

ALLSTATE FIRE AND CASUALTY INSURANCE COMPANY

CLAIMS & SUBROGATION / OFFICE OF GENERAL COUNSEL

FACSIMILE & EMAIL TRANSMISSION — CLAIM NO. 0670868884 — DATE OF LOSS May 23, 2022

TIME-SENSITIVE — YOUR ACTIVE CLAIM IS BEING INVOKED IN A CRIMINAL PROCEEDING — FAX PART 1 OF 2

DEMAND FOR CLAIMS & LEGAL REVIEW — CLAIM 0670868884

A loss covered by this active policy is being prosecuted as a criminal debt — your claim number is in the record

TO:	Allstate Fire and Casualty Insurance Company Claims / Subrogation Department — Connie O'Connor, (630) 972-7357 Claim No. 0670868884 — Fax: (866) 447-4293 — claims@claims.allstate.com PO Box 660636, Dallas, TX 75266
AND:	Allstate Insurance Company — Office of the General Counsel / Law Department 2775 Sanders Rd, Ste F7, Northbrook, IL 60062 — Fax: (847) 326-5004
CC:	Illinois Dept. of Insurance, Consumer Complaints Div., Fax: (217) 558-2083; Illinois Dept. of Insurance, Director's Office (Springfield), Fax: (217) 782-5020; Allstate Special Investigations Unit (fraud referral); filed of record, No. 1:26-cv-06738 (N.D. Ill.)
FROM:	Ehab Allababidi, Policyholder / Insured, Pro Se 8516 W. Winona St., Chicago, IL 60656 (773) 920-0030 — defcon5ready@gmail.com
RE:	A third-party property claim (O'Brien Landscape, \$2,670.86) arising from the SAME May 23, 2022 accident on which Allstate paid \$16,557.00 to Sentry Insurance under this claim was never tendered to Allstate; the Lake County State's Attorney is now prosecuting that un-routed balance as a criminal debt and invoking this accident in a revocation proceeding, while concealing the active coverage. Demand for claims/subrogation and legal review.
DATE:	June 16, 2026
PAGES:	Pages: 50

Why this is allstate's problem, not just mine:

Allstate has already paid \$16,557.00 to Sentry Insurance for the property-damage subrogation of James W. Smith Printing on this exact claim and accident (Claim 0670868884, Loss Date May 23, 2022). The O'Brien Landscape \$2,670.86 loss is from the same collision and the same policy period — yet it was never tendered to Allstate. Instead, a Lake County prosecutor swore that the insured "willfully failed" to pay it and obtained a zero-bond warrant — using a loss your policy covers, and invoking your claim, in open court. That exposes Allstate to duplicate-recovery and unrouted-claim risk, puts your claim number in a criminal record without your knowledge, and implies to a court that Allstate abandons covered losses. This is now central evidence in a federal civil-rights suit (No. 1:26-cv-06738).

DEMAND FOR CLAIMS & LEGAL REVIEW

Allstate Claim No. 0670868884 — Date of Loss May 23, 2022

I am the insured on Allstate Claim No. 0670868884. I write to you because of a documentary record that Allstate’s own files help complete: on or about June 3, 2025, Allstate paid \$16,557.00 to Sentry Insurance for the subrogation of James W. Smith Printing Company — a property loss arising from the May 23, 2022 collision that also produced the O’Brien Landscape loss. That O’Brien loss is **your claim**. It arises from the same accident, under the same policy, on the same claim number. And yet it was never tendered to Allstate. Instead, the Lake County State’s Attorney’s Office—the same office that, by Allstate’s own records, knew this policy was active—swore a Petition for Revocation alleging that I “willfully failed” to pay \$2,670.86 to O’Brien Landscape. A zero-bond warrant issued on that sworn allegation. The State said nothing to the court about the active Allstate policy that stood behind the very loss it was prosecuting as a crime. The warrant remains outstanding. Your claim number appears in the criminal record. This letter asks Allstate to examine what happened: how an active claim came to be bypassed, *weaponized*, and converted into a custodial arrest warrant against its own insured.

I. THE FACTS — YOUR POLICY PAID THE PARALLEL LOSS; THE ADJACENT LOSS BECAME A CRIME

Allstate has acknowledged this accident under this claim. “We paid Sentry Insurance for their subrogation for the property damage of James W Smith Printing. We paid a total of \$16,557.00 for supported damages submitted to us.” *Those are not my words*. They are Allstate’s. They come from Allstate’s own correspondence, bearing the company’s letterhead, identifying Claim 0670868884 and the May 23, 2022 date of loss by name — the same claim number and date that appear on the restitution order the State is now enforcing against me through a zero-bond warrant. (Exhibit A: Allstate settlement letter and claim email.)

The O’Brien Landscape property loss—\$2,670.86—arises from the **same collision**, under the same policy, on the same claim number. It is a third-party property-damage subrogation matter of exactly the kind Allstate already handled for Smith Printing. It was *never tendered* to Allstate’s subrogation department. It was never routed to the adjuster who handled Smith Printing. Instead, it became a line item in a criminal restitution order — drafted by a public defender who had access to the Allstate file — and then the financial predicate of a sworn petition that obtained a zero-bond warrant for the arrest of the insured whose own policy should have covered the loss.

This sequence—an insurer pays the parallel loss; the adjacent loss from the same accident goes untendered; the State charges the insured with a crime for not paying the untendered balance —*is not an insurance dispute*. It is the factual predicate of a Fourth Amendment malicious-prosecution claim now

pending before the United States District Court for the Northern District of Illinois in *Allababidi v. Shepherd*, No. 1:26-cv-06738 (Kennelly, J.). The same claim file that produced Allstate's \$16,557.00 payment is now the central documentary record in that federal action. That means Allstate's claim file, its correspondence, and its adjuster's records will be sought in federal discovery — unless Allstate acts on its own initiative first.

II. WHY ALLSTATE HAS A DIRECT STAKE IN THIS MATTER

The claim belongs in your subrogation process, not in a criminal restitution order. A covered third-party property loss from this accident was never routed to Allstate. Instead, it was folded into a restitution order that a prosecutor is now enforcing through the criminal courts. If Allstate's coverage is responsive to the O'Brien loss—as it was to the parallel Smith Printing loss—the claim belongs in Allstate's subrogation workflow, not in a Lake County warrant. Leaving a covered loss to be collected externally exposes Allstate to the risk of duplicate recovery and creates a procedural record that a responsive carrier ignored a claim it had already paid on the same accident.

Your claim number is in a criminal record. Allstate Claim 0670868884 and the May 23, 2022 collision are now part of a criminal revocation proceeding, a zero-bond warrant, and a federal civil-rights action. The State's position—that an insured “willfully failed” to pay a debt this policy covers—carries an *implicit* representation about Allstate: that the insurer either would not or did not cover the loss. That representation was made without Allstate's participation, and it affects Allstate's reputation and its contractual obligations under this policy.

Possible fraud or improper claim handling. To the extent any person or entity is positioned to collect twice for the same loss, or to convert a routine civil subrogation matter into a criminal debt by concealing active insurance coverage, that is a matter for Allstate's Special Investigations Unit. This letter serves as a formal referral for Allstate to examine how its own active claim file came to be weaponized against its own insured.

The federal record. The stamped federal filing attached as Exhibit B (the Supplemental Evidentiary Submission: Insurance Indemnification Record, CM/ECF, No. 1:26-cv-06738) places Allstate's \$16,557.00 payment, this claim number, and the restitution order before a federal district judge. Allstate is not a party to that action, but its claim file is now part of the evidentiary record in a civil-rights case against the very officials who bypassed this policy. The Insurance Indemnification Record is enclosed in full.

III. DEMAND

I respectfully request that Allstate take the following steps:

Open a claims and subrogation review of the O'Brien Landscape \$2,670.86 loss under Claim 0670868884 and determine whether it is a covered third-party property-damage claim that should be

handled by Allstate;

Preserve the complete claim file for Claim 0670868884, including all subrogation correspondence, the \$16,557.00 Sentry payment records, and any communications with Lake County or O'Brien Landscape representatives;

Refer this matter to the Office of the General Counsel and the Special Investigations Unit to examine how an active claim was bypassed and invoked in a criminal proceeding; and

Advise me in writing whether Allstate will accept tender of the O'Brien Landscape claim under this policy.

