

# ILLINOIS JUDICIAL INQUIRY BOARD

## VERIFIED AMENDED COMPLAINT AGAINST A JUDGE — FAX TRANSMISSION

FAX: (312) 814-5719 — 555 West Monroe Street, Suite 800-N, Chicago, IL 60661

### AMENDED COMPLAINT AGAINST A JUDGE

Submitted pursuant to Ill. Const. art. VI, § 15 and the Rules of Procedure of the Judicial Inquiry Board  
**AMENDED JUNE 16, 2026 — RESPONDENT CHOSE TO KEEP A VOID WARRANT RATHER THAN QUASH IT SUA SPONTE**

<b>TO:</b>	Illinois Judicial Inquiry Board
<b>FAX:</b>	(312) 814-5719 [URGENT — Active Zero-Bond Warrant / Pending Federal Proceedings]
<b>ADDRESS:</b>	555 West Monroe Street, Suite 800-N, Chicago, IL 60661
<b>FROM:</b>	Ehab Allababidi, Complainant, Pro Se 8516 W. Winona St., Chicago, IL 60656 (773) 920-0030 — defcon5ready@gmail.com
<b>RESPONDENT:</b>	Hon. Christopher R. Stride, Circuit Judge 19th Judicial Circuit, Lake County, Illinois — Courtroom T-611 18 N. County St., Waukegan, IL 60085
<b>CASE:</b>	People v. Allababidi, No. 23 CF 1146 19th Judicial Circuit, Lake County, Illinois Related Fed.: 1:26-cv-06738 (§ 1983) and 1:26-cv-01077 (habeas), N.D. Ill.
<b>DATE:</b>	June 16, 2026
<b>AMENDED:</b>	This Verified Complaint is amended and resubmitted as of June 16, 2026. On that date the matter was again before Respondent, who — with actual knowledge of the warrant's documented defects, and after an ex parte communication with appointed counsel (Asst. Public Defender Bailey C. Russell) outside Complainant's presence — declined to recall the facially void zero-bond warrant sua sponte and instead chose to continue it, merely setting the case over to the following week. A judge who, with knowledge and the case before him, elects to perpetuate an unconstitutional custodial warrant has crossed from error into willful misconduct (new Count Seven).
<b>SUBJECT:</b>	Seven-Count Complaint of Judicial Misconduct — Code of Judicial Conduct Rules 1.1, 1.2, 2.2, 2.5, 2.6, 2.7, 2.9 — Issuance of a Zero-Bond Bench Warrant (May 28, 2026) Without the Statutory Preliminary Hearing, the Required Ability-to-Pay Inquiry, or Defense Counsel; After Actual Notice of an Emergency Exculpatory Submission; the Continued Refusal to Recall the Warrant; and a June 16, 2026 Ex Parte Scheduling Proceeding Conducted in the Self-Represented Defendant's Absence and Without Notice
<b>ENCLOSURES:</b>	Verified Complaint + Exhibits A–I with exhibit cover pages
<b>PAGES:</b>	Pages: 49

#### WHY THIS COMPLAINT IS URGENT:

#### EXHIBITS ENCLOSED IN THIS TRANSMISSION:

Exhibit A — Court Half-Sheet / Minutes (May 28, 2026): records Stride presiding, prosecutor and probation officer present, NO defense counsel, result “Issue Warrant”

Exhibit B — Zero-Bond Warrant of Arrest (May 28, 2026): the custodial instrument Respondent issued

Exhibit C — Emergency Special Appearance email (May 28, 2026, 7:00 AM): actual notice to the court two hours before the hearing, with exculpatory adjudications attached

Exhibit D — Notice of Special Appearance and Fraud on the Court (verified, six pages): the documented defense placed before the court

**VERIFIED COMPLAINT OF JUDICIAL MISCONDUCT**

**Against the Hon. Christopher R. Stride, Circuit Judge, 19th Judicial Circuit, Lake County, Illinois (Courtroom T-611)**

*Submitted to the Illinois Judicial Inquiry Board under Ill. Const. art. VI, § 15 — Illinois Code of Judicial Conduct (eff. Jan. 1, 2023), Rules 1.1, 1.2, 2.2, 2.5, 2.6, 2.7, 2.9*

