:

**Lake County State’s Attorney’s Office**

18 N. County Street

Waukegan, IL 60085

**Lake County Public Defender’s Office**

15 S. County Street

Waukegan, IL 60085

**/s/ Ehab Allababidi**



Ehab Hilfiger &lt;defcon5ready@gmail.com&gt;

**Subject: People v. Allababidi (23CF1146) — Complete Client File & Native Discovery (IRPC 1.16(d))**

1 message

Ehab Hilfiger <defcon5ready@gmail.com>  
 To: Bailey Russell <BRussell@lakecountyil.gov>

Wed, Oct 22, 2025 at 11:52 PM

Dear Ms. Russel,

I was your client in **People v. Ehab Allababidi, Case No. 23CF1146**. Please treat this as my formal request for my **entire client file** under **Illinois Rule of Professional Conduct 1.16(d)** and my rights as a former client.

I have personally reviewed the **382-page discovery packet** in my case. Based on that review, several categories appear incomplete or missing in **native format**. Please produce the following within **14 days**:

**Items to Produce (native formats where applicable)**

- **All Rule 412 discovery** and all supplements/cover letters.
- **Reports & photos:** incident/supplemental reports; scene diagrams; **original photo files + photo logs**.
- **Crash reconstruction / MCAT:** total-station or other **raw measurement files**, notes, drafts, calculations, and final reports.
- **Vehicle EDR:** the **raw .CDRX image**, all Bosch exports/decodes, and any associated metadata or **checksums**.
- **Video:** all body-worn and dash-cam videos in their **original containers** with **timestamp/audit files** and any proprietary player/readme.
- **911/ETSB:** CAD event logs, **911 audio**, radio/dispatch traffic, run cards.
- **Tow/impound:** tow sheets, inventory, and **chain-of-custody** (physical & digital).
- **Medical/EMS/hospital materials** relied upon by the State, including labs/toxicology.
- **Correspondence:** to/from the State and agencies (MCAT/ISP/local PD/ETSB/911/hospitals), and any **Rule 412 certificates**.
- **Court records:** all filings and **orders** (including any protective orders/qualified HIPAA orders) and any record subpoenas.
- **Plea/negotiation materials:** offer letters/emails, any Rule 402 notes, plea paperwork, and communications reflecting advice provided and my decision timeline.
- **Media inventories:** indexes of all CD/DVD/USB media with **MD5/SHA-256** hashes if available.
- **Docketing/calendaring/task entries** reflecting discovery flow and deadlines.

If any item is not in your possession, please **identify the current custodian** and the last date you requested/received it. If you withhold anything as privileged/work product, please provide a **privilege/work-product log** (date, author, general description)

Thank you for your prompt attention.

Sincerely,  
**Ehab Allababidi**

--  
 **Ehab Allababidi**  
Personal Signature

**Phone:** 773-920-0030  
**Email:** defcon5ready@gmail.com

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**Follow-Up: Client File & Native Discovery (IRPC 1.16(d))**

1 message

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**Ehab Hilfiger** <defcon5ready@gmail.com>  
To: Bailey Russell <BRussell@lakecountyil.gov>

Thu, Oct 30, 2025 at 6:27 AM

Dear Ms. Bailey—following up on my Oct 22 request. Please confirm **today** and provide either (a) a download link/pickup time, or (b) an inspection date **this week** for any materials restricted by Rule 415. If 415 applies, please **move for the 5-day order under Rule 415(c)** so I can receive copies; I consent. If you assert privilege/work product on anything, please send a **privilege log**.

Thank you.  
- Ehab



**Ehab Allababidi**  
Personal Signature

Phone: 773-920-0030  
Email: defcon5ready@gmail.com

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FILED

DEC 08 2025

*Eric Cartwright Weinstein*  
CIRCUIT CLERK

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

**FILED**

PEOPLE OF THE STATE OF ILLINOIS,  
Plaintiff,

DEC 08 2025

v. No. 23 CF 1146

EHAB ALLABABIDI,  
Defendant/Petitioner.

*Ena Cantagut Weinstein*  
CIRCUIT CLERK

**PETITION FOR POST-CONVICTION RELIEF  
(725 ILCS 5/122-1 et seq.) – Pro se**

**PRELIMINARY STATEMENT**

This case presents a straightforward deprivation of constitutional rights masquerading as a run-of-the-mill plea. Petitioner Ehab Allababidi was induced to plead guilty to Aggravated Reckless Driving (Great Bodily Harm) while the State withheld exculpatory evidence, charged a felony injury element without any medical proof, and relied on unverified electronic data. Investigators downloaded the Bosch Crash Data Retrieval (CDR) report on May 27, 2022, which recorded the driver’s seat-belt switch as BUCKLED and required preservation of the raw .CDRx file for accurate translation, but the raw file was never produced. On August 11, 2022 Detective Paul Petrick emailed Assistant State’s Attorney Benjamin Dillon noting that the hospital toxicology report listed only amphetamine and benzodiazepine traces with no quantitative levels and that it would be “hard pressed to prove DUI drugs.” This internal doubt undermined the prosecution’s theory but was hidden from the defense.

Despite lacking medical evidence of great bodily harm, the State obtained an indictment on June 14, 2023. Court minutes from that day ask “WHAT ARE INJURIES?” and note “Nothing in file – NO med RECS etc.,” demonstrating that the felony element lacked a factual basis. More than a year later, on July 1 and July 2, 2024, the State sought a protective order and subpoenaed medical records, confirming that injury discovery remained incomplete. Trial counsel advised Petitioner to plead guilty on September 8, 2025 while discovery was still incomplete. After the plea Petitioner diligently pursued the withheld materials through Freedom of Information Act (FOIA) requests and a civil FOIA lawsuit, and he also filed a Motion to Stay Appeal and Remand for Limited Rule 604(d) Proceedings to cure the procedural default. The appellate court denied that motion and dismissed the appeal on November 17, 2025, leaving this petition as the only avenue to vindicate Petitioner’s constitutional rights.

**ROADMAP OF CONSTITUTIONAL VIOLATIONS**

1. **Brady Suppression and Due Process.** The State suppressed the August 11, 2022 Petrick email expressing doubt about a DUI-drug charge; a witness statement and related felony-review materials describing the truck driver's left turn as a "ballsy maneuver"; the raw .CDRx data and seat-belt evidence; and felony-review screening documents acknowledged in the FOIA response.
2. **Unsupported Felony Indictment.** The indictment for aggravated reckless driving (great bodily harm) was returned without any medical records. Court minutes note "NO med RECS," and the State sought medical records only in July 2024.
3. **Ineffective Assistance of Counsel.** Counsel allowed a plea while discovery was incomplete; failed to investigate or use the Petrick email, the witness statements, the felony-review screening documents, the raw data and seat-belt evidence; failed to challenge the scientific reliability of the EDR data; and failed to file the Rule 604(d) post-plea motion.
4. **Denial of Meaningful Appeal.** Inadequate Rule 605(c) admonitions and counsel's failure to file a Rule 604(d) motion resulted in dismissal of Petitioner's direct appeal. When Petitioner filed a Motion to Stay Appeal and Remand for Limited Rule 604(d) Proceedings, the appellate court denied remand and dismissed the appeal, explicitly citing *People ex rel. Alvarez v. Skryd*, thus foreclosing direct appellate review.
5. **Ongoing Concealment and Diligence.** Petitioner's FOIA requests, the post-plea discovery request and the civil FOIA complaint show that the State continues to withhold felony-review screening documents, internal communications and raw data. These efforts demonstrate Petitioner's diligence and the State's obstruction.

## CONDENSED CHRONOLOGY

1. **May 27, 2022 – CDR Download and Seat-belt Evidence.** Investigators download the Bosch CDR report. The system status table records the driver's seat-belt switch as BUCKLED and the vendor manual requires preserving the raw .CDRx file. The raw file was never provided.
2. **August 11, 2022 – Internal Doubt Email.** Detective Petrick emails ASA Dillon that the toxicology report lists only amphetamine and benzodiazepine traces with no levels and that it would be "hard pressed to prove DUI drugs."
3. **May 23, 2023 – Reconstruction and Speed Estimates.** Police and MCAT analysts generate speed estimates (116–125 mph) using partial video and EDR data while reconstruction and toxicology analyses are still ongoing.
4. **June 14, 2023 – Indictment Without Injury Proof.** The grand jury returns an indictment for aggravated reckless driving (great bodily harm). Court minutes ask "WHAT ARE INJURIES?" and record "Nothing in file – NO med RECS etc."
5. **July 1 and July 2, 2024 – Belated Medical Discovery.** The State obtains a Qualified Protective Order and subpoenas EMS and hospital records, confirming that medical discovery

is still in progress more than a year after indictment.

**6. September 8, 2025 – Guilty Plea and Sentencing.** Petitioner pleads guilty while discovery is incomplete and counsel has not obtained exculpatory materials. At the same hearing, the complaining witness testifies that the co-involved truck “made a ballsy maneuver” immediately before the collision, describing the truck’s left turn as a risky move.

**7. October 6, 2025 – Notice of Appeal Filed.** Petitioner files a notice of appeal in the Appellate Court of Illinois, Second District, docket no. 2-25-0440.

**8. October 7, 2025 – FOIA Request.** Petitioner requests crash reports, EDR analyses, witness statements, internal memos and discovery inventories.

**9. October 22, 2025 – FOIA Response and Discovery Request.** The State acknowledges responsive records but withholds felony-review screening documents, internal emails and witness statements, citing exemptions; counsel requests the raw .CDRx file and native video files with audit logs.

**10. November 7, 2025 – FOIA Complaint.** Petitioner files a civil FOIA enforcement action in Lake County Chancery Case No. 2025CH00000277 seeking production of withheld materials.

**11. November 17, 2025 – Motion to Stay/Remand Denied and Appeal Dismissed.** The Second District Appellate Court in case no. 2-25-0440 denies Petitioner’s Motion to Stay Appeal and Remand for Limited Rule 604(d) Proceedings and dismisses the appeal, citing *Skryd* and the absence of a Rule 604(d) motion.

**12. November 19, 2025 – Petition for Leave to Appeal Filed.** Petitioner files a Petition for Leave to Appeal with the Illinois Supreme Court, docket no. 132495. The stamped PLA with internal exhibits and the Motion to Stay/Remand is attached as Group Exhibit A.

## I. PARTIES AND JURISDICTION

1. Petitioner Ehab Allababidi is the Defendant in *People v. Allababidi*, Lake County case no. 23 CF 1146. On September 8, 2025 Petitioner entered a guilty plea to Aggravated Reckless Driving (625 ILCS 5/11-503(d)). The Court accepted the plea and imposed sentence.

2. Petitioner is incarcerated or otherwise restrained by virtue of that judgment and sentence. This petition is brought under the Illinois Post-Conviction Hearing Act, 725 ILCS 5/122-1 et seq.

3. This is Petitioner’s first post-conviction petition. Petitioner filed a timely notice of appeal on October 6, 2025 and pursued a direct appeal in the Appellate Court of Illinois, Second District, docket no. 2-25-0440. Before the appeal was dismissed he filed a pro se Motion to Stay Appeal and Remand for Limited Rule 604(d) Proceedings, asking the appellate court to pause the appeal and send the case back so he could file the missing motion and conduct discovery. On November 17, 2025 the appellate court in case no. 2-25-0440 denied that motion and dismissed the appeal because counsel had not filed a post-plea motion under Supreme Court Rule 604(d),

citing *People ex rel. Alvarez v. Skryd*. Petitioner filed a Petition for Leave to Appeal in the Illinois Supreme Court on November 19, 2025, docket no. 132495; the stamped PLA with internal exhibits, including the Motion to Stay/Remand and the appellate dismissal order, is attached as Group Exhibit A.

4. This petition is timely. The guilty plea and judgment were entered on September 8, 2025, and the petition is filed within three years of that date. Any delay is excused by the pendency of the direct appeal and PLA and by Petitioner's diligent efforts to obtain withheld evidence through FOIA and to correct the Rule 604(d) error through his motion for remand. Venue and jurisdiction lie in this Court because the conviction was entered in Lake County.

## **II. FACTUAL BASIS AND EVIDENCE**

### **A. Unsupported "Great Bodily Harm" Indictment**

1. On June 14, 2023 the State obtained an indictment charging Petitioner with aggravated reckless driving causing "great bodily harm." Court minutes contemporaneous with the indictment ask "WHAT ARE INJURIES?" and record "Nothing in file – NO med RECS etc." These notes prove there were no medical records in the file at charging.

2. Illinois law requires a charging instrument to be supported by facts establishing probable cause for each element; a felony indictment without factual basis is invalid. See, e.g., *People v. Green*, 368 Ill. 242, 13 N.E.2d 278 (1938). The State's subsequent efforts—obtaining a Qualified Protective Order on July 1, 2024 and issuing a subpoena for EMS records on July 2, 2024—show that injury discovery remained outstanding more than a year after charging. Charging Petitioner with a Class 3 felony without evidence of injury was fundamentally unfair and misled the grand jury.

### **B. Suppressed Exculpatory and Impeachment Evidence**

1. Internal Doubt Email (Group Exhibit A, Exhibit A-2). On August 11, 2022 Detective Paul Petrick emailed Assistant State's Attorney Dillon that the hospital toxicology report lacked quantitative levels and that it would be "hard pressed to prove DUI drugs." This email directly undermines the State's theory. It was not disclosed before the plea and was discovered only through FOIA. Suppressing this impeachment evidence violated *Brady v. Maryland*.

2. Seat-belt and Raw Data (Group Exhibit A, Exhibits A-4 and A-5). The May 27, 2022 CDR download recorded the driver's seat-belt switch as BUCKLED. The Bosch manual warns that investigators must preserve and re-translate the raw .CDRx file using current software. The State never produced the raw file. This objective data shows Petitioner was belted, negating the element of willful and wanton disregard. Concealing it misled the court.

3. Witness Statement, Sept. 8, 2025 Testimony, and Felony-review File. At the September 8, 2025 plea and sentencing hearing, the complaining witness testified that the co-involved truck "made a ballsy maneuver" immediately before the collision, describing the truck's left turn across Route 22 as a risky move. Petitioner has sought, through FOIA and the civil FOIA

complaint, the underlying written or recorded witness statements and felony-review screening documents that reflect the witness's description of the truck's turn and the State's internal evaluation of causation. The October 22, 2025 FOIA response specifically acknowledges "felony review screening documents," internal emails, and witness statements, but withholds them. Given that the witness was willing to characterize the truck's conduct as a "ballsy" maneuver in open court, it is reasonable to infer that the withheld felony-review materials contain similar or stronger statements about the truck driver's role in causing the crash and about whether Petitioner should bear sole criminal responsibility. These causation materials were never disclosed to the defense before the plea and remain hidden, which is why Petitioner filed the FOIA enforcement action in Group Exhibit B.

4. Incomplete Medical and EMS Records. The State issued subpoenas for medical and EMS records only in July 2024. As the indictment notes show, no medical records existed at charging, and the State continued to seek them after the plea. Counsel never had a complete picture of the injury evidence. Charging and maintaining a felony that requires proof of great bodily harm without contemporaneous medical evidence violated due process and misled the court.

5. EDR and Speed Data. The prosecution relied on EDR data, as reflected in the Lexus CDR and MCAT excerpts collected in Group Exhibit C, to claim speeds of 116–125 mph. However, without the raw .CDRx file and audit logs, these numbers cannot be independently verified. The Bosch manual requires preserving the raw file and processing it with current software. Under the *Frye* standard for scientific evidence and cases such as *People v. McKown*, 226 Ill. 2d 245 (2007), a proper foundation is required for automotive "black box" data. Counsel never demanded the raw file, never obtained audit logs, and never challenged whether the EDR evidence satisfied *Frye*. Without the raw file, the speed estimates lack scientific reliability, and counsel's failure to contest them left untested technical evidence at the heart of the plea.

6. Evasive Action and Reconstruction Findings. The EDR data and MCAT Crash Reconstruction Report, excerpts of which are compiled in Group Exhibit C, further show that Petitioner reacted to a sudden hazard rather than driving with willful and wanton disregard. The Bosch EDR data for the subject trigger event record that approximately 2.5 seconds before impact Petitioner's throttle position dropped from 100 percent to 0 percent and the brake switch circuit state changed from OFF to ON. This objective data demonstrates that Petitioner lifted off the accelerator and applied the brakes in an effort to avoid the collision. The reconstruction report also concludes that the Peterbilt dump truck took approximately 6.04 seconds to complete its left turn across Route 22, creating a slow-moving obstruction across Petitioner's lane. The truck driver admitted to investigators that he saw Petitioner's vehicle as it cleared Riverwoods Road before initiating his turn. These findings create a six-second obstruction versus a 2.5-second reaction window, supporting the defense theory that the left-turning truck driver, having seen Petitioner's vehicle, failed to yield and created a wall of steel across the roadway, and that Petitioner attempted evasive braking rather than

intentionally driving into the collision.

### **C. Ongoing Discovery and Diligence**

1. After pleading guilty Petitioner pursued the missing information. On October 7, 2025 he filed a FOIA request seeking crash reports, EDR analyses, witness statements, internal memos and discovery inventories. The October 22, 2025 FOIA response acknowledged responsive records but withheld the felony-review file, witness statements and internal emails, citing exemptions including 5 ILCS 140/7(1)(m) (deliberative process/attorney work product). Counsel simultaneously requested the raw .CDRx file and native video files with audit logs. Those requests went unanswered.

2. On November 7, 2025 Petitioner filed a civil FOIA complaint in Lake County Chancery Case No. 2025CH00000277 seeking a declaratory judgment that the State violated FOIA, production of all withheld materials and an in camera review. The complaint alleges that the State continues to withhold internal communications and felony-review documents. The assertion of work-product privilege over “felony review screening documents” confirms that a separate internal file exists describing charging decisions, doubts and evidentiary weaknesses. This litigation demonstrates Petitioner’s diligence and underscores ongoing concealment.

3. Throughout these efforts Petitioner remained proactive. He filed the Motion to Stay Appeal and Remand for Limited Rule 604(d) Proceedings to cure the procedural defect; he filed FOIA requests and a civil suit; and he pursued a Petition for Leave to Appeal. The State, by contrast, has withheld critical discovery, invoked work-product privilege and opposed remand. The pattern is one of a defendant trying to open the file and a system closing it; even appointed counsel has refused to surrender the native EDR and video data from the client file despite Petitioner’s request.

### **D. Procedural History and Timeliness**

1. Petitioner pled guilty on September 8, 2025 without knowledge of the suppressed evidence. On October 6, 2025 he filed a notice of appeal in case no. 2-25-0440. Aware that counsel had not filed the required Rule 604(d) motion, Petitioner filed a pro se Motion to Stay Appeal and Remand for Limited Rule 604(d) Proceedings, asking the appellate court to pause the appeal and send the case back so he could file the missing motion and conduct discovery. On November 17, 2025 the appellate court denied that motion and dismissed the appeal, relying on *People ex rel. Alvarez v. Skryd* and concluding that the absence of a Rule 604(d) motion was fatal. The court refused to apply the usual Skryd/Flowers/Wright remedy of remand for compliance.

