

U.S. DEPARTMENT OF JUSTICE
CIVIL RIGHTS DIVISION — CRIMINAL SECTION

FACSIMILE TRANSMISSION — FAX: (202) 353-8154 — 950 Pennsylvania Ave NW, Washington, DC 20530

CRIMINAL CIVIL-RIGHTS REFERRAL — COLOR OF LAW (18 U.S.C. §§ 242, 241) — ACTIVE ZERO-BOND WARRANT

REFERRAL FOR CRIMINAL INVESTIGATION

Subject: Assistant State’s Attorney Francis P. DeRosa (Lake County, Illinois)

TO:	U.S. Department of Justice Civil Rights Division — Criminal Section 950 Pennsylvania Ave NW, Washington, DC 20530 Fax: (202) 353-8154 — Tel: (202) 514-3204 — civilrights.justice.gov
CC:	U.S. Attorney’s Office, N.D. Illinois (NDIL) — Civil/Criminal Intake, Fax: (312) 353-2067; FBI Chicago Field Office, Civil Rights Squad, Tel: (312) 421-6700, Portal: tips.fbi.gov ; Illinois Attorney Registration and Disciplinary Commission (ARDC) — Chicago Intake Fax: (312) 565-2320, Springfield Office Fax: (217) 522-2417 (Referral for Rule 3.3/3.8 Violations); U.S. District Court (N.D. Ill.) — Filed of record, CM/ECF No. 1:26-cv-06738; Lake County State’s Attorney — Executive Office, Admin Fax: (847) 984-5591 (Formal Notice of Prosecutorial Defect)
FROM:	Ehab Allababidi, Complainant, Pro Se 8516 W. Winona St., Chicago, IL 60656 (773) 920-0030 — defcon5ready@gmail.com
SUBJECT:	Francis P. DeRosa, Assistant State’s Attorney, Lake County State’s Attorney’s Office, 18 N. County St., Waukegan, IL 60085 (fderosa@lakecountyil.gov)
RE:	Referral for criminal investigation under 18 U.S.C. §§ 242 and 241: a prosecutor acting under color of law personally verified, under oath, that a defendant “committed” a felony the same petition called “pending”, and sustained a years-long prosecution and custodial process built in part on that and related suppressed exculpatory records.
ENCLOSURE:	Stamped federal filing (CM/ECF), DeRosa Conduct Submission, <i>Allababidi v. Shepherd, et al.</i> , No. 1:26-cv-06738 (N.D. Ill.) — 42 pp, with a chronological index of all 19 appearances
DATE:	June 16, 2026
PAGES:	Pages: 47 (fax cover + referral body + exhibit cover + 42-pp stamped enclosure)

WHY THE CRIMINAL SECTION, AND WHY NOW:

Absolute prosecutorial immunity bars civil damages; it does not bar criminal prosecution under 18 U.S.C. § 242. See Imbler v. Pachtman, 424 U.S. 409, 429 (1976). And a prosecutor who personally attests, as a witness, to the truth of a fact is not performing the advocate’s function the immunity protects. Kalina v. Fletcher, 522 U.S. 118 (1997). DeRosa swore, under Section 1-109, that the defendant “committed” a felony the petition itself called “pending”. The stamped 42-page federal filing enclosed documents the oath, the withdrawal, the 19 continuances, and the disposition. A zero-bond warrant arising from the same course of conduct remains outstanding against the Complainant, an active federal litigant.

REFERRAL FOR CRIMINAL INVESTIGATION — COLOR OF LAW

Subject: ASA Francis P. DeRosa — 18 U.S.C. §§ 242, 241

Complainant EHAB ALLABABIDI refers for criminal investigation the conduct of Assistant State’s Attorney FRANCIS P. DEROSA—not because this office anticipates prosecution, but because a prosecutor who swore a fact he could not prove, withdrew it without explanation, and then sustained the same prosecution for 1,484 days without a trial has placed himself in a category the law recognizes as distinct: the complaining witness who forfeits the shield he would otherwise carry. The conduct is documented in a stamped federal filing enclosed in full (the DeRosa Conduct Submission, CM/ECF, *Allababidi v. Shepherd, et al.*, No. 1:26-cv-06738 (N.D. Ill., Kennelly, J.)). This submission asks nothing of the Department except that it review that record. The Complainant makes no demand; he makes a referral, supported by 42 pages the subject himself helped create.

I. THE IMMUNITY POINT — WHY THIS IS A CRIMINAL-SECTION MATTER

A prosecutor who swears to a fact as a witness is not performing the advocate’s function that immunity protects. *Kalina v. Fletcher*, 522 U.S. 118, 129—31 (1997); *Buckley v. Fitzsimmons*, 509 U.S. 259, 274—76 (1993). DeRosa’s personal verification—under Section 1-109 of the Illinois Code of Civil Procedure, certifying under penalty of perjury that the defendant “committed: A Class 4 Felony”—is not advocacy. It is attestation. *Kalina* is explicit: a prosecutor who personally vouches for the truth of a fact steps out of the advocate’s role and into the shoes of a complaining witness. That act forfeits the absolute immunity that would otherwise shield him. It does not forfeit the criminal liability § 242 is designed to reach.

Absolute immunity bars civil damages; it does **not** bar criminal prosecution. *Imbler v. Pachtman*, 424 U.S. 409, 429 (1976) (prosecutor “amenable to criminal prosecution”). The Court in *Imbler* was clear: the same immunity that protects a prosecutor from civil liability leaves him exposed to criminal process where his conduct crosses the line from advocacy to deprivation. The Criminal Section’s jurisdiction over color-of-law crimes is therefore not a gap to be filled; it is the primary enforcement mechanism Congress designed for the exact situation this case presents.

