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FILED
6/11/2026
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

EHAB ALLABABIDI,
Plaintiff, Pro Se,

Case No.: **1:26-cv-06738**

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,
Defendants.

Judge: *Hon. Matthew F. Kennelly*
Magistrate: *Hon. Karyn L. Bass Ehler*

EVIDENTIARY NEXUS DOSSIER

PLAINTIFF'S AUTHENTICATED EVIDENTIARY NEXUS DOSSIER

A Bates-Cited Presentation of the State's Own Records Establishing Fabricated Bodily Harm, a Misrepresented Toxicology Result, and Retaliatory Timing in People v. Allababidi, No. 23 CF 1146 (19th Jud. Cir., Lake County, Illinois)

(SUPPLEMENTAL EVIDENCE SUBMISSION — SUBMITTED FOR EVIDENTIARY PURPOSES ONLY)

NOTICE OF SCOPE AND PURPOSE — STRICTLY EVIDENTIARY SUBMISSION

This Dossier is submitted **strictly and exclusively for evidentiary purposes**. It is a supplemental evidence submission that compiles, indexes, and authenticates documentary materials for the record. It is **not** a motion. Given the preliminary posture of this action, Plaintiff does **not** request judicial notice, any evidentiary ruling, or any other relief by way of this filing, and nothing herein should be construed as such a request. Plaintiff reserves the right to move for judicial notice, admission, or other appropriate relief at the proper procedural stage.

Plaintiff has previously filed his **Verified Evidentiary Manifest** and his **Evidentiary Correction Notice**, both already submitted to this Court. This Dossier does not duplicate or supersede those filings; it supplements them. The prior filings authenticated the Cook County probation correspondence and corrected the verbatim record quotations; this Dossier adds what was not previously before the Court — the Bates-cited Lake County discovery production, the native state-court orders, and the authenticated key exhibits drawn page-for-page from that production — material necessary to complete the documentary record in this case.

Where this Dossier characterizes the legal significance of a document, that characterization is offered solely to explain the document's evidentiary relevance to the claims pleaded in the Complaint [Doc. 1]; the underlying documents speak for themselves.

I. INTRODUCTION AND EVIDENTIARY METHOD

Plaintiff EHAB ALLABABIDI submits this Dossier in support of his Complaint [Doc. 1]. Its purpose is narrow and disciplined: to show, **using the State’s own discovery and court records**, that the conviction and the pending revocation in Lake County Case No. 23 CF 1146 rest on (a) a felony bodily-harm charge the State indicted while its own file recorded that there were no medical records of any injury, and (b) a toxicology result the State characterized in 2026 as an “illegal substance” even though its own laboratory could not quantify the sample and its own supervising probation officer had already verified the result as the lawful product of a prescription.

Every factual assertion below is tied to a specific page of the 382-page Lake County production (cited by its Bates number, “FPD #####”) or to a dated, file-stamped order of the Circuit Court. The authenticated key documents are reproduced as Exhibits A through J and indexed in Section VIII; the full Bates production is identified in the Master Index at Section VII and is available for the Court’s inspection in its entirety. Plaintiff has separated what the documents prove (Sections III—IV) from the inferences he draws about retaliatory motive (Section VI), so that the documentary core stands on its own.

EXECUTIVE SUMMARY OF IRRECONCILABLE CONTRADICTIONS IN STATE RECORDS:

- ***Indicted for Felony Bodily Harm (6/14/23) vs. State File Contains “NO med REES” [No Medical Records] (6/14/23) (showing the felony bodily-harm element was indicted on an empty file).***
- ***LPD Press Release claims “Life Threatening Injuries” / “Intensive Care” vs. Det. Petrick Same-Day Hospital Report: “Neither driver had life threatening injuries”.***
- ***State Sentencing Order (9/8/25) Mandates Restitution strictly to Landscaping Corporation vs. \$0.00 Restitution to any Human Victim (corroborating that no human victim was awarded compensation for bodily harm).***
- ***ASA Shepherd Swears under oath to “Amphetamine (illegal substance)” (5/14/26) vs. PO Weeks Written Verification clearing ADHD Adderall Prescription (12/10/25) (supporting a Franks/Napue inference of knowing falsity in the procurement of a zero-bond warrant).***
- ***State files Revocation Petition (5/14/26) vs. Compliant drug test completed (11/10/25) (a 185-day delay, deployed exactly 31 days after the federal court’s habeas response order).***

II. CHRONOLOGY (EACH ENTRY KEYED TO THE RECORD)

Date	Event	Record Source
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05/23/2022	Three-vehicle crash on IL Route 22, Lincolnshire (LPD 2022-7193). Det. Petrick reports the same day from the hospital: “neither driver had life threatening injuries”.	Petrick supplement; FPD 00025 (Ex. F)
05/2022	LPD press release nonetheless announces both drivers were transported “with life threatening injuries” and “are currently in intensive care”.	LPD press release; FPD 00017 (Ex. F)
06/13/2022	Crime-lab toxicology: blood negative for ethanol; urine detected amphetamine; “insufficient sample volume” so testing could not be completed and no quantity reported.	NE Ill. Regional Crime Lab Rpt #1, Lab 22-2139; FPD 00042-43 (Ex. C)
08/11/2022	Det. Petrick emails ASA Dillon: lab “does not offer a specific amount” and it would be “hard pressed to prove DUI drugs”.	Petrick—Dillon email; Prod. Vol. I, p. 1 (Ex. A)
10/05/2022	ASA Dillon emails Petrick: complete the CDR/reconstruction training, then “We’ll issue the arrest warrant then”.	Dillon—Petrick email; Prod. Vol. I, pp. 25-26, at FPD 00125 (Ex. B)
06/14/2023	Grand Jury indicts Count 1 Aggravated Reckless Driving causing great bodily harm (Class 4). Court minutes note: “WHAT ARE INJURIES? Nothing, in file — NO med REES”.	Indictment FPD 00001-03; Court Minutes 6/14/2023 (Ex. D)
07/01-02/2024	State first obtains HIPAA qualified protective orders and issues subpoenas for the Condell medical records — more than a year AFTER the great-bodily-harm indictment.	Orders filed 7/1/2024; subpoenas of 7/2/2024 (Ex. H)
07/11/2024	EMS agency (Lincolnshire-Riverwoods FPD) certifies it does “not have the records describe[d] in the records request”.	Certification of Records; FPD 00127 (Ex. E)
09/08/2025	Guilty finding on Count 1; Count 2 nolle prosequi. Restitution of \$2,670.86 ordered to O’Brien Landscape; financial sentencing order entered.	Sentencing & Restitution Orders 9/8/2025 (Ex. I)
10/02-06/2025	Plaintiff, still unable to retain counsel, files a handwritten motion and sworn affidavit to stay his license revocation, and a pro se Notice of Appeal; minutes note “Defendant Proceeds Pro Se”.	Pro se filings of 10/2, 10/3 & 10/6/2025 (Exs. I, J)
11/10/2025	Urine screen detects amphetamine (metabolite of Plaintiff’s lawful Adderall prescription).	Cook County probation record; Complaint [Doc. 1]
11/12/2025	Plaintiff moves to waive transcript/record fees, obtain native-format discovery, and to ORDER his former public defender to surrender his complete client file within 14 days.	Fee-waiver/client-file motion, filed 11/12/2025 (Ex. J)
12/08/2025	Cook County PO Weeks to Plaintiff: “your drug test results were all negative”; no further testing required.	Weeks correspondence (Doc. 1; Manifest; Correction Notice)
12/10/2025	Weeks to Plaintiff: “positive for amphetamine, but it is all negative in my eyes because I know you are still taking the Adderall”.	Weeks correspondence (Doc. 1; Manifest; Correction Notice)
05/14/2026	ASA Nicholas Shepherd swears Petition for Revocation alleging Plaintiff tested positive for “Amphetamine (illegal substance)”.	Petition for Revocation, 23 CF 1146 [Doc. 1]
05/2026	No-bond arrest warrant issues on the Shepherd petition; warrant remains outstanding.	State warrant record; Omnibus Filing (companion)
06/2026	Plaintiff files this § 1983 action (1:26-cv-06738).	Complaint [Doc. 1]