2. On November 19, 2025 Petitioner filed a Petition for Leave to Appeal with the Illinois Supreme Court in case no. 132495. The stamped PLA is attached as Group Exhibit A along with its internal exhibits and Appendix Tab B, which includes the Motion to Stay/Remand and the appellate dismissal order. Petitioner’s diligent efforts to cure the procedural default and to obtain suppressed evidence excuse any delay. This petition is filed within the statutory period

and is not barred by waiver or res judicata because it relies on evidence outside the record and on constitutional violations that could not have been raised earlier.

### **III. CLAIMS FOR RELIEF**

Petitioner realleges and incorporates all preceding paragraphs.

#### **COUNT I – DUE PROCESS / BRADY VIOLATIONS AND INVOLUNTARY PLEA**

##### **A. Suppressed Evidence and Due Process**

1. The State violated due process by suppressing material exculpatory and impeachment evidence and by securing and maintaining a felony indictment without a factual basis. The withheld evidence includes the August 11, 2022 Petrick email, the witness statement and felony-review screening documents related to the truck driver's "ballsy maneuver," the seat-belt evidence and raw EDR data, the evasive-action and reconstruction findings, and the absence of medical records at indictment. These omissions deprived Petitioner of the information necessary to make a knowing and voluntary plea.

2. The suppressed materials were powerful on both the element of intoxication and the element of great bodily harm. The Petrick email undercuts the DUI-drugs theory. The witness statement and felony-review file support an alternate causation theory focused on the truck driver's maneuver. The seat-belt evidence undermines recklessness. The EDR and reconstruction data, as summarized in Group Exhibit C, show evasive braking and a slow left-turning truck that created an unavoidable obstruction. The absence of medical records at indictment shows that the great-bodily-harm element was unsupported when the felony was charged.

3. Exculpatory Evidence Regarding Causation (Truck's Fault). At the September 8, 2025 hearing, the complaining witness testified that the truck "made a ballsy maneuver" immediately before the collision, describing the truck's left turn across Route 22 as a risky move. Petitioner has since learned, through FOIA correspondence, that the State possesses witness statements and felony-review screening documents that discuss this same maneuver, but those materials were never disclosed to the defense before the plea and remain withheld. The crash sequence began when the truck driver turned left from Old Mill Road across Petitioner's lane and Petitioner's vehicle struck the rear portion of the truck; only then was Petitioner's vehicle deflected into the oncoming van. Under Illinois traffic law, a left-turning driver bears the duty to yield to oncoming traffic. The witness's description of the turn as a "ballsy" maneuver supports the defense theory that the truck driver knowingly took a reckless risk, failed to yield, and was the proximate cause of the crash, thereby undermining the allegation that Petitioner acted with willful and wanton disregard. Had the underlying witness statement and felony-review materials been disclosed before the plea, Petitioner could have developed and presented a causation defense that the truck driver's conduct was the sole or predominant proximate cause of the injuries, and that the aggravated reckless-driving charge

overstated Petitioner's culpability.

4. Evasive Action and Mental State. The State also failed to disclose and fairly present the exculpatory aspects of the EDR and reconstruction data bearing on Petitioner's mental state. The Bosch EDR data, as documented in Group Exhibit C, show that approximately 2.5 seconds before impact Petitioner's throttle dropped from 100 percent to 0 percent and the brake switch turned from OFF to ON, indicating that Petitioner attempted to slow and stop his vehicle when confronted with the truck in his path. The MCAT Reconstruction Report confirms that the dump truck required 6.04 seconds to execute its left turn across Route 22, and that the truck driver admitted seeing Petitioner's vehicle as it cleared Riverwoods Road before beginning that turn. This creates a simple, objective timeline: the truck driver created a six-second-long physical barricade across the highway, and Petitioner had only a 2.5-second reaction window once confronted with that "wall of steel." In that interval Petitioner lifted off the accelerator and applied the brakes. This mathematical reality demonstrates that the crash was caused by the truck driver's failure to yield and slow left turn, not by any willful and wanton desire by Petitioner to drive into the collision. Had counsel and the court been presented with this evasive-action evidence, Petitioner could have argued that the "willful and wanton" element was not satisfied and that a felony conviction for aggravated reckless driving overstated his culpability.

### **B. Materiality Under Brady**

5. Each suppressed item was independently outcome-determinative. The Petrick email would have undermined the DUI-drugs theory. The witness statement and felony-review file would have shifted the causation analysis and cast doubt on whether Petitioner acted with willful and wanton disregard. The EDR and reconstruction data summarized in Group Exhibit C would have shown evasive action and a slow left-turning truck that created an unavoidable obstruction. The lack of injury proof at indictment shows that the felony element was unsupported. The seat-belt evidence negates recklessness. Collectively, the omissions created a false factual landscape and induced a plea that Petitioner would not have entered had he known the truth. Under *Brady v. Maryland*, evidence is material when there is a reasonable probability that disclosure would have produced a different result; that standard is met here.

6. The fraudulent nature of the indictment magnifies the prejudice. As in *People v. Green*, an indictment that proceeds without evidence of an essential element is invalid. Here, the State charged "great bodily harm" while its own court minutes showed "Nothing in file – NO med RECS etc." and it did not seek medical records until a year later. Proceeding on a felony charge without factual basis while suppressing exculpatory materials violated due process and tainted the plea from the outset.

### **C. Effect on the Plea (Hill v. Lockhart)**

7. The continuing concealment of the felony-review file, internal emails and witness statements—invoking FOIA exemptions and work-product privilege—further shows that

material evidence remains outside the record. This petition is the first opportunity for a court to order disclosure and to assess how the suppressed materials would have affected Petitioner's decision to plead.

8. Under *Hill v. Lockhart*, a plea induced by misinformation or concealment of material facts is involuntary. Had Petitioner known about the internal doubts regarding DUI drugs, the weaknesses in the great-bodily-harm element, the alternate-causation witness statement, the evasive-action EDR and reconstruction data summarized in Group Exhibit C, and the seat-belt evidence, there is a reasonable probability he would have rejected the plea and insisted on trial or sought a substantially better agreement. Post-conviction relief is warranted.

## **COUNT II – INEFFECTIVE ASSISTANCE OF COUNSEL (STRICKLAND/HILL)**

### **A. Deficient Performance**

1. Petitioner was denied the effective assistance of counsel. Under *Strickland v. Washington* and *Hill v. Lockhart*, counsel's performance must meet an objective standard of reasonableness and prejudice exists if there is a reasonable probability that, but for counsel's errors, the result would have been different.

2. Counsel's performance was objectively deficient in multiple respects: (a) counsel permitted a guilty plea while discovery was unfinished; (b) counsel failed to obtain or investigate the August 11, 2022 email, the witness statement and the felony-review screening documents or to demand disclosure under Supreme Court Rule 412; (c) counsel did not obtain the raw .CDRx file or audit logs and did not question the reliability of the State's speed estimates or whether the EDR evidence satisfied the *Frye* standard and *McKown*; (d) counsel ignored the fact that the CDR recorded the driver's seat-belt switch as BUCKLED; (e) counsel failed to file the mandatory post-plea motion under Rule 604(d) or advise Petitioner about this requirement; (f) even after the complaining witness testified on September 8, 2025 that the truck "made a ballsy maneuver," counsel failed to obtain the transcript, failed to pursue the underlying witness statement and felony-review documents, and failed to move to withdraw the plea or otherwise develop a causation defense based on that testimony; (g) counsel failed to use the EDR and reconstruction data summarized in Group Exhibit C, showing that Petitioner lifted off the accelerator, applied the brakes, and was confronted with a dump truck that took approximately 6.04 seconds to turn across his lane, evidence that would have directly undercut the allegation that Petitioner acted with willful and wanton disregard; and (h) after judgment, when Petitioner requested his complete case file, including any native EDR data and video files, counsel refused to provide the native files or confirm that they had ever been obtained, contrary to counsel's duty under Illinois Rule of Professional Conduct 1.16(d) to surrender the client's papers and property upon termination of representation. This refusal underscores that counsel never secured or used the native data before advising Petitioner's plea and continues to hinder Petitioner's ability to litigate his claims and present the true scientific evidence of speed and braking.

**B. Prejudice to the Plea Decision**

3. Had counsel demanded complete discovery, uncovered the Petrick email and the witness statement, highlighted the seat-belt evidence, used the EDR and reconstruction data summarized in Group Exhibit C to show evasive action and truck fault, challenged the reliability of the EDR speed estimates, and preserved appellate rights, Petitioner would not have pled guilty or would have obtained a more favorable outcome. The deficient performance was outcome-determinative and satisfies the prejudice prong of *Strickland* and *Hill*.

**C. Loss of the First Appeal of Right**

4. When Petitioner later discovered the omission he himself filed a Motion to Stay Appeal and Remand for Limited Rule 604(d) Proceedings to repair the error. The appellate court denied that motion and dismissed the appeal, proving that counsel's earlier failure permanently forfeited the right to direct review. Had counsel filed the Rule 604(d) motion, the appellate court would have had jurisdiction and Petitioner could have obtained review of the suppressed evidence and counsel's own deficiencies.

5. The loss of Petitioner's first appeal of right is itself a form of prejudice. Illinois and federal courts recognize that when counsel's deficient performance causes a defendant to forfeit an appeal altogether, prejudice is presumed because the defendant is denied an entire tier of review. Here, counsel's failure to file the Rule 604(d) motion, combined with inadequate admonitions, led directly to dismissal of the appeal in case no. 2-25-0440. That structural harm independently warrants post-conviction relief or, at minimum, advancement to second-stage proceedings.

**COUNT III – DENIAL OF MEANINGFUL APPEAL (SKRYD TRAP AND DENIED REMAND)****A. Rule 604(d)/605(c) Framework**

1. Petitioner was denied his right to a meaningful appeal. Supreme Court Rule 605(c) requires the trial court to advise a defendant who pleads guilty in a case subject to Rule 604(d) that he must file a written post-plea motion within 30 days in order to preserve appellate rights. Rule 604(d) provides that, after a guilty plea, a defendant must file such a motion before appealing. When a circuit court fails to give proper Rule 605(c) admonitions, the usual remedy under *People ex rel. Alvarez v. Skryd*, *People v. Flowers* and *People v. Wright* is to remand the cause for strict compliance rather than dismiss the appeal.

**B. Application to This Case**

2. In this case the trial court's Rule 605(c) admonitions were inadequate. Counsel never filed the required Rule 604(d) motion and did not advise Petitioner of this requirement. Believing that a notice of appeal was sufficient, Petitioner filed one on October 6, 2025. When Petitioner discovered the omission he filed a pro se Motion to Stay Appeal and Remand for Limited Rule 604(d) Proceedings, seeking the standard Skryd remedy—pausing the appeal and remanding to

file the missing motion and conduct post-plea discovery. On November 17, 2025 the Second District Appellate Court in case no. 2-25-0440 denied the motion and dismissed the appeal. The dismissal order explicitly cited *Skryd* and held that Petitioner's failure to file a Rule 604(d) motion was fatal and offered no recourse. The court refused the usual remedy of remand.

### **C. Why Dismissal Was Unconstitutional**

3. Under *Skryd* and its progeny, when a defendant files a timely notice of appeal without a Rule 604(d) motion, the appropriate remedy is to remand for proper admonitions and for the filing of a Rule 604(d) motion, not to dismiss the appeal. By denying remand and choosing dismissal, despite Petitioner's request, the appellate court foreclosed any remedy on direct appeal. This was not a case of neglect: Petitioner acted diligently by filing the motion to remand as soon as he learned of the procedural defect. The court's refusal to remand, coupled with counsel's failure and inadequate admonitions, meant that no court has ever reviewed the suppressed evidence or counsel's deficiencies.

4. When a State creates a first appeal of right, due process and equal protection require that the appeal not be arbitrarily denied or extinguished by a combination of defective admonitions and attorney error. Here, Petitioner did everything a layperson could reasonably do to obtain review: he filed a notice of appeal, he identified the missing Rule 604(d) motion, and he affirmatively asked for the *Skryd* remedy. The system nonetheless denied him any appellate review. The denial of appellate review caused by constitutional errors violates due process.

### **D. Necessity of Post-Conviction Review**

5. This post-conviction petition is therefore the only remaining avenue to vindicate Petitioner's constitutional claims. Direct review is completely foreclosed. Advancement to second-stage proceedings is required to provide a forum for review.

### **Cumulative Impact**

Even if any single error were deemed insufficient, the cumulative effect of the suppressed evidence, the unsupported indictment, counsel's failures and the denial of appellate review undermines confidence in the plea and conviction. The State pursued a felony charge without injury proof, hid exculpatory evidence and technical data, and then invoked procedural technicalities to avoid appellate scrutiny. Such a conviction cannot stand.

## **IV. REQUEST FOR EVIDENTIARY HEARING**

Many of the claims herein depend on evidence outside the trial record, including internal emails, witness statements, felony-review screening documents, raw EDR data and counsel's communications. Petitioner requests an evidentiary hearing under 725 ILCS 5/122-6 to present the suppressed materials and testimony regarding counsel's performance. An evidentiary hearing is necessary to determine the facts, evaluate the suppressed evidence and adjudicate the *Brady* and *Strickland* claims.

## **V. PRAYER FOR RELIEF**

### **Primary Relief**

A. Find that Petitioner has made a substantial showing of constitutional violations and advance this petition to second-stage proceedings; appoint counsel if required by law.

B. After appropriate proceedings (including an evidentiary hearing if necessary), grant substantive relief that corrects the constitutional errors and brings Petitioner's conviction and sentence into line with the actual evidence and his rehabilitative progress, including one or more of the following:

1. Reduce the degree of the conviction and resentence Petitioner to a non-felony disposition (such as a misdemeanor reckless-driving offense or comparable non-felony offense) that accurately reflects the proof of injury, the State's suppression of exculpatory material, the scientific issues with the EDR data, and the loss of appellate review, and adjust the terms and conditions of probation (including community service and financial obligations) so that they are fair and proportionate;

2. In the alternative, vacate the judgment of conviction and sentence in case no. 23 CF 1146 and permit Petitioner to withdraw his guilty plea, restoring the matter to the pre-plea posture for trial; and/or

3. Enter such other orders as are necessary to remedy the constitutional violations shown in this petition, including orders directing disclosure of withheld materials and limiting the State's use of undisclosed or unreliable evidence.

### **Additional Alternative Relief**

C. In the alternative, allow Petitioner to file a post-plea motion under Supreme Court Rule 604(d) instantar and enter such orders as are necessary to restore his right to a meaningful direct appeal, including remand for proper Rule 605(c) admonitions and further proceedings.

### **Minimum Relief**

D. At minimum, conduct an in camera review of the materials referenced in the October 22, 2025 FOIA response and order their production subject to lawful redactions.

E. Grant such other and further relief as the Court deems just and proper.

## **LIST OF EXHIBITS**

**Group Exhibit A** – Stamped Illinois Supreme Court Petition for Leave to Appeal (filed Nov. 19, 2025, case no. 132495), containing an internal exhibit packet index and the following materials:

1. Exhibit A-1 – Chronology of reconstruction, toxicology, charging, and discovery events.
2. Exhibit A-2 – Aug. 11, 2022 internal email (Petrick email) expressing doubt about the DUI-drugs theory.

3. Exhibit A-3 – June 14, 2023 indictment court minutes showing “Nothing in file – NO med RECS”.
4. Exhibit A-4 – Bosch CDR system status table recording the driver’s seat-belt switch as BUCKLED.
5. Exhibit A-5 – Bosch vendor disclaimer regarding preservation of raw .CDRx data.
6. Exhibits D-1 and D-2 – July 1, 2024 Qualified Protective Order and July 2, 2024 subpoena for medical and EMS records.
7. Exhibit B-1 – Oct. 7, 2025 FOIA request for crash reports, EDR analyses, witness statements, and internal memos.
8. Exhibit B-2 – Oct. 22, 2025 FOIA response acknowledging but withholding felony-review screening documents and internal communications.
9. Exhibit C-1 – Oct. 22, 2025 post-plea discovery request for raw .CDRx file and native videos.
10. Appendix Tab B – Motion to Stay Appeal and Remand for Limited Rule 604(d) Proceedings and the appellate dismissal order in case no. 2-25-0440.
11. Exhibit A-6 – Selected excerpts from the MCAT Crash Reconstruction Report documenting EDR throttle and brake data (evasive action), the 6.04-second left turn, and the truck driver’s statement that he saw Petitioner’s vehicle before initiating the turn.

**Group Exhibit B** – Stamped Complaint for Declaratory and Injunctive Relief under the Illinois Freedom of Information Act (filed Nov. 7, 2025, Lake County Chancery Case No. 2025CH00000277), alleging that the State violated FOIA by withholding witness statements, internal emails and felony-review screening documents and seeking production, in camera review and other relief. The FOIA complaint alleges that the withheld felony-review screening documents, internal emails, and witness statements bear directly on causation and blame allocation, including the “bally maneuver” description that the complaining witness later used in open court, and seeks production and in camera review of those records.

**Group Exhibit C** – Selected Lexus LC 500 EDR and MCAT 22-22 Crash Reconstruction Report excerpts (including TRG 6–10 pre-crash data tables, throttle and brake status, recorded vehicle speed, and Lexus transmission details) illustrating the claimed 116–125 mph speed range and Petitioner’s throttle drop to 0 percent with braking prior to impact.

Respectfully submitted,

/s/ Ehab Allababidi

Ehab Allababidi, Petitioner, pro se

Date: \_\_\_\_\_ 2025

**VERIFICATION**

I, Ehab Allababidi, certify under penalty of perjury (735 ILCS 5/1-109) that I have read this petition and that the facts stated herein are true and correct to the best of my knowledge.

Ehab Allababidi

DATED: \_\_\_\_\_ 2025

**CERTIFICATE OF SERVICE**

I, Ehab Allababidi, hereby certify that on \_\_\_\_\_, 2025, I served a copy of this petition on the Lake County State's Attorney by first-class mail to 18 N. County Street, Waukegan, IL 60085.

Ehab Allababidi

<p>Ehab Allababidi 8516 W Winona St, Chicago, IL 60656 Telephone: (773) 920-0030 Email: ehabhilfiger@gmail.com <i>Plaintiff, pro se</i></p> <p>v.</p> <p><b>Lake County State's Attorney's Office, a public body</b> <i>Defendant.</i></p>	<p>Case No.:</p> <p>2025CH00000277</p>
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**COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF UNDER THE ILLINOIS  
FREEDOM OF INFORMATION ACT (5 ILCS 140/11)**

*(Exhibits reserved; to be presented at or before hearing)*

**Parties and Jurisdiction**

- 1 Plaintiff is an Illinois resident and the requester of the public records at issue.
- 2 Defendant is a public body within the meaning of 5 ILCS 140/2(a), headquartered in Waukegan, Illinois.
- 3 Jurisdiction and venue are proper under 5 ILCS 140/11 and because Defendant maintains its principal office in Lake County.