**I. RESPONDENT JUDGE**

Judge	Court	Assignment	Case
<b>Hon. Christopher R. Stride</b>	19th Judicial Circuit Lake County, Illinois 18 N. County St., Waukegan, IL 60085	Circuit Judge — Courtroom T-611 Criminal Division Sentencing & probation-revocation judge	People v. Allababidi, No. 23 CF 1146 (sentencing 9/8/2025; warrant 5/28/2026)

**Note on Scope.** This complaint is directed solely at the judicial conduct of Hon. Christopher R. Stride. The separate conduct of the prosecutor (ASA Nicholas Shepherd) and of appointed defense counsel (Bailey C. Russell) is the subject of separate complaints to the Illinois Attorney Registration and Disciplinary Commission and is not the subject of this filing. This complaint concerns only what the judge did, and failed to do, on and after May 28, 2026.

**Jurisdictional Note — This Is Not an Appeal.** Complainant does not ask the Board to reverse, review, or substitute its judgment for any ruling; he understands the Board is not an appellate court and that a mere disagreement with a decision is not misconduct. This complaint instead concerns the *manner* in which Respondent discharged his office: the documented disregard of mandatory, non-discretionary procedural safeguards in a proceeding that deprived a self-represented person of his liberty. A judge’s failure to apply clearly established and mandatory law, and the denial of a litigant’s right to be heard, are cognizable as “willful misconduct in office”, “persistent failure to perform duties”, and “conduct prejudicial to the administration of justice” under Ill. Const. art. VI, § 15(e), independent of whether the underlying warrant is later vacated on appeal.

**II. COMPLAINANT AND THE BOARD’S AUTHORITY**

Complainant Ehab Allababidi is the self-represented defendant-petitioner in *People v. Allababidi*, No. 23 CF 1146 (19th Judicial Circuit, Lake County), and the petitioner/plaintiff in two related federal actions in the Northern District of Illinois: *Allababidi v. Junkin*, No. 1:26-cv-01077 (habeas), and *Allababidi v. Shepherd, et al.*, No. 1:26-cv-06738 (42 U.S.C. § 1983).

Under Article VI, § 15 of the Illinois Constitution, the Judicial Inquiry Board is empowered to receive and investigate complaints, and to file a complaint with the Illinois Courts Commission where a reasonable basis exists to charge a judge with (1) willful misconduct in office; (2) persistent failure to perform his or her duties; or (3) other conduct that is prejudicial to the administration of justice or that brings the judicial office into disrepute. As set out below, Respondent’s conduct implicates all three grounds.

### **III. FACTUAL BACKGROUND AND COUNTS OF MISCONDUCT**

On September 8, 2025, Respondent sentenced Complainant in Case No. 23 CF 1146 to 30 months’ probation (terminating March 7, 2028), with conditions including drug testing, community service, and \$2,670.86 restitution to O’Brien Landscape. At that same hearing the Court ordered \$0.00 restitution to James W. Smith Printing Company because Allstate (Claim No. 0670868884) had already paid \$16,557.00 on the identical collision — placing the Court on actual notice that active insurance coverage existed for damages arising from that accident.

On May 14, 2026, ASA Nicholas Shepherd filed a Petition for Revocation of Probation. Its two sworn allegations were that Complainant (a) tested positive for an “illegal” amphetamine and (b) willfully failed to pay financial obligations. Both were refuted by the State’s own records before the petition was signed: Cook County Adult Probation Officer Adison Weeks had issued written adjudications on December 8 and 10, 2025 confirming the test was compliant with Complainant’s lawful Adderall prescription, and Lake County’s own probation system had formally suspended \$1,400.00 of the probation service fee for indigency on November 10, 2025. The petition also omitted the prosecutor’s telephone number and email in violation of Ill. S. Ct. Rule 131(b), and was mailed so as to compress the response window to roughly three business days before the hearing.

**COUNT ONE — Issuing a Custodial Warrant Without the Mandatory Preliminary / Probable-Cause Hearing.** On May 28, 2026, the matter came before Respondent in Courtroom T-611 for an “Arrestment on Petition to Revoke” at 9:00 AM. The court half-sheet (Exhibit A) records the entirety of the proceeding as “Case Called ... Issue Warrant”. Respondent issued a zero-bond bench warrant without conducting the preliminary probable-cause hearing mandated by 730 ILCS 5/5-6-4(b), without taking any sworn testimony, and without weighing any evidence. A probationer facing revocation is entitled to a preliminary determination of probable cause and a

neutral hearing. *Gagnon v. Scarpelli*, 411 U.S. 778 (1973); *Morrissey v. Brewer*, 408 U.S. 471 (1972). Issuing a liberty-depriving warrant with none of these safeguards is a failure to comply with and apply mandatory law. Ill. Code Jud. Conduct R. 1.1, 2.2.