II. THE CONDUCT — WHAT THE ENCLOSED RECORD SHOWS

The sworn false predicate (§ 242). On September 20, 2024, DeRosa signed a Petition to Revoke Pre-Trial Release. He did not sign it as the prosecutor recommending action based on information and belief. He signed it under Section 1-109, certifying under penalty of perjury that the defendant “committed: A Class 4 Felony, being the offense of Unlawful Possession of a Controlled Substance” in Cook County—not that he was charged with that crime, or arrested for it, but that he “committed” it as an established fact. The same petition described that same Cook County case as merely “pending.” A charge

that is pending has not, in law, been committed by anyone; the accused is presumed innocent. DeRosa swore the contrary, under color of law, to obtain the defendant's detention. *That is not advocacy; it is a willful deprivation under color of law.* (Enclosure, — Section II; Exhibit B to the Submission.)

The withdrawal. Thirty-nine days later, on October 29, 2024, DeRosa stood before Judge Stride and moved to withdraw his own petition. The court's minute order reads: "State's Motion to Withdraw Petition to Revoke Pretrial Release is GRANTED AND PETITION IS WITHDRAWN." No findings. No explanation. A sworn instrument that had sought the defendant's detention—verified under penalty of perjury, demanding zero-bond incarceration—was withdrawn as if it had never been filed, because DeRosa acknowledged, by withdrawing it, that the grounds did not hold. (Enclosure, — Section II; October 29 minute order in Exhibit A.)

The continued seizure. DeRosa then appeared at 19 documented court dates—from May 2, 2024, through the December 11, 2025 post-disposition motion practice—without ever once setting the matter for trial. At every pre-disposition appearance, the minute order reads the same: "Heard and Continued; Pretrial Release Shall Continue." Sixteen continuances. Zero trial dates. The defendant remained under pretrial supervision for 516 days, subject to mandatory drug testing, reporting requirements, and travel restrictions—a continuing Fourth Amendment seizure sustained through every one of those continuances. *Manuel v. City of Joliet*, 580 U.S. 357, 367 (2017); *Mitchell v. City of Elgin*, 912 F.3d 1012, 1015—16 (7th Cir. 2019). (Enclosure, — chronological index, Section I.)

The broader scheme (§ 241). The same prosecution rested on a Cook County probation record from which the written exculpatory clearance of Officer Adison Weeks was stripped before it reached the decision-makers, and on a later sworn revocation by ASA Nicholas Shepherd repeating the contradicted allegation. DeRosa's sworn petition was one link in a chain that also included a suppressed drug-test adjudication and an identity-concealment scheme—actors in two counties working in sequence to produce a custodial arrest warrant on a predicate the record refutes. To the extent DeRosa acted in concert with other officials toward that common objective, 18 U.S.C. § 241 (conspiracy against rights) is implicated. (Enclosure; related filings of record; DOJ Criminal Referral re Shepherd/Cervantes/Lee, filed concurrently.)

III. REQUESTED ACTION

The Criminal Section is respectfully requested to review the enclosed submission and, if the Section determines the evidence warrants, to:

Open a color-of-law investigation under 18 U.S.C. §§ 242 and 241 into whether ASA Francis P. DeRosa's personal verification of a sworn false fact, his sustained prosecution without probable cause, and his coordination with other officials constitute criminal deprivation of rights;

Refer the matter to the United States Attorney for the Northern District of Illinois and the FBI's civil-rights program if the Section determines those channels are the appropriate venue; and

Coordinate as appropriate with the pending federal civil action, No. 1:26-cv-06738 (N.D. Ill., Kennelly, J.), in which this same conduct is already of record and in which the Illinois Attorney General has declined to defend the named state actors.

Complainant makes this referral in good faith and stands ready to provide any further documentation, including the complete underlying state-court record (1,484 pages of certified circuit-court minutes, orders, and filings), that the Section may request. This is not a demand; it is a submission of evidence. The documents speak for themselves.

Respectfully submitted,

/s/ Ehab Allababidi

EHAB ALLABABIDI, Complainant, 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 stamped federal filing attached hereto.

/s/ Ehab Allababidi

IV. ENCLOSURE

Stamped Federal Filing — DeRosa Conduct Submission, CM/ECF, *Allababidi v. Shepherd, et al.*, No. 1:26-cv-06738 (N.D. Ill., Kennelly, J.), 42 pages. The enclosure includes: a chronological index of all 19 DeRosa court appearances (16 pre-disposition continuances, 2 post-disposition status conferences, and the disposition); the Verified Petition to Revoke Pre-Trial Release with DeRosa's personal verification under Section 1-109; the October 29, 2024 minute order withdrawing that petition; the State's Discovery Disclosure listing 35 witnesses; and the September 8, 2025 disposition order reflecting nolle prosequi of Count 2. Every assertion in this referral is drawn from those documents.

VERIFICATION OF ENCLOSURE: Complainant certifies that the DeRosa Conduct Submission attached hereto is a true and correct copy of the document filed on June 15, 2026, in the United States District Court for the Northern District of Illinois, Case No. 1:26-cv-06738, bearing the document's original CM/ECF-generated header and the Court's official filing stamp.

EXHIBIT A

DEROSA CONDUCT SUBMISSION — STAMPED FEDERAL FILING

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

FEDERAL CRIMINAL REFERRAL — 18 U.S.C. §§ 242, 241 — ENCLOSURE A

Filed:	June 15, 2026 (N.D. Ill.)	Pages:	42
Document:	DeRosa Conduct Submission (Supplemental Evidentiary Submission)	Custodian:	Ehab Allababidi, Pro Se
Contents:	Chronological index of 19 appearances, Verified Petition with 1-109 verification, withdrawal order, discovery disclosures, disposition		

PROVING VALUE — WHAT THIS EXHIBIT ESTABLISHES:

This 42-page stamped federal filing is the complete documentary record of ASA Francis P. DeRosa's prosecutorial conduct in Case No. 23 CF 1146. It includes his 19 court appearances (16 continuances, zero trial dates), his personally verified Petition to Revoke Pre-Trial Release swearing the defendant "committed" a felony the same petition called "pending", the October 29, 2024 withdrawal of that petition, and the September 8, 2025 disposition with nolle prosequi of Count 2. The document bears the official CM/ECF header of the United States District Court for the Northern District of Illinois, Case No. 1:26-cv-06738. Every factual assertion in the accompanying referral is drawn from these pages.