**Factual Background**

- 4 On or about October 7, 2025, Plaintiff submitted a FOIA request to Defendant seeking records relating to *People v. Ehab Allababidi* (23CF1146), including witness statements, felony-review screening documents, and internal communications.
- 5 On October 15, 2025, Defendant extended the response time pursuant to Section 3(e).
- 6 On October 22, 2025, Defendant issued a response acknowledging the existence of responsive records but withholding entire categories of documents under Sections 7(1)(b), 7(1)(c), 7(1)(d)(iv), and 7(1)(m).
- 7 Plaintiff contends that factual witness statements, completed screening documents, and factual portions of internal communications are not exempt and must be produced, with redaction only as permitted by law.
- 8 More than five business days elapsed after the extension; Defendant did not produce the withheld materials or a lawful justification beyond the cited exemptions.

### **Violation of the Illinois Freedom of Information Act**

- 9 Defendant's continued withholding violates Sections 3 and 11 of the Illinois FOIA, 5 ILCS 140/3 and 140/11.
- 10 The cited exemptions are inapplicable to the extent they are asserted over non-exempt records or segregable factual material.
- 11 Plaintiff has exhausted all remedies and seeks enforcement of the right to inspect and copy public records.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests that this Court:

- a Enter a declaratory judgment that Defendant violated FOIA by withholding non-exempt records;
- b Order Defendant to produce forthwith all withheld records referenced in the October 22, 2025 correspondence, including witness statements, internal emails containing segregable factual material, and felony-review screening documents, with only lawful redactions;
- c Conduct an in camera review of withheld materials if necessary;
- d Award Plaintiff reasonable costs and, if represented by counsel at any stage, attorney's fees under 5 ILCS 140/11(i); and
- e Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

**Ehab Allababidi**

8516 W Winona St, Chicago, IL 60656

Telephone: (773) 920-0030

Email: ehabhilfiger@gmail.com

Plaintiff, pro se

**VERIFICATION (735 ILCS 5/1-109)**

Under penalties as provided by law pursuant to 735 ILCS 5/1-109, I certify that the statements set forth in this complaint are true and correct, except as to matters stated to be on information and belief and as to such matters I certify that I believe the same to be true.

Dated: 10/26/25

/s/ Ehab Allababidi

8516 W Winona St, Chicago, IL 60656

Telephone: (773) 920-0030

Email: ehabhilfiger@gmail.com

IN THE SUPREME COURT OF ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,

Plaintiff-Appellee,

v.

EHAB ALLABABIDI,

Defendant-Appellant.

On Petition for Leave to Appeal from the Appellate Court of Illinois, Second District, No. 2-25-0440, and from the Circuit Court of Lake County, Illinois, No. 23 CF 1146.

PETITION FOR LEAVE TO APPEAL  
UNDER ILLINOIS SUPREME COURT RULE 315

Submitted by:

EHAB ALLABABIDI

Defendant-Appellant, pro se

8516 W. Winona Street

Chicago, Illinois 60656

Phone: (773) 920-0030

Email: defcon5ready@gmail.com

E-FILED  
11/19/2025 1:01 PM  
CYNTHIA A. GRANT  
SUPREME COURT CLERK

PETITION FOR LEAVE TO APPEAL UNDER ILLINOIS SUPREME COURT RULE 315  
(PRO SE)

PETITION FOR LEAVE TO APPEAL UNDER ILLINOIS SUPREME COURT RULE 315  
(PRO SE) On Petition for Leave to Appeal from the Appellate Court of Illinois, Second District, in No. 2-25-0440, and from the Circuit Court of Lake County, Illinois, No. 23 CF 1146. NOW COMES defendant-appellant, EHAB ALLABABIDI, pro se, and pursuant to Illinois Supreme Court Rule 315, respectfully petitions this Court for leave to appeal from the judgment of the Appellate Court of Illinois, Second District, in People v. Allababidi, Appeal No. 2-25-0440, which dismissed his direct appeal from the judgment of conviction entered in the Circuit Court of Lake County, No. 23 CF 1146. In support, petitioner states as follows:

**I. JURISDICTIONAL STATEMENT**

1. On November 17, 2025, the Appellate Court of Illinois, Second District, entered a final order in People v. Allababidi, Appeal No. 2-25-0440, denying petitioner's motion to stay the appeal and remand for limited proceedings under Supreme Court Rule 604(d) and, instead, dismissing the appeal on the ground that petitioner had not filed a Rule 604(d) motion in the circuit court. 2. This petition for leave to appeal is being filed within thirty-five (35) days of the Appellate Court's November 17, 2025, judgment, and is therefore timely under Illinois Supreme Court Rule 315(b). 3. The judgment from which review is sought is final, and this Court has jurisdiction to entertain this petition pursuant to Rule 315(a).

**II. NATURE OF THE CASE AND DECISION OF THE APPELLATE COURT**

BELOW 4. Petitioner was charged in Lake County case 23 CF 1146 with offenses arising from a motor vehicle incident in which the State alleged that he drove under the influence of drugs.

On or about September 8, 2025, petitioner pled guilty in the Circuit Court of Lake County and was sentenced. Petitioner filed a notice of appeal on October 6, 2025. 5. No motion to withdraw the guilty plea or reconsider the sentence was filed in the circuit court within thirty (30) days, and no certificate under Supreme Court Rule 604(d) was filed. 6. After sentencing, petitioner obtained public-records responses under the Freedom of Information Act (FOIA) showing that the State possessed but had not disclosed significant categories of material,

### **III. STATEMENT OF FACTS**

This case arises from a multi-vehicle collision in Lake County in 2022. Law-enforcement investigators concluded that petitioner was the driver of one of the involved vehicles and that excessive speed and alleged impairment contributed to the crash. On June 14, 2023, a Lake County grand jury returned an indictment in case 23 CF 1146 charging petitioner with aggravated reckless driving causing great bodily harm and related offenses, including driving under the influence of drugs.

The indictment alleged that petitioner caused 'great bodily harm' to another motorist. Yet the contemporaneous court minutes from the true-bill hearing reflect the trial judge's handwritten notation that there was 'Nothing in file – NO med RECS etc.' and the question 'WHAT ARE INJURIES,' indicating that the medical records necessary to substantiate the 'great bodily harm' allegation were not then in the file. More than a year later, on July 1, 2024, the circuit court entered a qualified protective order authorizing the State to obtain 'any and all' medical information from Advocate Condell Medical Center, and subpoenas were issued for medical and EMS records, returnable on July 24, 2024. Those dates show that discovery into basic injury and causation evidence was still underway long after indictment.

The State's reconstruction of the collision relied heavily on electronically retrieved crash data from the vehicle's event data recorder (EDR) and proprietary software that produced

peak-speed estimates of approximately 124 to 125 miles per hour and segment speeds of roughly 116 to 120 miles per hour between Oxford Drive and Riverwoods Road. Petitioner, through counsel and later pro se, sought access to the native EDR image files, audit logs, and associated metadata so that independent experts could test and verify those conclusions. Those underlying materials have never been produced in native form.

Internal law-enforcement communications obtained later under the Freedom of Information Act (FOIA) show that, well before indictment, officials themselves questioned whether the evidence would support the charged DUI-drugs theory. In an August 11, 2022 email to the Lake County State's Attorney, Detective Paul Petrick discussed the emergency-room lab report, noting that it listed only 'Amphetamine and Benzodiazepines' without any quantitative amounts, and stated that he 'believe[d] it would be hard pressed to prove DUI drugs' on that basis. This internal assessment, which was not disclosed to the defense before petitioner pled guilty, directly undercut the State's theory of impairment.

On or about September 8, 2025, represented by appointed counsel, petitioner pled guilty in the Circuit Court of Lake County and was sentenced. The common-law record does not affirmatively demonstrate that petitioner received clear admonitions under Supreme Court Rule 605 explaining that, to obtain review, he was required to file within thirty days a written motion to withdraw his plea or reconsider his sentence and that failure to do so would bar any direct appeal. No motion under Rule 604(d) was filed, and no Rule 604(d) certificate appears in the record.

After sentencing, petitioner—now indigent and proceeding pro se—sought public records from law-enforcement agencies and the State's Attorney's Office. FOIA responses and other clerk-filed materials revealed the previously undisclosed Petrick email, felony-review screening documents, witness-related materials, and the timing of the medical-record subpoenas and protective order. Petitioner concluded that his plea had been induced by an

incomplete and misleading discovery picture and moved promptly to seek relief.

On October 6, 2025, petitioner filed a notice of appeal from the judgment in 23 CF 1146. He then filed in the Appellate Court, Second District, a motion to stay the appeal and remand for a limited period of time so that the circuit court could (a) supervise targeted discovery into the newly identified materials, (b) conduct a short evidentiary hearing focused on the existence, timing, and disclosure of those materials, and (c) allow petitioner, with appointed counsel, to file a proper motion under Rule 604(d) to withdraw his guilty plea. On November 17, 2025, the Appellate Court denied that motion and dismissed the appeal in No. 2-25-0440 on the ground that no Rule 604(d) motion had been filed in the circuit court.

#### **IV. REASONS FOR ALLOWING THE APPEAL**

A. The decision below extends Skryd's "must dismiss" rule beyond its rationale and conflicts with this Court's admonition jurisprudence. In *People ex rel. Alvarez v. Skryd*, 241 Ill. 2d 34 (2011), this Court held that where a defendant has failed to file the post-plea motion required by Rule 604(d), the appellate court "must dismiss" an appeal from a judgment entered on a guilty plea. Skryd, however, explicitly recognized an important limitation: this Court has declined to enforce Rule 604(d) where the circuit court fails to give the "applicable Rule 605 admonishments" informing the defendant of the need to file such a motion. In other words, Skryd's mandatory-dismissal rule is conditioned on the prior, effective operation of Rule 605. That limitation is not new. This Court has long held that compliance with Rule 604(d) is ordinarily a condition precedent to appeal, but that when a trial court fails to give the admonitions required by Rule 605 and the defendant then attempts to appeal without first filing the motions specified in Rule 604(d), the appeal is not dismissed. Rather, the proper remedy is to remand to the circuit court for correct admonitions and new post-plea proceedings. See, e.g., *People v. Jamison*, 181 Ill. 2d 24, 28–29 (1998); *People v. Flowers*, 208 Ill. 2d 291, 301

(2003); *In re William M.*, 206 Ill. 2d 595, 605 (2003); *People v. Foster*, 171 Ill. 2d 469, 473 (1996). Those cases reflect a consistent principle: Rule 604(d) is enforced strictly, but not at the cost of nullifying Rule 605 or the constitutional requirement of a knowing and intelligent plea. The order below departs from that line of authority. The Appellate Court treated Skryd as requiring dismissal whenever the record shows that no 604(d) motion was filed, regardless of whether the defendant actually received adequate Rule 605 admonitions or understood the requirement. The court stated that petitioner's "admitted failure" to file a 604(d) motion "requires" dismissal and that he did not "offer the only excuse that is legally actionable" — namely, a failure of the circuit court to provide the applicable Rule 605 admonitions — yet it made no effort to determine whether such admonitions were in fact given or effective in this case. Applied to an indigent, pro se defendant, that approach effectively nullifies the Rule 605 exception that Skryd itself recognized. A defendant who never understood that a written 604(d) motion was a jurisdictional prerequisite to review cannot be expected to invoke, by name, the "admonition exception" in his very first pro se filing. Treating his failure to recite that technical doctrine as a forfeiture of the only "legally actionable" excuse converts Rule 605 from a protection into a trap — precisely the outcome this Court's admonition cases were designed to avoid. Petitioner was represented by appointed counsel in the circuit court and is now proceeding pro se and indigent. Nothing in the sparse record of the plea hearing affirmatively demonstrates that he received clear, comprehensible Rule 605 admonitions explaining that (1) a written motion to withdraw the plea or reconsider the sentence had to be filed within thirty days, and (2) failure to do so would forever bar any direct review. At a minimum, the record is ambiguous on this critical point. Yet the Appellate Court imposed on petitioner the burden to "offer" admonition error before it would even consider a limited remand, and then dismissed the appeal without any inquiry into whether the condition precedent that Skryd presupposes — proper Rule 605 admonitions — was actually satisfied. The question presented is of statewide importance because it affects the large number of

defendants who plead guilty and then attempt, often pro se, to seek direct review. This Court has recognized that guilty pleas account for the vast majority of criminal convictions, and the reliability of those pleas depends on the fairness of the procedures that surround them. Rules 604(d) and 605, and the admonition exception, therefore operate not at the margins but at the core of Illinois criminal practice. Unless this Court clarifies that Skryd's "must dismiss" language cannot be applied mechanically without first addressing Rule 605 and the constitutional context, appellate courts will continue to treat Skryd as an automatic jurisdictional bar in any case where the record lacks a 604(d) motion, regardless of whether admonitions were ever meaningfully given. B. The appellate court's refusal to grant a limited remand, despite serious constitutional concerns about withheld evidence and incomplete discovery, undermines the integrity of the plea-bargaining process. Petitioner's motion to stay and remand did not rest on a mere technicality. After judgment, Freedom of Information Act (FOIA) responses and clerk-filed materials revealed that, well before the plea, the State possessed but had not disclosed entire categories of material bearing directly on the viability of the charged offense and the completeness of discovery. These included felony-review screening documents, witness-related materials, and internal law-enforcement communications explicitly acknowledging that the State would be "hard pressed" to prove DUI-drugs at trial without quantitative toxicology. One of the most significant pieces of undisclosed information was an August 11, 2022 email from Detective Paul Petrick to the Lake County State's Attorney. In that communication, written more than a year before the grand jury indictment, Petrick discussed the emergency-room lab report and emphasized that it listed only "Amphetamine and Benzodiazepines" without any specified amounts. He then stated that he "believe[d] it would be hard pressed to prove DUI drugs" on that basis. That internal admission, never disclosed to the defense before the plea, directly undercuts the State's DUI-drugs theory and confirms that law enforcement itself questioned whether the evidence could support the charge as framed. The chronology further shows that the aggravated

reckless-driving indictment alleging “great bodily harm” went forward without the medical proof that would substantiate that allegation. On June 14, 2023, the grand jury returned the indictment in case 23 CF 1146. Yet the court minutes from that same true-bill hearing record the trial judge’s handwritten note, “Nothing in file – NO med RECS etc.,” and ask, “WHAT ARE INJURIES,” even though the indictment alleged that the collision caused great bodily harm. Only later, on July 1, 2024, did the circuit court enter a qualified protective order authorizing the release of “any and all” medical information from Advocate Condell Medical Center, and subpoenas were issued for medical and EMS records, returnable on July 24, 2024 — more than two years after the crash and more than one year after indictment. Those dates demonstrate that discovery into the very records needed to prove “great bodily harm” was still underway long after charging and well before petitioner was urged to plead guilty. Petitioner explained that his guilty plea was based on an incomplete and misleading discovery picture. Had he known that (a) internal law-enforcement communications cast serious doubt on the ability to prove DUI-drugs; (b) the State proceeded to a “great bodily harm” indictment at a time when the court file contained “NO med RECS” and the judge was still asking “WHAT ARE INJURIES”; and (c) the State was still pursuing essential medical and EMS records more than a year after indictment, he would not have pled guilty and would have insisted on going to trial. These are classic due-process concerns going to the voluntariness and intelligence of the plea, not mere disagreements about the weight of the evidence. The questions of speed and causation in this case further underscore why a limited remand was necessary. The State’s reconstruction rests heavily on electronically retrieved crash data (EDR) and a proprietary software interpretation that yields peak-speed estimates of approximately 124–125 miles per hour and segment speeds of roughly 116–120 miles per hour between Oxford Drive and Riverwoods Road. Petitioner specifically requested access to the native EDR image files, audit logs, and associated metadata so that independent experts could test and verify those conclusions. Those materials have never been produced in native form. Whether the plea was

knowing and intelligent in light of undisclosed internal doubts, incomplete medical discovery, and untestable black-box electronic evidence is a fact-intensive question that cannot be resolved in a one-page dismissal order. Petitioner's pro se motion did not ask the Appellate Court to decide those factual disputes in the first instance. Instead, he requested a narrow, time-limited remand — sixty days — during which the circuit court would (a) supervise targeted discovery into specifically identified categories of materials, including the internal Petrick email, felony-review screening documents, and medical and EMS records; (b) hold a short evidentiary hearing confined to the existence, timing, and disclosure of those materials; and (c) permit petitioner, with appointed counsel, to file and litigate a proper Rule 604(d) motion to withdraw his guilty plea. Petitioner expressly agreed to remain subject to the existing judgment and probation conditions during that remand. That is exactly the type of limited procedure this Court has long endorsed in the admonition context, adapted here to the unique posture created by Skryd. By denying that motion and dismissing the appeal without any inquiry into the Rule 605 admonitions or the constitutional context just described, the Appellate Court adopted an approach that, if left uncorrected, will encourage lower courts to treat Skryd as an automatic, mechanical dismissal rule in all pro se guilty-plea appeals where no 604(d) motion appears of record — even where trial-court admonitions are defective or ineffective, substantial discovery remained incomplete at the time of the plea, and serious due-process questions exist about withheld evidence and the voluntariness of the plea. This Court's guidance is needed to ensure that Rule 604(d) and Skryd are applied in a manner consistent with defendants' constitutional rights and with the protective function of Rule 605, particularly for pro se, indigent litigants who may not know how to articulate the “admonition exception” even when it applies to them. This case offers a focused, practical vehicle for reaffirming that guilty-plea appeals should, where possible, be decided on their merits rather than on curable procedural missteps, and for clarifying that limited remand remains available when newly revealed evidence shows that a plea may have been induced by incomplete

**V. CONCLUSION AND PRAYER FOR RELIEF**

WHEREFORE, for the foregoing reasons, petitioner, EHAB ALLABABIDI, respectfully prays that this Court: A. Grant this Petition for Leave to Appeal under Illinois Supreme Court Rule 315; B. On review, reverse the Appellate Court's summary dismissal of Appeal No. 2-25-0440 and remand with directions to: (1) vacate the dismissal, (2) stay the appeal, and (3) remand the cause to the Circuit Court of Lake County for a limited, time-bound period during which the circuit court shall: (a) supervise targeted discovery into specified categories of materials identified in petitioner's motion, (b) conduct an evidentiary hearing confined to the existence, timing, and disclosure of those materials, and (c) permit petitioner, with appointed counsel, to file and litigate a proper Rule 604(d) motion to withdraw his guilty plea; C. Alternatively, exercise this Court's supervisory authority to enter such further orders as are necessary to ensure that petitioner receives the benefit of proper Rule 605 admonishments and a meaningful opportunity to pursue post-plea relief under Rule 604(d); and D. Grant such other and further relief as this Court deems just and proper.