IV. THE CONSEQUENCES OF INACTION

This is not a threat; it is a *forecast* of the procedural consequences if the active coverage continues to be bypassed. If Allstate declines to open the review requested above, I will: (1) serve a subpoena under Fed. R. Civ. P. 45 on Allstate's claims, subrogation, and legal departments in *Allababidi v. Shepherd*, No. 1:26-cv-06738, compelling production of the claim file and testimony about why the O'Brien loss was not routed to this policy; and (2) file a written complaint with the Illinois Department of Insurance regarding the handling of a covered loss under this policy. Allstate is better positioned to review this matter on its own initiative than to have its claim file produced first in federal discovery.

Respectfully,

/s/ Ehab Allababidi

EHAB ALLABABIDI, Insured / Policyholder, Pro Se

8516 W. Winona St., Chicago, IL 60656

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

Dated: June 16, 2026

DECLARATION (28 U.S.C. § 1746): I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief, and that each factual assertion is corroborated by the documents attached hereto.

/s/ Ehab Allababidi

V. EXHIBITS

Exhibit A — Allstate Settlement Confirmation and Claim Email. Allstate's own written confirmation that it paid \$16,557.00 to Sentry Insurance for the Smith Printing property-damage subrogation on Claim 0670868884 (Loss Date May 23, 2022). Establishes the active, responsive coverage on this accident.

Exhibit B — Email Transmission to Allstate (June 16, 2026). The email sent by the insured to Allstate’s claims department at claims@claims.allstate.com on June 16, 2026, placing Allstate on notice of the criminal prosecution and requesting claims/subrogation review under Claim 0670868884.

Exhibit C — Failed Delivery Notice (June 16, 2026). Allstate’s own mail system returned the transmission as undeliverable to claims@claims.allstate.com, confirming that Allstate’s published claims channel did not accept the notice. This failure of electronic service is itself a matter of record.

Exhibit D — Supplemental Evidentiary Submission: Insurance Indemnification Record (CM/ECF, No. 1:26-cv-06738, N.D. Ill., Kennelly, J.). The stamped 58-page federal filing that places Allstate’s claim, the restitution order, and the complete docket chronology before the United States District Court. Attached in full.

EXHIBIT A

Allstate Settlement Confirmation — \$16,557.00 Paid on Claim 0670868884

Allstate Fire and Casualty — Date of Loss May 23, 2022

ALLSTATE CLAIMS & LEGAL DEMAND — CLAIM 0670868884

WHY THIS EXHIBIT MATTERS:

Allstate's own written confirmation that it paid \$16,557.00 to Sentry Insurance for the Smith Printing property-damage subrogation on this claim and accident. It establishes that this policy is active and responsive to property losses from the May 23, 2022 collision—the same collision that produced the O'Brien Landscape \$2,670.86 loss now being prosecuted as a criminal debt.

KEY CONTENT:

- “we paid Sentry Insurance for their subrogation for the property damage of James W Smith Printing”
- “We paid a total of \$16,557.00 for supported damages submitted to us”
- Claim No. 0670868884 | Loss Date May 23, 2022 | Rep: Connie O'Connor, (630) 972-7357
- Proves active, responsive coverage on the same accident as the O'Brien loss



EHAB ALLABABIDI
8516 W WINONA ST
CHICAGO, IL 60656-2720

Information as of June 03, 2025

Claim number: 0670868884

Date of loss: May 23, 2022

Insured:
Ehab Allababidi

Dedicated claim contact:
Connie Oconnor

Direct phone:
630-972-7357

Visit us anytime at MyClaim.com



Per Your Request

Hello Ehab Allababidi,

As we discussed, we paid Sentry Insurance for their subrogation for the property damage of James W Smith Printing. We paid a total of \$16,557.00 for supported damages submitted to us.

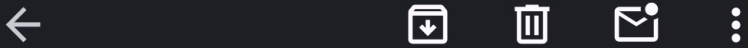
We're here to help. If you need additional information, please visit MyClaim.com or contact us.

State-specific communications:

Any person who knowingly and with intent to defraud any insurance company or other person files an application for insurance or statement of claim containing any materially false information or conceals for the purpose of misleading, information concerning any fact material thereto commits a fraudulent insurance act, which is a crime and subjects such person to criminal and civil penalties.

GEN001





Allstate claim: 000670868884



Inbox



claims@clai...

12:40 PM



to me ▾

See attached letter

Connie Oconnor
Phone: (630) 972-7357
Fax: (866) 447-4293
claims@claims.allstate.com
Allstate Fire and Casualty Insurance Company

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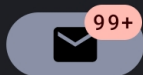
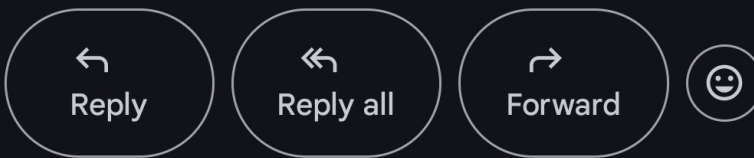


EXHIBIT B

EMAIL TRANSMISSION TO ALLSTATE — June 16, 2026

To: claims@claims.allstate.com — Re: Claim 0670868884

ALLSTATE CLAIMS & LEGAL DEMAND — CLAIM 0670868884

WHY THIS EXHIBIT MATTERS:

The email transmission sent by the insured to Allstate's published claims channel on June 16, 2026, notifying Allstate that its active claim file was being invoked in a criminal revocation proceeding and requesting a claims/subrogation review. Establishes that Allstate had actual notice of the misuse of its claim file in a criminal prosecution of its own insured.

KEY CONTENT:

- Sent to claims@claims.allstate.com on June 16, 2026
- Notifies Allstate of the criminal prosecution of its insured
- Requests claims/subrogation review and preservation of Claim 0670868884
- Establishes Allstate's actual notice of the misuse of its active claim



Ehab Hilfiger <defcon5ready@gmail.com>

Claim No. 0670868884 (DOL 05/23/2022) — Active coverage being prosecuted as a criminal debt in Lake County; demand for claims/legal review before Rule 45 subpoena

1 message

Ehab Hilfiger <defcon5ready@gmail.com>

Tue, Jun 16, 2026 at 5:43 PM

To: claims@claims.allstate.com, xecutive.office@allstate.com

Cc: SIU@allstate.com, DOI.Consumer@illinois.gov, DOI.InfoDesk@illinois.gov, Circuit Clerk <circuitclerk@lakecountyl.gov>, Lake County State's Attorney <statesattorney@lakecountyl.gov>, efile.support@cookcountycourt.com

Bcc: Ehab Hilfiger <defcon5ready@gmail.com>

To Allstate Claims, Subrogation, and the Office of the General Counsel:

I am the insured on Allstate Claim No. 0670868884 (Date of Loss May 23, 2022). I sent the attached 7-page demand by fax to (866) 447-4293 today; this email confirms it and asks for a written response.

The short version: Allstate has already paid \$16,557.00 to Sentry Insurance for the James W. Smith Printing property-damage subrogation on this exact claim and accident. A second property loss from the SAME collision — O'Brien Landscape, \$2,670.86 — was never tendered to Allstate. Instead, the Lake County State's Attorney obtained a restitution order against me for that amount and then swore, in a Petition for Revocation, that I "willfully failed" to pay it — without disclosing to the court that an active Allstate policy covers the loss. A zero-bond warrant issued on that sworn statement and is outstanding. Allstate's claim number and this accident are now in a criminal record and are central evidence in my federal civil-rights lawsuit, Allababidi v. Shepherd, No. 1:26-cv-06738 (N.D. Ill.).

This is Allstate's concern, not only mine: a covered third-party loss is being collected outside the policy (duplicate-recovery / unrouted-claim exposure); Allstate's claim is being invoked in court without Allstate's knowledge; and the State's position implies that Allstate abandons covered losses.

I request that Allstate, within a reasonable time: (1) open a claims/subrogation review of the O'Brien Landscape loss under this claim; (2) preserve the entire claim file, including the \$16,557.00 Sentry payment records and all Lake County / O'Brien communications; (3) refer the matter to the Office of the General Counsel and the SIU; and (4) advise me in writing whether Allstate will accept tender of the O'Brien claim.