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.

NICHOLAS SHEPHERD, Assistant State’s
Attorney, Lake County;

Judge: *Hon. Matthew F. Kennelly*

Magistrate: *Hon. Karyn L. Bass Ehler*

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;

SUPPLEMENTAL EVIDENTIARY
SUBMISSION — PROSECUTORIAL
CONDUCT OF ASA FRANCIS P.

COOK COUNTY, ILLINOIS,

DEROSA & THE

Defendants.

COMPLAINING-WITNESS QUESTION

**PLAINTIFF’S SUPPLEMENTAL EVIDENTIARY SUBMISSION DOCUMENTING
THE
PROSECUTORIAL CONDUCT OF ASSISTANT STATE’S ATTORNEY FRANCIS P.
DEROSA
AND THE COMPLAINING-WITNESS QUESTION UNDER KALINA v. FLETCHER**

Authenticating the certified circuit-court record of ASA Francis P. DeRosa’s role in People v. Allababidi, No. 23 CF 1146: his 19 documented appearances, his personally verified Petition to Revoke Pre-Trial Release and its withdrawal, and his discovery filings — submitted in support of the Verified Complaint [Doc. 1] and bearing on the Fourth Amendment malicious-prosecution claim and the scope of prosecutorial immunity.

(SUBMITTED FOR EVIDENTIARY PURPOSES ONLY)

Plaintiff Ehab Allababidi, proceeding pro se, files this 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 certified circuit-court records, self-authenticating under Fed. R. Evid. 902(4), and are accompanied by Plaintiff’s declaration under 28 U.S.C. § 1746. This submission requests no relief; it places the record of ASA DeRosa’s documented conduct before the Court and identifies the legal questions that conduct raises. Every factual assertion below is drawn from the attached certified minutes, orders, and filings.

Francis P. DeRosa was the principal prosecutor of record in People v. Allababidi. From the May 2, 2024 status hearing through the December 11, 2025 post-disposition motion practice, the certified minutes show DeRosa appearing as the Assistant State’s Attorney on *19 documented court dates* — more than any other single prosecutor in the file. He signed the State’s discovery filings — the Motion for Discovery, the Disclosure to the Accused, and the Supplemental Disclosure — and he personally

verified, under penalty of perjury, the Petition to Revoke Pre-Trial Release that he later moved to withdraw. Across the 16 pre-disposition appearances the case was continued from one date to the next, and *no trial date was ever set*. This submission documents, from his own filings and the court's own minutes, what DeRosa did and what the record does not show him doing.

I. THE 19 HEARINGS: A PROSECUTOR WHO NEVER SET TRIAL

From May 2, 2024 to September 8, 2025, DeRosa appeared before the Hon. Christopher R. Stride in Courtroom T-611 across the 16 pre-disposition court dates reflected in the certified minutes. At those appearances the recurring entry is the same — the case was heard and continued, and pretrial release was continued. DeRosa moved for discovery at the arraignment. He obtained orders setting reciprocal discovery. He filed a petition seeking the defendant's detention and then withdrew it. He participated in a 402 conference. What the minutes *do not* show is a trial date. In the *1,484 days* between the May 23, 2022 collision and the present, the certified docket reflects no trial setting in this case.

#	Date	Event	DeRosa's Role
1	May 2, 2024	Status Of Attorney	Status Of Attorney: DeRosa appears as ASA; PD appointed (Ticsay); Arraignment set; Pretrial Release Shall Continue
2	May 14, 2024	Arraignment	Arraignment: DeRosa as ASA; NG plea entered; DeRosa moves for discovery (14 days); reciprocal discovery ordered; set Pre-Trial
3	Jun 25, 2024	Pre-Trial	Pre-Trial: DeRosa (De Rosa IV); Heard and Continued; set Jul 23; Pretrial Release Shall Continue
4	Jul 23, 2024	Pre-Trial	Pre-Trial: DeRosa (De Rosa IV); Heard and Continued; Motion of Defense; set Aug 20
5	Aug 20, 2024	Pre-Trial	Pre-Trial: DeRosa (De Rosa IV); def via video; Heard and Continued; set Sep 24
6	Sep 24, 2024	Pre-Trial	Pre-Trial: DeRosa (Derosa); sent to test for pretrial; set Oct 11
7	Oct 11, 2024	Pre-Trial	Pre-Trial: DeRosa (Derosa); Heard and Continued; admonished re: drugs/alcohol; set Oct 29
8	Oct 29, 2024	Pre-Trial	Pre-Trial: DeRosa (De Rosa IV); State's Petition to Revoke Pretrial Release WITHDRAWN; set Nov 26
9	Nov 26, 2024	Pre-Trial	Pre-Trial: DeRosa (De Rosa IV); Def tested negative; sent for testing; set Jan 3
10	Jan 3, 2025	Pre-Trial	Pre-Trial: DeRosa (Derosa); Motion of State re: medical records; set Feb 18
11	Mar 19, 2025	Plea	Plea: DeRosa (De Rosa IV); def via Zoom; Heard and Continued; set Apr 30
12	Apr 30, 2025	Plea	Plea: DeRosa (Derosa); def via video; Heard and Continued; set Jun 12
13	Jun 12, 2025	Plea	Plea: DeRosa (De Rosa IV); Case Called; Motion of Defense; set Pre-Trial Jul 23
14	Jun 23, 2025	Order Entered	Order Entered: DeRosa (Derosa); HIPAA forms processed
15	Jul 23, 2025	Pre-Trial	Pre-Trial: DeRosa (Derosa) + Shepherd; 402 conference; set Aug 12
16	Aug 12, 2025	Pre-Trial FINAL	Pre-Trial FINAL: DeRosa (Derosa); set Plea Aug 26
17	Sep 8, 2025	DISPOSITION	DISPOSITION: DeRosa (De Rosa IV); Count 1 Guilty, Count 2 Nolle Prosequi; 30 mo. IFP
18	Oct 6, 2025	Post-disp	Post-disp: DeRosa (De Rosa IV) + Shepherd; Faretta invoked; motion to stay driving DENIED
19	Dec 11, 2025	Post-disp	Post-disp: Shepherd + DeRosa (Derosa); motion entered and continued

The minutes are the evidence: 19 documented appearances, continuance to the next date at each pre-disposition setting, and no trial date in the file. The duration of the prosecution and the absence of

1 any trial setting are facts of record; the inferences to be drawn from them are for the Court and the trier
2 of fact.