Respectfully submitted,

/s/ Ehab Allababidi

**EHAB ALLABABIDI**

Defendant-Appellant, pro se

8516 W. Winona Street

Chicago, Illinois 60656

Phone: (773) 920-0030

Email: defcon5ready@gmail.com

**CERTIFICATE OF COMPLIANCE**

I, Ehab Allababidi, certify that this Petition for Leave to Appeal complies with the requirements of Illinois Supreme Court Rules 315(c), 315(d), 341, and 343. In support of this certification, I further state as follows:

1. **Format, Font, and Spacing Compliance:** This Petition has been prepared using Times New Roman, 12-point font, with double-spacing throughout the body of the text, consistent with Illinois Supreme Court Rule 341(b)(2). All margins are set to one inch on all sides as required by Rule 341(a).
2. **Length and Word Count:** In accordance with Illinois Supreme Court Rule 315(d), I certify that the total length of this Petition, excluding the cover, this Certificate of Compliance, the Certificate of Service, and the Appendix, is **2897 words**. This count was generated using a word-processing system with an automated word-count feature.
3. **Content and Structural Requirements:** This Petition contains all required sections under Rules 315(c) and 341(h), including: (a) a proper Statement of Jurisdiction; (b) a concise Procedural History; (c) a clear articulation of the Issues Presented for Review; (d) a detailed Statement of Facts with appropriate citations; (e) an Argument section organized around the points raised, with authorities cited; (f) a Conclusion and Prayer for Relief; and (g) all necessary supporting materials in the Appendix.
4. **Accuracy and Integrity of Submission:** I certify that this Petition is accurate, complete, and submitted in good faith. No portion of this Petition has been generated, altered, or modified for the purpose of misleading the Court, and all representations herein are true to the best of my knowledge and belief.

I certify under penalty of perjury under the laws of the State of Illinois that the foregoing is true and correct.

Dated: \_\_\_\_\_, 2025

/s/ Ehab Allababidi EHAB ALLABABIDI

**CERTIFICATE OF SERVICE**

I, EHAB ALLABABIDI, certify that on \_\_\_\_\_, 2025, I served a copy of this PETITION FOR LEAVE TO APPEAL under Supreme Court Rule 315 by [check one: depositing it in the U.S. Mail, postage prepaid; delivering it to a third-party commercial carrier; or electronic service through the approved e-filing system], addressed to:

Clerk of the Supreme Court of Illinois  
 200 E. Capitol Avenue  
 Springfield, Illinois 62701

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

Illinois Attorney General  
 115 S. LaSalle Street, 23rd Floor  
 Chicago, Illinois 60603

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this Certificate of Service are true and correct.

Dated: \_\_\_\_\_, 2025

/s/ Ehab Allababidi

**EHAB ALLABABIDI**

**APPENDIX TO PETITION FOR LEAVE TO APPEAL**

People v. Allababidi

Appeal No. 2-25-0440

Circuit Court of Lake County No. 23 CF 1146

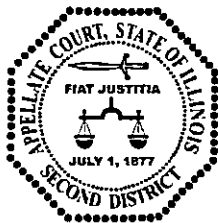
This Appendix contains the following materials:

Tab A — Order of the Appellate Court, Second District, entered November 17, 2025, in People v. Allababidi, Appeal No. 2-25-0440.

Tab B — Appellant’s Motion to Stay Appeal and Remand for Limited Rule 604(d) Proceedings, file-stamped October 31, 2025, in Appeal No. 2-25-0440.

Respectfully submitted,

**EHAB ALLABABIDI**  
Defendant-Appellant, pro se



**ILLINOIS APPELLATE COURT  
SECOND DISTRICT**

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

---

November 17, 2025

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

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

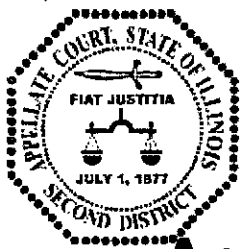
The court has this day, November 17, 2025, entered the following order in the above entitled case:

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

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

Jeffrey H. Kaplan  
Clerk of the Court

cc: Edward Randall Psenicka  
Lake County Circuit Court



132495  
2-25-0440

E-FILED  
Transaction ID: 2-25-0440  
File Date: 10/31/2025 10:43 AM

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

# Appellant's Motion to Stay Appeal and Remand for Limited Rule 604(d) Proceedings

## Notice of Filing

To the Lake County State's Attorney (Appellate/Criminal Division) and the Clerk of the Circuit Court of Lake County: notice is hereby given that the undersigned will file the following motion and proposed order.

## Caption

In the Appellate Court of Illinois, Second District

People of the State of Illinois, Plaintiff-Appellee,

v.

Ehab Allababidi, Defendant-Appellant.

Appeal No. 2-25-0440

On appeal from the Circuit Court of Lake County, No. 23CF1146

## Appellant's Motion to Stay Appeal and Remand for Limited Rule 604(d) Proceedings

**NOW COMES** defendant-appellant **Ehab Allababidi**, appearing **pro se**, and pursuant to Illinois Supreme Court Rules 361 and 604(d), respectfully moves this Court to stay the above-captioned appeal and remand the cause to the circuit court for the limited purpose of permitting appellant to file and litigate a Rule 604(d) motion to withdraw his guilty plea, with narrowly tailored discovery and a brief evidentiary hearing.

### 1 Procedural posture

Judgment was entered on **September 8 2025**, and appellant filed his notice of appeal on **October 6 2025**; no Rule 604(d) motion or certificate was filed. Appellant remains on probation and continues to comply with all conditions.

### 2 Good-cause showing

- **Public-records correspondence.** Freedom-of-Information-Act responses in October 2025 show that the State acknowledged responsive records yet **withheld entire categories** of material—including **witness statements, felony-review screening materials and internal communications**. These materials bear directly on whether

appellant's plea was informed and whether material evidence was suppressed. The withheld categories thus justify limited discovery.

- **Post-plea diligence.** After sentencing, appellant served counsel with a **native-format discovery/preservation request**, asking for **raw .CDRX event-data-recorder images with metadata, all body-worn and dash-camera videos in their native containers together with proprietary players and audit logs, CAD/911 records, photo logs and EXIF data, media hash lists, and a privilege log.** These items were not produced.
- **Chronology of reconstruction and discovery.** The chronology of the State's reconstruction shows that the Oxford-to-Riverwoods segment spanned roughly **14.5–15 seconds**, yielding estimated speeds of **116–120 mph** and event-data-recorder peaks around **124 mph**. Because those conclusions rely on reconstructed timing and proprietary software, **native files and metadata are necessary** to verify accuracy.
- **Subpoena exemplars.** Clerk-issued subpoenas (Exhibit D) show that medical and EMS records were pursued **after** the indictment, further illustrating that discovery was not complete when appellant entered his plea.

### 3 Need for limited remand

The appellate court **cannot take new evidence** on direct appeal; therefore, a **limited remand** is the only mechanism by which appellant can make a proper record for review. A focused remand would permit the circuit court to (a) supervise **targeted Rule 412/415 discovery** limited to the categories documented above, (b) conduct a brief **evidentiary hearing** confined to the existence, timing and disclosure of those materials, and (c) allow appellant to file and litigate a **Rule 604(d) motion**, with appointment of conflict-free counsel if necessary. Appellant requests a **60-day remand** so that discovery, the hearing and the post-plea motion can occur expeditiously.

### 4 Governing law

Under Rule 604(d), a defendant who appeals from a judgment entered on a guilty plea must first file a motion to withdraw the plea or reconsider the sentence, and counsel must certify that he or she has **consulted with the defendant, examined the record and made necessary amendments. Strict compliance** with each requirement is mandatory; the remedy for noncompliance is to vacate any denial and **remand** for a new motion and hearing. When a notice of appeal has already been filed, the appellate court retains jurisdiction but may order a **limited remand** to permit the trial court to perfect the record and ensure Rule 604(d) compliance. Limited remands are routinely used to create a full record without prejudicing the parties.

### 5 Specific request and proposed schedule

Appellant respectfully requests that this Court:

1. **Stay the appeal** pending completion of the limited remand.
2. **Remand the cause for 60 days**, authorizing the circuit court to:
  - **Supervise targeted discovery** limited to the following categories:
    1. **CAD/911 logs and audio**;
    2. **All body-worn and dash-camera videos in their native containers**, with proprietary players and associated **audit logs**;
    3. **Scene/reconstruction raw files** and the **raw event-data-recorder (.CDRX) image with metadata**;
    4. **Photo logs and EXIF data**;
    5. **EMS/hospital records relied upon** by the State;
    6. **Tow/impound chain-of-custody documents**.
  - **Conduct an evidentiary hearing** confined to the existence, timing and disclosure status of each item.
  - **Permit appellant to file and litigate a Rule 604(d) motion** to withdraw his plea, including appointment of conflict-free counsel to consult, review the record, make any necessary amendments, and file the required certificate.
  - **Direct the circuit court to file a brief status report within 60 days**, after which jurisdiction will return to this Court.

## **6 No prejudice to the State**

The State retains all appellate rights, and the limited remand preserves this Court's jurisdiction; appellant will remain subject to the judgment and all probation conditions during the remand. Because the remand is narrowly tailored and time-limited, the State suffers **no prejudice**. Rather, the procedure promotes **judicial economy** by narrowing issues and preventing later collateral litigation.

## **7 WHEREFORE**

For these reasons, appellant respectfully prays that this Court **stay the appeal, remand the cause** to the circuit court of Lake County for **60 days** for the limited purposes described herein,

**direct the circuit court to file a status report within 60 days, retain jurisdiction over this appeal, and grant such further relief as is just.**

Respectfully submitted,

**/s/ Ehab Allababidi**

**Ehab Allababidi, Defendant-Appellant (pro se)**

8516 W. Winona St.

Chicago, IL 60656

(773) 920-0030

Email: defcon5ready@gmail.com

## Exhibit Packet Index

All exhibits are organized by label, packet page, and Bates range (FPD) where available. They support the Petition for Leave to Appeal by documenting discovery gaps, internal doubt about the DUI-drugs charge, and the timing of medical and technical evidence.

Exhibit	Document / Title	Packet p.	Bates (FPD)	Key Fact Proven	Why This Matters Legally / Supports PLA §
A-1	Chronology of reconstruction, toxicology, indictment, QPO, subpoenas, plea, and post-plea requests.	4	—	Lists key events from the May 27, 2022 Bosch CDR download, the Aug. 11, 2022 Petrick email, the June 14, 2023 indictment, the July 2024 QPO and subpoena, and the Oct. 22, 2025 native-format request.	Shows that reconstruction and discovery were still evolving when the case was indicted and when the plea was taken; supports PLA §§ III-IV (facts and reasons) on incomplete discovery and materiality.
A-2	Aug. 11, 2022 internal email from Detective Paul Petrick regarding ER toxicology results.	5	—	States that the ER lab report lists only "Amphetamine and Benzodiazepines" without quantitative levels and concludes it would be "hard pressed to prove DUI drugs."	Documents internal doubt about the DUI-drugs theory; supports the due-process and Brady/materiality arguments in PLA § IV.
A-3	June 14, 2023 grand-jury court minutes at time of indictment.	6	—	Handwritten notes ask "WHAT ARE INJURIES?" and record "Nothing in file – NO med RECS etc." even though the indictment alleged great bodily harm.	Shows the aggravated reckless-driving (great bodily harm) indictment issued without medical documentation; supports the claim that the factual basis and discovery on injuries were incomplete (PLA §§ III-IV).
A-4	Bosch CDR system status table (EDR data).	8	FPD 00011	Lists the driver's belt-switch circuit status as BUCKLED at the time of the deployment.	Contradicts assumptions that the driver was unrestrained and undermines aggravating inferences about recklessness; supports challenges to the reconstruction in PLA § IV.
A-5	Bosch / PCS vendor disclaimer on raw .CDRx data preservation and translation.	9	FPD 00004	States that the original .CDRx raw file must be preserved in native format and retranslated with the latest software; warns that improper handling may corrupt data.	Demonstrates why competent counsel would have insisted on obtaining the raw image and why its absence is material to the voluntariness of the plea (PLA § IV).
B-1	October 7, 2025 FOIA request from defendant.	17	—	Seeks crash reports, EDR analyses, witness statements, internal memos, and discovery inventories relating to People v. Allababidi, 23CF1146.	Shows post-plea diligence in trying to obtain missing discovery and internal analyses; supports PLA's narrative of newly discovered evidence and incomplete disclosure.
B-2	October 22, 2025 FOIA response from State / agency.	18	—	Acknowledges responsive records but withholds "felony review screening documents" and related materials under FOIA § 7(1)(m) and Supreme Court Rule 412(j)(i).	Confirms the existence of undisclosed internal charging/witness analyses; supports Brady and Rule 412 arguments in PLA § IV.
C-1	October 22, 2025 post-plea native-format discovery request email.	20	—	Requests the raw .CDRx image file with checksums, native body-/dash-cam files with audit logs, and a privilege log for withheld items.	Shows prompt, targeted efforts by new counsel to obtain technical evidence that prior counsel failed to secure pre-plea; supports ineffective-assistance and voluntariness arguments (PLA § IV).

Exhibit	Document / Title	Packet p.	Bates (FPD)	Key Fact Proven	Why This Matters Legally / Supports PLA §
D-1	July 1, 2024 Qualified Protective Order to Advocate Condell Medical Center.	23	—	Orders production of any and all medical records for treatment on or about May 23, 2022.	Shows that medical-injury evidence for "great bodily harm" was still being obtained thirteen months after indictment; supports the argument that discovery on injuries was incomplete at charging and at the time of the plea (PLA §§ III-IV).
D-2	July 24, 2024 subpoena to Lincolnshire-Riverwoods Fire Protection District.	24	—	Commands production of all EMS records and protected health information relating to the crash.	Further demonstrates that injury documentation was still being pursued well after indictment; supports materiality and prejudice from the incomplete discovery picture (PLA § IV).

## **Exhibit A-1**

### ***Chronology of Reconstruction, Toxicology, Charging, and Discovery Events***

**Offered to show:** the sequence of events demonstrating that reconstruction and toxicology analyses were ongoing when the case was indicted; that investigators harbored serious doubt about a DUI-drugs charge; that the indictment for aggravated reckless driving (great bodily harm) was returned without medical records; and that discovery into injuries continued long after charging.

This exhibit provides a narrative timeline showing the May 27 2022 Bosch CDR download; the Aug 11 2022 internal email expressing doubt about proving DUI-drugs; the Jun 14 2023 indictment with no medical records; the July 2024 Qualified Protective Order and subpoena seeking medical and EMS records; and the Oct 22 2025 post-plea request for raw technical data. These facts collectively demonstrate that the State lacked a factual basis for the charge and suppressed exculpatory material.

## Exhibit A-1 Chronology of Reconstruction, Investigation & Discovery

This timeline summarizes key events demonstrating the evolving investigation and charging decisions in **People v. Ehab Allababidi**, Lake County Case No. 23CF1146. It shows that reconstruction and toxicology analyses were ongoing while serious doubts about a DUI-drugs charge existed, and that the indictment for aggravated reckless driving (great bodily harm) was returned without any medical records. Discovery into the “great bodily harm” element continued well after the indictment.

- **May 27 2022** – The Bosch Crash Data Retrieval (CDR) report was downloaded from the Lexus. The CDR report recorded the driver’s belt status as **buckled**, and the manufacturer’s disclaimer required preserving the raw **.CDRx** file for translation with the latest software.
- **Aug 11 2022** – Detective **Paul Petrick** emailed ASA Benjamin Dillon stating that the toxicology report listed only “Amphetamine and Benzodiazepines” and concluded: “*I believe it would be hard pressed to prove DUI drugs.*” This internal doubt was never disclosed to the defense.
- **May 23 2023** – Crash reconstruction continued; police and MCAT analysts prepared speed estimates ranging from 116–125 mph using partial video and EDR data.
- **Jun 14 2023** – The grand jury returned a **true-bill indictment** charging aggravated reckless driving (great bodily harm). Contemporaneous court minutes ask “**WHAT ARE INJURIES?**” and note “**Nothing in file – NO med recs etc.**”, showing that no medical records supported the “great bodily harm” element.
- **Jul 1 2024** – The State obtained a **Qualified Protective Order** requiring **Condell Medical Center** to release *any and all* health records relating to the crash. This occurred over a year after the indictment.
- **Jul 2 2024** – A subpoena issued to **Lincolnshire-Riverwoods Fire Protection District** commanding production of all protected health information and EMS records, further demonstrating that injury documentation was still being sought.
- **Oct 22 2025** – Post-plea counsel requested the raw **.CDRx** image file with checksum values, native body-cam and dash-cam video files with audit logs, and a privilege log for withheld items. This request underscores prior counsel’s failure to obtain critical technical evidence before advising the plea.

This chronology supports the due process and *Brady* claims by showing that (1) key exculpatory and impeachment material (internal doubts about DUI-drugs) was suppressed, (2) the “great bodily harm” element lacked factual basis when charged, and (3) counsel failed to obtain the raw technical data necessary to verify the reconstruction.

## **Exhibit A-2 – Internal Email (Aug. 11 2022)**

Detective Paul Petrick's August 11 2022 email to fellow investigators notes that the laboratory report lists only "**Amphetamine and Benzodiazepines**" with no specific amounts. He concludes that it would be "**hard pressed to prove DUI drugs.**" This internal assessment of weakness in the DUI-drugs charge was not disclosed prior to the plea.

**Dillon, Benjamin**

---

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

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

Mr. Dillon,

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

Our lab report also did not specify amounts.

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

Thank you.

**Detective Paul J. Petrick**  
 Village of Lincolnshire  
 Police Department

O: 847-913-2349  
[ppetrick@lincolnshireil.gov](mailto:ppetrick@lincolnshireil.gov)



VILLAGE OF  
**L I N C O L N S H I R E**

**CONFIDENTIAL COMMUNICATION**

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

## **Exhibit A-3 – Indictment Court Minutes (June 14 2023)**

Handwritten notes on the June 14 2023 grand-jury court minutes, recorded at the time the indictment was returned, ask **“WHAT ARE INJURIES?”** and note **“Nothing, in file – NO med RECS etc.”** This shows that the felony charge of aggravated reckless driving causing great bodily harm was authorized without medical records or injury documentation.

**COURT MINUTES**

**DATE: JUNE 14, 2023**

CASE NUMBER: **23CF/146**

DEFENDANT(S): **EHAB ALLABABIDI**

JUDGE: SHANES

ASA: STEVE SCHELLER

CT REPORTER: \_\_\_\_\_

ACTION TAKEN: True Bill Indictment returned in open court.

Court sets bond in the amount of \$ 50,000 BW

\_\_\_\_\_ Bond Posted.