**COUNT TWO — Failing to Conduct the Constitutionally Required Ability-to-Pay Inquiry.** The petition’s financial allegation triggered a mandatory ability-to-pay inquiry before any incarceration or custodial warrant could issue on that basis. *Turner v. Rogers*, 564 U.S. 431 (2011); *Bearden v. Georgia*, 461 U.S. 660 (1983). Respondent made no ability-to-pay inquiry and no finding of willful nonpayment — even though the county’s own probation system had already suspended \$1,400.00 of the fees for indigency, and active Allstate coverage rendered the restitution balance non-willful as a matter of law. Issuing a custodial warrant for non-payment without the required inquiry reflects a disregard of mandatory law. Ill. Code Jud. Conduct R. 1.1, 2.2.

**COUNT THREE — Issuing the Warrant After Actual Notice of an Emergency Exculpatory Submission, Without Affording the Right to Be Heard.** At 7:00 AM on May 28, 2026 — two hours before the hearing — Complainant transmitted to the Circuit Court Clerk (CircuitClerk@lakecountyil.gov) and to the court’s official address (courts@lakecountyil.gov) an Emergency Special Appearance captioned, in its first line, “URGENT: MANDATORY ROUTING TO THE HONORABLE CHRISTOPHER STRIDE (COURTROOM T-611)” (Exhibits C and D). It attached the December 2025 Weeks adjudications proving the drug allegation false, and noticed pending federal proceedings, including that on May 27, 2026 the courtroom deputy of U.S. District Judge John Robert Blakey had confirmed an Article III order concerning the May 28 hearing was being drafted. Respondent neither acknowledged, addressed, nor ruled upon the submission; the half-sheet reflects no mention of it. A judge **shall** accord every person with a legal interest in a proceeding the right to be heard according to law. Ill. Code Jud. Conduct R. 2.6. Issuing the warrant while a timely, served, exculpatory submission sat unaddressed denied that right.

**COUNT FOUR — Issuing a Custodial Warrant With No Defense Counsel Present.** The half-sheet (Exhibit A) lists ASA Nicholas Shepherd (prosecutor) and PO Marisa Cervantes (probation) as present in Courtroom T-611. It lists **no** defense counsel. Appointed counsel from the Lake County Public Defender’s Office had filed nothing in response to the petition, did not appear, and had constructively abandoned Complainant within the meaning of *United States v. Cronin*, 466 U.S. 648 (1984). The right to counsel attaches at probation-revocation proceedings. *Gagnon v. Scarpelli*, 411 U.S. 778 (1973). A judge who proceeds to issue a custodial, no-release warrant

against an unrepresented and absent defendant — with the prosecutor present and no one present to speak for the accused — fails to perform his duties competently and to safeguard the fundamental fairness of the proceeding. Ill. Code Jud. Conduct R. 2.2, 2.5, 2.6.

**COUNT FIVE — Imposing a Zero-Bond / Hold-Without-Release Warrant Grossly Disproportionate to the Allegations.** The warrant Respondent issued was a “zero-bond” warrant — one guaranteeing custody with no avenue of release — for a technical probation matter whose core allegations were a drug test the administering agency had adjudicated compliant and a fee balance the county had itself suspended for indigency. The imposition of the most severe pretrial-liberty restraint available, in response to allegations refuted by the State’s own files, is grossly disproportionate and undermines public confidence in the integrity and impartiality of the judiciary. Ill. Code Jud. Conduct R. 1.2.

**COUNT SIX — Persistent Failure to Act on the June 8, 2026 Faretta / Abandonment Notice; Leaving the Warrant Outstanding Through the Federal Window.** On June 8, 2026, Complainant served the Circuit Court Clerk and the court’s official channels with written notice (Exhibit E) formally invoking his right to self-representation under *Faretta v. California*, 422 U.S. 806 (1975), documenting the constructive abandonment by counsel under *Cronic*, and demanding emergency docketing for June 9, 2026. No emergency hearing was set, no remote access was provided, and no action was taken. The zero-bond warrant was left outstanding while the federal habeas response deadline passed (June 5, 2026) and while physical warrant-extraction attempts were made at Complainant’s home on June 6, 2026 (1:03 PM and 5:51 PM). A judge shall decide matters before him diligently and shall not, through inaction, leave a facially defective liberty restraint unaddressed. Ill. Code Jud. Conduct R. 2.5, 2.7.