III. THE ORIGINAL CONVICTION: A FELONY BODILY-HARM CHARGE INDICTED WITH NO RECORD OF INJURY

A. No probable cause for impairment — admitted in writing. The State’s own crime laboratory reported that the blood exhibit failed to detect ethanol and that the urine exhibit, while showing amphetamine, carried “insufficient sample volume” so that “testing could not be completed” and no quantity was reported. (NE Ill. Regional Crime Lab Report #1, Lab Case 22-2139; FPD 00042—00043, Ex. C.) The lead investigator, Detective Paul Petrick, told ASA Benjamin Dillon in writing on August 11, 2022 that “[t]his lab report does not offer a specific amount [sic]; just Amphetamine and

1 Benzodiazepines” and that “it would be hard pressed to prove DUI drugs”. (Prod. Vol. I, p. 1, Ex. A.)
2 Under Illinois forensic standards and evidentiary law, a qualitative screening result indicating the mere
3 presence of amphetamine without a quantitative measurement is legally insufficient to establish
4 impairment. Against that backdrop, the defendants’ subsequent sworn assertions characterizing the
5 result as a verified positive for an “illegal substance” evince a reckless disregard for the limits of the
6 forensic record and support a strong inference of knowing misrepresentation to the court.

7 **B. The decision to charge a felony was strategic, not evidentiary, stripping absolute immunity.** On
8 October 5, 2022, ASA Benjamin Dillon emailed Detective Petrick that after the crash-reconstruction
9 training was complete, “We’ll issue the arrest warrant then”. (Prod. Vol. I, pp. 25-26, at FPD 00125,
10 Ex. B.) This pre-indictment instruction constitutes an investigative, administrative directing of
11 Detective Petrick’s active investigation, rather than an advocacy-based charging decision. By stepping
12 into the role of a “complaining witness” or an “investigative administrative supervisor”—specifically
13 by overriding or re-characterizing the laboratory’s explicit finding of “insufficient sample volume” into
14 a definitive allegation of impairment under oath, the prosecutor acted entirely outside the traditional
15 advocacy function. Under *Buckley v. Fitzsimmons*, 509 U.S. 259 (1993), and *Kalina v. Fletcher*, 522
16 U.S. 118 (1997), such pre-indictment investigative and administrative acts fall outside the courtroom
17 advocacy function, stripping the prosecutor of the shield of absolute immunity and exposing him to
18 qualified liability for the deliberate fabrication of evidence.

19 **C. The great-bodily-harm element was indicted on an empty file.** To elevate the crash to a Class 4
20 felony under 625 ILCS 5/11-503(a)(1)(d), the State had to show a victim suffered great bodily harm.
21 The Grand Jury returned a True Bill on June 14, 2023 (FPD 00001—00003, Ex. D), yet the
22 contemporaneous Court Minutes of that very date record, in the notes field:

23 *“WHAT ARE INJURIES? Nothing, in file — NO med REES [medical records] etc. Per R[ep]t to*
24 *Petrick “broken bones” “compound fx.”” (Handwritten notes field; reproduced at Ex. D.)*

25 The State thus obtained a felony bodily-harm indictment on second-hand, file-less hearsay —
26 “Report to Petrick” — while its file contained no medical records of any injury. Consistent with that
27 vacuum, the Lincolnshire-Riverwoods Fire Protection District later certified, through its records
28 custodian, that “this facility [does] not have the records describe[d] in the records request” (FPD 00127,
00133, Ex. E), and the crash reconstruction itself describes Plaintiff’s injuries as “non-life-threatening”
(FPD 00053, Ex. F).

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D. The State’s own records contradict each other on the injuries. The Lincolnshire Police press release announced that both the Lexus and van drivers were transported “with life threatening injuries” and “are currently in intensive care”. (FPD 00017, Ex. F.) Detective Petrick’s own supplement, reporting from the hospital the same day, says the opposite: “I learned neither driver had life threatening injuries”. (FPD 00025, Ex. F.) The reconstruction report later recorded that the van driver “suffered serious injuries and was released from hospital care” and that Plaintiff’s own injuries were “non-life-threatening”. (FPD 00047, 00053, Ex. F.) Crucially, when the case concluded, the only restitution the court ordered was **\$2,670.86**, payable exclusively to a private landscaping company (O’Brien Landscape) for property damage. (Order for Restitution, 9/8/2025, Ex. I.) Under Illinois law, 730 ILCS 5/5-5-6, restitution is statutorily tied to the actual physical injuries and out-of-pocket expenses of the crime victims. The absence of any medical restitution in the final sentencing order is powerful judicial corroboration that no human victim was compensated for great bodily harm — a fact consistent only with a felony injury element that was never documented.

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E. The State did not even seek the victim’s medical records until thirteen months after the indictment. The HIPAA qualified protective orders directing Condell Medical Center and the Lincolnshire-Riverwoods Fire Protection District to produce records were filed on **July 1, 2024**, and the corresponding subpoenas issued July 2, 2024, returnable July 24, 2024. (FPD 00126, 00533—00537; Ex. H.) The Grand Jury had returned the great-bodily-harm indictment on June 14, 2023. The State therefore charged the injury element first and looked for the injury evidence more than a year later — and when it did, the EMS agency that transported both drivers certified it had no responsive records at all. (FPD 00127, 00133, Ex. E.)

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F. Geometric impossibility proof from EDR and left-turn telemetry. While the EDR recorded a high entry speed, a definitive geometric impossibility proof demonstrates that once the 30-foot Peterbilt truck initiated its left turn from Old Mill Road—occupying and blocking both eastbound lanes for a reconstructed duration of 5.90 to 6.04 seconds (FPD 00064–00065)—a collision was a physical and mathematical certainty irrespective of the entry speed. At 124 MPH (181.87 ft/s), the Lexus covers approximately 445.5 feet during the 2.45-second emergency braking window. The EDR data records the accelerator was released at -2.95s, the service brake was ON from -2.45s, ABS engaged at -1.45s, brake-oil pressure reached 9.65 MPa, and evasive steering input rose to 178–183 degrees. Minimum physical stopping distance from 124 MPH under maximum 0.9g deceleration is approximately 560 feet. Thus, once the 30-foot truck initiated the turn and obstructed the roadway, the available stopping

1 distance and lateral escape envelope were mathematically reduced to zero. The mathematical delta
2 between the Peterbilt's 6.0-second turn duration and Plaintiff's 2.45-second braking window proves the
3 proximate cause of the impact sequence was structural and volitionally unavoidable, demonstrating the
4 reckless falsity of the prosecution's willful disregard theory. Furthermore, factoring in the
5 industry-standard human Perception-Reaction Time (PRT) of 1.5 seconds, the human cognitive
6 envelope was breached long before mechanical braking registered. At 124 MPH, the vehicle travels
7 272.8 feet during PRT alone. When added to the 445.5-foot mechanical braking window, the total
8 inescapable hazard avoidance zone required was 718.3 feet. Because the Peterbilt truck blocked both
9 lanes at a distance far below this threshold, a collision was structurally inevitable before Plaintiff's foot
10 could physically touch the brake pedal.

11 **G. The Grand Jury transcript perjury vector.** The June 14, 2023 minutes record: "WHAT ARE
12 INJURIES? Nothing, in file — NO med REES". Because the state's file contained no medical evidence
13 or records of any injury at the time of the indictment, the record supports a strong inference that the
14 grand jury's True Bill on the great-bodily-harm element was obtained through materially false
15 testimony by a state agent or police witness attesting to undocumented "broken bones" or "compound
16 fractures". Such a tainted indictment supports a distinct, actionable claim for fabrication of evidence
17 under the Fourth and Fourteenth Amendments, segregating the pre-trial liberty restriction from
18 post-sentencing harms.