If Allstate does not open that review, I will serve a subpoena under Fed. R. Civ. P. 45 on Allstate's claims and subrogation departments in the federal case, and file a written complaint with the Illinois Department of Insurance regarding the handling of this claim. Allstate is far better positioned reviewing this now than having the claim file examined first in federal discovery.

The attached PDF includes Allstate's own written confirmation of the \$16,557.00 payment (Exhibit A). I declare under penalty of perjury (28 U.S.C. § 1746) that the foregoing is true and correct to the best of my knowledge and belief.

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

--

**Ehab Allababidi**

Personal Signature

Phone: 773-920-0030 (CAGE 16QC7)**Email:** defcon5ready@gmail.com**LEGAL NOTICE & CONFIDENTIALITY**

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5 attachments **ALLSTATE_CLAIMS_LEGAL_DEMAND.pdf**
949K **doc10 derosa conduct.pdf**
1861K **doc11 insurance.pdf**
4418K **doc9evidentiarydossier.pdf**
6985K **Federalcivilrights.pdf**
1483K

EXHIBIT C

FAILED DELIVERY NOTICE — ALLSTATE MAIL SYSTEM RETURNED AS UNDELIVERABLE

claims@claims.allstate.com — June 16, 2026

ALLSTATE CLAIMS & LEGAL DEMAND — CLAIM 0670868884

WHY THIS EXHIBIT MATTERS:

Allstate's own mail system returned the insured's transmission as undeliverable, confirming that Allstate's published claims email channel rejected the notice. This is a matter of record: the insured attempted to provide notice through Allstate's designated electronic service channel and the channel failed. The failed delivery notice is attached as Exhibit C.

KEY CONTENT:

- Allstate's mail system rejected delivery to claims@claims.allstate.com
- Confirms the insured's attempt to provide notice through Allstate's designated channel
- The failure of electronic service is itself a matter of record in this matter



Ehab Hilfiger <defcon5ready@gmail.com>

Undeliverable [EXTERNAL] Claim No. 0670868884 (DOL 05/23/2022) — Active coverage being prosecuted as a criminal debt in Lake County; demand for claims/legal review before Rule 45 subpoena

1 message

Allstate Insurance <allstate@service01.email-allstate.com>
Reply-To: claims@claims.allstate.com
To: "defcon5ready@gmail.com" <defcon5ready@gmail.com>

Tue, Jun 16, 2026 at 5:46 PM



Sorry, we can't route your message.

Thank you for contacting us. We are unable to deliver your message, because it contains an attachment in a file format not supported by our system. Please resend your message with attachments in one of the following file formats: .PDF, .JPG, or .DOC.

Questions?

We're here to help. Call 1-800 Allstate[®] (255-7828).

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1-800-ALLSTATE

P_CLAIMS_EOB7C_BOUNCEBACKNOTICE_T

[EMAIL_TO:claims@claims.allstate.com:](mailto:claims@claims.allstate.com)

EXHIBIT D

SUPPLEMENTAL EVIDENTIARY SUBMISSION — INSURANCE INDEMNIFICATION RECORD

CM/ECF, Allababidi v. Shepherd, et al., No. 1:26-cv-06738 (N.D. Ill., Kennelly, J.)

ALLSTATE CLAIMS & LEGAL DEMAND — CLAIM 0670868884

WHY THIS EXHIBIT MATTERS:

The stamped 58-page federal filing that places the complete Allstate indemnification record (Claim 0670868884, \$16,557.00 payment before sentencing), the restitution orders, the probation memorandum, and the full chronological docket of 26 appearances before the United States District Court. Every factual assertion in this demand is corroborated by these documents.

KEY CONTENT:

- Allstate \$16,557.00 payment on Claim 0670868884 — indemnified before sentencing
- Court's \$0.00 entry for the insured loss — uncompensated-loss principle
- Complete chronological index of 26 court appearances in Case No. 23 CF 1146
- Probation memorandum omitted the active Allstate coverage
- Disposition records with nolle prosequi on Count 2



FILED
6/15/2026

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

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

EHAB ALLABABIDI,
Plaintiff, Pro Se,

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

v.

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

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.

PLAINTIFF’S VERIFIED
SUPPLEMENTAL EVIDENTIARY
SUBMISSION (INSURANCE
INDEMNIFICATION RECORD):
SELF-AUTHENTICATING FACTUAL
ANCHOR IN SUPPORT OF THE FOURTH
AMENDMENT MALICIOUS
PROSECUTION CLAIMS

**PLAINTIFF’S VERIFIED SUPPLEMENTAL EVIDENTIARY SUBMISSION
(INSURANCE INDEMNIFICATION RECORD):
SELF-AUTHENTICATING FACTUAL ANCHOR IN SUPPORT OF THE
FOURTH AMENDMENT MALICIOUS PROSECUTION CLAIMS**

*Authenticating Plaintiff’s Allstate indemnification records and the Lake County restitution and disposition orders that bear on the financial predicate of the May 14, 2026 Petition for Revocation — evidence in support of the Fourth Amendment malicious-prosecution and related claims pleaded in the Verified Complaint [Doc. 1], and supplementing the Evidentiary Nexus Dossier [Doc. 9]
(SUBMITTED FOR EVIDENTIARY PURPOSES ONLY)*

Plaintiff Ehab Allababidi, proceeding pro se, files this Verified Supplemental Evidentiary Submission in support of his Verified Complaint [Doc. 1] pursuant to Fed. R. Civ. P. 5(d), in the form prescribed by N.D. Ill. Local Rule 5.2. The attached exhibits are self-authenticating under Fed. R. Evid. 902(13)–(14) and are accompanied by Plaintiff’s declaration under 28 U.S.C. § 1746. The submission places of record the Allstate indemnification correspondence and the Lake County restitution and disposition orders bearing on the financial ground of the May 14, 2026 Petition for Revocation. It requests no relief; it perfects the documentary record on which the Fourth Amendment malicious-prosecution and related claims will be tried, and it parallels, on the financial ground, the Evidentiary Nexus Dossier [Doc. 9] already of record on the drug ground.

I. INTRODUCTION

The May 14, 2026 *Petition for Revocation* charges Plaintiff with the *willful* failure to satisfy a \$2,670.86 restitution obligation to O’Brien Landscape. The documents authenticated here defeat that

1 charge at its root. The property loss underlying the obligation arose from the May 23, 2022 collision for
2 which Plaintiff’s insurer, Allstate Fire and Casualty Insurance Company, had already paid \$16,557.00
3 under the same active policy, on the same claim, for a parallel loss from the same crash.

4 The point is not that a balance was hard to pay. It is more elemental: an active, responsive
5 insurance policy stood behind the very loss the State enforced as a “*willful*” criminal default. A
6 revocation ground that rests on a loss an insurer has already answered is a ground without *probable*
7 *cause*—and the absence of probable cause is the heart of the Fourth Amendment malicious-prosecution
8 claim pleaded in the Complaint. Under the landmark Supreme Court authority of *Bearden v. Georgia*,
9 461 U.S. 660 (1983), the State is constitutionally barred from revoking probation for nonpayment of
10 restitution without an inquiry into the probationer’s *ability to pay* and a finding of *willfulness*. The
11 presence of active, responsive insurance coverage ready to cover the underlying debt satisfies the
12 willfulness threshold and legally estops the State from converting a civil subrogation matter into a
13 criminal revocation under the *Civil-Criminal Subrogation Estoppel Theory*. The exhibits that prove this
14 financial premise follow.

14 **II. THE INDEMNIFICATION: PLAINTIFF’S INSURER PAID THE LOSS**

15 The operative fact is established by Allstate’s own written correspondence, authenticated at
16 Exhibits L and M. In a letter Plaintiff received on or about June 3, 2025, Allstate confirmed, in terms
17 that are *past-tense and unqualified*, that it had “paid Sentry Insurance for their subrogation for the
18 property damage of James W Smith Printing. We paid a total of \$16,557.00 for supported damages
19 submitted to us.” The correspondence identifies the claim number (0670868884), the date of loss (*May*
20 *23, 2022*), Plaintiff as the insured, and the claims representative of record (Connie O’Connor,
21 630-972-7357).