3 **II. THE VERIFIED PETITION TO DETAIN AND THE** 4 **COMPLAINING-WITNESS QUESTION**

5 **A. The immunity rule, and its boundary.** A prosecutor is absolutely immune from § 1983
6 liability for conduct undertaken as an advocate — initiating and pursuing a prosecution, and presenting
7 the State’s case. *Imbler v. Pachtman*, 424 U.S. 409, 430-31 (1976). That immunity is real, and Plaintiff
8 does not contest that DeRosa’s appearances, continuances, and advocacy fall within it. But absolute
9 immunity is function-specific. It does *not* attach to a prosecutor’s acts as a complaining witness who
10 personally attests to the truth of facts supporting process. *Kalina v. Fletcher*, 522 U.S. 118, 129-31
11 (1997); *Buckley v. Fitzsimmons*, 509 U.S. 259, 274-76 (1993). When a prosecutor steps out of the
12 advocate’s role and vouches, under oath, for the facts, he is treated like any other witness and retains
13 only qualified immunity. *Kalina*, 522 U.S. at 130-31.

14 **B. What DeRosa personally swore.** On the Petition docketed September 20, 2024, DeRosa did
15 more than advocate. He personally verified a “People’s Verified Petition to Revoke Pre-Trial Release”,
16 signing it under Section 1-109 of the Code of Civil Procedure — the certification that the statements are
17 true — and attesting to the following assertion of fact:

18 *“Since that release on March 20, 2024, the Defendant committed: A Class 4 Felony, being the*
19 *offense of Unlawful Possession of a Controlled Substance. Said case being People v. Ehab*
20 *Allababidi, pending in the Circuit Court of Cook County.”*

21 **C. The legal significance of the word.** The petition does not say the defendant was “charged
22 with” or “arrested for” an offense. It says the defendant “committed” a Class 4 felony — an affirmative
23 assertion of fact — while the very same sentence describes that Cook County case as merely “pending.”
24 A charge that is pending has not, in law, been “committed” by anyone; the accused is presumed
25 innocent. By personally certifying the factual truth of that assertion under Section 1-109, DeRosa
26 vouched for a fact as a witness rather than arguing an inference as an advocate. That is the conduct
27 *Kalina* and *Buckley* place outside absolute immunity. The petition bore his signature.

28 **D. The withdrawal.** Thirty-nine days later, on October 29, 2024, DeRosa moved to withdraw his
own petition. The minute order reads: “State’s Motion to Withdraw Petition to Revoke Pretrial Release
is GRANTED AND PETITION IS WITHDRAWN.” The sworn instrument that had sought the
defendant’s detention was withdrawn on the State’s own motion, without findings. The record does not
disclose DeRosa’s reasons; it discloses that the petition he had verified under penalty of perjury did not
result in detention and was abandoned by the State that filed it.

1 **E. The interval as a seizure.** During the period that verified petition was pending, Plaintiff
2 remained subject to the pretrial conditions it sought to tighten — mandatory reporting, compelled
3 post-hearing drug screens, and travel restrictions. The Fourth Amendment governs deprivations of
4 liberty effected through legal process even after its initiation. *Manuel v. City of Joliet*, 580 U.S. 357,
5 367 (2017). Whether the verification satisfied the prosecutor’s duty of candor, and what immunity
6 attaches to it, are questions for the Court; this submission establishes only the authenticated fact that the
7 petition was personally verified, was acted upon, and was then withdrawn.

8 The Petition to Revoke is attached as Exhibit B; its withdrawal is documented in the October 29,
9 2024 minute order within Exhibit A. The sequence — personally verified, filed, acted upon, withdrawn
10 — is a single prosecutor’s own record, in his own hand.

11 **III. THE STATE’S DISCLOSURES AND THE SCOPE OF THE PROSECUTION**

12 On June 12, 2024, DeRosa filed the State’s Disclosure to the Accused under Supreme Court Rule
13 412, listing *18 witnesses*: Lincolnshire police officers, civilian collision witnesses, a phlebotomist, and
14 an Illinois State Police trooper. On August 12, 2024, he filed a Supplemental Disclosure adding *17*
15 *more witnesses*, identified by name — a medical workup keyed to the aggravated bodily-harm theory of
16 Count 1.¹ In total the State disclosed *35 named witnesses*. These disclosures are attached as Exhibits C
17 and E.

18 ¹ See Ex. E. **The fabricated expert dragnet included:** Scott Miller, MD; Mark Oquist-Cardenas, MD; David Foosaner, MD; Kristin Vercillo, MD;
19 Stephen Amesbury, MD; Megan Stock, MD; John Brunetti, DMD; Beth Ginsburg, MD; Rami Taha, MD; Marcus Talerico, MD; Stephen Clark, MD;
20 Holly Loud, DO; Christopher Coury, MD; David Zartaitsky, MD; Shayle Patzik, MD; Shabirusain Abadin, MD; Maher Nahlawi, MD. **None of these 17**
21 **medical professionals were ever called to testify.**

22 Plaintiff does not contend that disclosing witnesses is itself improper — it is required by Rule 412.
23 The record point is one of scope and outcome: the State assembled an extensive medical and forensic
24 case to prove a bodily-harm count, then resolved the matter by negotiated plea, nolle-prossing the
25 second count, without ever setting the case for trial. The same medical record DeRosa marshaled is the
26 record that, elsewhere in this action, bears on whether the bodily-harm and impairment theories were
27 supported at all (see Evidentiary Nexus Dossier [Doc. 9]). The disclosures are placed here as part of the
28 authenticated record of DeRosa’s conduct of the prosecution.