19 The right of an individual to be free from a deprivation of liberty based on a state official's deliberate
20 fabrication of evidence or sworn perjury was clearly established in the Seventh Circuit long prior to the
21 events of this case, bypassing any assertion of qualified immunity (see *Lewis v. City of Chicago*, 914
22 F.3d 472 (7th Cir. 2019); *Manuel v. City of Joliet*, 580 U.S. 357 (2017)).

23 **IV. THE REVOCATION: A VERIFIED-CLEARED RESULT RE-SWORN AS AN** 24 **"ILLEGAL SUBSTANCE"**

25 **A. The result was verified and cleared by the State's own supervising officer.** Plaintiff's November
26 10, 2025 urine screen detected amphetamine, the expected metabolite of his lawful Adderall (ADHD)
27 prescription. The supervising Cook County Adult Probation Officer, Adison Weeks, confirmed in
28 writing on December 8, 2025 that "your drug test results were all negative" and that no further testing
was required, and on December 10, 2025 wrote that the result was "positive for amphetamine, but it is
all negative in my eyes because I know you are still taking the Adderall". (Verbatim text authenticated
in Plaintiff's Notice of Correction; see Doc. 1 and the Verified Evidentiary Manifest.) The written

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correspondence of Cook County Adult Probation Officer Adison Weeks constitutes an uncontroverted admission of a party-opponent’s agent under Federal Rule of Evidence 801(d)(2)(D). Officer Weeks was a designated employee of Defendant Cook County, acting directly within the scope of her official employment and statutory duties when she formally verified, evaluated, and cleared Plaintiff’s prescription toxicology profile.

B. The same result was then re-characterized under oath. On May 14, 2026, Assistant State's Attorney Nicholas Shepherd swore a Petition for Revocation alleging that Plaintiff tested positive for “Amphetamine (illegal substance)”, omitting that the State's own probation officer Adison Weeks had verified the Adderall prescription and cleared the result five months earlier on December 10, 2025. ASA Shepherd had actual and constructive knowledge of the automated probation log and the explicit written clearance entries made by Officer Weeks in the unified case management file prior to executing the petition. Omitting these written clearance entries and re-characterizing a verified prescription as an “illegal substance” under oath supports an inference of deliberate material omission rather than mere negligence. Under *Franks v. Delaware*, 438 U.S. 154 (1978), and *Napue v. Illinois*, 360 U.S. 264 (1959), a warrant procured by such deliberate perjury and material omission is void ab initio. Furthermore, detailing the exact dates of the protected federal litigation milestones between December 2025 and May 2026 exposes the retaliatory causation pathway: (1) on January 14, 2026, Plaintiff’s family vehicle was sabotaged (Mobility Kill, documented as Predicate Act 6 in Civil RICO Case No. 1:25-cv-15800); (2) on January 30, 2026, Plaintiff formally invoked the pending RICO action to suspend probation appearance threats; (3) on February 19, 2026, Plaintiff served a formal Memorialization of probation harassment on Director Fontana; (4) on April 13, 2026, the federal court in Plaintiff’s dual habeas cases (Nos. 1:26-cv-01077 and 1:25-cv-15181) passed Rule 4 screening and ordered Respondents to answer by June 5, 2026; and (5) on April 28, 2026, the Illinois Attorney General withdrew from local representation, leaving defendants to face federal review alone. The Petition for Revocation was filed on May 14, 2026—exactly 31 days after the habeas scheduling order and setting a hearing for May 28, exactly 8 days before the federal response deadline. Filing this petition on the heels of these federal milestones transforms a temporal inference into a compelling, documented retaliatory pattern.

Notably, the State has a documented history in this case of pleading drug allegations on thin foundations: an earlier Verified Petition to Revoke Pre-Trial Release was sworn “on information and belief” as to a separate Cook County controlled-substance arrest (Petition to Revoke Pre-Trial Release,

9/20/2024, Ex. D), establishing a pattern relevant to scienter.

The right of an individual to be free from a deprivation of liberty based on a state official's deliberate fabrication of evidence or sworn perjury was clearly established in the Seventh Circuit long prior to the events of this case, bypassing any assertion of qualified immunity (see *Lewis v. City of Chicago*, 914 F.3d 472 (7th Cir. 2019); *Manuel v. City of Joliet*, 580 U.S. 357 (2017)).

V. THE LENGTHS PLAINTIFF WENT TO FOR HIS OWN RECORD — AND THE CONDUCT OF APPOINTED COUNSEL

The state-court file documents, in Plaintiff's own contemporaneous filings, what it cost an indigent defendant simply to obtain the record of his own case. On October 2, 2025, days before his license revocation took effect, Plaintiff filed a **handwritten** pro se motion to stay the revocation, supported by a notarized affidavit swearing that he earns approximately \$15,000 per year, transports his mother to medical appointments, attends the University of Illinois at Chicago, received no notice from the Secretary of State until the eve of the revocation, and "ha[d] not yet been able to retain an attorney". (Ex. J.) On October 6, 2025 — a date on which the minutes list two assistant public defenders as counsel of record — Plaintiff nonetheless had to file his own pro se Notice of Appeal and argue his own motion, which the court heard with the docket notation "Defendant Proceeds Pro Se" and denied. (Exs. I, J.)

Then, on November 12, 2025, Plaintiff was forced to file a motion asking the court to: (1) waive court-reporting fees and direct preparation of the transcripts of his own plea and sentencing; (2) waive the clerk's fees for the record on appeal and provide a searchable litigant copy at no cost; (3) authorize defendant copies of the discovery in native formats (body-camera and dash video with audit logs, 911/CAD audio, photographic originals with EXIF data, EDR .CDRX exports, and crash-reconstruction files), subject to protective terms; and (4) **order his own former public defender to surrender his complete client file and any necessary viewing software within 14 days**. (Ex. J.) A client should never need a court order to obtain his own file: Illinois Rule of Professional Conduct 1.16(d) obligates counsel to surrender the client's papers upon termination. That Plaintiff had to move for it is itself evidence.

The same file frames the quality of the representation that preceded those motions. Appointed counsel's only substantive discovery response of record is a five-paragraph boilerplate Answer to the State's Motion for Discovery (filed March 25, 2025), disclosing no defense experts, no analysis of the EDR data, and no challenge to the injury record dissected in Section III. (Ex. J.) The restitution order against

1 Plaintiff was itself “Prepared by” his appointed counsel, Bailey C. Russell. (Ex. I.) And in the parallel
2 revocation proceeding, the same appointed counsel went silent for ten consecutive days during an
3 active no-bond warrant — the constructive abandonment documented in Plaintiff’s state omnibus filing
4 and in the companion federal filings in this case. Plaintiff presents these facts from the documents
5 themselves; their cumulative weight speaks for itself.

6 **Judicially coerced waiver architecture.** This systemic withholding of vital discovery—specifically
7 native EDR data, native MCAT files, and Plaintiff’s own client file—constitutes a deliberate
8 architecture of coerced waiver. By denying a pro se litigant the fundamental tools of his defense in
9 violation of Illinois Rule of Professional Conduct 1.16(d), the defendants engaged in a tactical
10 maneuver to obstruct his access to the courts and force a default waiver of appellate rights. This
11 structural deprivation represents an independent procedural due process violation under the Fourteenth
12 Amendment.