Warrant to Issue Instanter. 50K

\_\_\_\_\_ Warrant to Issue but stayed until next court date.

\_\_\_\_\_ Case is set for arraignment on \_\_\_\_\_ / \_\_\_\_\_ /2023 at 9:00 a.m. / 1:30 p.m.

510 as assigned

610 BOORAS

611 STRIDE

612 SHANES

710 ROSSETTI

812 STRICKLAND

Court orders that the State notify the defendant and attorney of date.

**NOTE TO FELONY SECRETARY: SEND NOTICE/NOTIFY ATTORNEY BY PHONE**

\_\_\_\_\_ Remand to be issued to the Sheriff for above date.

\_\_\_\_\_ Indictment is sealed until arrest or \_\_\_\_\_ days, whichever is first.

\_\_\_\_\_ Defendant to appear in Preliminary Hearing Court but setting of hearing vacated.

Case is assigned to Judge \_\_\_\_\_ for all further proceedings.

Arraignment to be held in that courtroom \_\_\_\_\_

(NOTES: WHAT ARE [REDACTED] INJURIES??

Nothing in file - no med recs etc.

## Exhibit A-4 – CDR System Status Table (EDR Data)

A table from the Bosch Crash Data Retrieval report lists the driver's belt-switch circuit status as **BUCKLED** at the deployment associated with the crash. This contradicts any narrative that the driver was unrestrained and undermines aggravating inferences about recklessness.

**System Status At Deployment #2**

Ignition Cycles At Investigation	17377
SIR Warning Lamp Status	ON
SIR Warning Lamp ON/OFF Time Continuously (seconds)	0
Number of Ignition Cycles SIR Warning Lamp was ON/OFF Continuously	0
Ignition Cycles At Event	17376
Ignition Cycles Since DTCs Were Last Cleared	255
Driver's Belt Switch Circuit Status	BUCKLED
Passenger Air Bag Indicator Status at Event Enable	Undefined
Passenger SIR Suppression Switch Circuit Status	Air Bag Suppressed
Diagnostic Trouble Codes at Event, fault number: 1	B0052-00
Diagnostic Trouble Codes at Event, fault number: 2	N/A
Diagnostic Trouble Codes at Event, fault number: 3	N/A
Diagnostic Trouble Codes at Event, fault number: 4	N/A
Diagnostic Trouble Codes at Event, fault number: 5	N/A
Diagnostic Trouble Codes at Event, fault number: 6	N/A
Diagnostic Trouble Codes at Event, fault number: 7	N/A
Diagnostic Trouble Codes at Event, fault number: 8	N/A
Diagnostic Trouble Codes at Event, fault number: 9	N/A
Driver 1st Stage Time From Algorithm Enable to Deployment Command Criteria Met (msec)	N/A
Driver 2nd Stage Time From Algorithm Enable to Deployment Command Criteria Met (msec)	N/A
Passenger 1st Stage Time From Algorithm Enable to Deployment Command Criteria Met (msec)	N/A
Passenger 2nd Stage Time From Algorithm Enable to Deployment Command Criteria Met (msec)	N/A
Driver Side or Roof Rail/Head Curtain Time From Algorithm Enable to Deployment Command Criteria Met (msec)	N/A
Passenger Side or Roof Rail/Head Curtain Time From Algorithm Enable to Deployment Command Criteria Met (msec)	N/A
Command Criteria Met (msec)	N/A
Crash Record Locked	Yes
Deployment Event Recorded in the Non-Deployment Record	Yes
Vehicle Event Data (Pre-Crash) Associated With This Event	No
Time Between Events (sec)	0.0
Event Recording Complete	Yes
Driver First Stage Deployment Loop Commanded	No
Passenger First Stage Deployment Loop Commanded	No
Driver Second Stage Deployment Loop Commanded	No
Driver 2nd Stage Deployment Loop Commanded for Disposal	No
Passenger Second Stage Deployment Loop Commanded	No
Passenger 2nd Stage Deployment Loop Commanded for Disposal	No
Driver Pretensioner Deployment Loop Commanded (If Equipped)	No
Passenger Pretensioner Deployment Loop Commanded (If Equipped)	No
Driver Side Deployment Loop Commanded (If Equipped)	No
Passenger Side Deployment Loop Commanded (If Equipped)	No
Second Row Left Side Deployment Loop Commanded (If Equipped)	No
Second Row Right Side Deployment Loop Commanded (If Equipped)	No
Driver (Initiator 1) Roof Rail/Head Curtain Loop Commanded (If Equipped)	No
Passenger (Initiator 1) Roof Rail/Head Curtain Loop Commanded (If Equipped)	No
Driver (Initiator 2) Roof Rail/Head Curtain Loop Commanded (If Equipped)	No
Passenger (Initiator 2) Roof Rail/Head Curtain Loop Commanded (If Equipped)	No
Driver (Initiator 3) Roof Rail/Head Curtain Loop Commanded (If Equipped)	No
Passenger (Initiator 3) Roof Rail/Head Curtain Loop Commanded (If Equipped)	No
Driver Knee Deployment Loop Commanded (If Equipped)	No
Passenger Knee Deployment Loop Commanded (If Equipped)	No
Second Row Left Pretensioner Deployment Loop Commanded (If Equipped)	No
Second Row Right Pretensioner Deployment Loop Commanded (If Equipped)	No
Second Row Center Pretensioner Deployment Loop Commanded (If Equipped)	No

## **Exhibit A-5 – Bosch/PCS Vendor Disclaimer**

The Bosch Crash Data Retrieval documentation instructs investigators to preserve the original raw .CDRx image file and to re-translate that file using the latest approved software. This highlights the need for the raw image file and supports the claim that competent counsel would have obtained it before recommending a plea.

(F) BOSCH

**CDR** CRASH DATA RETRIEVAL

2022-7143

Van

**IMPORTANT NOTICE:** Robert Bosch LLC and the manufacturers whose vehicles are accessible using the CDR System urge end users to use the latest production release of the Crash Data Retrieval system software when viewing, printing or exporting any retrieved data from within the CDR program. Using the latest version of the CDR software is the best way to ensure that retrieved data has been translated using the most current information provided by the manufacturers of the vehicles supported by this product.

**CDR File Information**

User Entered VIN	[REDACTED]
User	P.MURRAY 120
Case Number	MCAT 22-22
EDR Optio Imaging Date	05/27/2022
Crash Date	05/23/2022
Filename	[REDACTED]
Saved on	Friday, May 27 2022 at 11:37:40
Imaged with CDR version	Crash Data Retrieval Tool 21.5.1
Imaged with Software Licensed to (Company Name)	MCAT
Reported with CDR version	Crash Data Retrieval Tool 21.5.1
Reported with Software Licensed to (Company Name)	MCAT
EDR Device Type	Airbag Control Module
Event(s) recovered	Deployment Deployment #2

**Comments**

Inspection location: ERNIES WRECKER SERVICE  
Individuals present: P.MURRAY 120

Observed visible restraint deployment(s): YES

Imaging conducted pursuant to search warrant (warrant data:ls) (Y/N)? N  
Imaging conducted pursuant to owner consent (Y/N)? Y  
Imaging conducted pursuant to civil discovery (Y/N)? N

Ignition key or fob available and its position at the start of the inspection: NOT PRESENT  
Odometer reading/units: UNKNOWN  
Recommended tire size (slicker): LT245/75R16E  
Tire size(s) (actual): LT245/75R16E  
For GM vehicles, were RPCs documented (i.e.: photo)? N UNABLE TO ACCESS

Imaging completed by DLC or direct-to-module access: D2M  
"Re-powering" required (Y/N)? Y  
Additional power-up used: VETRONIX AC/DC ADAPTER 02002436

Other notes:

**Disclaimer**

I have accessed and retrieved data from CDR Tool accessible system(s) from or in the vehicle identified by the applied VIN in which potential Event Data Recorder (EDR) may be found. The retrieved data may be related to a crash or other physical event. The successful retrieval of the data and production of this report is an indication that the procedure(s) necessary to properly access and retrieve the data have been followed and the data was properly imaged/downloaded.

I have or will provide the appropriate party(s) a copy of the original, raw data file – the underlying CDR System file - for discovery and/or later re-printing as necessary. This file will be named using the vehicle's Vehicle Identification Number (VIN) and identified by the \*.CDRx file extension. This file should only be opened and viewed with the latest version of the Bosch Crash Data Retrieval System Software; improper use of a "text viewer" may corrupt the CDRx file which would prevent it from being opened again in the CDR Tool software and generating a data translation report.

The raw data as found in the CDRx file might be compared to a photographic negative and it is a direct image or copy of the data stored on/in the module(s) accessed using the CDR Tool. The CDRx file should be preserved in its native format, unedited, and should be shared in that format where it may be viewed at a later date using a licensed copy of the CDR Tool software or using the "free reader" version of the CDR Tool software in the latest production release of that software. Prior to

## **Exhibit B-1 – FOIA Request**

The defense's October 2025 Freedom of Information Act request asks for crash reconstruction reports, electronic data recorder analyses, internal correspondence, witness statements and felony-review screening documents that were missing from criminal discovery. The request reflects diligence in seeking the State's internal analysis and witness material.

Act request has been sent and will be processed as soon as possible.

Your request has been given the reference number R005581-100725 for tracking purposes.

Records Requested: Records Requested:

Pursuant to the Illinois Freedom of Information Act (5 ILCS 140), I request copies of all records relating to People v. Ehab Allababidi, Lake County Case No. 23CF1146, including but not limited to:

- All police and crash investigation reports, supplemental narratives, field notes, and diagrams.
- All photographs, video recordings (body-worn camera, dash camera, and traffic camera), 911 audio, and CAD dispatch logs.
- Any Bosch Crash Data Report or other event-data-recorder (EDR / “black box”) downloads or analyses for my vehicle or any other involved vehicle (including the truck).
- Accident-reconstruction reports, analyses, and related technical data.
- Witness statements, interview transcripts, and summary reports.
- All correspondence, emails, memoranda, or internal notes between the Lake County State’s Attorney’s Office and any law enforcement agencies related to this case or evidence.
- The discovery inventory list or logs showing what materials were provided to the defense.

I request that all records be provided in electronic format (PDFs, audio, or video) and sent to defcon5ready@gmail.com

If any portion of this request is denied, please cite each specific FOIA exemption authorizing the denial and provide the non-exempt material.

I am the defendant in this matter and request these materials for my own legal recordkeeping and post-conviction review.

Your request will be reviewed by a FOIA officer who will contact you about the availability of the records you have requested.

PLEASE NOTE: The Freedom of Information Act is designed to allow you to inspect or receive copies of records. It is not designed to require a public body to create new records or answer questions. To the extent that

## Exhibit B-2 – State’s FOIA Response

In its written response, the State acknowledges responsive records but withholds “**felony review screening documents**” under FOIA § 7(1)(m) (attorney work product) and Supreme Court Rule 412(j)(i) (opinions and theories of staff). This shows the existence of undisclosed internal charging analyses and witness material.

furnished only by a confidential source, or persons who file complaints with or provide information to administrative, investigative, law enforcement or penal agencies." 5 ILCS 140/7(1)(d)(iv) (West 2012). *Watkins v. Johnson*, 2016 IL App (1st) 152958, ¶ 39. *Perry v. Dep't of Fin. & Prof'l Regulation*, 2017 IL App (1st) 161780, ¶ 9

Felony review screening documents were withheld pursuant to Section 7(1)(m) of FOIA which exempts documents that would not be subject to disclosure in litigation, including attorney work-product. Pursuant to Illinois Supreme Court Rule 412(j)(i), disclosure "shall not be required of legal research or of records, correspondence, reports or memoranda to the extent that they contain the opinions, theories or conclusions of the State or members of its legal or investigative staffs, or of defense counsel or his staff." *People v. Sutherland*, 223 Ill. 2d 187, 276-77, 860 N.E.2d 178, 235 (2006); *People v. Harper*, 279 Ill. App. 3d 801, 810-11, 665 N.E.2d 474, 482-83 (1996); *People v. Elzey*, 203 Ill. App. 3d 153, 158-59, 560 N.E.2d 1107, 1112-13 (1990).

To the extent any portion of this response is construed as a denial, you have a right to have the denial of your request reviewed by the Public Access Counselor (PAC) at the Office of the Illinois Attorney General. 5 ILCS 140/9.5(a).

You can file your Request for Review with the PAC by writing to:

Public Access Counselor  
Office of the Attorney General  
500 South 2nd Street  
Springfield, Illinois 62701  
Phone: 877-299-3642  
E-mail: [Public.Access@ilag.gov](mailto:Public.Access@ilag.gov)

You also have the right to seek judicial review of your denial by filing a lawsuit in the State circuit court. 5 ILCS 140/11.

If you choose to file a Request for Review with the PAC, you must do so within 60 calendar days of the date of this denial. 5 ILCS 140/9.5(a). Please note that you must include a copy of your original FOIA request and this denial letter when filing a Request for Review with the PAC.

If you have any questions about this response or need additional information, please respond to this email.

Sincerely,

Melanie Nelson  
Chief Deputy, Civil Trial Division  
State's Attorney's Office

## **Exhibit C-1 – Post-Plea Native-Format Discovery Request**

A post-plea email dated October 22 2025 requests the raw **.CDRx** image file with checksum, native body-worn and dash-cam video files with complete audit logs, and a privilege log for any items withheld as privileged or work product. This demonstrates diligence after the plea and identifies the technical evidence that prior counsel failed to secure before the plea.



Ehab Hilfiger &lt;defcon5ready@gmail.com&gt;

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**Subject: People v. Allababidi (23CF1146) — Complete Client File & Native Discovery (IRPC 1.16(d))**

1 message

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**Ehab Hilfiger** <defcon5ready@gmail.com>  
 To: Bailey Russell <BRussell@lakecountyil.gov>

Wed, Oct 22, 2025 at 11:52 PM

Dear Ms. Russel,

I was your client in **People v. Ehab Allababidi, Case No. 23CF1146**.Please treat this as my formal request for my **entire client file** under **Illinois Rule of Professional Conduct 1.16(d)** and my rights as a former client.I have personally reviewed the **382-page discovery packet** in my case. Based on that review, several categories appear incomplete or missing in **native format**. Please produce the following within **14 days**:**Items to Produce (native formats where applicable)**

- **All Rule 412 discovery** and all supplements/cover letters.
- **Reports & photos:** incident/supplemental reports; scene diagrams; **original photo files + photo logs**.
- **Crash reconstruction / MCAT:** total-station or other **raw measurement files**, notes, drafts, calculations, and final reports.
- **Vehicle EDR:** the **raw .CDRX image**, all Bosch exports/decodes, and any associated metadata or **checksums**.
- **Video:** all body-worn and dash-cam videos in their **original containers** with **timestamp/audit files** and any proprietary player/readme.
- **911/ETSB:** CAD event logs, **911 audio**, radio/dispatch traffic, run cards.
- **Tow/impound:** tow sheets, inventory, and **chain-of-custody** (physical & digital).
- **Medical/EMS/hospital materials** relied upon by the State, including labs/toxicology.
- **Correspondence:** to/from the State and agencies (MCAT/ISP/local PD/ETSB/911/hospitals), and any **Rule 412 certificates**.
- **Court records:** all filings and **orders** (including any protective orders/qualified HIPAA orders) and any record subpoenas.
- **Plea/negotiation materials:** offer letters/emails, any Rule 402 notes, plea paperwork, and communications reflecting advice provided and my decision timeline.
- **Media inventories:** indexes of all CD/DVD/USB media with **MD5/SHA-256** hashes if available.
- **Docketing/calendaring/task entries** reflecting discovery flow and deadlines.

If any item is not in your possession, please **identify the current custodian** and the last date you requested/received it. If you withhold anything as privileged/work product, please provide a **privilege/work-product log** (date, author, general description)

Thank you for your prompt attention.

Sincerely,  
**Ehab Allababidi**



**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.

## **Exhibit D-1 – Qualified Protective Order (July 1 2024)**

This July 1 2024 qualified protective order authorizes Advocate Condell Medical Center to release **“any and all health information and medical records”** relating to the case. Entered more than a year after the June 14 2023 indictment, the order proves that discovery on the element of great bodily harm was still ongoing.

FILED

STATE OF ILLINOIS )  
 ) SS  
COUNTY OF LAKE )

JUL 01 2024

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT, LAKE COUNTY, ILLINOIS *Emi Cantagut Weinstein*  
CIRCUIT CLERK

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
VS. ) General No. 23CF1146  
 )  
EHAB ALLABABIDI )

**CERTIFIED MEDICAL RECORDS RELEASE AND QUALIFIED PROTECTIVE ORDER PURSUANT TO HIPPA**

This matter coming to be heard on Motion of the People of the State of Illinois, the court having jurisdiction and being fully advised in the premises:

**IT IS HEREBY ORDERED:**

CONDELL MEDICAL CENTER is ordered to submit any and all health information and medical records, including sensitive information, pertaining to the patient of [REDACTED] treated on or about MAY 23, 2022 THROUGH DATE OF DISCHARGE. Said records shall be accompanied by a CERTIFICATION from the Keeper of Records, signed under the penalty of perjury.

CONDELL MEDICAL CENTER must comply with this Qualified Protection Order Pursuant to HIPPA by mailing legible copies within two weeks to the Honorable Judge Stride, Courtroom T611, 18 North County Street, Waukegan, Illinois.

1. The current parties (and their attorneys) and any future parties (and their attorneys) to the above captioned matter are hereby authorized to receive, subpoena, and transmit "protected health information" (also referred to herein as "PHI") pertaining to [REDACTED] treated on or about MAY 23, 2022 THROUGH DATE OF DISCHARGE, to the extent and subject to the conditions outlined herein.
2. For the purposes of this Qualified Protective Order, "PHI" or "protected health information" shall have the same scope and definition as set forth in 45 CFR 160.103 and 160.501. Without limiting the generality of the foregoing, "PHI" includes, but is not limited to, health information, including sensitive material, including demographic information, relating to either, (a) the past, present, or future physical or mental condition

## **Exhibit D-2 – Subpoena to Lincolnshire-Riverwoods Fire Protection District (July 24 2024)**

The subpoena dated July 24 2024 commands the Lincolnshire-Riverwoods Fire Protection District to produce all EMS records and protected health information related to the crash. This further confirms that injury and causation evidence necessary to support the felony charge was still being sought long after the indictment.



**TRG Counts 6 & 7**

TRG Counts 6 & 7 occur almost simultaneously with the time from TRG 6 to TRG 7 being 16 msec. TRG Count 6 was recorded as a rollover event and TRG 7 was recorded as a frontal/rear/side event. See figures 17 and 18.