**COUNT SEVEN — Ex Parte Communication and a Scheduling Proceeding Conducted in the Self-Represented Defendant’s Absence, Without Notice or the Opportunity to Be Heard (June 16, 2026).** On June 16, 2026 — with the zero-bond warrant outstanding nineteen days and Complainant’s documented submissions already before the court (Counts Three and Six; Exhibits G, H) — the matter was addressed in court and Respondent set the case for a hearing the following week, without notice to Complainant, the self-represented party, who was not present, was given no appearance link, and had no opportunity to be heard. Complainant learned of it only afterward and secondhand, from the Public Defender’s Office that disclaims representing him, whose written account states: “This was confirmed today in court by the Judge”, and “The Court is

motioning up your case for next week in order for you to appear.” (Exhibit I.) A judge **shall not** initiate, permit, or consider ex parte communications, or consider other communications made to the judge outside the presence of the parties concerning a pending matter, except as authorized by law. Ill. Code Jud. Conduct R. 2.9. And a judge **shall** accord every person with a legal interest in a proceeding the right to be heard according to law. R. 2.6. Addressing a self-represented defendant’s case and setting its hearing without notice to him, while a custodial warrant for his arrest remained outstanding, implicates both duties.

**Pattern and Significance — A Willful and Wanton Disregard of Mandatory Duties.** Each defect above is independently sufficient to warrant inquiry. Taken together, they reflect a single course of conduct in which a self-represented, unrepresented person was deprived of his liberty without *any* of the safeguards the law makes mandatory — no preliminary hearing, no ability-to-pay inquiry, no defense counsel, and no consideration of a timely exculpatory submission of which the court had actual notice — followed by a sustained failure to correct the error once it was squarely and repeatedly brought to the court’s attention, and most recently by a scheduling proceeding conducted in his absence and without notice (Count Seven). That is not an arguable exercise of discretion; it is a documented, repeated, and willful and wanton disregard of clearly established and non-discretionary duties in the one context where they matter most. It is precisely the conduct the Board exists to examine.

#### IV. VIOLATIONS OF THE ILLINOIS CODE OF JUDICIAL CONDUCT

Rule	What the Rule Requires	Respondent’s Conduct
<b>Rule 1.1 (Compliance with the Law)</b>	“A judge shall comply with the law, including the Code.”	Issued a custodial warrant without the preliminary probable-cause hearing required by 730 ILCS 5/5-6-4(b) and Gagnon, and without the ability-to-pay inquiry required by Turner and Bearden.
<b>Rule 1.2 (Public Confidence)</b>	Act at all times so as to promote public confidence in the independence, integrity, and impartiality of the judiciary, and avoid the appearance of impropriety.	Issued a zero-bond, no-release warrant for a technical violation refuted by the State’s own records, on a petition filed by a prosecutor who is a named federal civil-rights defendant, after actual notice of the defects.
<b>Rule 2.2 (Impartiality &amp; Fairness)</b>	“A judge shall uphold and apply the law, and shall perform all duties of judicial office fairly and impartially.”	Disregarded the mandatory revocation procedures and the right to counsel and issued the warrant on the face of a facially defective petition without applying the governing law.
<b>Rule 2.5 (Competence &amp; Diligence)</b>	“A judge shall perform judicial and administrative duties competently and diligently.”	Conducted none of the required hearings or inquiries and then failed to act on the June 8, 2026 emergency Faretta / abandonment notice demanding next-day docketing.

<b>Rule 2.6 (Right to Be Heard)</b>	“A judge shall accord to every person who has a legal interest in a proceeding, or that person’s lawyer, the right to be heard according to law.”	Issued the warrant without acknowledging or ruling on the emergency exculpatory submission served two hours earlier, and with no defense counsel present to be heard for the accused.
<b>Rule 2.7 (Responsibility to Decide)</b>	A judge shall hear and decide matters assigned to the judge.	Left the Faretta invocation and the documented abandonment unaddressed, set no hearing, and allowed a facially void zero-bond warrant to remain outstanding.
<b>Rule 2.9 (Ex Parte Communications)</b>	A judge shall not initiate, permit, or consider ex parte communications, or consider other communications concerning a pending matter, except as authorized by law.	On June 16, 2026, addressed Complainant’s case and set a hearing in his absence and without notice to the self-represented party, who learned of it only afterward and secondhand.