13 VI. THE INFERENCES OF RETALIATORY MOTIVE & HECK BYPASS

14 **A. Heck Bypass and Constitutional Injury Segregation.** The documents above evidence the
15 falsity and recklessness of the charges. Plaintiff’s civil-rights claims do **not** seek to invalidate his
16 underlying reckless driving conviction, thereby bypassing any bar under *Heck v. Humphrey*, 512 U.S.
17 477 (1994). For the avoidance of doubt, nothing in this evidentiary submission asserts, or should be
18 construed to advance, any claim, remedy, or damages theory that would necessarily imply the invalidity
19 of the underlying state-court conviction or sentence duration in Lake County Case No. 23 CF 1146.
20 Rather, the Complaint seeks damages for separate, constitutionally distinct injuries that map directly to
21 the Count architecture in the main Complaint: (1) Count I & II cover original pre-trial detention harms
22 resulting from fabricated bodily harm prior to medical record acquisition under *Manuel v. City of Joliet*,
23 580 U.S. 357 (2017); and (2) Count III & IV cover post-sentencing revocation harms and outstanding
24 no-bond warrant liberty restrictions under the fabrication-of-evidence framework of *Lewis v. City of*
25 *Chicago*, 914 F.3d 472 (7th Cir. 2019). Every distinct period of liberty restriction maps to its own
26 specific demand for damages to prevent the defense from merging them into a single, less potent injury
27 category. Furthermore, the Rooker-Feldman doctrine is entirely inapplicable here. Plaintiff does not
28 seek the review, reversal, or modification of any state-court order or judgment. Instead, Plaintiff seeks
independent damages for extrajudicial, deceptive acts of evidence fabrication and perjury committed by
individual actors during the investigative and pre-warrant phases, which constitute distinct torts
independent of the state court’s ultimate rulings.

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B. Systemic Municipal Liability under Monell. Beyond individual actor malfeasance, the documents and timelines establish that these constitutional violations arose from unconstitutional municipal customs, policies, or widespread practices maintained by Lake County and Cook County. Specifically, Plaintiff alleges that the defendant counties maintain a widespread practice of: (1) pleading and indicting felony bodily harm components without verifying medical confirmation files, resulting in systemic fabrication of felony charges; and (2) purposely ignoring documented prescription disclosures in the unified case management file to artificially inflate probation violation rates and trigger warrants. Characterizing these systemic issues as unconstitutional municipal customs solidifies entity liability under *Monell v. Department of Social Services*, 436 U.S. 658 (1978), and protects the suit against individual qualified immunity dismissals.

11 VII. MASTER INDEX OF THE 382-PAGE LAKE COUNTY PRODUCTION

12 The following Master Index maps the State's discovery production in 23 CF 1146. The production was
13 tendered in volumes and bears Bates numbers in the “FPD #####” series. Pages cited throughout this
14 Dossier are drawn from these volumes; the authenticated key pages are reproduced as Exhibits A—G.

15 **Key Record Citations (verified against the production):**

- 16 • **NE III. Regional Crime Lab Report #1 (Lab 22-2139):** FPD 00042—00043 (blood screening
17 negative for ethanol; urine amphetamine qualitative finding only, with “insufficient sample volume” to
18 complete testing). (Ex. C.)
- 19 • **Grand Jury Indictment:** FPD 00001—00003 (Count 1, aggravated reckless driving causing great
20 bodily harm). (Ex. D.)
- 21 • **Charging emails:** Petrick—Dillon email of 8/11/2022, Prod. Vol. I, p. 1 (Ex. A); Dillon—Petrick
22 email of 10/5/2022, Prod. Vol. I, pp. 25—26, at FPD 00125 (Ex. B).
- 23 • **Event Data Recorder (EDR) Pre-Crash Tables:** FPD 00068—00071, with the related TRG
24 pre-crash table at FPD 00099. (Ex. G.)
- 25 • **MCAT Reconstruction Left-Turn Study:** FPD 00064—00065 (Peterbilt left-turn re-enactment
26 timing of 5.90 to 6.04 seconds). (Ex. G.)
- 27 • **State Court Minutes (6/14/2023):** Prod. Vol. II, p. 14 (handwritten minute entry: “WHAT ARE
28 INJURIES? Nothing, in file — NO med REES”). (Ex. D.)
- **Injury-record contradiction set:** LPD press release, FPD 00017; Petrick supplement, FPD
00025—00026; MCAT excerpts, FPD 00047, 00053. (Ex. F.)
- **Native media:** Squad video, 911/CAD audio, photographic originals, and EDR data files are

identified within the production and remain in the State’s custody in native format; Plaintiff has moved in the state court for their production in native form (Ex. J) and will supplement the record upon receipt.

Volume	Contents	Representative Bates
Vol. I (pp. 1—100)	Petrick—Dillon charging emails; State’s Disclosure to the Accused and witness list; medical-records HIPAA orders and subpoenas; Grand Jury indictment; crime-lab toxicology report; LPD field/supplement reports; MCAT reconstruction (begins).	FPD 00001—00062; 00125—00137; 00533—00537
Vol. II (pp. 101—200)	MCAT reconstruction (EDR/CDR data, speed analysis, squad-video analysis); Court Minutes of 6/14/2023 (“NO med REES”); Verified Petition to Revoke Pre-Trial Release (9/20/2024); VCH/FFD vehicle data.	FPD 00063—00099 (reconstruction); Court Minutes 6/14/2023
Vol. III (pp. 201—300)	Scene, vehicle, and evidence photographs (crash site, vehicle damage, roadway evidence).	Photographic production
Vol. IV (pp. 301—382)	Additional scene/vehicle photographs and imaging.	Photographic production
Native court orders	Financial sentencing order (9/8/2025); Order for Restitution \$2,670.86 (9/8/2025); Criminal/Traffic Minutes — Guilty finding, Count 2 nolle prosequi (10/6/2025).	Circuit Court of Lake County, 23 CF 1146

VIII. INDEX OF AUTHENTICATED EXHIBITS

Ex.	Document	What It Proves
A	Petrick—Dillon email, 8/11/2022 (Prod. Vol. I, p. 1)	Lead investigator’s written admission of no quantifiable drug evidence; “hard pressed to prove DUI drugs”.
B	Dillon—Petrick email, 10/5/2022 (Prod. Vol. I, pp. 25-26, at FPD 00125)	Charging/warrant decision deferred to reconstruction work: “We’ll issue the arrest warrant then”.
C	NE III. Regional Crime Lab Toxicology Report, Lab 22-2139 (FPD 00042—00043)	Blood negative for ethanol; urine amphetamine unquantified; “insufficient sample volume”.
D	Grand Jury Indictment (FPD 00001—03); Court Minutes 6/14/2023; Petition to Revoke Pre-Trial Release (9/20/2024)	Felony great-bodily-harm charge indicted while file shows “NO med REES”; prior info-and-belief revocation pleading.
E	Fire District Certification of Records (FPD 00127, 00133)	EMS custodian certifies (checked box) the agency does not have the requested records.
F	Injury-record contradiction set: LPD press release (FPD 00017); Petrick supplement (FPD 00025—00026); MCAT excerpts (FPD 00047, 00053)	Press release claims “life threatening injuries”/“intensive care”; Petrick same day: “neither driver had life threatening injuries”.
G	EDR pre-crash data tables (FPD 00068—00071) and left-turn timing study (FPD 00064—00065)	Brake ON at —2.45s, ABS at —1.45s, 9.65 MPa at impact, evasive steering; Peterbilt turn took 5.90—6.04s.
H	HIPAA Qualified Protective Orders (filed 7/1/2024) and medical-records subpoenas (7/2/2024) (FPD 00126, 00533—00537)	Victim medical records first sought 13 months after the indictment.
I	Sentencing, Restitution & Guilty-Finding Orders (9/8/2025; 10/6/2025)	Disposition, \$2,670.86 restitution to a landscaper, and Count 2 nolle prosequi.
J	Pro se record-access filings and counsel’s discovery answer: motion & affidavit to stay license revocation (10/2-3/2025); pro se Notice of Appeal (10/6/2025); fee-waiver / transcript / client-file motion (filed 11/12/2025); PD’s Answer to State’s Motion for Discovery (3/25/2025)	The lengths Plaintiff went to for his own record, and the boilerplate character of appointed counsel’s discovery response.