TRG Count (times)	8
Event Type	Rollover
Previous Crash Type	Side Crash
Time from Previous TRG (msec)	25.0
Freeze Signal	OFF
Freeze Signal Factor	None
Recording Status, Rollover Crash Info	Complete
Odometer signal (miles /km)	6,595 (10,614)
Trip count (times)	870
Time count (msec)	553,200
Time count input system	Normal

**Figure 17. TRG Count 6**

TRG Count (times)	7
Event Type	Frontal/Rear/Side Crash
Previous Crash Type	Rollover
Time from Previous TRG (msec)	16.0
Time from Time Zero to TRG (msec)	56.5
Event Establishment Factor	Frontal Crash
TRG Establishment Factor	Frontal Crash
Freeze Signal	OFF
Freeze Signal Factor	None
Recording Status, Front/Rear and Side Crash Info	Complete
Odometer signal (miles /km)	6,595 (10,614)
Trip count (times)	870
Time count (msec)	553,200
Time count input system	Normal

**Figure 18. TRG Count 7**

**Pre-Crash Data -5 to 0 Seconds (4th Prior Event, TRG 6) - Table 1 of 4**

Time (sec)	Vehicle Speed (MPH (km/h))	Accelerator Pedal, % Full (%)	Percentage of Engine Throttle (%)	Fuel Injection Quantity (mm <sup>3</sup> /inj)	Engine RPM (RPM)	Motor RPM (RPM)	Service Brake, ON/OFF
-4.95	119.3 (192)	100.0	88.5	Invalid	4,400	Invalid	OFF
-4.45	120.5 (194)	100.0	100.0	Invalid	5,100	Invalid	OFF
-3.95	121.8 (195)	100.0	99.5	Invalid	5,200	Invalid	OFF
-3.45	123.0 (198)	100.0	100.0	Invalid	5,200	Invalid	OFF
-2.95	124.3 (200)	85.5	100.0	Invalid	5,300	Invalid	OFF
-2.45	124.3 (200)	0.0	0.0	Invalid	5,300	Invalid	ON
-1.95	114.3 (184)	0.0	0.0	Invalid	4,900	Invalid	ON
-1.45	103.1 (166)	0.0	0.0	Invalid	4,200	Invalid	ON
-0.95	98.9 (156)	0.0	0.0	Invalid	3,700	Invalid	ON
-0.45	87.6 (141)	0.0	0.0	Invalid	3,500	Invalid	ON
TRG(0)	83.3 (134)	0.0	0.0	Invalid	3,200	Invalid	ON

**Pre-Crash Data -5 to 0 Seconds (4th Prior Event, TRG 6) - Table 2 of 4**

Time (sec)	ABS Control Status	BOS Control Status	Brake Oil Pressure (Men)	Longitudinal Acceleration, VSC Sensor (m/s <sup>2</sup> )	Yaw Rate (deg/s)	Steering Input (degrees)	Shift Position
-4.95	OFF	OFF	0.00	0.359	-1.95	-6.0	D
-4.45	OFF	OFF	0.00	1.364	-0.98	-3.0	D
-3.95	OFF	OFF	0.00	1.579	1.46	6.0	D
-3.45	OFF	OFF	0.00	1.579	1.95	6.0	D
-2.95	OFF	OFF	0.00	1.795	0.49	-1.5	D
-2.45	OFF	OFF	0.10	-0.790	-0.88	-4.5	D
-1.95	OFF	OFF	0.96	-8.973	0.00	0.0	D
-1.45	ON	OFF	3.65	-8.801	0.49	9.0	D
-0.95	ON	OFF	8.98	-6.604	7.81	60.0	D
-0.45	ON	OFF	7.39	-6.891	8.30	132.0	D
TRG(0)	ON	OFF	6.05	-8.073	18.00	183.0	D

Figure 19. TRG Count 6 -5 to 0 Seconds

In summary, the Lexus' speed was increasing 4.95 seconds up to 2.45 seconds prior to TRG Count 6 being recorded. The Lexus' speed increased from 119.3 MPH to 124.3 MPH. The CDR report notes the upper limit for the recorded "vehicle speed" value is 200km/h (124.3 mph). During this same time frame, the accelerator pedal was at 100% before decreasing to 85.5% and then to 0% after impact with the rear driver side axle of the Peterbilt truck.

**Pre-Crash Data -5 to 0 Seconds (3rd Prior Event, TRG 7) - Table 1 of 4**

Time (sec)	Vehicle Speed (MPH (km/h))	Accelerator Pedal, % Full (%)	Percentage of Engine Throttle (%)	Fuel Injection Quantity (mm <sup>3</sup> /st)	Engine RPM (RPM)	Motor RPM (RPM)	Service Brake, ON/OFF
-5.00	119.3 (192)	100.0	89.5	Invalid	4,400	Invalid	OFF
-4.50	120.5 (194)	100.0	100.0	Invalid	5,100	Invalid	OFF
-4.00	121.8 (196)	100.0	99.5	Invalid	5,200	Invalid	OFF
-3.50	123.0 (198)	100.0	100.0	Invalid	5,200	Invalid	OFF
-3.00	124.3 (200)	85.5	100.0	Invalid	5,300	Invalid	OFF
-2.50	124.3 (200)	0.0	0.0	Invalid	5,300	Invalid	ON
-2.00	114.3 (184)	0.0	0.0	Invalid	4,900	Invalid	ON
-1.50	103.1 (166)	0.0	0.0	Invalid	4,200	Invalid	ON
-1.00	95.9 (156)	0.0	0.0	Invalid	3,700	Invalid	ON
-0.50	87.6 (141)	0.0	0.0	Invalid	3,500	Invalid	ON
TRG(0)	81.4 (131)	2.5	0.0	Invalid	3,200	Invalid	ON

**Pre-Crash Data -5 to 0 Seconds (3rd Prior Event, TRG 7) - Table 2 of 4**

Time (sec)	ABS Control Status	BOS Control Status	Brake Oil Pressure (Mpa)	Longitudinal Acceleration, VBC Sensor (m/s <sup>2</sup> )	Yaw Rate (deg/s)	Steering Input (degrees)	Shift Position
-5.00	OFF	OFF	0.00	0.359	-1.95	-6.0	D
-4.50	OFF	OFF	0.00	1.364	-0.98	-3.0	D
-4.00	OFF	OFF	0.00	1.579	1.46	6.0	D
-3.50	OFF	OFF	0.00	1.579	1.85	6.0	D
-3.00	OFF	OFF	0.00	1.795	0.49	-1.5	D
-2.50	OFF	OFF	0.10	-0.790	-0.98	-4.5	D
-2.00	OFF	OFF	0.96	-8.973	0.00	0.0	D
-1.50	ON	OFF	3.65	-8.901	0.49	9.0	D
-1.00	ON	OFF	8.98	-6.604	7.81	60.0	D
-0.50	ON	OFF	7.39	-6.891	8.30	132.0	D
TRG(0)	ON	OFF	9.65	2.082	12.20	178.5	D

Figure 20. TRG Count 7 -5 to 0 Seconds

TRG Count 7 began recording 16 msec after TRG 6 and such the data recorded is similar to TRG 6. TRG Counts 6 and 7 were recorded as a result of the collision with the rear driver side axle of the Peterbilt.

**TRG Count 8, 9 & 10**

TRG Count 8 and 9 occur almost simultaneously with each other and they were recorded approximately 1.3 seconds after TRG count 7. TRG Count 8, 9 and 10 were recorded because of the collision with the GMC van. The Lexus struck the rear of the Peterbilt at 81 MPH and then 1.3 seconds later struck the front of the van at 62 MPH.

<b>System Status at Event (2nd Prior Event, TRG 8)</b>	
TRG Count (times)	8
Event Type	Frontal/Rear/Side Crash
Previous Crash Type	Frontal/Rear/Side Crash
Time from Previous TRG (msec)	1.375.5
Time from Time Zero to TRG (msec)	5.5
Event Establishment Factor	Frontal Crash
TRG Establishment Factor	Frontal Crash
Freeze Signal	ON
Freeze Signal Factor	Front Airbag Deployment, Driver / Front Airbag Deployment, Passenger
Recording Status, Front/Rear and Side Crash Info.	Complete
Odometer signal (miles [km])	6,595 [10,614]
Trip count (times)	870
Time count (msec)	554,500
Time count input system	Normal

Figure 21. TRG Count 8

<b>System Status at Event (1st Prior Event, TRG 9)</b>	
TRG Count (times)	9
Event Type	Side Crash
Previous Crash Type	Frontal/Rear/Side Crash
Time from Previous TRG (msec)	5.0
Freeze Signal	OFF
Freeze Signal Factor	None
Odometer signal (miles [km])	6,595 [10,614]
Trip count (times)	870
Time count (msec)	554,500
Time count input system	Normal

Figure 22. TRG Count 9

Pre-Crash Data -5 to 0 Seconds (2nd Prior Event, TRG 8) - Table 1 of 4

Time (sec)	Vehicle Speed (MPH [km/h])	Accelerator Pedal, % Full (%)	Percentage of Engine Throttle (%)	Fuel Injection Quantity (mm <sup>3</sup> /st)	Engine RPM (RPM)	Motor RPM (RPM)	Service Brakes, ON/OFF
-4.85	123.0 [198]	100.0	100.0	Invalid	5,200	Invalid	OFF
-4.35	124.3 [200]	85.5	100.0	Invalid	5,300	Invalid	OFF
-3.85	124.3 [200]	0.0	0.0	Invalid	5,300	Invalid	ON
-3.35	114.3 [184]	0.0	0.0	Invalid	4,900	Invalid	ON
-2.85	103.1 [166]	0.0	0.0	Invalid	4,200	Invalid	ON
-2.35	86.9 [139]	0.0	0.0	Invalid	3,700	Invalid	ON
-1.85	87.8 [141]	0.0	0.0	Invalid	3,500	Invalid	ON
-1.35	80.2 [129]	2.5	0.0	Invalid	3,200	Invalid	ON
-0.85	76.4 [123]	0.0	15.0	Invalid	3,300	Invalid	ON
-0.35	69.0 [111]	0.0	0.0	Invalid	3,400	Invalid	ON
TRG(0)	62.8 [101]	0.0	8.5	Invalid	4,300	Invalid	ON

Pre-Crash Data -5 to 0 Seconds (2nd Prior Event, TRG 8) - Table 2 of 4

Time (sec)	ABS Control Status	BOS Control Status	Brake Oil Pressure (Mpa)	Longitudinal Acceleration, VSC Sensor (m/s <sup>2</sup> )	Yaw Rate (deg/s)	Steering Input (degrees)	Shift Position
-4.85	OFF	OFF	0.00	1.579	1.95	6.0	D
-4.35	OFF	OFF	0.00	1.795	0.49	-1.5	D
-3.85	OFF	OFF	0.10	-0.790	-0.98	-4.5	D
-3.35	OFF	OFF	0.96	-8.973	0.00	0.0	D
-2.85	ON	OFF	3.65	-8.901	0.49	9.0	D
-2.35	ON	OFF	8.98	-6.604	7.87	60.0	D
-1.85	ON	OFF	7.39	-6.891	8.30	132.0	D
-1.35	ON	OFF	12.00	-3.878	-4.39	150.0	D
-0.85	ON	OFF	7.54	-4.809	-6.34	-58.5	D
-0.35	ON	OFF	5.38	-8.747	-4.88	-165.0	D
TRG(0)	ON	OFF	8.93	-8.973	-8.78	-169.5	D

Lateral Crash Pulse (1st Prior Event, TRG 9) - Table 1 of 2

Time (msec)	Rate of Change of Pressure, Side Satellite Sensor 1, L (%)	Lateral Acceleration, Side Satellite Sensor 2, L (m/s <sup>2</sup> )	Lateral Acceleration, Side Satellite Sensor 3, L (m/s <sup>2</sup> )	Lateral Acceleration, Side Satellite Sensor 4, L (m/s <sup>2</sup> )	Rate of Change of Pressure, Side Satellite Sensor 1, R (%)	Lateral Acceleration, Side Satellite Sensor 2, R (m/s <sup>2</sup> )	Lateral Acceleration, Side Satellite Sensor 3, R (m/s <sup>2</sup> )	Lateral Acceleration, Side Satellite Sensor 4, R (m/s <sup>2</sup> )
-29	0.0	SNA	SNA	0.0	0.0	SNA	SNA	0.0
-25	0.0	SNA	SNA	0.0	0.0	SNA	SNA	0.0
-21	0.0	SNA	SNA	0.0	0.1	SNA	SNA	0.0
-17	0.0	SNA	SNA	0.0	0.1	SNA	SNA	0.0
-13	0.0	SNA	SNA	0.0	0.0	SNA	SNA	0.0
-9	0.1	SNA	SNA	0.0	0.0	SNA	SNA	0.0
-5	0.1	SNA	SNA	0.0	0.0	SNA	SNA	0.0
-1	0.0	SNA	SNA	-14.4	0.0	SNA	SNA	0.0
3	0.0	SNA	SNA	14.4	0.0	SNA	SNA	14.4
7	0.4	SNA	SNA	-100.6	0.2	SNA	SNA	0.0
11	1.1	SNA	SNA	86.2	0.5	SNA	SNA	28.7
15	1.3	SNA	SNA	-71.9	0.3	SNA	SNA	0.0
19	0.8	SNA	SNA	-28.7	0.2	SNA	SNA	71.9
23	1.1	SNA	SNA	14.4	0.6	SNA	SNA	28.7
27	0.5	SNA	SNA	-71.9	0.5	SNA	SNA	-28.7
31	0.3	SNA	SNA	143.7	-0.4	SNA	SNA	115.0
35	-0.3	SNA	SNA	-115.0	-0.5	SNA	SNA	0.0
39	0.3	SNA	SNA	100.6	-0.4	SNA	SNA	57.5
43	0.7	SNA	SNA	-71.9	-0.3	SNA	SNA	129.3
47	0.2	SNA	SNA	14.4	0.3	SNA	SNA	-57.5
51	0.1	SNA	SNA	-143.7	0.1	SNA	SNA	0.0
55	0.1	SNA	SNA	43.1	-0.2	SNA	SNA	14.4
59	0.3	SNA	SNA	57.5	0.4	SNA	SNA	-28.7
63	0.3	SNA	SNA	100.6	0.0	SNA	SNA	14.4
67	0.4	SNA	SNA	0.0	0.0	SNA	SNA	0.0
71	0.5	SNA	SNA	-172.4	0.4	SNA	SNA	0.0

Figure 23. TRG Count 8 & 9 Recorded Pre-Crash Data.

TRG Count 10, the most recent and final event recorded, was recorded as a side crash. TRG Count 10 was recorded approximately .64 seconds after TRG Count 9. The following pre-crash data was recorded from TRG Count 10.

**Lateral Crash Pulse (Most Recent Event, TRG 10) - Table 1 of 2**

Time (msec)	Rate of Change of Pressure, Side Satellite Sensor 1, L (%)	Lateral Acceleration, Side Satellite Sensor 2, L (m/s <sup>2</sup> )	Lateral Acceleration, Side Satellite Sensor 3, L (m/s <sup>2</sup> )	Lateral Acceleration, Side Satellite Sensor 4, L (m/s <sup>2</sup> )	Rate of Change of Pressure, Side Satellite Sensor 1, R (%)	Lateral Acceleration, Side Satellite Sensor 2, R (m/s <sup>2</sup> )	Lateral Acceleration, Side Satellite Sensor 3, R (m/s <sup>2</sup> )	Lateral Acceleration, Side Satellite Sensor 4, R (m/s <sup>2</sup> )
-30	0.0	SNA	SNA	-28.7	0.2	SNA	SNA	-28.7
-26	0.0	SNA	SNA	-28.7	0.0	SNA	SNA	-28.7
-22	0.0	SNA	SNA	-14.4	0.0	SNA	SNA	-14.4
-18	0.0	SNA	SNA	-14.4	0.0	SNA	SNA	-14.4
-14	0.0	SNA	SNA	-14.4	0.0	SNA	SNA	-14.4
-10	0.1	SNA	SNA	-14.4	0.1	SNA	SNA	-14.4
-6	0.1	SNA	SNA	-14.4	0.2	SNA	SNA	-14.4
-2	0.0	SNA	SNA	-14.4	0.2	SNA	SNA	-28.7
2	0.0	SNA	SNA	-14.4	0.2	SNA	SNA	-14.4
6	0.0	SNA	SNA	-14.4	0.0	SNA	SNA	-14.4
10	0.1	SNA	SNA	-14.4	0.1	SNA	SNA	-14.4
14	0.0	SNA	SNA	0.0	0.0	SNA	SNA	-14.4
18	0.0	SNA	SNA	-14.4	0.0	SNA	SNA	0.0
22	0.0	SNA	SNA	-14.4	0.0	SNA	SNA	-28.7
26	0.1	SNA	SNA	0.0	0.1	SNA	SNA	0.0
30	0.0	SNA	SNA	0.0	0.1	SNA	SNA	-28.7
34	0.1	SNA	SNA	0.0	0.1	SNA	SNA	14.4
38	0.1	SNA	SNA	0.0	0.1	SNA	SNA	-28.7
42	0.1	SNA	SNA	0.0	0.1	SNA	SNA	0.0
46	0.0	SNA	SNA	0.0	0.1	SNA	SNA	-14.4
50	0.0	SNA	SNA	0.0	0.2	SNA	SNA	0.0
54	0.0	SNA	SNA	0.0	0.1	SNA	SNA	0.0
58	0.1	SNA	SNA	0.0	0.1	SNA	SNA	0.0
62	0.0	SNA	SNA	0.0	0.0	SNA	SNA	0.0
66	0.0	SNA	SNA	0.0	0.1	SNA	SNA	0.0
70	0.0	SNA	SNA	0.0	0.1	SNA	SNA	0.0

Figure 24. TRG Count 10

Lexus Transmission

The 2021 Lexus LC 500 is a 10-speed transmission with a final drive axle ratio of 2.937. Figure 25 shows the gear ratios for each speed of the transmission. At the time of the crash, the rear tires on the Lexus were size 275/35R21 and the front tires on the Lexus were size 245/40R21. In TRG 7, The EDR recorded the highest engine RPM of 5300 at 3 and 2.5 seconds before time zero. The CDR report also notes the recorded value of Engine RPM has an upper limit of 12,800 rpm. The resolution is 100 rpm, and the value is rounded down and recorded. For example, if the engine speed is 799 rpm, the recorded value will be 700 rpm. I then completed a speed analysis of the Lexus based on the recorded RPM, transmission information and tire sizes. The highest speed the Lexus reached was 124 to 125 miles per hour. See figures 26 and 27 for the Lexus' speed from engine RPM.