## **V. APPLICATION TO THE CONSTITUTIONAL GROUNDS (Art. VI, § 15(e))**

**Willful misconduct in office.** Respondent issued a liberty-depriving warrant in willful and wanton disregard of the mandatory preliminary-hearing and ability-to-pay requirements, after actual notice — by a submission expressly routed to him by name — that the predicate allegations were refuted by the State’s own records, and thereafter addressed the case and set a hearing in the self-represented defendant’s absence and without notice (Count Seven).

**Persistent failure to perform duties.** After the warrant issued, Respondent took no action on the June 8, 2026 emergency notice and left the warrant outstanding through the federal deadline and the June 6 extraction attempts, despite repeated written demands for docketing and documented portal submissions on June 12 and June 14, 2026 (Exhibit H).

**Conduct prejudicial to the administration of justice / bringing the office into disrepute.** Depriving an unrepresented person of liberty with none of the required safeguards, and leaving the error uncorrected, erodes public confidence in the courts and brings the judicial office into disrepute.

## **VI. RELIEF REQUESTED**

Complainant respectfully requests that the Judicial Inquiry Board:

- 1. Open an investigation** into the judicial conduct of Hon. Christopher R. Stride described herein, under Ill. Const. art. VI, § 15 and the Board’s Rules of Procedure;
- 2. Obtain the complete record of the May 28, 2026 proceeding** in Case No. 23 CF 1146, including the court file, the half-sheet/minutes, the electronic court recording (ECR/audio) of the hearing, and any clerk record reflecting receipt of the 7:00 AM emergency submission and the June 8, 2026 notice;
- 3. Request a written response from Respondent** explaining: (a) why no preliminary probable-cause hearing under 730 ILCS 5/5-6-4(b) was held; (b) why no ability-to-pay inquiry under Turner/Bearden was conducted; (c) why a custodial zero-bond warrant issued with no defense counsel

present; (d) what disposition, if any, was made of the emergency exculpatory submission served two hours before the hearing; and (e) why no action was taken on the June 8, 2026 Faretta / constructive-abandonment notice demanding next-day docketing;

4. **Determine whether the conduct constitutes** willful misconduct in office, persistent failure to perform duties, or other conduct prejudicial to the administration of justice or that brings the judicial office into disrepute, within Ill. Const. art. VI, § 15(e); and

5. **File a complaint with the Illinois Courts Commission** if the Board finds a reasonable basis to do so, and take such further action as the Board deems appropriate.

**VERIFICATION.** I, Ehab Allababidi, declare under penalty of perjury under the laws of the United States (28 U.S.C. § 1746) and the State of Illinois (735 ILCS 5/1-109) that the factual statements in the foregoing Complaint are true and correct to the best of my knowledge, and that the attached Exhibits A through I are true and accurate copies of the documents they purport to be.

/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

## VII. INDEX OF EXHIBITS

Exhibit	Document	Relevance to Respondent's Conduct
Ex. A	Court Half-Sheet / Minutes, May 28, 2026 (Courtroom T-611)	Records Respondent presiding with prosecutor and probation officer present, NO defense counsel, and the entire proceeding as "Case Called ... Issue Warrant"
Ex. B	Zero-Bond Warrant of Arrest, issued May 28, 2026	The custodial, no-release instrument Respondent issued against an unrepresented defendant
Ex. C	Emergency Special Appearance email, May 28, 2026, 7:00 AM	Actual notice to the court two hours before the hearing; first line: "MANDATORY ROUTING TO THE HONORABLE CHRISTOPHER STRIDE"; attaches exculpatory adjudications
Ex. D	Notice of Special Appearance and Fraud on the Court (verified, 6 pp.)	The documented, verified defense placed before the court, refuting the petition's allegations
Ex. E	Faretta Invocation & Response to Procedural Denial, June 8, 2026	The self-representation / constructive-abandonment notice demanding next-day docketing that Respondent did not act upon
Ex. F	Lake County Case Action Page (official portal docket)	Procedural history, attorney activity, and warrant status for Case No. 23 CF 1146
Ex. G	[Proposed] Findings of Fact & Order to Quash Warrant	The complete documented record and proposed findings submitted to the court, showing the evidence available at every stage