22 Three features of that record matter, and each is documentary rather than argumentative. First, the
23 policy was *active and responsive* to this accident: Allstate did not lapse, dispute, or decline the claim; it
24 paid it. Second, the payment was *made before sentencing*—Allstate’s written confirmation predates the
25 September 8, 2025 sentencing by approximately three months, so the coverage was a present, knowable
26 fact at every stage that followed. Third, the James W. Smith Printing loss and the O’Brien Landscape
27 loss arose from the *same collision, under the same policy, on the same claim, on the same date of loss*.
28 The record establishes that the insurer who paid the one was the insurer contractually responsible for
the other.

28 **III. THE RESTITUTION RECORD AND THE UNCOMPENSATED-LOSS PRINCIPLE**

The state court's own orders, authenticated at Exhibit I, complete the picture. At sentencing the court ordered restitution of \$2,670.86 to O'Brien Landscape and **\$0.00** to James W. Smith Printing. The \$0.00 entry is significant, and it is the court's, not Plaintiff's: it reflects that the Smith Printing loss had already been satisfied by insurance and therefore was not a loss the court would order a defendant to pay a second time.

That treatment is what Illinois law requires. Under 730 ILCS 5/5-5-6, restitution reaches an actual loss *not otherwise compensated*; a loss a responsive insurer has paid is not an uncompensated loss. *People v. Mathews*, 2016 IL App (1st) 140353. The sentencing court applied that rule to Smith Printing. The O'Brien Landscape loss arose from the same accident and fell under the same Allstate policy that paid the parallel claim.

The \$2,670.86 figure traces not to any insurer-tested accounting but to the probation memorandum of April 8, 2026 (Exhibit N), which forwarded the number to the State while omitting the active Allstate coverage on the same accident. No inquiry into active coverage, insurance subrogation status, or Plaintiff's *ability to pay* was conducted prior to forwarding this figure or issuing the zero-bond bench warrant, in direct violation of the constitutional protections established under *Bearden*.

IV. THE FOUR-YEAR PROSECUTION: DOCKET CHRONOLOGY AND CONTINUED SEIZURE

A. Duration. The duration of the prosecution, computed from the native circuit-court record, is exact:

Interval	From → To	Elapsed
Date of loss to present	05/23/2022 → 06/15/2026	1,484 days (≈ 4.06 years), case still open
Indictment to present	06/14/2023 → 06/15/2026	1,097 days (exactly 3.00 years)
Date of loss to disposition	05/23/2022 → 09/08/2025	1,204 days (≈ 3.30 years)
Level 2 pretrial supervision	04/10/2024 → 09/08/2025	516 days (17 months) of continuous supervision

B. The Native Docket of the Prosecution. The Lake County circuit-court production (the native case files) documents the complete chronology of compelled court appearances, successive continuances, and supervision orders across the prosecution. Each entry below is a certified circuit-court record, attached at Exhibit K (and its parts). Together they show a prosecution not merely commenced but continued and actively enforced against Plaintiff for 1,484 days — sustaining a Fourth Amendment seizure through the period in which the State's own files (the Allstate indemnification and the "all negative" adjudication) undercut probable cause.

Date	Native Docket Entry	Significance	Liberty Restraint
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05/23/2022	Date of loss — multi-vehicle crash, IL Route 22 (LPD 2022-7193).	Allstate coverage active from this date.	None (pre-commencement)
06/14/2023	Grand Jury indictment, No. 23 CF 1146.	Commencement of the prosecution.	Compelled appearance
03/30/2024	First Appearance: arrested in custody; PD appointed; Level 2 Pretrial ordered (Ex. K).	Arrest and initial restraint on liberty.	Custodial arrest; pretrial supervision
04/10/2024	Level 2 pretrial supervision begins (AOIC, 19th Cir.).	Start of the 516-day supervision period.	Pretrial supervision; reporting; travel limits
05/02/2024	Status Of Attorney: PD appointed; Arraignment set (Ex. J).	Supervision conditions imposed.	Pretrial release conditions
05/14/2024	Arraignment: NG plea entered; discovery orders (Ex. K).	First substantive hearing.	Compelled appearance
06/12/2024	State's Disclosure (20 witnesses) and Motion for Discovery (Ex. K).	Formal motion practice initiated.	Compelled appearance
06/20/2024	Court Order: reciprocal discovery ordered (14 days) (Ex. K).	Discovery compliance ordered.	Compelled appearance
06/25/2024	Pre-Trial: Heard and Continued; set Jul 23 (Ex. K).	First continuance; no trial set.	Compelled appearance
07/23/2024	Pre-Trial: Heard and Continued; Motion of Defense; set Aug 20 (Ex. K).	Second continuance.	Compelled appearance
08/20/2024	Pre-Trial via video: Heard and Continued; set Sep 24 (Ex. K).	Third continuance.	Compelled appearance (video)
09/24/2024	Pre-Trial: sent to test for pretrial; set Oct 11 (Ex. J).	Compelled drug testing ordered.	Compelled drug/alcohol testing
10/11/2024	Pre-Trial: Heard and Continued; admonished re: no drugs/alcohol; set Oct 29 (Ex. K).	Fourth continuance.	Compelled appearance
10/29/2024	Pre-Trial: State's Petition to Revoke Pretrial Release WITHDRAWN; set Nov 26 (Ex. K).	State conceded lack of grounds for detention.	Compelled appearance
11/26/2024	Pre-Trial + Status (same day): Def tested negative; admonished re: conditions; set Jan 3 (Ex. K).	Defendant compliant with testing.	Compelled drug testing
01/03/2025	Pre-Trial: Heard and Continued; State motion re: medical records; set Feb 18 (Ex. K).	Fifth continuance.	Compelled appearance
02/18/2025	Pre-Trial: ordered to test at Pretrial directly after court; set Plea Mar 19 (Ex. J).	Second compelled testing ordered.	Compelled drug/alcohol testing
03/19/2025	Plea via Zoom: Heard and Continued; set Apr 30 (Ex. K).	No plea reached; continued.	Compelled appearance (Zoom)
03/25–26/2025	Defense Answer to Discovery (03/25) and Court Order (03/26) (Ex. K).	Discovery compliance; PD appointment confirmed.	Compelled appearance
04/30/2025	Plea via video: Heard and Continued; set Jun 12 (Ex. K).	No plea reached; continued.	Compelled appearance (video)
On or before 06/03/2025	Allstate pays \$16,557.00 to Sentry for Smith Printing subrogation (Ex. L & M).	Parallel loss indemnified before sentencing.	N/A (insurance indemnification)
06/12/2025	Plea: Case Called; Motion of Defense; set Pre-Trial Jul 23 (Ex. K).	No plea; sent back to Pre-Trial.	Compelled appearance
06/23/2025	Order Entered: HIPAA forms processed (Ex. K).	Administrative step.	Compelled appearance
07/23/2025	Pre-Trial: 402 conference; set Aug 12 (Ex. K).	Plea negotiations begin.	Compelled appearance
08/12/2025	Pre-Trial FINAL: set Plea Aug 26 (Ex. K).	Final pretrial.	Compelled appearance
08/26/2025	Plea FINAL: Heard and Continued; set Sep 8 (Ex. K).	Disposition scheduled.	Compelled appearance
09/08/2025	DISPOSITION: Count 1 Guilty, Count 2 Nolle Prosequi; 30 mo. IFP; restitution \$2,670.86 (Ex. I, Q).	1,204 days from loss; prosecution resolved.	Probation conditions imposed