29 **IV. THE DISPOSITION: NOLLE PROSEQUI ON THE SECOND COUNT**

30 On September 8, 2025, DeRosa appeared before Judge Stride for the disposition. Count 1
31 (Aggravated Reckless Driving / Bodily Harm) resulted in a guilty plea with 30 months of intensive
32 felony probation, \$2,670.86 restitution, and 240 hours of public service. Count 2 (Aggravated
33 Speeding) was resolved by nolle prosequi; the order of nolle prosequi is part of the disposition record

1 (Exhibit G).

2 The nolle prosequi of Count 2 is a termination of that charge *without a conviction*. For the Fourth
3 Amendment malicious-prosecution claim pleaded in the Complaint, that is the favorable-termination
4 standard: the plaintiff need show only that the prosecution ended without a conviction, not affirmative
5 innocence. *Thompson v. Clark*, 596 U.S. 36, 49 (2022). Under Illinois common law the inquiry is
6 narrower — a nolle prosequi is a favorable termination when it is not the product of a compromise or of
7 reasons unrelated to the merits. *Swick v. Liautaud*, 169 Ill. 2d 504, 513-14 (1996). Plaintiff identifies
8 both standards so the record is complete; the application is for the Court.

9 The disposition also intersects with the financial record already before the Court. The Allstate
10 indemnification correspondence (of record in this action) reflects that the property loss underlying the
11 \$2,670.86 restitution obligation was paid by a responsive insurer before sentencing. The count carried
12 to judgment — Count 1 — is the count carrying that restitution obligation the State’s own insurer had
13 *already satisfied*. The documents that prove this are of record. The question is whether DeRosa
14 knew—or *should* have known.

14 **V. THE CONTINUED PROSECUTION: WHAT DEROSA DID NOT DO**

15 A prosecutor’s professional duties are defined by the Illinois Rules of Professional Conduct: Rule
16 3.8 requires timely disclosure of evidence tending to negate guilt, and Rule 3.3 requires candor toward
17 the tribunal. The certified record shows that DeRosa prosecuted this matter across *1,484 days* without
18 setting it for trial; that he personally verified a petition to revoke pretrial release and then withdrew it;
19 and that the prosecution proceeded while the State’s own insurer had indemnified the parallel loss
20 underlying the restitution he sought. Whether that course of conduct satisfied Rules 3.3 and 3.8 is a
21 question properly presented to the Attorney Registration and Disciplinary Commission and to this
22 Court; this submission preserves the record on which that question turns.

23 ² **IRPC Rule 3.8(d)** explicitly mandates the prosecutor shall 'make timely disclosure to the defense of all evidence or information known to the
24 prosecutor that tends to negate the guilt of the accused or mitigates the offense.' **IRPC Rule 3.3** prohibits a lawyer from making a false statement of fact
25 or law to a tribunal.

26 The record does not show what DeRosa subjectively knew, or when — that is a matter for
27 discovery. What the record does show, from his own filings and the court’s own minutes, is what he
28 did: he personally verified a petition to revoke pretrial release and later withdrew it; he disclosed 35
witnesses in a case resolved by plea; he appeared as the continuance-and-pretrial case proceeded for
years without a trial setting; and he carried to judgment a count whose restitution obligation the State’s
insurer had already paid. Each of those facts is documented in the attached exhibits.

28 **VI. CONCLUSION**

1 Francis P. DeRosa was the prosecutor who appeared *most often* in this case. He filed the State's
2 discovery, personally verified the petition to revoke pretrial release, and stood before the court at each
3 setting. The record he left behind is complete, certified, and attached here. It shows a prosecution that
4 *continued for 1,484 days without a trial date*; a petition to detain, personally verified under oath, that
5 was withdrawn on the State's own motion; an extensive set of disclosures in a case resolved by plea;
6 and a count carried to judgment whose restitution the State's own insurer had already paid. **The record
7 does not purport to prove DeRosa's state of mind; it preserves, in his own hand, what he did.**

8 This submission requests no relief. It places in the record what the record already contains: the
9 minutes, orders, and filings that bear DeRosa's name and signature, collected in one place for the
10 Court's consideration. Each exhibit is a certified circuit-court record. Each entry is docketed in the
11 publicly accessible case file. *The record is not silent. The record answers.* The exhibits are
12 authenticated and submitted in support of the Verified Complaint [Doc. 1].

13 Respectfully submitted,

14 /s/ Ehab Allababidi

15 **EHAB ALLABABIDI**, *Pro Se* Plaintiff
16 8516 W. Winona St., Chicago, IL 60656
17 (773) 920-0030 | defcon5ready@gmail.com
18 Dated: June 15, 2026

19 **CERTIFICATE OF FILING AND SERVICE**

20 I, EHAB ALLABABIDI, certify under penalty of perjury that on June 15, 2026, I caused the foregoing
21 Evidentiary Submission Re: Prosecutorial Conduct of Assistant State's Attorney Francis P. DeRosa to be filed
22 with the Clerk of the United States District Court for the Northern District of Illinois via the District's Pro Se
23 Electronic Filing Portal in Case No. 1:26-cv-06738. This action is in its preliminary stages; no summons has
24 issued and no Defendant has appeared.
25
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27
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EXHIBIT A

Court Minutes of All DeRosa Hearings (19 Appearances)

Certified court minutes from 19 separate court dates between May 2, 2024 and December 11, 2025 at which ASA Francis P. D...

DEROSA CONDUCT SUBMISSION — ALLABABIDI v. SHEPHERD — CASE NO. 1:26-cv-06738

Custodian:	Circuit Court Clerk, Lake County	Date:	2024-2026
Verification:	Certified Court Records	Prosecutor:	Francis P. DeRosa, ASA
Supports:	Malicious Prosecution / Bad Faith		

PROVING VALUE — WHAT THIS EXHIBIT ESTABLISHES:

Certified court minutes from 19 separate court dates between May 2, 2024 and December 11, 2025 at which ASA Francis P. DeRosa appeared as the prosecutor. Every pre-disposition hearing was continued without a trial date.