**Transmission**

Transmission Type	Automatic
<del>Shiftable</del> Automatic	Paddles
<b>Gear Number</b>	<b>10</b>
<b>Final Drive Axle Ratio</b>	<b>2.937</b>
<b>First Gear Ratio</b>	<b>4.92</b>
<b>Second Gear Ratio</b>	<b>3.15</b>
<b>Third Gear Ratio</b>	<b>2.35</b>
<b>Fourth Gear Ratio</b>	<b>1.88</b>
<b>Fifth Gear Ratio</b>	<b>1.46</b>
<b>Sixth Gear Ratio</b>	<b>1.19</b>
<b>Seventh Gear Ratio</b>	<b>1.0</b>
Eighth Gear Ratio	0.79
Ninth Gear Ratio	0.64
Tenth Gear Ratio	0.598

**Figure 25. Lexus Transmission Details**

FILED

DEC 08 2025

*Eric Cantor*  
**CIRCUIT CLERK**

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

PEOPLE OF THE STATE OF ILLINOIS,  
Plaintiff,

v.

No. 23 CF 1146  
EHAB ALLABABIDI,  
Defendant.

FILED

NOV 25 2025

Eric Cantagut Weinstock  
CIRCUIT CLERK

**PETITION FOR POST-CONVICTION RELIEF**

*(725 ILCS 5/122-1 ET SEQ.) – PRO SE*

NOW COMES the Petitioner, **EHAB ALLABABIDI**, pro se, and pursuant to the Illinois Post-Conviction Hearing Act, 725 ILCS 5/122-1 et seq., respectfully petitions this Court to vacate the judgment of conviction and sentence entered against him in Lake County case number 23 CF 1146, and in support states as follows:

***I. PARTIES AND JURISDICTION***

1. Petitioner is the defendant in *People v. Allababidi*, Lake County case number 23 CF 1146. On or about September 8, 2025, Petitioner entered a guilty plea in this case and the Court entered judgment and imposed sentence.

2. Petitioner is currently subject to the sentence and judgment in this case and his liberty is restrained thereby, within the meaning of 725 ILCS 5/122-1(a).

3. This is Petitioner's first petition for post-conviction relief under 725 ILCS 5/122-1 et seq..

4. Petitioner previously pursued direct review. He filed a notice of appeal on October 6, 2025, and the Illinois Appellate Court, Second District, opened Appeal No. 2-25-0440. On November 17, 2025, the Appellate Court entered an order denying Petitioner's motion for a limited remand under Supreme Court Rule 604(d) and dismissed the appeal solely on the basis that Petitioner had not filed a Rule 604(d) motion in the trial court.

5. This petition is timely under 725 ILCS 5/122-1(c). It is being filed within three (3) years of the judgment entered on or about September 8, 2025. Any delay is not due to his culpable negligence but to the pendency of his direct appeal, his pro se status, and his ongoing efforts to obtain discovery and records through the Freedom of Information Act (FOIA).

6. Petitioner brings this action because, in the proceedings that resulted in his conviction, there were substantial deprivations of his rights under the United States Constitution and the Illinois Constitution, including his rights to due process of law, the effective assistance of counsel, a knowing and intelligent guilty plea, and a meaningful right to appeal.

## **II. FACTUAL BACKGROUND**

7. The charges in 23 CF 1146 arise from a motor vehicle incident in Lake County, Illinois, in which the State alleged that Petitioner drove under the influence of drugs. The Aggravated Reckless Driving indictment alleged that the collision “resulted in great bodily harm” to a victim.

8. The State’s theory of guilt relied heavily on toxicology results. However, internal State communications dated August 11, 2022, revealed that a Lincolnshire Detective informed the State’s Attorney’s Office (SAO) that the emergency room lab report lacked specific amounts of Amphetamine and Benzodiazepines, leading the detective to state: “I believe it would be hard pressed to prove DUI drugs”. This communication reflecting material doubt was never disclosed to the defense.

9. Throughout the pendency of the criminal case, discovery was incomplete and materially misleading, thereby corrupting the guilty plea entered on September 8, 2025. Among the critical omissions:

- *Factual Basis Lacking at Indictment:* The indictment alleging great bodily harm was returned on June 14, 2023. Yet, the court minutes from that same date contain handwritten notes asking “WHAT ARE INJURIES?” and recording “NothiNg, in file – NO med RECS EtE”.
- *Ongoing Discovery:* Clerk-issued subpoenas and Qualified Protective Orders (QPOs) were still being issued as late as July 2024 to Advocate Condell Medical Center and the Lincolnshire-Riverwoods Fire Protection District, proving the State was actively securing core medical and EMS records thirteen months after indictment and shortly before plea discussions. This confirms discovery was “not complete when appellant entered his plea”.
- *Active Suppression Post-Plea:* In October 2025 FOIA responses, Petitioner learned for the first time that the State acknowledged possessing but withheld entire categories of materials, including “felony-review screening documents” and internal correspondence/memoranda, citing attorney work-product under Illinois Supreme Court Rule 412(j)(i).

10. The suppression of the internal doubt email and the concealment of felony-review documents and the incomplete medical records created a misleading picture of the evidence.

11. Petitioner’s decision to plead guilty on September 8, 2025, was based on this incomplete and inaccurate discovery. Had Petitioner known about the internal doubts regarding the ability to prove DUI-drugs, the existence of undisclosed medical, EMS, felony-review, and internal documents, he would not have pled guilty and would have insisted on going to trial.

12. Petitioner's subsequent direct appeal was dismissed on procedural grounds on November 17, 2025, based on his failure to file a Rule 604(d) motion. The Appellate Court stated that Petitioner did not offer the "only excuse that is legally actionable," which is the failure to give proper Rule 605 admonishments. Petitioner, being pro se, did not understand the requirement to file the Rule 604(d) motion as a jurisdictional precondition to appeal.

### **III. CONSTITUTIONAL CLAIMS FOR RELIEF**

#### **COUNT I – DUE PROCESS VIOLATIONS (BRADY AND INVOLUNTARY PLEA)**

13. Petitioner realleges and incorporates paragraphs 1–12 as though fully set forth herein.

14. The State failed to disclose material exculpatory and impeachment evidence, including but not limited to:

a. *Internal Doubt Email*: An August 11, 2022, email in which law enforcement acknowledged the emergency room lab report lacked specific amounts of controlled substances and concluded the State would be "hard pressed to prove DUI drugs".

b. *Factual Basis Flaw*: June 14, 2023, court minutes noting "Nothing in file – NO med RECS etc." at the time of the indictment alleging "great bodily harm".

c. *Active Suppression Post-Plea*: October 2025 FOIA responses acknowledging but withholding "felony-review screening documents," witness statements, and internal correspondence under Supreme Court Rule 412(j)(i).

d. *Incomplete Medical Discovery*: Judicial orders and subpoenas from July 2024 demonstrating that essential medical and EMS records related to the element of "great bodily harm" were still being secured well over a year after indictment.

15. This suppression violated Petitioner's right to due process of law under *Brady v. Maryland*. The evidence is material because it directly undermines the viability of the DUI-drugs charge and impeaches the State's case strength.

16. Petitioner's plea was not knowing, intelligent, or voluntary because it was entered without knowledge of this suppressed, material evidence. Had Petitioner known the true state of the evidence, he would not have pled guilty.

#### **COUNT II – INEFFECTIVE ASSISTANCE OF COUNSEL (IAC)**

17. Petitioner realleges and incorporates paragraphs 1–16 as though fully set forth herein.

18. Petitioner was denied the effective assistance of counsel guaranteed by the Sixth Amendment to the United States Constitution and article I, section 8 of the Illinois Constitution, in that trial counsel failed to perform an objectively reasonable investigation and failed to protect Petitioner's rights.

19. Specifically, counsel's deficient performance included:

a. *Failure to Secure Complete Discovery*: Counsel failed to ensure discovery was complete before the September 8, 2025, plea, evidenced by the fact that the State was still issuing QPOs

and subpoenas for medical/EMS records in July 2024.

b. *Failure to Investigate Key Evidence:* Counsel failed to investigate or obtain the August 11, 2022, internal communication acknowledging that the State would be “hard pressed” to prove DUI-drugs without quantitative toxicology.

c. *Failure to Challenge Technical Data:* Counsel failed to pursue native digital evidence (e.g., the raw .CDRX image, audit logs, and metadata requested on October 22, 2025) necessary to independently verify the State’s critical speed estimate of 116–120 mph segment speed and 124–125 mph EDR peak.

d. *Failure to Preserve Appellate Rights:* Counsel failed to file a timely, written Rule 604(d) motion to withdraw the guilty plea, which directly resulted in the dismissal of Petitioner’s appeal on November 17, 2025.

20. But for counsel’s deficient performance, there is a reasonable probability that Petitioner would not have pled guilty or, at minimum, would have had meaningful appellate review.

### ***COUNT III – DENIAL OF MEANINGFUL RIGHT TO DIRECT APPEAL***

21. Petitioner realleges and incorporates paragraphs 1–20 as though fully set forth herein.

22. Petitioner was not properly admonished under Supreme Court Rule 605(c) concerning his obligation to file a Rule 604(d) motion as a precondition to appeal.

23. Because of deficient Rule 605 admonishments and counsel's failure to file a 604(d) motion, the Appellate Court summarily dismissed his direct appeal on November 17, 2025. The Appellate Court expressly cited *People ex rel. Alvarez v. Skryd* and refused to acknowledge any excuse other than defective Rule 605 admonishments.

24. This combination deprived Petitioner of his due process right to a meaningful direct appeal and to the effective assistance of counsel through the first tier of appellate review. Petitioner has never had judicial review of his claims of suppression and incomplete discovery that corrupted his plea.

### ***IV. REQUEST FOR EVIDENTIARY HEARING***

25. Petitioner’s claims rely on substantial evidence outside the trial record, including internal State emails (August 11, 2022), FOIA responses (October 2025), subpoenas (July 2024), and court minutes (June 14, 2023). These claims require factual development and an evidentiary hearing.

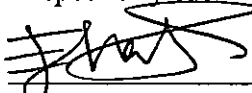
26. Petitioner requests that this Court advance this petition to second and third stages, appoint counsel if required by law, and conduct an evidentiary hearing.

### ***V. PRAYER FOR RELIEF***

WHEREFORE, Petitioner, EHAB ALLABABIDI, respectfully prays that this Honorable Court:

- A. Find that the Petitioner has made a substantial showing that his constitutional rights were violated in the proceedings leading to his conviction in case 23 CF 1146;
- B. Vacate the judgment of conviction and sentence, allow Petitioner to withdraw his guilty plea, and restore the case to a pre-plea posture;
- C. In the alternative, grant an evidentiary hearing, further discovery, or modification of sentence; and
- D. Grant any additional relief that this Court deems just and proper.

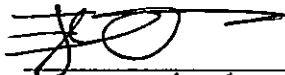
Respectfully submitted,



EHAB ALLABABIDI, Petitioner, pro se  
8516 W. Winona Street  
Chicago, Illinois 60656  
Phone: (773) 920-0030  
Email: defcon5ready@gmail.com

#### VERIFICATION

I, EHAB ALLABABIDI, certify under penalty of perjury pursuant to 735 ILCS 5/1-109 that I have read this Petition for Post-Conviction Relief and that the facts stated herein are true and correct to the best of my knowledge, information, and belief.



Date: 11/19/2025  
EHAB ALLABABIDI

#### CERTIFICATE OF SERVICE

I, EHAB ALLABABIDI, certify that on \_\_\_\_\_, 2025, I served a copy of this PETITION FOR POST-CONVICTION RELIEF by depositing it in the United States mail, postage prepaid, or by other authorized method of service, addressed to:

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

FILED

NOV 25 2025

U.S. COURT OF APPEALS  
CIRCUIT CLERK



**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: December 11, 2025 9:00 AM  
Event Type: Motion Of Defense  
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**

Nicholas Shepherd, States Attorney  
Christopher R Stride, Judge  
Francis P Derosa, States Attorney  
ECR Specialist, Lake County Court Reporters

**Present in Court**

ALLABABIDI, EHAB, Appellant, Defendant present in person

**Nature of Proceedings:**

Event Result: Heard 12/11/2025.

**The matter is set for Status on 01/26/2026 at 9:00 AM in Courtroom 611. OF MOTION.**  
MOTION ENTERED AND CONTINUED  
Release



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

People	)	
	)	
Plaintiff,	)	Case No. 23CF00001146
v.	)	Location: Courtroom 611
	)	Event Date: January 26, 2026 9:00 AM
PEOPLE VS ALLABABIDI	)	Event Type: Status
Defendant.	)	OF MOTION
	)	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**

Nicholas Shepherd, States Attorney  
ECR Specialist, Lake County Court Reporters  
Christopher R Stride, Judge

**Present in Court**

ALLABABIDI, EHAB, Appellant, Defendant present via video

**Nature of Proceedings:**

Event Result: Heard and Continued 01/26/2026.

**The matter is set for Status on 03/10/2026 at 9:00 AM in Courtroom 611. OF MOTION - HEARING - IN PERSON.**

Release



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

	)		
	)		
People	)		
	)	Case No.	23CF00001146
Plaintiff,	)	Location:	Courtroom 611
v.	)	Event Date:	March 10, 2026 11:00 AM
	)	Event Type:	Status
PEOPLE VS ALLABABIDI	)	OF MOTION - HEARING - IN PERSON	
Defendant.	)	Clerk:	Johanna B
_____	)		

**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Guilty  
09/08/2025

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Nolle Prosequi  
09/08/2025

**Criminal/Traffic - Minutes**

Nicholas Shepherd, States Attorney  
ECR Specialist, Lake County Court Reporters  
Christopher R Stride, Judge

**Present in Court**

**Nature of Proceedings:**

Event Result: Case Called 03/10/2026.  
STRICKEN FROM CALL - NO SHOW

# ADMINISTRATIVE OFFICE OF THE NINETEENTH JUDICIAL CIRCUIT

**FILED**

18 DEC 26 2019 AOC



Erin Cartwright  
Clerk of the Court  
Lake County, Illinois

Division of Adult Probation Services

Lake County, Illinois

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

## MEMORANDUM

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

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

2. Defendant is assessed \$2,531.00 in court cost and fees. The defendant has an outstanding balance of \$1,131.00.
4. Defendant tested positive for Amphetamines on 11/20/25. Defendant has not provided an updated prescription.
12. Defendant failed to report to probation on the following dates: 02/19/26, 02/27/26, 03/10/26, 03/11/26 & 03/26/26.
19. Defendant failed to complete 240 public service hours.
23. Defendant failed to complete the victim impact panel.

RECOMMENDATION:  REQUEST THAT PETITION BE FILED  
 Request hearing to determine status of case with Court  
 Take no action  
 Other/Comments: \_\_\_

COPY: Judge  
Defense Attorney  
Probation File

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

Approved By: LORI CARRIER

AOC-3-36-18-R-0399

**FILED**

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STATE OF ILLINOIS )  
 ) SS  
COUNTY OF LAKE )

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

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

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
 )  
VS. )  
 )  
 )  
EHAB ALLABABIDI )

GENERAL NO: 23CF1146

NOTICE

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

On **May 28<sup>th</sup>, 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



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

Erin Cartwright Weinstein  
Clerk of the Court  
Lake County, Illinois

PEOPLE OF THE STATE OF ILLINOIS

vs.

**EHAB ALLABABIDI**

GEN. NO. 23CF00001146

**PETITION FOR REVOCATION**

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

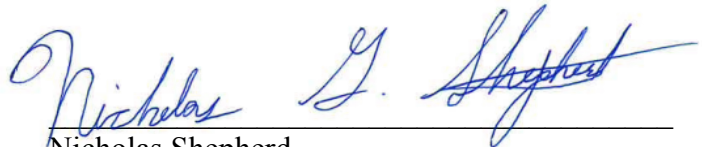
1. That on or about September 8, 2025, the defendant was placed on 30 months of probation, for the offense of AGG RECKLESS DRVG/BODILY HARM, a Class 4 Felony.
2. That the defendant's probation, includes the following condition(s):
  - A. The defendant shall pay all fines, fees, court costs, assessments,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

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

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

ERIC F. RINEHART

LAKE COUNTY STATE'S ATTORNEY



Nicholas Shepherd  
Assistant State's Attorney

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



NOTARY PUBLIC





**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



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

THE PEOPLE OF THE STATE OF ILLINOIS

CASE  
NUMBER(S)

23CF00001146

VS.

EHAB ALLABABIDI  
8516 W. WINONA ST.  
CHICAGO, IL 60656

**WARRANT OF ARREST - VIOLATION**

To all Peace Officers of the State of Illinois:

You are hereby commanded to arrest **EHAB ALLABABIDI** and bring said person without unnecessary delay before the judge sitting in First Appearance Court in the Circuit Court of the 19th Judicial Circuit, Lake County, Illinois, to answer a charge made against said person for a technical violation while on for the following offense(s):

AGG RECKLESS DRVG/BODILY HARMSPEEDING 35+ MPH OVER LIMIT

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

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

JUDGE

PD APPOINTED  
ARRESTING  
AGENCY:  
Lincolnshire



DOB: 09/24/1996	Race:	Sex: Male	Hair: Brown	Eyes: Brown	HGT: 6	WGT: 200
Driver's License: A41120096272	DL State: IL	SSN:	State ID:			
Vehicle Reg:	Veh Make:	Year:	License Plate:			



**FILED**

JUN 15 2026

*Em. Courtney 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,*

General No.: 23 CF 1146

v.

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

**EHAB ALLABABIDI,**  
*Defendant-Petitioner, Pro Se.*

**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

<b>THE PEOPLE OF THE STATE OF ILLINOIS,</b> <i>Plaintiff-Respondent,</i>	General No.: <b>23 CF 1146</b>
v.	Judge: <i>Hon. Christopher Stride, Courtroom T-611</i>
<b>EHAB ALLABABIDI,</b> <i>Defendant-Petitioner, Pro Se.</i>	<b>EMERGENCY NOTICE OF MOTION</b>

**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

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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

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

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**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**

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**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

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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

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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:

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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. Cronic*, 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. Cronic*, 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

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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

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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.

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**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
<b>Apr. 13, 2026</b>	<b>Federal habeas deadline set</b>	State ordered to answer by June 5 in both habeas cases
<b>May 14, 2026</b>	<b>Revocation petition filed</b>	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
<b>May 28, 2026</b>	<b>No-bond warrant issued at 9:00 AM</b>	8 days before federal deadline; no PC hearing
<b>June 6, 2026</b>	<b>Two execution attempts (1:03 PM, 5:51 PM)</b>	Doorbell camera confirmed; federal § 1983 filed 6/6/2026

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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**

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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**

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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;

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- (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

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**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

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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](mailto: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](http://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*

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**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

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## **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).

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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,

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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.

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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

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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

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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

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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.”

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## 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	<b>Federal habeas deadline set</b>	June 5, 2026 response date in both habeas cases
Apr. 28, 2026	AG files Non-Involvement	Local Defendants left unprotected
<b>May 14, 2026</b>	<b>Revocation petition filed</b>	<b>31 days after deadline; false drug allegation</b>
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
<b>May 28, 2026</b>	<b>7:00 AM: Fraud Notice sent</b>	<b>Exculpatory evidence served 2 hrs before hearing</b>
<b>May 28, 2026</b>	<b>9:00 AM: Warrant executed</b>	<b>8 days before June 5 federal deadline</b>
May 29, 2026	Cervantes lure letter	First contact after 100 days of concealment (Exhibit 7)

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## VI. CLAIMS FOR RELIEF

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### COUNT I: FIRST AMENDMENT RETALIATION

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

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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.