10/06/2025	Faretta hearing: Defendant Proceeds Pro Se; motion to stay driving DENIED (Ex. K).	Defendant invokes Faretta; pro se status confirmed.	Probation conditions
12/11/2025	Motion of Defense: motion entered and continued (Ex. K).	Post-disposition litigation.	Probation conditions
01/26/2026	Status of Motion (video): Heard and Continued (Ex. K).	Appeal/motion practice ongoing.	Probation conditions
03/10/2026	Status of Motion: STRICKEN — NO SHOW (Ex. K).	Defendant did not appear.	Probation conditions
04/08/2026	Probation memorandum forwards \$2,670.86 to State, omitting Allstate coverage (Ex. N).	Provenance of the enforced figure.	Administrative — precedes revocation
05/14/2026	Petition for Revocation sworn, alleging willful nonpayment.	New prosecution on indemnified loss.	Initiation of revocation prosecution
05/28/2026	Zero-bond bench warrant issued; "PD APPOINTED" on warrant (Ex. K, warrant).	No probable-cause hearing; no Bearden inquiry.	Custodial arrest warrant (zero bond)
06/15/2026	Prosecution remains open and pending.	1,484 days from loss; still enforced.	Active warrant; continuing restraint

C. Pretrial Supervision as a Continuing Restraint on Liberty. For the 516 days between April 10, 2024 and the September 8, 2025 disposition, Plaintiff was subject to Level 2 pretrial supervision: mandatory reporting, travel restrictions, and drug- and alcohol-testing he was ordered to undergo at Pretrial Services immediately after hearings (Exhibit J). These are restraints on liberty, not mere administrative monitoring, and they were sustained throughout the period in which the State's own files had already answered the grounds of the prosecution. The Fourth Amendment governs deprivations of liberty effected through legal process even after its initiation. *Manuel v. City of Joliet*, 580 U.S. 357, 367 (2017); *Manuel v. City of Joliet*, 903 F.3d 667, 670 (7th Cir. 2018) (*Manuel II*). The Seventh Circuit has recognized that conditions of pretrial release may themselves implicate the Fourth Amendment given the significant restrictions on liberty they impose, while leaving the precise scope of that question open. *Mitchell v. City of Elgin*, 912 F.3d 1012, 1015–16 (7th Cir. 2019). These authenticated conditions are the factual basis on which the continued-seizure component of Plaintiff's malicious-prosecution claim will be measured.

V. THE INSURANCE RECORD IN SUPPORT OF THE MALICIOUS-PROSECUTION CLAIMS

A. Absence of probable cause on the financial ground (The Bearden Nexus). The Supreme Court's landmark ruling in *Bearden v. Georgia*, 461 U.S. 660 (1983), strictly prohibits the revocation of probation for failure to pay restitution without an explicit judicial inquiry into the probationer's *ability to pay* and a specific finding of *willfulness*. Under standard subrogation principles, the active Allstate policy (Claim 0670868884) was a responsive civil indemnity pool established to absorb the property loss arising from the May 23, 2022 collision. The defense will attempt to argue that because the Sentry subrogation payment of \$16,557.00 was allocated to James W. Smith Printing and not

O'Brien Landscape, the payout did not satisfy the specific debt listed in the May 14, 2026 Petition for Revocation. This argument fails as a matter of constitutional law. The legal reality is that the presence of an active, responsive insurance carrier covering the underlying loss bears directly on whether any nonpayment could be found *willful*. The failure to route the claim to the active insurer, followed by a zero-bond bench warrant on May 28, 2026 issued without any ability-to-pay inquiry, is incompatible with the willfulness finding *Bearden* requires before liberty may be taken for nonpayment. Incarceration for nonpayment of a loss a responsive insurer stood ready to cover, without the constitutionally required inquiry, presents a due process and Fourth Amendment question — not a mere billing dispute.

B. Malice — Two Grounds, Each Answered by the State's Own Records. The Petition for Revocation rested on two grounds, and the State's own records answer both: the drug ground, addressed by Officer Weeks's written acknowledgment of Plaintiff's prescription adherence (Doc. 9), and the financial ground, addressed by the Allstate subrogation payment (Exhibits L and M). A sworn petition that advances two grounds the prosecuting authority's own files refute is probative of the malice and improper purpose the Complaint alleges; the convergence of two independently answered grounds in a single sworn instrument is difficult to reconcile with mere oversight.

Under ordinary subrogation principles, Allstate's \$16,557.00 payment to Sentry Insurance (Exhibit M) tendered the property loss from the collision to a responsive insurer. The April 8, 2026 probation memorandum (Exhibit N) forwarded the \$2,670.86 figure to the State without reference to that active coverage. A party that does not route a loss to the responsive insurer, and then charges the resulting balance as a willful refusal to pay, supplies the improper-purpose evidence relevant to the § 1983 malicious-prosecution claim. The omission is shown in the comparison below:

April 8, 2026 Probation Memorandum (Exhibit N)	June 3, 2025 Allstate Settlement Letter (Exhibit M)
Asserts default on the restitution obligation, claiming Plaintiff willfully failed to pay \$2,670.86 to O'Brien Landscape.	Confirms that Allstate paid a total of \$16,557.00 for supported damages submitted on Claim 0670868884 for the May 23, 2022 collision.
Omits all references to active insurance coverage, the pending insurer claims, or the parallel subrogation payout.	Explicitly identifies Allstate as the active insurer responding to the May 23, 2022 collision under Plaintiff's policy.
Frames the failure to pay as a "willful" default, recommending a zero-bond bench warrant.	Establishes a responsive civil indemnity pool, demonstrating the total absence of criminal intent or "willful" default under <i>Bearden</i> .

C. Favorable Termination Preservation. The disposition order (Exhibit Q) reflects that Count 2 (Aggravated Speeding) was resolved by *nolle prosequi* on September 8, 2025. This constitutes a favorable termination under the federal standard established in *Thompson v. Clark*, 596 U.S. 36 (2022). Plaintiff explicitly preempts any defense reliance on modified state-law interpretations of *nolle*

1 *prosequi* that require affirmative indications of innocence. Under *Thompson*, the federal standard
2 requires only that the prosecution ended *without a conviction*, independent of any state-law innocence
3 requirement. Count 2 is therefore a fully actionable basis for the malicious-prosecution claim under §
4 1983.

5 **D. The Immunity Boundary.** To preempt the defendants' anticipated assertions of *absolute*
6 *prosecutorial immunity* (for Assistant State's Attorneys) or *quasi-judicial immunity* (for probation
7 officers), Plaintiff's claims are anchored specifically in *investigative* and *administrative* misconduct
8 that occurred prior to the initiation of the judicial revocation proceeding. The absolute immunity shield
9 only protects a prosecutor's actions as an advocate in court. By targeting the deliberate concealment of
10 known financial coverage and the manipulation of accounting records—specifically the drafting and
11 transmission of the April 8, 2026 probation memorandum (Exhibit N)—Plaintiff targets administrative
12 and investigative acts. These actions are not protected by absolute immunity, but are only subject to
13 qualified immunity. Under the Fourth Amendment, qualified immunity is defeated by showing a
14 reckless disregard for clearly established constitutional rights, which the bad-faith omission of the
15 active Allstate coverage and the falsified drug-testing records here manifest.

15 **VI. AUTHENTICATION (FED. R. EVID. 902(4) & 901; 28 U.S.C. § 1746)**

16 The certified circuit-court records (Exhibits I, J, K, and Q) are self-authenticating as certified
17 copies of public records under Fed. R. Evid. 902(4), and the probation memorandum (Exhibit N) is a
18 record of a coordinate state agency. The Allstate email and settlement letter (Exhibits L and M) are
19 authenticated by Plaintiff's declaration under 28 U.S.C. § 1746 (Fed. R. Evid. 901(b)(1)), and bear five
20 independent indicia of reliability that further support self-authentication under Rule 902(13)–(14):
21 Allstate's corporate letterhead; a specific claim number (0670868884); a specific date of loss (May 23,
22 2022); the insured's exact name and address; and a specific amount (\$16,557.00) paid to a named
23 counterparty (Sentry Insurance).

24 Plaintiff further declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that Exhibits L
25 and M are true, correct, and unaltered copies of the Allstate email and settlement letter as he received
26 them in connection with Allstate Claim No. 0670868884, as they appear in his email and on his device.
27 The email (Exhibit L) was sent from claims@claims.allstate.com, dated June 3, 2025, bearing the
28 subject line "Allstate claim: 0000670868884." The contents accurately reflect Allstate's confirmation
of the payment of \$16,557.00 to Sentry Insurance for the property-damage subrogation of James W.
Smith Printing arising from the May 23, 2022 accident. Plaintiff will produce the native electronic files,
with full header metadata, upon request or in discovery.