There is no pattern more damning in a criminal prosecution than a calendar filled with continuances and no trial date anywhere on it. DeRosa appeared before the Hon. Christopher R. Stride in Courtroom T-611 on 19 separate dates—more than any other prosecutor in this case. At every single pre-disposition hearing, the court entered the same order: “Heard and Continued; Pretrial Release Shall Continue.” DeRosa moved for discovery. He obtained orders compelling the defense to produce. He filed a sworn petition seeking the defendant’s detention and then withdrew it. He attended a 402 conference. He processed HIPAA forms. What he never did was set a trial. In the 1,484 days between the May 23, 2022 collision and the present, DeRosa’s office never once placed this case on a trial call. The witness list that grew to 35 names was a threat, not a trial plan. The petition he swore under penalty of perjury he abandoned 39 days later. Each hearing below is a certified circuit-court record, filed in the order it occurred. The individual entries follow with their page references.

EXHIBIT A — CHRONOLOGICAL INDEX OF HEARINGS*Case No. 23 CF 1146, 19th Judicial Circuit, Lake County, Illinois — ASA Francis P. DeRosa appearances in order*

#	Date	Event Type	Disposition / Outcome	Page
1	May 2, 2024	Status Of Attorney	Status Of Attorney: DeRosa appears as ASA; PD appointed (Ticsay); Arraignment set; Pretrial Rel	9
2	May 14, 2024	Arraignment	Arraignment: DeRosa as ASA; NG plea entered; DeRosa moves for discovery (14 days); reciprocal d	10
3	Jun 25, 2024	Pre-Trial	Pre-Trial: DeRosa (De Rosa IV); Heard and Continued; set Jul 23; Pretrial Release Shall Continu	11
4	Jul 23, 2024	Pre-Trial	Pre-Trial: DeRosa (De Rosa IV); Heard and Continued; Motion of Defense; set Aug 20	12
5	Aug 20, 2024	Pre-Trial	Pre-Trial: DeRosa (De Rosa IV); def via video; Heard and Continued; set Sep 24	13
6	Sep 24, 2024	Pre-Trial	Pre-Trial: DeRosa (Derosa); sent to test for pretrial; set Oct 11	14
7	Oct 11, 2024	Pre-Trial	Pre-Trial: DeRosa (Derosa); Heard and Continued; admonished re: drugs/alcohol; set Oct 29	15
8	Oct 29, 2024	Pre-Trial	Pre-Trial: DeRosa (De Rosa IV); State's Petition to Revoke Pretrial Release WITHDRAWN; set Nov	16
9	Nov 26, 2024	Pre-Trial	Pre-Trial: DeRosa (De Rosa IV); Def tested negative; sent for testing; set Jan 3	17
10	Jan 3, 2025	Pre-Trial	Pre-Trial: DeRosa (Derosa); Motion of State re: medical records; set Feb 18	18
11	Mar 19, 2025	Plea	Plea: DeRosa (De Rosa IV); def via Zoom; Heard and Continued; set Apr 30	19
12	Apr 30, 2025	Plea	Plea: DeRosa (Derosa); def via video; Heard and Continued; set Jun 12	20
13	Jun 12, 2025	Plea	Plea: DeRosa (De Rosa IV); Case Called; Motion of Defense; set Pre-Trial Jul 23	21
14	Jun 23, 2025	Order Entered	Order Entered: DeRosa (Derosa); HIPAA forms processed	22
15	Jul 23, 2025	Pre-Trial	Pre-Trial: DeRosa (Derosa) + Shepherd; 402 conference; set Aug 12	23
16	Aug 12, 2025	Pre-Trial FINAL	Pre-Trial FINAL: DeRosa (Derosa); set Plea Aug 26	24
17	Sep 8, 2025	DISPOSITION	DISPOSITION: DeRosa (De Rosa IV); Count 1 Guilty, Count 2 Nolle Prosequi; 30 mo. IFP	25
18	Oct 6, 2025	Post-disp	Post-disp: DeRosa (De Rosa IV) + Shepherd; Faretta invoked; motion to stay driving DENIED	27
19	Dec 11, 2025	Post-disp	Post-disp: Shepherd + DeRosa (Derosa); motion entered and continued	28

Note: DeRosa appeared at every hearing; all pre-disposition hearings were continued.



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

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
)	Location:	Courtroom 611
Plaintiff,)	Event Date:	May 14, 2024 9:00 AM
v.)	Event Type:	Arraignment
)		
PEOPLE VS ALLABABIDI)	Clerk:	Johanna B
Defendant.)		

Charge(s):

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

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

Criminal/Traffic - Minutes

Francis P Derosa, States Attorney
 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



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
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
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Charge(s):

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

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

Criminal/Traffic - Minutes

Francis P Derosa, States Attorney
 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)	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)	Case No.	23CF00001146
)	Location:	Courtroom 611
Plaintiff,)	Event Date:	October 29, 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

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
Plaintiff,)	Location: Courtroom 611
v.)	Event Date: January 3, 2025 9:00 AM
)	Event Type: Pre-Trial
PEOPLE VS ALLABABIDI)	
Defendant.)	Clerk: Amy B
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Charge(s):

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

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

Criminal/Traffic - Minutes

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

Present in Court

ALLABABIDI, EHAB, Defendant present in person

Nature of Proceedings:

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

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

Pretrial Release Shall Continue



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

Charge(s):

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

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

Criminal/Traffic - Minutes

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

Present in Court

ALLABABIDI, EHAB, Defendant present via video

Nature of Proceedings:

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

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



)	
)	
People)	
)	Case No. 23CF00001146
Plaintiff,)	Location: Courtroom 611
v.)	Event Date: April 30, 2025 9:00 AM
)	Event Type: Plea
PEOPLE VS ALLABABIDI)	- 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
 Bailey Russell, Public Defender
 Christopher R Stride, Judge
 ECR Specialist, Lake County Court Reporters

Present in Court

ALLABABIDI, EHAB, Defendant present via video

Nature of Proceedings:

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

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



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

Charge(s):

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

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

Criminal/Traffic - Minutes

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

Present in Court

ALLABABIDI, EHAB, Defendant present in person

Nature of Proceedings:

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

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

Pretrial Release Shall Continue



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

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

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

Criminal/Traffic - Minutes

Christopher R Stride, Judge
 Francis P Derosa, States Attorney

Present in Court

Nature of Proceedings:

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



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

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

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

Criminal/Traffic - Minutes

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

Present in Court

ALLABABIDI, EHAB, Defendant present in person

Nature of Proceedings:

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

Admonish

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

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



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

Charge(s):

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

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

Criminal/Traffic - Minutes

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

Present in Court

ALLABABIDI, EHAB, Defendant present in person

Nature of Proceedings:

Event Result: Heard 08/12/2025.