1
2 **IX. CONCLUSION**

3 The State’s own records — a crime-lab report it could not quantify, a charging email conceding it
4 could not prove impairment, court minutes recording that the injury file was empty, an EMS custodian
5 certifying no injury records exist, and its own probation officer clearing the very drug result later sworn
6 as an “illegal substance” — establish a documentary nexus of fabrication that no contrary evidence in
7 the production rebuts. On this record, Plaintiff respectfully submits that his § 1983 claims for malicious
8 prosecution and fabrication of evidence are substantial, and that the documentary foundation set out
here warrants full discovery into the matters alleged in Section VI.

9 Respectfully submitted,

10 /s/ Ehab Allababidi

11 **EHAB ALLABABIDI**, *Pro Se* Plaintiff

12 8516 W. Winona St., Chicago, IL 60656

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

13 Dated: June 10, 2026
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BATES RANGE
Prod. Vol. I, p. 1

EXHIBIT A

Detective Petrick to ASA Dillon, August 11, 2022 (FPD 00001)

CUSTODIAN: Lincolnshire PD / State's Attorney	DATE OF SOURCE: August 11, 2022
VERIFICATION: Certified Public Record	BATES CITATION: Prod. Vol. I, p. 1
SUPPORTS COMPLAINT: Count II (Fabrication of DUI Drugs)	

PROVING VALUE:

The lead investigator concedes the lab “does not offer a specific amount” and it would be “hard pressed to prove DUI drugs.”

Supplemental Evidence Submission — For Evidentiary Purposes Only

Filed in Support of Plaintiff's Civil Rights Complaint [Doc. 1]

Allababidi v. Shepherd, et al.

Case No. 1:26-cv-06738 | N.D. Illinois, Eastern Division

Dillon, Benjamin

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

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

Mr. Dillon,

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

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

Thank you.

Detective Paul J. Petrick
Village of Lincolnshire
Police Department

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



VILLAGE OF
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.

BATES RANGE
Vol. I, pp. 25-26 (FPD 00125)

EXHIBIT B

ASA Dillon to Detective Petrick, October 5, 2022 (FPD 00125)

CUSTODIAN: Lincolnshire PD / State's Attorney	DATE OF SOURCE: October 5, 2022
VERIFICATION: Certified Public Record	BATES CITATION: Vol. I, pp. 25-26 (FPD 00125)
SUPPORTS COMPLAINT: Count II (Pre-trial Malfeasance)	

PROVING VALUE:

*The charging decision is deferred to reconstruction work:
"We'll issue the arrest warrant then."*

Supplemental Evidence Submission — For Evidentiary Purposes Only

Filed in Support of Plaintiff's Civil Rights Complaint [Doc. 1]

Allababidi v. Shepherd, et al.

Case No. 1:26-cv-06738 | N.D. Illinois, Eastern Division

Dillon, Benjamin

From: Dillon, Benjamin
Sent: Wednesday, October 5, 2022 12:41 PM
To: Paul Petrick; Dillon Forkes
Subject: 22-7193 / MCAT 22-22

Dillon,

I spoke with Hyde and he mentioned that you two had previously spoken about this accident as well. As discussed, we'll need the brief reconstruction with the CDR analysis to support the data for the impact speed analysis. Adam said he can help you with that, but this can also wait until you complete the training next month. We'll issue the arrest warrant then. Thanks,

Ben

BATES RANGE
FPD 00042-00043

EXHIBIT C

Northeastern Illinois Regional Crime Laboratory Toxicology Report, Lab Case 22-2139 (FPD 00042-00043)

CUSTODIAN: NE Illinois Regional Crime Lab	DATE OF SOURCE: June 13, 2022
VERIFICATION: Certified Public Record	BATES CITATION: FPD 00042-00043
SUPPORTS COMPLAINT: Count II & IV (Toxicology Deficiencies)	

PROVING VALUE:

Blood negative for ethanol; urine amphetamine could not be quantified due to "insufficient sample volume."

Supplemental Evidence Submission — For Evidentiary Purposes Only

Filed in Support of Plaintiff's Civil Rights Complaint [Doc. 1]

Allababidi v. Shepherd, et al.

Case No. 1:26-cv-06738 | N.D. Illinois, Eastern Division



Northeastern Illinois Regional Crime Laboratory



Toxicology Report

905 E. Orchard St., Mundelein, IL 60060

Phone: (847) 362-0676 Fax: (847) 362-0712

Board President
Steve Husak

Executive Director
Philip T. Kinsey, Ph.D.



Chief Joseph Leonas
Lincolnshire Police Department
1 Old Half Day Road
Lincolnshire, IL 60069

Subject: Driving Under the Influence of Drugs
Agency Case #: 2022-07193
Case Officer: Dana Plotke
Submission Date: 06/03/2022

Laboratory Case #: 22-2139
Laboratory Report #: 1
Report Date: 06/13/2022

Case Names: Allababidi, Ehab

The following evidence was submitted in a sealed condition:

ITEM 01
(PP1)

Exhibit 01
One tube of whole blood, one tube of serum, and one tube of plasma, of which the whole blood was tested. The tubes are designated as being collected from the following individual:

Allababidi, Ehab.

RESULTS

Analysis of the blood exhibit by Gas Chromatography/Flame Ionization failed to detect blood ethanol.

Exhibit 02

One tube of urine. The tube is designated as being collected from the following individual:

Allababidi, Ehab.

RESULTS

Analysis of the urine exhibit by Enzyme Linked Immunosorbent Assay and Gas Chromatography/Mass Spectrometry detected the presence of the following:

Amphetamine

Due to insufficient sample volume, testing could not be completed on the above exhibit.

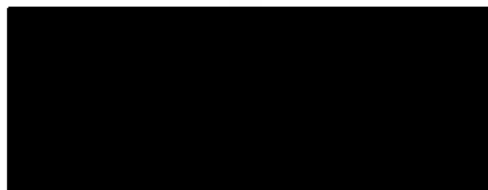
Lab Case 22-2139
Lab Report # 1
Analyst Lindsay J. Simpson M.S.

Section 5-9-1.9 of the Unified Code of Corrections (730ILCS) authorizes a criminal laboratory analysis fee of \$150.00 to be imposed for persons adjudged guilty of an offense in violation of Section 11-501 of the Illinois Vehicle Code.

The results portion of this report contains scientific judgments and interpretations rendered by the individual whose signature appears on the report.



Reviewer
Gina M. Havlik, M.S.



Forensic Scientist
Lindsay J. Simpson M.S.

BATES RANGE
FPD 00001-00003, Vol II 13-15

EXHIBIT D

Grand Jury Indictment (FPD 00001-00003); Court Minutes of June 14, 2023; Verified Petition to Revoke Pre-Trial Release (September 20, 2024)

CUSTODIAN: Circuit Court Clerk of Lake County	DATE OF SOURCE: June 14, 2023 / September 20, 2024
VERIFICATION: Certified Public Record	BATES CITATION: FPD 00001-00003, Vol II 13-15
SUPPORTS COMPLAINT: Count I, II & III (Fabricated Injury Charge)	

PROVING VALUE:

A felony great-bodily-harm charge returned while the minutes record "NO med REES" (no medical records of injury), and the State's prior information-and-belief revocation pleading.

Supplemental Evidence Submission — For Evidentiary Purposes Only

Filed in Support of Plaintiff's Civil Rights Complaint [Doc. 1]

Allababidi v. Shepherd, et al.