VII. EVIDENCE-PRESERVATION DEMAND (FED. R. CIV. P. 37(e))

Consistent with the Mandatory Litigation Hold already served on all Defendants (Complaint, Exhibit 8), Plaintiff supplements that hold with the following targeted demand directed to the insurance and restitution record. Defendants have a duty to preserve evidence they know or reasonably should know is relevant to this litigation. *Silvestri v. Gen. Motors Corp.*, 271 F.3d 583, 590 (4th Cir. 2001). Because the defendants proceeded to issue and execute a zero-bond bench warrant on May 28, 2026, without conducting any ability-to-pay inquiry or verification hearing, any destruction of internal emails, text messages, system logs, or personal notes regarding the decision to bypass standard verification protocols will be treated as bad-faith spoliation, and will trigger a formal request for adverse-inference jury instructions under Fed. R. Civ. P. 37(e).

Category	Records to Preserve	Custodian
Insurance Coordination	All communications between any agent of the Lake County State's Attorney's Office or Adult Probation and O'Brien Landscape regarding the \$2,670.86 restitution, including any notice (or non-notice) directing O'Brien to file with Allstate (Claim 0670868884, Loss Date 05/23/2022).	Lake County State's Attorney; Lake County Adult Probation
Sentencing Disclosure	All records in the Case 23 CF 1146 file bearing on knowledge or disclosure of the Allstate payment at or before the September 8, 2025 sentencing.	Lake County State's Attorney — file 23 CF 1146
Restitution Figure Provenance	All materials underlying the \$2,670.86 figure, including the April 8, 2026 probation memorandum and any supporting accounting or insurance inquiry.	Lake County Adult Probation

VIII. CONCLUSION

The claim that Ehab Allababidi willfully defaulted on a debt his insurer had already paid is not a theory; it is a documentary record. Allstate's own letter—bearing claim number 0670868884, identifying the May 23, 2022 collision by date and the loss by name—states it in terms that admit no qualification: “We paid a total of \$16,557.00 for supported damages submitted to us.” The sentencing court entered \$0.00 for that same insured loss on the same day it ordered \$2,670.86 to O'Brien Landscape—applying the uncompensated-loss principle the State then ignored when it swore out the Petition for Revocation. The probation memorandum that forwarded that figure omitted the active Allstate coverage. The warrant that issued recited “PD APPOINTED” for a defendant this Office has said in writing it does not represent. Each document answers the charge ahead of it. The file refutes itself.

This submission requests no relief. It places in the record what the record already contains: an insurer's paid claim, a court's \$0.00 entry, a probation memorandum that omitted what it should have disclosed, and a warrant that enforces an obligation the State's own insurer answered three months before sentencing. The exhibits are authenticated and submitted in support of the Verified Complaint

1 [Doc. 1]. The Clerk is directed to file them of record.

2 Respectfully submitted,

3 /s/ Ehab Allababidi

4 **EHAB ALLABABIDI**, *Pro Se* Plaintiff

5 8516 W. Winona St., Chicago, IL 60656

6 (773) 920-0030 | defcon5ready@gmail.com

Dated: June 15, 2026

7 **CERTIFICATE OF FILING AND SERVICE**

8
9 I, EHAB ALLABABIDI, certify under penalty of perjury that on June 15, 2026, I caused the foregoing *Plaintiff's*
10 *Verified Supplemental Evidentiary Submission in Support of the Malicious-Prosecution and Related Claims: The*
11 *Insurance-Indemnification Record* to be filed with the Clerk of the United States District Court for the Northern
12 District of Illinois via the District's Pro Se Electronic Filing Portal in Case No. 1:26-cv-06738. This action is in its
13 preliminary stages; no summons has issued and no Defendant has appeared. The CM/ECF system will
14 automatically serve all counsel of record promptly upon their appearance in this action.
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INDEX OF AUTHENTICATED EXHIBITS

Ex.	Document	What It Establishes
I	Disposition: Sentencing, Restitution & Plea Minutes (Sept. 8, 2025) <i>[Pages 11–16]</i>	Restitution of \$2,670.86 to OBrien Landscape and \$0.00 to James W. Smith Printing — the courts own application of the uncompensated-loss principle to an insured loss.
J	Pretrial Supervision & Mandatory Testing Records (May 2, 2024 – Feb. 18, 2025) <i>[Pages 17–20]</i>	Three certified minute records reflecting Level 2 supervision and the orders to test directly after court — the continued seizure (also within the docket at Ex. K).
K	Chronological Docket of Court Appearances & Continuances (Mar 2024 – May 2026) <i>[Pages 21–50]</i>	Certified minute records of the hearings, continuances, and post-disposition and revocation events across the prosecution (supervision/testing at Ex. J; disposition at Ex. I).
L	Allstate Claim Email (June 3, 2025) <i>[Pages 51–52]</i>	Active, responsive Allstate policy; claim number and claims-representative contact. Self-authenticating under Fed. R. Evid. 902(13)–(14).
M	Allstate Settlement Confirmation Letter (June 3, 2025) <i>[Pages 53–54]</i>	Written confirmation of the \$16,557.00 payment to Sentry Insurance on Claim 0670868884 (Loss Date May 23, 2022) — the core indemnification document.
N	Probation Restitution Memorandum (April 8, 2026) <i>[Pages 55–56]</i>	Source of the \$2,670.86 figure forwarded to the State; establishes the provenance of the number absent any insurer-tested accounting.
Q	Disposition Order (Sept. 8, 2025) <i>[Pages 57–58]</i>	Count 1 — Guilty; Count 2 (Aggravated Speeding) — Nolle Prosequi. Bears on the favorable-termination element of the malicious-prosecution claim under <i>Thompson v. Clark</i> , 596 U.S. 36 (2022).

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

EXHIBIT I

Disposition: Sentencing, Restitution, and Plea Minutes (September 8, 2025)

September 8, 2025

SUPPLEMENTAL EVIDENTIARY SUBMISSION — ALLABABIDI v. SHEPHERD — CASE NO. 1:26-cv-06738

Custodian:	Circuit Court Clerk, Lake County	Date:	September 8, 2025
Verification:	Certified / Self-Authenticating	Bates Range:	Circuit Court Native Files
Supports:	Insurance Indemnification; Restitution Record		

PROVING VALUE — WHAT THIS EXHIBIT ESTABLISHES:

On September 8, 2025, the Circuit Court entered a Financial Sentencing Order, a separate Order for Restitution directing Defendant to pay \$2,670.86 to O'Brien Landscape for property damage from the May 23, 2022 collision, and recorded the plea disposition (Count 1 guilty; Count 2 nolle prosequi). The restitution order assessed \$0.00 to James W. Smith Printing because Allstate had already paid \$16,557.00 on Claim 0670868884 for that identical loss.

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

FILED

JUN 16 2026

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(e))	\$	_____
_____ g.	<input type="checkbox"/>	Street Value – Methamphetamine, possession/manufacture (705 ILCS 135/15-70(7))	\$	_____
_____ h.	<input type="checkbox"/>	Order of protection violation (705 ILCS 135/15-70(8))	\$200 per conviction	\$ _____
_____ i.	<input type="checkbox"/>	Order of protection violation (705 ILCS 135/15-70(9))	\$ 25 per violation	\$ _____
_____ j.	<input type="checkbox"/>	State’s Attorney petty or business offense (705 ILCS 135/15-70(10)(A))	\$ 4	\$ _____
_____ k.	<input checked="" type="checkbox"/>	State’s Attorney conservation or traffic offense (705 ILCS 135/15-70(10)(B))	\$ 2	\$ <u>2</u>
_____ l.	<input type="checkbox"/>	Speeding in a construction zone (705 ILCS 135/15-70(11))		
	<input type="checkbox"/>	Interstate Highway	<input type="checkbox"/>	County
_____ 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"/>
			\$ 250	\$ _____
			Subtotal – Conditional Assessment Amount:	\$ _____
			TOTAL CRIMINAL AND CONDITIONAL ASSESSMENTS:	\$ <u>551.00</u>

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

a. Waiver of Criminal Court Assessment granted _____ (does not apply to fines or IVC)

(Date)

100% 75% 50% 25% Waiver amount: \$ (_____)