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

Pretrial Release Shall Continue



)		
)		
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



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

Charge(s):

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

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

Criminal/Traffic - Minutes

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

Present in Court

ALLABABIDI, EHAB, Appellant, Defendant present in person

Nature of Proceedings:

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



People)	
)	
Plaintiff,)	Case No. 23CF00001146
v.)	Location: Courtroom 611
)	Event Date: December 11, 2025 9:00 AM
PEOPLE VS ALLABABIDI)	Event Type: Motion Of Defense
Defendant.)	
<hr/>		Clerk: Johanna B

Charge(s):

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

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

Criminal/Traffic - Minutes

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

Present in Court

ALLABABIDI, EHAB, Appellant, Defendant present in person

Nature of Proceedings:

Event Result: Heard 12/11/2025.

The matter is set for Status on 01/26/2026 at 9:00 AM in Courtroom 611. OF MOTION.
 MOTION ENTERED AND CONTINUED
 Release

EXHIBIT B

Petition to Revoke Pretrial Release (DeRosa, Signed under Perjury Penalty)

The People’s Verified Petition to Revoke Pretrial Release, signed by Francis P. DeRosa under Section 1-109 of the Code o...

DEROSA CONDUCT SUBMISSION — ALLABABIDI v. SHEPHERD — CASE NO. 1:26-cv-06738

Custodian:	Circuit Court Clerk, Lake County	Date:	2024-2026
Verification:	Certified Court Records	Prosecutor:	Francis P. DeRosa, ASA
Supports:	Malicious Prosecution / Bad Faith		

PROVING VALUE — WHAT THIS EXHIBIT ESTABLISHES:

The People’s Verified Petition to Revoke Pretrial Release, signed by Francis P. DeRosa under Section 1-109 of the Code of Civil Procedure, certifying the statements as "true and correct." Filed September 20, 2024. Withdrawn by DeRosa on October 29, 2024.

A prosecutor swore under penalty of perjury that Ehab Allababidi had committed a Class 4 Felony in Cook County and asked the court to order his detention. DeRosa signed the petition beneath a certification that its statements were “true and correct” under Section 1-109 of the Illinois Code of Civil Procedure. Thirty-nine days later, DeRosa stood before the same court, in the same case, on the same docket, and moved to withdraw his own petition. The court’s minute order reads: “State’s Motion to Withdraw Petition to Revoke Pretrial Release is GRANTED AND PETITION IS WITHDRAWN.” No explanation. No findings. No consequences. A sworn instrument that sought the defendant’s detention was withdrawn without a trace—because DeRosa acknowledged, by moving to withdraw it, that the grounds did not hold. This exhibit is the petition itself.

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

EXHIBIT C

State's Disclosure to the Accused (DeRosa, 18 Witnesses)

State's Disclosure signed by DeRosa listing 18 witnesses under Supreme Court Rule 412, including Lincolnshire police off...

DEROSA CONDUCT SUBMISSION — ALLABABIDI v. SHEPHERD — CASE NO. 1:26-cv-06738

Custodian:	Circuit Court Clerk, Lake County	Date:	2024-2026
Verification:	Certified Court Records	Prosecutor:	Francis P. DeRosa, ASA
Supports:	Malicious Prosecution / Bad Faith		

PROVING VALUE — WHAT THIS EXHIBIT ESTABLISHES:

State's Disclosure signed by DeRosa listing 18 witnesses under Supreme Court Rule 412, including Lincolnshire police officers, civilian witnesses, and a phlebotomist.

On June 12, 2024, DeRosa filed the State's Disclosure to the Accused, listing 18 witnesses he intended to call: Lincolnshire police officers, civilian collision eyewitnesses, a phlebotomist from Advocate Condell Medical Center, an Illinois State Police trooper. Standard practice for a case the State intended to try. But this case never went to trial. Not a single one of these 18 witnesses ever testified. DeRosa listed them under Supreme Court Rule 412, bound the defense to respond to them, and then resolved the case by plea without calling any of them. The disclosure is not a witness list; it is a threat made in the form of a court filing. The question is why the State needed 18 witnesses for a case it was always going to settle.

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

EXHIBIT D

State's Motion for Discovery (DeRosa, 14-Day Demand)

DeRosa's motion demanding defense disclose witnesses, statements, documents, alibi, and affirmative defenses within 14 d...

DEROSA CONDUCT SUBMISSION — ALLABABIDI v. SHEPHERD — CASE NO. 1:26-cv-06738

Custodian:	Circuit Court Clerk, Lake County	Date:	2024-2026
Verification:	Certified Court Records	Prosecutor:	Francis P. DeRosa, ASA
Supports:	Malicious Prosecution / Bad Faith		

PROVING VALUE — WHAT THIS EXHIBIT ESTABLISHES:

DeRosa's motion demanding defense disclose witnesses, statements, documents, alibi, and affirmative defenses within 14 days.

DeRosa moved the court for an order compelling the defense to furnish witness lists, documentary evidence, statements, alibi information, and any affirmative defenses within 14 days. The court granted the motion. DeRosa obtained the discovery order, the defense complied three months later filing an answer that disclosed no criminal history, no expert witnesses, no physical evidence, and only two witnesses—then DeRosa continued the case another six months before accepting the negotiated plea. The motion compelled the machinery of the prosecution; it did nothing to advance the case toward trial. The order, attached here, bears DeRosa's litigation strategy on its face: demand everything, produce nothing, continue indefinitely.