Case No. 1:26-cv-06738 | N.D. Illinois, Eastern Division

FILED

STATE OF ILLINOIS)
) SS
COUNTY OF LAKE)

Gen. No.: 23CF1146
DCN: _____

JUN 14 2023

Erin Courtney 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

COPY

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, [REDACTED]** 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 [REDACTED] 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,** [REDACTED] 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

[REDACTED]

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; [REDACTED]

Indictment for:

Count 1: Aggravated Reckless Driving (Class 4)

Count 2: Aggravated Speeding (class A)

[REDACTED]

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: [REDACTED] HT: 6'0" WT: 200 HAIR: Brown EYES: Brown
DL#: [REDACTED] ADDRESS: 8516 W. Winona St. Chicago, IL 60656**

TM

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 *BN*

_____ 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.

Per R/O Petrick: "broken bones"

"compound fx"

FILED

JUDICIAL BRANCH

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

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

BATES RANGE
FPD 00127, 00133

EXHIBIT E

Lincolnshire-Riverwoods Fire Protection District, Certification of Records (FPD 00127, 00133)

CUSTODIAN:	Lincolnshire-Riverwoods FPD EMS	DATE OF SOURCE:	July 11, 2024
VERIFICATION:	Certified Public Record	BATES CITATION:	FPD 00127, 00133
SUPPORTS COMPLAINT:	Count I & II (Lack of Injury Evidence)		

PROVING VALUE:

The EMS records custodian certifies (checked box) that the facility does “not have the records describe[d] in the records request.”

Supplemental Evidence Submission — For Evidentiary Purposes Only

Filed in Support of Plaintiff's Civil Rights Complaint [Doc. 1]

Allababidi v. Shepherd, et al.

Case No. 1:26-cv-06738 | N.D. Illinois, Eastern Division

Certification of Records

Name: Chief Tom Krueger Record Number: 22-20062
Business Facility: Lincolnshire-Riverwoods Fire Protection District
Address: 151 Scheller Road City/State: Lincolnshire IL
Zipcode: 60069 Phone: 847-634-2512

I certify that the documents accompanying this certificate are accurate and complete duplicates of the original record of the patient listed above for the following dates.

5-23-22 to 5-23-22

A through search of our files conducted under my direction revealed that this facility not have the records describe in the records request.

I further certify that the produced records are a true copy of all the records requested and are kept in the course of regularly conducted activity.

Executed on the date: 7-11-24

Records Custodian (signature): 

Printed Name of Custodian: Tom Krueger

Certification of Records

Name: Chief Tom Krueger Record Number: 22-20062
Business Facility: Lincolnshire-Riverviews Fire Protection District
Address: 151 Scheller Road City/State: Lincolnshire IL
Zipcode: 60069 Phone: 847-634-2512

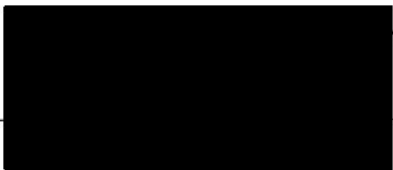
I certify that the documents accompanying this certificate are accurate and complete duplicates of the original record of the patient listed above for the following dates.

5-23-22 to 5-23-22

A through search of our files conducted under my direction revealed that this facility not have the records describe in the records request.

I further certify that the produced records are a true copy of all the records requested and are kept in the course of regularly conducted activity.

Executed on the date: 7-11-24

Records Custodian (signature): 

Printed Name of Custodian: Tom Krueger

BATES RANGE
FPD 00017, 00025-00026, 00047, 00053

EXHIBIT F

Injury-Record Contradiction Set: LPD Press Release (FPD 00017); Petrick Supplement (FPD 00025-00026); MCAT Excerpts (FPD 00047, 00053)

CUSTODIAN: Lincolnshire Police Department / MCAT	DATE OF SOURCE: May 2022
VERIFICATION: Certified Public Record	BATES CITATION: FPD 00017, 00025-00026, 00047, 00053
SUPPORTS COMPLAINT: Count I & II (Systemic Injury Contradictions)	

PROVING VALUE:

The press release announces “life threatening injuries” and “intensive care”; Detective Petrick’s same-day report states “neither driver had life threatening injuries.”

Supplemental Evidence Submission — For Evidentiary Purposes Only

Filed in Support of Plaintiff’s Civil Rights Complaint [Doc. 1]

Allababidi v. Shepherd, et al.

Case No. 1:26-cv-06738 | N.D. Illinois, Eastern Division

Lincolnshire 22-7193

MCAT #22-22
Lincolnshire Police Department

On Monday, May 23, 2022 at 1:16 p.m., officers from the Lincolnshire Police Department responded to a serious injury crash on Illinois Route 22 near Old Mill Road. The preliminary investigation revealed a truck turned onto Route 22 from Old Mill Road when a Lexus collided with the rear of the truck. The Lexus continued across the center lines and collided with a westbound Ford van before starting on fire.

Both the driver of the Lexus and the driver of the Ford were transported to Advocate Condell Medical Center with life threatening injuries and both are currently in intensive care. The truck driver was uninjured. Impairment on the Lexus driver is suspected.

MCAT was activated on May 26, 2022 to assist with a delayed investigative response to assist Lincolnshire with Event Data Recorder imaging and other investigatory duties.

The following personnel responded to assist:

Murray – Gurnee
Forkes - Lincolnshire



LINCOLNSHIRE POLICE

CASE# 2022-00007193

FIELD CASE SUPPLIMENT REPORT

NARRATIVE

On May 23, 2022, I responded to the area of Illinois Route 22 and Old Mill Road in reference to an injury accident.

Upon arrival I observed a rust-colored Lexus engulfed in fire and a work type van with extensive front end damage and a person inside the van. The vehicles were positioned in the outside traffic lane and onto the curbing of westbound Illinois Route 22, east of Old Mill Road.

I requested Deerfield Dispatch have an outside agency shut down westbound traffic on Illinois Route 22 at Westminster Way as well as eastbound at Riverwoods Road.

I briefly spoke with [REDACTED] driver of the work van, he was pinned in his vehicle. I informed [REDACTED] the fire department was arriving and would assist him. He indicated understanding of what was happening. The Lincolnshire/Riverwoods Fire Department (LRFD) provided assistance to [REDACTED].

The driver of the Lexus was out and speaking with Officer Skrobot and Community Service Officer (CSO) Kantner. See Officer Skrobot and CSO Kantner's supplemental reports.

Officer Temple was the Officer in Charge (OIC) and took command of the scene. He requested I pick up a camera from the police station and bring it to the crash scene. I did so.

I was then sent to Condell Medical Center.

Upon arrival at Condell Medical Center in Libertyville, I learned neither driver had life threatening injuries.

[REDACTED] had a severe injury to his right leg. He also had pain to his torso, upper body. He was sedated and being treated by emergency room doctors and nurses. I was able to contact [REDACTED] spouse, and informed her of this incident. She came to the hospital, I provided her with this crash number and my business card. She was informed the accident is being investigated and a report would be made. [REDACTED] was not spoken with about the accident due to his treatment.

I learned the identity of the driver of the Lexus, Ehab Allababidi. This driver had an apparent facial injury. He was in an agitated state and needed to be restrained and heavily sedated by the medical staff. I was not able to interview Allababidi.

REPORTING OFFICER	DATE	REVIEWED BY	
6447 Petrick	05/23/2022	Ulanowski, Matthew	05/26/2022

OF



LINCOLNSHIRE POLICE

CASE# 2022-00007193

FIELD CASE SUPPLIMENT REPORT

NARRATIVE (continuation)

I was informed by medical staff the blood toxicology of Allababidi showed Benzodiazepines and Amphetamines in his system.

Police reports and documentation will be sent to the Lake County State's Attorney's Office for subpoenas of medical records concerning Allababidi and his treatment on May 23, 2022 regarding this traffic crash.

No further action taken by this investigator at this time. Case open and continuing.