Balance of assessments and conditional assessments after credits are applied: \$ _____

7. Other Assessments:

a. Restitution (See separate Restitution Order for details) \$ _____

b. Probation/Supervision/Conditional Discharge Fee \$ 50 /month x 30 months \$ 1500

c. Public Defender assessment \$ 100

d. Service Provider cost Urinalysis Testing \$ 125 \$ 125

e. Therapeutic Intensive Monitoring Fee \$ _____

f. Other: _____ \$ _____

g. Pretrial Bond Services Fee \$ _____

h. Court Ordered Contribution: Agency & Address: _____ \$ _____

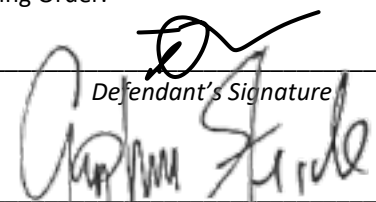
i. Roadside Memorial Fund \$ 50 \$ _____

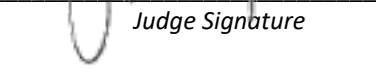
8. Bond posted: _____ **minus 10% bond fee** _____ **= Bond Available:** \$ _____

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

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

Dated: September 8, 2025


Defendant's Signature


Judge Signature

Entered this date: 09/08/2025, 20

FILED

JUDICIAL CLERK

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:

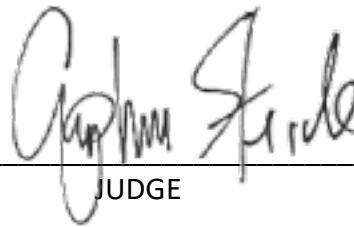
Name O'Brien Landscape
Address 5700 Howard St.
City, Skokie State, IL Zip 60077

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:



)		
)		
People)	Case No.	23CF00001146
)	Location:	Courtroom 611
Plaintiff,)	Event Date:	September 8, 2025 9:00 AM
v.)	Event Type:	Plea
)	FINAL	
PEOPLE VS ALLABABIDI)	Clerk:	Amy B
Defendant.)		

Charge(s):

Count 1 625 ILCS 5/11-503(a)(1) AGG RECKLESS DRVG/BODILY HARM 4 Guilty
 09/08/2025

Count 2 625 ILCS 5/11-601.5(b) SPEEDING 35+ MPH OVER LIMIT A Nolle Prosequi
 09/08/2025

Criminal/Traffic - Minutes

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

Present in Court

ALLABABIDI, EHAB, Defendant present in person

Nature of Proceedings:

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



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

Defendant Advised of Right to Appeal

It is hereby ordered:

Charge(s):

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

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

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

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

Additional Sentence Information

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

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

Additional Sentence Information

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

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

Alcohol & Drug

09/08/2025 Employment - Ordered

09/08/2025 Not Possess Illegal Drug - Ordered

Additional Sentence Information

09/08/2025 No Cannabis - Ordered

09/08/2025 No Alcohol Consumed - Ordered

09/08/2025 Nowhere Alcohol Sold - Ordered

09/08/2025 No Driving - Ordered

Do Not Drive Without Valid Driver's License

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

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

09/08/2025 Administrative Sanctions Program - Ordered

09/08/2025 Jail - 180.0 Day - Stayed

Additional Sentence Information

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

Additional Sentence Information

09/08/2025 No Contact - Ordered

Additional Sentence Information

09/08/2025 Attend Program - Ordered

03/07/2028 Victim Impact-Live

09/08/2025 Attend Program - Ordered

03/07/2028 8 Hour Defensive Driving

09/08/2025 Evaluation - Ordered

Rehab Assessment & Serv

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

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

Release

EXHIBIT J

Pretrial Supervision and Mandatory Testing Records (May 2, 2024 – February 18, 2025)

2024-2025

SUPPLEMENTAL EVIDENTIARY SUBMISSION — ALLABABIDI v. SHEPHERD — CASE NO. 1:26-cv-06738

Custodian:	Circuit Court Clerk / Pretrial Services, Lake County	Date:	2024-2025
Verification:	Certified / Self-Authenticating	Bates Range:	Circuit Court Native Files
Supports:	Malicious Prosecution — Continued Seizure		

PROVING VALUE — WHAT THIS EXHIBIT ESTABLISHES:

Three certified circuit-court minute records documenting the conditions of pretrial supervision. The September 24, 2024 minute reflects that Defendant was sent to test for pretrial directly after the hearing; the February 18, 2025 minute reflects an order to report and test at Pretrial directly after court. These records evidence the ongoing restraints on Defendant's liberty (also reflected in the complete docket at Exhibit K).



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

Charge(s):

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

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

Criminal/Traffic - Minutes

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

Present in Court

ALLABABIDI, EHAB, Defendant present in person

Nature of Proceedings:

Event Result: Heard 05/02/2024.

Appoint Public Defender

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

Pretrial Release Shall Continue



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

Charge(s):

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

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

Criminal/Traffic - Minutes

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

Present in Court

ALLABABIDI, EHAB, Defendant present in person

Nature of Proceedings:

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

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

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

Pretrial Release Shall Continue



People)
)
)

Plaintiff,)

v.)

PEOPLE VS ALLABABIDI)

Defendant.)
)
)

Case No. 23CF00001146

Location: Courtroom 611

Event Date: February 18, 2025 9:00 AM

Event Type: Pre-Trial

/ STAT. OF DISCOVERY OF MEDICAL
 RECORDS

Clerk: Amy B

Charge(s):

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

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

Criminal/Traffic - Minutes

ECR Specialist, Lake County Court Reporters

Emma Smoler, States Attorney

Christopher R Stride, Judge

Bailey Russell, Public Defender

Present in Court

ALLABABIDI, EHAB, Defendant present in person

Nature of Proceedings:

Event Result: Heard 02/18/2025.

Motion of Defense

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

Admonish

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

Pretrial Release Shall Continue

EXHIBIT K

Chronological Docket of Court Appearances and Continuances (March 30, 2024 – May 28, 2026)

March 30, 2024 – May 28, 2026

SUPPLEMENTAL EVIDENTIARY SUBMISSION — ALLABABIDI v. SHEPHERD — CASE NO. 1:26-cv-06738

Custodian:	Circuit Court Clerk, Lake County	Date:	March 30, 2024 – May 28, 2026
Verification:	Certified / Self-Authenticating	Bates Range:	Circuit Court Native Files
Supports:	Malicious Prosecution — Continuance & Duration		

PROVING VALUE — WHAT THIS EXHIBIT ESTABLISHES:

The certified circuit-court minute records of the court appearances and continuances in No. 23 CF 1146, in chronological order from the March 30, 2024 first appearance through the May 28, 2026 revocation proceeding. At each pre-disposition hearing the court continued the matter and ordered that “Pretrial Release Shall Continue,” and no trial date was set before the September 8, 2025 disposition — 817 days after indictment. The supervision and testing entries are reproduced at Exhibit J, and the sentencing and restitution orders at Exhibit I, so that no record is attached twice. See the Chronological Index on the following page.