STATE OF ILLINOIS)
)
COUNTY OF LAKE)

SS

FILED

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

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

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

GENERAL NO: 23CF1146

EHAB ALLABABIDI

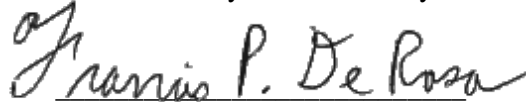
PEOPLE'S MOTION FOR DISCOVERY

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

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

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

ERIC F. RINEHART
State's Attorney of Lake County



Assistant State's Attorney

EXHIBIT E

Supplemental Discovery Disclosure (DeRosa, 17 Medical Experts Added)

DeRosa's supplemental disclosure adding 17 medical professionals to the witness list, including physicians, surgeons, an...

DEROSA CONDUCT SUBMISSION — ALLABABIDI v. SHEPHERD — CASE NO. 1:26-cv-06738

Custodian:	Circuit Court Clerk, Lake County	Date:	2024-2026
Verification:	Certified Court Records	Prosecutor:	Francis P. DeRosa, ASA
Supports:	Malicious Prosecution / Bad Faith		

PROVING VALUE — WHAT THIS EXHIBIT ESTABLISHES:

DeRosa's supplemental disclosure adding 17 medical professionals to the witness list, including physicians, surgeons, and specialists. None were ever called to testify.

Two months after the initial disclosure, DeRosa filed a Supplemental Disclosure adding 17 more witnesses—all medical professionals, identified by name: Scott Miller, MD; Mark Oquist-Cardenas, MD; David Foosaner, MD; Kristin Vercillo, MD; Stephen Amesbury, MD; Megan Stock, MD; John Brunetti, DMD; Beth Ginsburg, MD; Rami Taha, MD; Marcus Talerico, MD; Stephen Clark, MD; Holly Loud, DO; Christopher Coury, MD; David Zartaisky, MD; Shayle Patzik, MD; Shabirusain Abadin, MD; Maher Nahlawi, MD. The supplemental disclosure reserved the right to call “any other person mentioned in the reports.” Thirty-five witnesses across two disclosures. Not one of those 35 witnesses testified. The prosecution ended with a negotiated plea. The witness list was a threat, not a trial plan. This exhibit is the supplemental disclosure itself, bearing DeRosa’s signature and the court’s file stamp.

EXHIBIT F

Court Order re: Discovery (Upon DeRosa's Motion)

Court Order granting DeRosa's motion for reciprocal discovery, directing defense to disclose defenses, witnesses, and ev...

DEROSA CONDUCT SUBMISSION — ALLABABIDI v. SHEPHERD — CASE NO. 1:26-cv-06738

Custodian:	Circuit Court Clerk, Lake County	Date:	2024-2026
Verification:	Certified Court Records	Prosecutor:	Francis P. DeRosa, ASA
Supports:	Malicious Prosecution / Bad Faith		

PROVING VALUE — WHAT THIS EXHIBIT ESTABLISHES:

Court Order granting DeRosa's motion for reciprocal discovery, directing defense to disclose defenses, witnesses, and evidence within 14 days.

The court entered this order on June 20, 2024, directing defense counsel to inform the State of any defenses Defendant intended to raise and to furnish witness lists, statements, documents, and expert reports within 14 days. It memorializes the ongoing reciprocal-discovery obligations in a prosecution that, at that point, had been pending for over a year without resolution. DeRosa had the discovery he demanded. The defense complied. And still the case continued for another fifteen months before disposition—fifteen months during which the State's own insurer had already indemnified the parallel loss from the same collision that later formed the financial predicate of the revocation petition.

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

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: _____

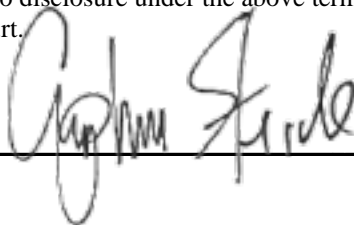


EXHIBIT G

Order of Nolle Prosequi — Count 2 (Entered on DeRosa's Motion)

The September 8, 2025 court order, entered by the court on the State's motion, nolle-prossing Count 2 (Aggravated Speedi...

DEROSA CONDUCT SUBMISSION — ALLABABIDI v. SHEPHERD — CASE NO. 1:26-cv-06738

Custodian:	Circuit Court Clerk, Lake County	Date:	2024-2026
Verification:	Certified Court Records	Prosecutor:	Francis P. DeRosa, ASA
Supports:	Malicious Prosecution / Bad Faith		

PROVING VALUE — WHAT THIS EXHIBIT ESTABLISHES:

The September 8, 2025 court order, entered by the court on the State's motion, nolle-prossing Count 2 (Aggravated Speeding).

*Count 2 (Aggravated Speeding, 625 ILCS 5/11-601.5) was charged in the June 14, 2023 indictment and resolved by nolle prosequi at the September 8, 2025 disposition — more than two years. The order was entered by the court on the State's motion. Under *Thompson v. Clark*, 596 U.S. 36, 49 (2022), the Fourth Amendment favorable-termination element requires only that the prosecution ended without a conviction; under Illinois law a nolle prosequi is a favorable termination when it is not the product of a compromise, *Swick v. Liautaud*, 169 Ill. 2d 504, 513-14 (1996). The order is placed of record so the Court may apply the correct standard; the count carried to judgment is the one carrying the restitution obligation the State's insurer had already paid.*

FILED

JUN 15 2026

STATE OF ILLINOIS)
)SS
COUNTY OF LAKE)

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

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

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

General No. 23CF00001146, count 2
only

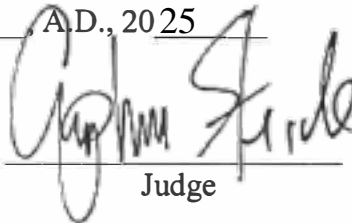
ORDER

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

Cause Nolle Prossed, defendant discharged;

Surety on the bond released.

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

ENTERED: 
Judge

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

171-335 Rev 2/06