REPORTING OFFICER 6447 Petrick	DATE 05/23/2022	REVIEWED BY Ulanowski, Matthew	05/26/2022
--	---------------------------	--	-------------------

OF

An analysis was completed using data from the Lexus' Event Data Recorder (EDR) to determine the speed of the Lexus. It was determined the Lexus was traveling between 124-125 miles per hour pre-impact, which is greater than the posted speed limit of 35 miles per hour by 89-90 miles per hour. The average speed of the Lexus, when passing CSO Kantner, was 116-120 miles per hour.

A time-distance analysis was also completed to determine if the Peterbilt would have had sufficient time to complete its maneuver had the Lexus been driving at the posted speed limit.

The analysis of Mr. Allababidi's urine showed positive for amphetamines and benzodiazepines. The quantity of each drug present was not provided due to an insufficient sample.

Crash Narrative

The traffic crash occurred during the daytime hours of Monday, May 23rd, 2022, at approximately 1:16 p.m. It occurred on Illinois Route 22 (Half Day Road) east of Old Mill Road, in the Village of Lincolnshire, Lake County, Illinois. The crash involved three vehicles: a 2021 Lexus LC 500 coupe, a 2021 Peterbilt Conventional 348 truck and a 2014 GMC Savana G2500 van.

The 2021 Peterbilt was stopped facing southbound on Old Mill Road at the stop sign of Illinois Route 22. The Peterbilt executed a left-hand turn from Old Mill Road into the right eastbound lane of Illinois Route 22. After completing the left turn, the Peterbilt was struck in the driver side rear by the Lexus, causing the outside tire of the Peterbilt to become unseated. The Peterbilt came to a stop in the outside eastbound of Half Day Road and the Lexus veered into the westbound lane of Half Day Road, striking the front of the white GMC van. As a result of the collision with the GMC van, the Lexus became fully engulfed in flames.

Prior to the crash, the Lexus passed a fully marked Lincolnshire Squad Car, driven by Community Service Officer (CSO) Kantner, at the intersection of Illinois Route 22 and Oxford Drive. Oxford Drive is approximately .73 miles west of Old Mill Road. When the Lexus Passed CSO Kantner, it did so by traveling at a high rate of speed, eastbound in the westbound lanes of traffic of Illinois Route 22. Witnesses stated they observed the Lexus traveling "so fast" and at a "high rate of speed."

The driver of the Lexus, Ehab Allababidi, was treated at the hospital with non-life-threatening injuries. The driver of the Peterbilt, [REDACTED] was treated on the scene and refused medical transport. The driver of the GMC, [REDACTED] suffered serious injuries and was released from hospital care.

Scene Investigation and Emergency Response

CSO Kantner first observed the Lexus while he was traveling eastbound on Illinois Route 22 at Oxford Drive. Due to CSO Kantner being a civilian employee, no emergency lights were activated to stop the Lexus. CSO Kantner continued eastbound on Illinois Route 22, at the posted speed limit, as the Lexus continued eastbound towards Old Mill Road at a much higher rate of speed. When CSO Kantner arrived at the intersection of Old Mill Road, he observed what appeared to be a head-on collision involving a Lexus sedan and GMC van, in the westbound lane of Illinois Route 22. At this time, the Lexus was on fire and CSO Kantner attempted to extinguish the fire but was unsuccessful. CSO Kantner also notified dispatch and Officer Skrobot was the first to arrive on scene. Additionally, Officer Temple, Officer Plotke,

BATES RANGE
FPD 00064-00065, 00068-00071, 00099

EXHIBIT G

Event-Data-Recorder Pre-Crash Tables (FPD 00068-00071) and Left-Turn Timing Study (FPD 00064-00065)

CUSTODIAN: Gurnee Police Department / MCAT	DATE OF SOURCE: June 20, 2022 / December 16, 2022
VERIFICATION: Certified Public Record	BATES CITATION: FPD 00064-00065, 00068-00071, 00099
SUPPORTS COMPLAINT: Count II (EDR Telemetry & Collision Physics)	

PROVING VALUE:

The State's own data: accelerator released ~2.95s before impact; brake ON at 2.45s; ABS at 1.45s; 9.65 MPa at impact; evasive steering; the Peterbilt's turn took 5.90-6.04 seconds.

Supplemental Evidence Submission — For Evidentiary Purposes Only

Filed in Support of Plaintiff's Civil Rights Complaint [Doc. 1]

Allababidi v. Shepherd, et al.

Case No. 1:26-cv-06738 | N.D. Illinois, Eastern Division

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)	6
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 ³ /at)	Engine RPM (RPM)	Motor RPM (RPM)	Service Brake, ON/OFF
-4.95	119.3 [192]	100.0	68.5	Invalid	4,400	Invalid	OFF
-4.45	120.5 [194]	100.0	100.0	Invalid	5,100	Invalid	OFF
-3.95	121.8 [196]	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	96.9 [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 (Mpa)	Longitudinal Acceleration, VSC Sensor (m/s ²)	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	-0.98	-4.5	D
-1.95	OFF	OFF	0.96	-8.973	0.00	0.0	D
-1.45	ON	OFF	3.85	-8.901	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	-8.973	18.06	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.

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.

System Status at Event (2nd Prior Event, TRG 8)	
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

System Status at Event (1st Prior Event, TRG 9)	
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



Figure 11. Cabin of Peterbilt



Figure 12. Cabin of Peterbilt

When the crash occurred on May 23, 2022, the weather was clear skies, and the roadway was dry. When [REDACTED] was available to recreate his turn, the visibility was less clear, and the roadway was beginning to become wet from light snow. Due to [REDACTED] it was not possible to reschedule.

Left-Turn

I instructed [REDACTED] to turn left from southbound Old Mill Road into the outside eastbound lane of Illinois Route 22 as he had done on May 23rd. This turn was executed three times and the time was recorded with a stopwatch. Before each left turn, both the eastbound and westbound lanes of Half Day Road were shut down to prevent traffic from passing through. Also, each left turn was initiated with the front wheels of the Peterbilt on the stop bar with the wheels turned to the left. The stopwatch was 'stopped' once [REDACTED] Peterbilt was completely in the outside lane and beginning to travel eastbound. This was due to his previous statement of: he was beginning to travel "straight" when the Peterbilt was struck in the rear.

The time of [REDACTED] left-hand turns are as follows:

1st left turn. 6.04 seconds.

2nd left turn. 6.01 seconds.

3rd left turn. 5.90 seconds.

The distance [REDACTED] traveled from the left-turn to the outside lane of eastbound Illinois Route 22 was approximately 65 feet. The distance to the rear of [REDACTED] Peterbilt (after the turn was completed) to east of Riverwoods Road was approximately 1,050 feet.

The following motion equation was used to obtain the acceleration of the Peterbilt:

$$a = \frac{2(d) - 2(V_i)(t)}{t^2}$$
$$a = \frac{2(65 \text{ ft}) - 2(0)(6)}{6^2}$$

The Peterbilt had an acceleration of 3.6 fps²

If the Lexus was seen by [REDACTED] eastbound on Illinois Route 22, just east of the Riverwoods Road intersection, before he attempted his left-hand turn, this means it would have taken the Lexus approximately 5.9 to 6.04 seconds to get from its position eastbound on Illinois Route 22 to the rear of the Peterbilt, where the vehicles collided (front to rear). If the Lexus was traveling the posted speed limit of 35 miles per hour, the Lexus would reach the same position on Illinois Route 22 at Old Mill Circle in approximately 20 seconds, allowing the Peterbilt an additional 14 seconds to complete his left-hand turn.

If the Lexus had been going 35 miles per hour, after passing through the intersection of Riverwoods Road, and the Peterbilt continued eastbound on Illinois Route 22 after completing the left-hand turn, the Peterbilt would have been approximately 350-360 feet eastbound when the Lexus was arriving at Old Mill Road and avoiding this crash.