EXHIBIT K — CHRONOLOGICAL INDEX OF HEARINGS & COURT EVENTS

Case No. 23 CF 1146, 19th Judicial Circuit, Lake County, Illinois — All 26 appearances in exact chronological order

#	Date	Event Type	Disposition / Outcome	Page
1	Mar 30, 2024	First Appearance	arrested in custody on warrant; PD appointed (Ticsay); Level 2 Pretrial ordered; set Status ...	23
2	May 14, 2024	Arraignment	NG plea entered; discovery ordered (14 days); set Pre-Trial Jun 25; Pretrial Release Shall C...	24
3	Jun 12, 2024	State's Disclosure (20 witnesses) and Motion for Discovery filed, ordering defense response within 14 days	State's Disclosure (20 witnesses) and Motion for Discovery filed, ordering defense response ...	25
4	Jun 12, 2024	State's Motion for Discovery	demands witness lists, documents, and alibi info within 14 days	27
5	Jun 20, 2024	Court Order	reciprocal discovery ordered (14 days); defense to disclose defenses and witnesses	28
6	Jun 25, 2024	Pre-Trial (Stride, J	Heard and Continued; set Pre-Trial Jul 23; Pretrial Release Shall Continue	29
7	Jul 23, 2024	Pre-Trial (Stride, J	Heard and Continued; Motion of Defense; set Pre-Trial Aug 20; Pretrial Release Shall Continue	30
8	Aug 20, 2024	Pre-Trial (Stride, J	Heard and Continued (def via video); set Pre-Trial Sep 24 MUST APPEAR IN PERSON; Pretrial Re...	31
9	Oct 11, 2024	Pre-Trial (Stride, J	Heard and Continued; admonished re: no drugs/alcohol; set Pre-Trial Oct 29; Pretrial Release...	32
10	Oct 29, 2024	Pre-Trial (Stride, J	State's Petition to Revoke Pretrial Release WITHDRAWN; set Pre-Trial Nov 26; Pretrial Releas...	33
11	Nov 26, 2024	Pre-Trial (Stride, J	Heard; Def tested negative; sent for testing; set Pre-Trial Jan 3, 2025; Pretrial Release Sh...	34
12	Nov 26, 2024	Status (Stride, J	same-day continued hearing; admonished re: conditions; Motion of Defense; set Pre-Trial Jan ...	35
13	Jan 3, 2025	Pre-Trial (Stride, J	Heard and Continued; State motion re: medical records; set Pre-Trial Feb 18; Pretrial Releas...	36
14	Mar 19, 2025	Plea (Stride, J	Heard and Continued (def via Zoom); set Plea Apr 30 IN PERSON; Pretrial Release Shall Continue	37
15	Mar 25, 2025	Defense Answer to Discovery	no criminal history, no expert testimony, no physical evidence; identifies Def and passenger...	38
16	Mar 26, 2025	Court Order	PD (Bailey C. Russell) confirmed as counsel of record; matter continued to Apr 30 Pre-Trial	39
17	Apr 30, 2025	Plea (Stride, J	Heard and Continued (def via video); set Plea Jun 12 MUST APPEAR; Pretrial Release Shall Con...	40
18	Jun 12, 2025	Plea (Stride, J	Case Called; Motion of Defense; set Pre-Trial Jul 23; Pretrial Release Shall Continue	41
19	Jun 23, 2025	Order Entered (Stride, J	HIPAA forms processed	42
20	Jul 23, 2025	Pre-Trial (Stride, J	402 conference conducted; set Pre-Trial Aug 12; Pretrial Release Shall Continue	43
21	Aug 12, 2025	Pre-Trial FINAL (Stride, J	Heard; set Plea Aug 26; Pretrial Release Shall Continue	44
22	Aug 26, 2025	Plea FINAL (Stride, J	Heard and Continued; set Plea Sep 8; Pretrial Release Shall Continue	45
23	Oct 6, 2025	Motion of Defendant (Stride, J	Faretta invoked; Defendant Proceeds Pro Se; motion to stay driving DENIED; set Terminate Mar...	46
24	Dec 11, 2025	Motion of Defense (Stride, J	motion entered and continued; set Status Jan 26, 2026	47
25	Jan 26, 2026	Status of Motion (Stride, J	Heard and Continued (def via video); set Status Mar 10 IN PERSON	48
26	Mar 10, 2026	Status of Motion (Stride, J	STRICKEN — NO SHOW; defendant did not appear	49
27	May 28, 2026	Arraignment on Petition to Revoke (Stride, J	Case Called; Issue Warrant (zero-bond, LEADS/NCIC); "PD APPOINTED" on warrant	50

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

FILED

~~HIDEG ÁKÉ ÁÉ~~

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

CASE NO: 23CF00001146

Cartwright Weinstein
Clerk of the Court
Lake County, Illinois

FIRST APPEARANCE ORDER

This matter coming before the Court for First Appearance hearing.

THE COURT FINDS that:

1. The defendant appears before the court:

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

2. The offense(s) charged:

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

by statute is detainable and

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

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

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

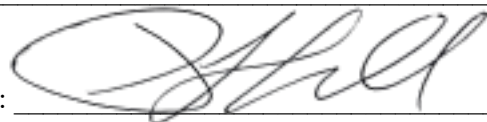
3. The matter is set on 5/2/24 at 9am in T611 for:

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

Entered:

Date: March 30th, 2024

Signature: _____



Judge



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

Charge(s):

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

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

Criminal/Traffic - Minutes

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

Present in Court

ALLABABIDI, EHAB, Defendant present in person

Nature of Proceedings:

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

STATE OF ILLINOIS)
) SS
COUNTY OF LAKE)

FILED

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

Erin Cartwright Weinstein
Clerk of the Court
Lake County, Illinois

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

DISCLOSURE TO THE ACCUSED

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

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

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

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

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

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

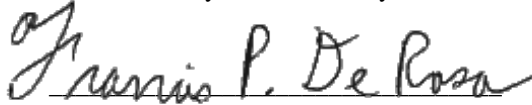
5. Books, papers, documents, photographs or tangible objects which the State intends to use at hearing or trial or which were obtained from or belong to the accused, may be examined at the State's Attorney's Office upon reasonable notice during business hours.

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

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

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

ERIC F. RINEHART
State's Attorney of Lake County


Assistant State's Attorney

STATE OF ILLINOIS)
) SS:
COUNTY OF LAKE)

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

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

EHAB ALLABABIDI

LIST OF WITNESS

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

WITNESSES

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

STATE OF ILLINOIS)
)
) SS
COUNTY OF LAKE)

FILED

ERIN CARTWRIGHT WEINSTEIN
Clerk of the Court
Lake County, Illinois

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

Erin Cartwright Weinstein
Clerk of the Court
Lake County, Illinois

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

GENERAL NO: 23CF1146

EHAB ALLABABIDI

ORDER

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

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

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

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

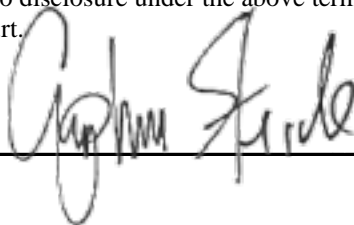
IT IS FURTHER ORDERED that if said defendant intends to establish an alibi, said defendant shall disclose to the State specific information as to the place where the defendant maintains he was located at the time of the alleged offense;

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

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

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

ENTERED: _____





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

Charge(s):

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

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

Criminal/Traffic - Minutes

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

Present in Court

ALLABABIDI, EHAB, Defendant present in person

Nature of Proceedings:

Event Result: Heard and Continued 06/25/2024.
 The Court orders this matter set as follows: Pre-Trial on 07/23/2024 at 09:00 AM in T611
 By Agreement
 Pretrial Release Shall Continue



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

Charge(s):

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

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

Criminal/Traffic - Minutes

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

Present in Court

ALLABABIDI, EHAB, Defendant present in person

Nature of Proceedings:

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

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

Pretrial Release Shall Continue



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

Charge(s):

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

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

Criminal/Traffic - Minutes

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

Present in Court

ALLABABIDI, EHAB, Defendant present via video

Nature of Proceedings:

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

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



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

Charge(s):

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

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

Criminal/Traffic - Minutes

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

Present in Court

ALLABABIDI, EHAB, Defendant present in person

Nature of Proceedings:

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

Admonish

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

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

Pretrial Release Shall Continue



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

Charge(s):

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

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

Criminal/Traffic - Minutes

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

Present in Court

ALLABABIDI, EHAB, Defendant present in person

Nature of Proceedings:

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

Motion of State

Petition Withdrawn

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

Motion of Defense

No Objection by the State

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

Pretrial Release Shall Continue



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

Charge(s):

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

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

Criminal/Traffic - Minutes

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

Present in Court

ALLABABIDI, EHAB, Defendant present in person

Nature of Proceedings:

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



)		
)		
People)	Case No.	23CF00001146
)	Location:	Courtroom 611
Plaintiff,)	Event Date:	November 26, 2024 9:32 AM
v.)	Event Type:	Status
)		
PEOPLE VS ALLABABIDI)	Clerk:	Amy B
Defendant.)		

Charge(s):

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

Criminal/Traffic - Minutes

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

Present in Court

ALLABABIDI, EHAB, Defendant present in person

Nature of Proceedings:

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

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