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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

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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)*

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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

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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)*

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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.

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(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)**

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*(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

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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.

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(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

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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.

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## **IX. PRAYER FOR RELIEF**

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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**

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(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

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**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

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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\_\_\_\_

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## EXHIBIT PACKET

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

Exhibit B  
(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

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### 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.

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*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

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# 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>  
To: Ehab Hilfiger <defcon5ready@gmail.com>

Wed, Dec 10, 2025 at 10:32 PM

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*



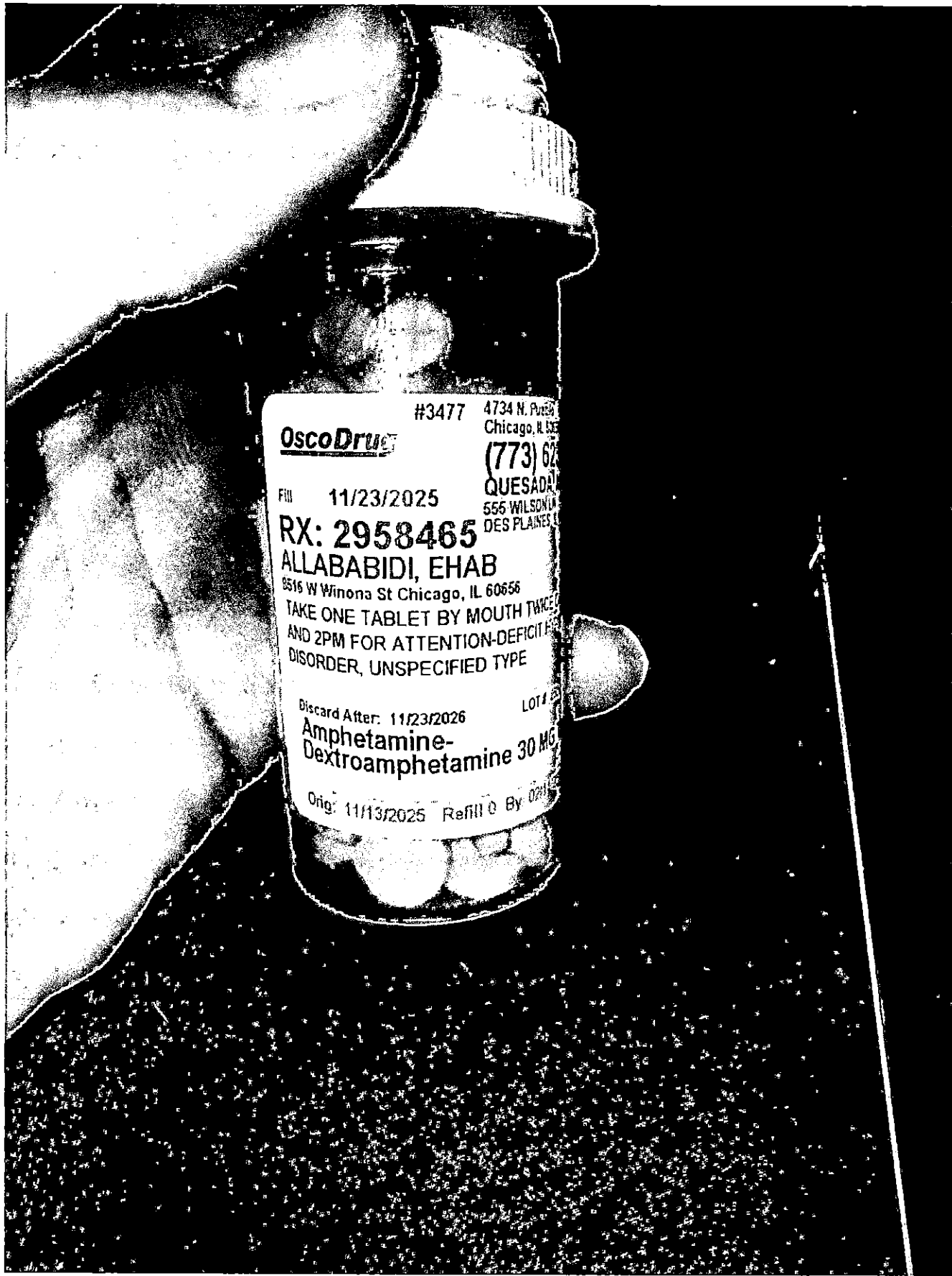
**From:** Ehab Hilfiger <defcon5ready@gmail.com>  
**Sent:** Wednesday, December 10, 2025 1:40 PM  
**To:** Adison Weeks (Adult Probation) <Adison.Weeks@cookcountyil.gov>  
**Subject:** Re: Prescription Verification & Compliance Letter

**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 exculp  
c months before Defendant Shepherd swore the opposite under oath. This independently establishes Count II (Fabrication of Evidence) and the bad-faith element c*



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 (tcfcon5ready@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 executed months before Defendant Shepherd swore the opposite under oath. This independently establishes Contm II (Fabrication of Evidence) and the bad-faith element*

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 months before Defendant Shepherd swore the opposite under oath. This independently establishes Count II (Fabrication of Evidence) and the bad-faith element.*

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 23<sup>rd</sup> @ 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

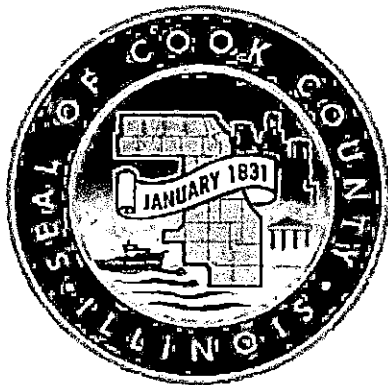
2121 Euclid Ave

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 executed months before Defendant Shepherd swore the opposite under oath. This independently establishes Count II (Fabrication of Evidence) and the bad-faith element c*

**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 executed months before Defendant Shepherd swore the opposite under oath. This independently establishes Count II (Fabrication of Evidence) and the bad-faith element.*

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

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## 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. )  
 )  
 )  
EHAB ALLABABIDI )

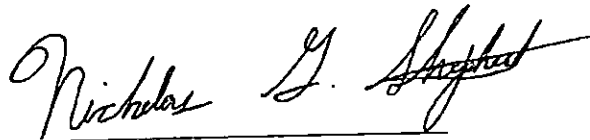
GENERAL NO: 23CF1146

NOTICE

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

On May 28<sup>th</sup>, 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

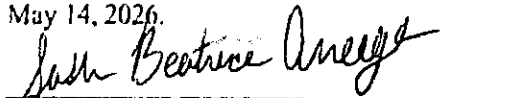
STATE OF ILLINOIS )  
 ) SS  
COUNTY OF LAKE )

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 retention 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:**

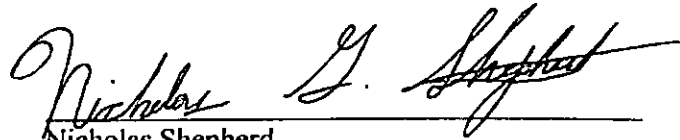
*This exhibit is a true and correct copy of the Petition for Revocation and Notice of Arraignment obtained by Plaintiff from Lake County Circuit Court records on or about May 14, 2026. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.*  
*SMOKING GUN EXHIBIT 2. The 8-day interval between May 28 (arraignment) and June 5 (federal habeas deadline) is the central mathematical proof of retrospective 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

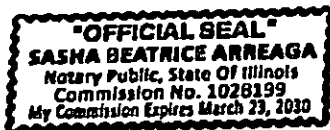


Nicholas Shepherd  
Assistant State's Attorney

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

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## 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**

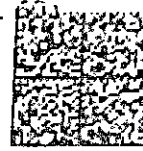
*This exhibit is a true and correct scan of the original envelope received by Plaintiff on or about May 21, 2026, bearing the Lake County State's Attorney's return address, the Pitney Bowes postage meter stamp, and the USPS processing barcode. Plaintiff certifies under penalty of perjury that this record 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

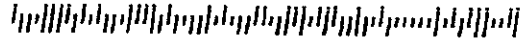
CAROL STREAM IL  
 18 MAY 2026PM 4



US POSTAGE  
 ZIP 60085 \$ 000.74<sup>0</sup>  
 02 49  
 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 shows 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

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## 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 &lt;defcon5ready@gmail.com&gt;

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

1 message

Ehab Hilfiger &lt;defcon5ready@gmail.com&gt;

Thu, Feb 19, 2026 at 10:59 PM

To: "Matthew T. Junkin" &lt;mjunkin@lakecountyl.gov&gt;, "Destiny Lee (Adult Probation)" &lt;destiny.lee@cookcountyl.gov&gt;

Cc: Lake County State's Attorney &lt;statesattorney@lakecountyl.gov&gt;, Circuit Clerk &lt;circuitclerk@lakecountyl.gov&gt;

### 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 Fontana was served with this notice 84 days before the warrant executed and did nothing — establishing ratification through deliberate inaction.*

Page 284 of 316

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 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

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## 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.*



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

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## 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**

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*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 Corvantes 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):

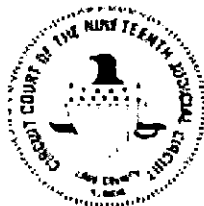
**AGG RECKLESS DRVG/BODILY HARMSPEEDING 35+ MPH OVER LIMIT**

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

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

JUDGE

PD APPOINTED  
ARRESTING  
AGENCY:  
Lincolnshire



DOB: 09/24/1996	Race:	Sex: Male	Hair: Brown	Eyes: Brown	HGT: 6	WGT: 200
Driver's License: A41120096272	DL State: IL	SSN:	State ID:			
Vehicle Reg:	Veh Make:	Year:	License Plate:			

**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 on, Defendant Cervantes concealed her identity to manufacture a default, and Defendant Fontana failed to intervene despite actual notice. It proves the deprivation.*



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

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## 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 3610

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](mailto:mcervantes@lakecountyil.gov)

Sincerely,

A handwritten signature in black ink, appearing to read "Marisa Cervantes".

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 received 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

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## 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, tampered with, or destroyed. This document establishes that all Defendants had actual written knowledge of the Napue violation, the identity concealment, and the PROVES ACTUAL NOTICE. This document establishes that all Defendants had actual written knowledge of the Napue violation, the identity concealment, and the s before they executed the warrant. This defeats any claim of qualified immunity or good-faith belief. Independently establishes the "knowledge" element of Com*

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 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 spoliation before they executed the warrant. This defeats any claim of qualified immunity or good-faith belief. Independently establishes the "knowledge" element of Count*

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 is not a copy of a copy, and that it is a true and correct copy of the original. 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 facts before they executed the warrant. This defeats any claim of qualified immunity or good-faith belief. Independently establishes the "knowledge" element of Count*

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 deleted. 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 s before they executed the warrant. This defeats any claim of qualified immunity or good-faith belief. Independently establishes the "knowledge" element of Count*

The State's conduct constitutes a textbook violation of the supervisory duty imposed by 730 ILCS 5/5-6-4(c). The statute does not merely require that a defendant fail to report; it requires that the State prove such failure was **willful**. Where the State's own agent actively conceals her identity on the first contact date, affirmatively downgrades the reporting directive from a command to a discretionary "appreciation," generates zero calls during a four-hour window expressly established for compliance, and then remains absolutely silent for 60 days before filing a revocation petition, the element of willfulness is not merely unproven — it is structurally impossible.

### **B. The Pretextual Paper Trail & Refusal of Digital Vectors**

The State cannot cure its supervisory abandonment by relying on generic, physical mail ultimatums demanding in-person reporting. The State possesses actual, written notice that physical transit was rendered structurally impossible due to documented vehicle sabotage (Predicate Act 6; Case No. 1:25-cv-15800, Dkt. 30, ¶ 87; Dkt. 43).

Despite possessing Petitioner's verified, continuously active telephone number and email address, Cook County and Lake County probation agents initiated zero telephonic contacts and sent zero digital notifications. Sending physical mail demanding an impossible physical act, while actively refusing to utilize functional, direct telephonic and digital communication vectors, constitutes the deliberate manufacturing of a pretextual paper trail. The burden of supervision rests with the State; the State cannot intentionally bypass available, functional communication channels and subsequently claim a "willful" failure to report.

## **IV. CONSEQUENCES OF FAILURE TO PRESERVE**

Failure to preserve any data point identified in the Preservation Matrix above will be documented as active spoliation of evidence and submitted in support of the following relief, which Petitioner will seek from the coordinate federal tribunals:

**Adverse Inference Instructions.** Under Fed. R. Civ. P. 37(e)(2), where electronically stored information that should have been preserved is lost because a party failed to take reasonable steps to preserve it, and the court finds that the party acted with the intent to deprive another party of the information's use, the court may presume that the lost information was unfavorable to the party that failed to preserve it. *Parker v. City of Chicago*, 2005 WL 1384056, at \*4-5 (N.D. Ill. May 20, 2005) (adverse inference instruction for spoliation of ESI).

**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 is the original document, modified litigation hold: Lake County Evidence Preservation PROVES ACTUAL NOTICE. This document establishes that all Defendants had actual written knowledge of the Napve violation, the identity concealment, and the s before they executed the warrant. This defeats any claim of qualified immunity or good-faith belief. Independently establishes the "knowledge" element of Count*

**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 or modified. 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 s before they executed the warrant. This defeats any claim of qualified immunity or good-faith belief. Independently establishes the "knowledge" element of Count*

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 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 1 s before they executed the warrant. This defeats any claim of qualified immunity or good-faith belief. Independently establishes the "knowledge" element of Con*

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**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 Nupue violation, the identity concealment, and the s before they executed the warrant. This defeats any claim of qualified immunity or good-faith belief. Independently establishes the "knowledge" element of Coun.*

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

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## 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:**

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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  
I would make the court a participant in federal witness tampering. The warrant issued anyway. This independently corroborates the "bad faith" element of Court*

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. PROTES 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 I would make the court a participant in federal witness tampering. The warrant issued anyway. This independently corroborates the “bad faith” element of Coun.*

**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 exhibit 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 Nupur violation t would make the court a participant in federal witness tampering. The warrant issued anyway. This independently corroborates the "bad faith" element of Court*

(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 for 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 would make the court a participant in federal witness tampering. The warrant issued anyway. This independently corroborates the "bad faith" element of Court*

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 recital has not been modified or altered 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 that would make the court a participant in federal witness tampering. The warrant issued anyway. This independently corroborates the "bad faith" element of Count*

## **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

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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. The Notice explicitly identified the Nape violation PROVES STATE COURT WAS WARNED. Filed at 8:00 AM on May 28, before the 9:00 AM warrant hearing. The warrant issued anyway. This independently corroborates the "bad faith" element of Court*

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

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## 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(e).

#### 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 &lt;defcon5ready@gmail.com&gt;

**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 &lt;defcon5ready@gmail.com&gt;

Thu, May 28, 2026 at 7:00 AM

To: Circuit Clerk &lt;CircuitClerk@lakecountyil.gov&gt;, courts@lakecountyil.gov, Lake County State's Attorney &lt;statesattorney@lakecountyil.gov&gt;, nshepherd@lakecountyil.gov

Cc: "Destiny Lee (Adult Probation)" &lt;destiny.lee@cookcountyil.gov&gt;, "Matthew T. Junkin" &lt;mjunkin@lakecountyil.gov&gt;, 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

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## 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 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*

**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:**

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**FILED**

**JUN 15 2026**

*Eric Cantor*  
**CIRCUIT CLERK**



Ehab Hilfiger &lt;defcon5ready@gmail.com&gt;

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**Response to Request for Assistance**

1 message

**Bailey Russell** <BRussell@lakecountyiil.gov>

Mon, Jun 15, 2026 at 7:24 PM

To: "defcon5ready@gmail.com" &lt;defcon5ready@gmail.com&gt;

Cc: "Gregory C. Ticsay" &lt;GTicsay@lakecountyiil.gov&gt;

Dear Ehab,

We have reviewed our records that show that you proceeded pro se on October 6, 2025.

Since that date our office has not been reappointed to represent you. This is the reason we have not responded. We do not represent you at this time.

Regarding the clerk refusing to accept your pleadings, the clerk is incorrect in believing that we are the attorney of record at this time.

Sincerely,

Bailey C. Russell

Erin Cartwright Weinstein  
Clerk of the Court  
Lake County, Illinois

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     )  
  )  
  )     General No. 23CF1146  
  )  
  )  
Ehab Allababidi                                    )

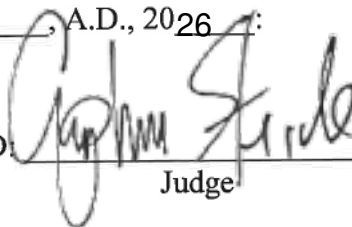
**ORDER**

**Public Defender Withdraw/Discharge**

**It is Hereby Ordered** that the Lake County Public Defenders is discharged as attorney of record in the above-entitled cause;

Nunc pro tunc to October 6, 2025

Dated at Waukegan, Illinois, this 17 day of June, A.D., 2026:

ENTERED:   
Judge

- Pursuant to a hearing held in this matter, a Public Defender Fee in the amount of \$ \_\_\_\_\_ is hereby ordered.
- Pursuant to a hearing held in this matter, it has been determined that no Public Defender Fee shall be assessed.



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

	)		
	)		
People	)	Case No.	23CF00001146
	)	Location:	Courtroom 611
Plaintiff,	)	Event Date:	June 17, 2026 9:00 AM
v.	)	Event Type:	Status
	)		
PEOPLE VS ALLABABIDI	)	Clerk:	Johanna B
Defendant.	)		

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**Charge(s):**

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Guilty  
09/08/2025

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Nolle Prosequi  
09/08/2025

**Criminal/Traffic - Minutes**

Christopher R Stride, Judge  
ECR Specialist, Lake County Court Reporters  
Nicholas Shepherd, States Attorney  
Bailey Russell, Public Defender

**Present in Court**

ALLABABIDI, EHAB, Appellant, Defendant present via video

**Nature of Proceedings:**

Event Result: Heard 06/17/2026.  
Public Defender Discharged  
WARRANT WILL NOT BE QUASHED  
Oral Motion  
TO LIFT STAY ON JAIL SENTENCE  
Granted  
Order Entered

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

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

PEOPLE OF THE STATE OF ILLINOIS

vs.

**EHAB ALLABABIDI**

GEN. NO. 23CF00001146

**ORDER**

This matter coming before this Honorable Court with the Court being fully advised of the premises. It is so ordered:

1. The stay of the 180 day Lake County Jail term of the defendant's sentence is hereby lifted.

Enter:

Dated: June 17, 2026



JUDGE