Event Data Recorder (EDR) Imaging

The Lexus and GMC were examined for Event Data Recording capabilities (EDR). Both the Lexus and the GMC were found to have an EDR. On May 26, 2022, a search warrant was signed by Judge Potkonjak to obtain the EDR from the Lexus. The search warrant was executed by Officer Murray of the Gurnee Police Department and a member of the Lake County Major Crash Assistance Team (MCAT). On May 27, 2022, David Smith, the owner of the GMC, provided written consent to obtain the EDR. Officer Murray also obtained the GMC's EDR. The following is an analysis of the Lexus EDR report.

BATES RANGE
FPD 00126, 00533-00537

EXHIBIT H

HIPAA Qualified Protective Orders (filed July 1, 2024) and Medical-Records Subpoenas (July 2, 2024) (FPD 00126, 00533-00537)

CUSTODIAN: Circuit Court of Lake County	DATE OF SOURCE: July 1-2, 2024
VERIFICATION: Certified Public Record	BATES CITATION: FPD 00126, 00533-00537
SUPPORTS COMPLAINT: Count I & II (Prosecutorial Delay in Medical Subpoenas)	

PROVING VALUE:
The State first sought the Condell medical records more than thirteen months after the June 14, 2023 indictment.

Supplemental Evidence Submission — For Evidentiary Purposes Only
Filed in Support of Plaintiff's Civil Rights Complaint [Doc. 1]
Allababidi v. Shepherd, et al.
Case No. 1:26-cv-06738 | N.D. Illinois, Eastern Division

FILED

JUL 01 2024

STATE OF ILLINOIS)
) SS
COUNTY OF LAKE)

IN THE CIRCUIT COURT OF THE NINETEENTH *Emi Carabuzzi Weinstein*
JUDICIAL CIRCUIT, LAKE COUNTY, ILLINOIS **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 [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.

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: ADVOCATE CONDELL MEDICAL CENTER
SUBPOENA COMPLIANCE
801 S. MILWAUKEE AVE.,
LIBERTYVILLE, IL 60048

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 24TH, 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 2ND, 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.



REC'D JUL 02

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

PEOPLE OF THE STATE OF ILLINOIS)

v.)

EHAB ALLABABIDI)

) NO.: 23CF1146
) AGENCY NO:

M: 4937574

R: 909956258

SUBPOENA

TO: ADVOCATE CONDELL MEDICAL CENTER
SUBPOENA COMPLIANCE
801 S. MILWAUKEE AVE.,
LIBERTYVILLE, IL 60048

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YOUR FAILURE TO APPEAR IN RESPONSE TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF THIS COURT.

Witness, JULY 2ND, 2024.



Erin Cartwright Weinstein

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.



BATES RANGE
Circuit Court native files

EXHIBIT I

Sentencing, Restitution, and Guilty-Finding Orders (September 8 and October 6, 2025)

CUSTODIAN: Circuit Court Clerk of Lake County	DATE OF SOURCE: Sept 8 / Oct 6, 2025
VERIFICATION: Certified Public Record	BATES CITATION: Circuit Court native files
SUPPORTS COMPLAINT: Count I & II (Sentencing Defects & Property Restitution)	

PROVING VALUE:

The disposition: guilty on Count 1, Count 2 nolle prosequi, and \$2,670.86 restitution ordered to a private landscaper.

Supplemental Evidence Submission — For Evidentiary Purposes Only

Filed in Support of Plaintiff's Civil Rights Complaint [Doc. 1]

Allababidi v. Shepherd, et al.

Case No. 1:26-cv-06738 | N.D. Illinois, Eastern Division

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

FILED

9/8/2025 9:09 AM

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(5))	\$ _____
_____ 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 \$ ² _____
_____ l.	<input type="checkbox"/>	Speeding in a construction zone (705 ILCS 135/15-70(11))	\$ _____
		<input type="checkbox"/> Interstate Highway <input type="checkbox"/> County	\$ 250 \$ _____
_____ 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"/> Sentencing offense is Sexual Assault (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"/> State Police <input type="checkbox"/> County	\$ 250 \$ _____
		Subtotal – Conditional Assessment Amount:	\$ _____
		TOTAL CRIMINAL AND CONDITIONAL ASSESSMENTS:	\$551.00

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

Entered this date: 09/08/2025, 2025



 Defendant's Signature


 Judge Signature

FILED

9/8/2025 9:10 AM

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

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

State of Illinois

Plaintiff(s)

vs.

Ehab Allababidi

Defendant(s)

General No. **23CF1146**

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
Phone:
Fax
ARDC: 6340962

State: IL
Zip Code:

BATES RANGE
State Court Record filings

EXHIBIT J

Pro Se Record-Access Filings and Appointed Counsel's Discovery Answer (October-November 2025; March 2025)

CUSTODIAN:	Circuit Court Clerk / Public Defender	DATE OF SOURCE:	March – Nov 2025
VERIFICATION:	Certified Public Record	BATES CITATION:	State Court Record filings
SUPPORTS COMPLAINT:	Count IV & VI (Constructive Abandonment & Coerced Waiver)		

PROVING VALUE:

Handwritten motion and sworn affidavit to stay license revocation (10/2-3/2025); pro se Notice of Appeal (10/6/2025); motion to waive transcript/record fees, obtain native-format discovery, and ORDER former counsel to surrender the complete client file within 14 days (filed 11/12/2025); and the public defender's five-paragraph Answer to the State's Motion for Discovery (3/25/2025).

Supplemental Evidence Submission — For Evidentiary Purposes Only

Filed in Support of Plaintiff's Civil Rights Complaint [Doc. 1]

Allababidi v. Shepherd, et al.

Case No. 1:26-cv-06738 | N.D. Illinois, Eastern Division

FILED

OCT 02 2025

Erica Carabogal 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:

The grant me 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.

Case Number 23CF1146



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/ [Signature] Print Name Ehab Alhababi

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 Alhababi
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

Case Number 23CF1146

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 AlwBubici

I am completing this form for myself

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

Address 8516 W WINDONA 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.



Learn more about each step in the process and how to file in our Instructions:
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.

If there are any words or terms that you do not understand, please visit **Illinois Legal Aid Online** at 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.



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 \$5,000 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. 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*.

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

FILED

OCT 02 2025

Eva Carabiet 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.

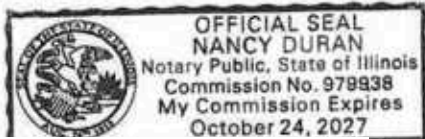
I respectfully request that the Court grant a stay of the revocation for sixty (60) to ninety (90) days, or such period as the Court deems just, so that I may retain counsel and responsibly address this matter.

EA
~~10-02-2025~~ *[Signature]*
 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

[Signature]
 Notary Public



**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

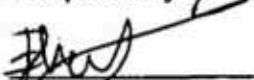
Eva Cantorget Weinstein
CIRCUIT CLERK

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.

THE CIRCUIT CLERK

OCT 06 2025

FILED

[Faint, mostly illegible text, possibly a notice or legal document]

NOTICE OF APPEARANCE

[Faint text, possibly names or dates]

OCT 06 2025

IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT OF FLORIDA



MOTION

IN THE STATE OF ILLINOIS, CIRCUIT COURT

FILED

NOV 12 2025

Eni Cantagut Webster
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.

This form is approved by the Illinois Supreme Court and is required to be accepted in all Illinois Circuit Courts. Forms are free at icourts.info/forms.



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 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

Case Number 23CF1146

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 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 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

FILED

3/25/2025 3:51 PM

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

)
)
)
)
)

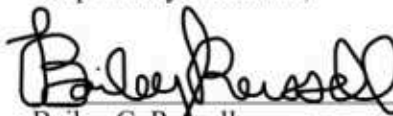
CASE NO: 23CF1146

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