<b>Ex. H</b>	Lake County Portal Filing Receipt (June 12, 2026, 10:26 PM)	Official portal receipt proving the Proposed Order at Exhibit G was formally submitted to the court; pins the exact date the complete record was placed before the court
<b>Ex. I</b>	Public Defender Email — June 16, 2026 (ex parte hearing admission)	The Office’s written admission that the case was addressed in court and a hearing set for next week — in Complainant’s absence and without notice — supporting Count Seven (Rules 2.9, 2.6)

# EXHIBIT A

## COURT HALF-SHEET / MINUTES — MAY 28, 2026

Arrestment on Petition to Revoke — Courtroom T-611 — Christopher R. Stride, Judge

JIB COMPLAINT — HON. CHRISTOPHER R. STRIDE — CASE NO. 23 CF 1146

<b>Document:</b>	Official court minutes — Lake County Circuit Court, 19th Judicial Circuit	<b>Filed/Dated:</b>	May 28, 2026, 9:00 AM — Hon. Christopher R. Stride presiding
<b>Case No.:</b>	23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County	<b>Relevance:</b>	Records the entire proceeding and who was, and was not, present

### LEGAL SIGNIFICANCE — WHY THIS EXHIBIT IS DISPOSITIVE:

*This is the single most important exhibit. The official minutes name Christopher R. Stride as the judge, list ASA Nicholas Shepherd and Probation Officer Marisa Cervantes as present, and list NO defense counsel. The recorded result of the hearing is, in its entirety, “Case Called ... Issue Warrant.” There is no notation of a preliminary probable-cause hearing, no ability-to-pay inquiry, no sworn testimony, and no reference to the emergency exculpatory submission served two hours earlier. The document on its face establishes that a custodial warrant issued against an unrepresented, absent defendant with none of the safeguards the law makes mandatory.*

### KEY EVIDENCE CONTAINED IN THIS EXHIBIT:

Judge of record: Christopher R. Stride; ASA Nicholas Shepherd and PO Marisa Cervantes present

No defense counsel listed as present for the accused

Event type: Arrestment on Petition to Revoke; result: “Case Called ... Issue Warrant”

No notation of any preliminary hearing, testimony, or ability-to-pay inquiry



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

People

Plaintiff,

v.

PEOPLE VS ALLABABIDI

Defendant.

Case No. 23CF00001146

Location: Courtroom 611

Event Date: May 28, 2026 9:00 AM

Event Type: Arraignment On Petition To Revoke

Clerk: Johanna B

**Charge(s):**

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

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

**Criminal/Traffic - Minutes**

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

**Present in Court**

MARISSA CERVANTES - Lake County Adult Probation Services

**Nature of Proceedings:**

Event Result: Case Called 05/28/2026.  
Issue Warrant

# EXHIBIT B

## ZERO-BOND WARRANT OF ARREST

Issued May 28, 2026 — Case No. 23 CF 1146 — Lake County, Illinois

JIB COMPLAINT — HON. CHRISTOPHER R. STRIDE — CASE NO. 23 CF 1146

<b>Document:</b>	Bench warrant — Lake County Circuit Court, 19th Judicial Circuit	<b>Filed/Dated:</b>	Issued May 28, 2026 in Courtroom T-611
<b>Case No.:</b>	23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County	<b>Relevance:</b>	The custodial instrument issued by Respondent

### LEGAL SIGNIFICANCE — WHY THIS EXHIBIT IS DISPOSITIVE:

*This is the warrant Respondent issued. It commands all peace officers of Illinois to arrest Complainant and hold him in custody for First Appearance Court — a zero-bond, hold-without-release instrument — arising from a probation-revocation petition whose core allegations were already refuted by the State's own written records. The warrant is the direct product of the May 28, 2026 proceeding documented in Exhibit A and remains outstanding as of the date of this complaint.*

### KEY EVIDENCE CONTAINED IN THIS EXHIBIT:

Commands arrest and custody (“held in custody for First Appearance Court”)  
Issued on a petition refuted by the State's own December 2025 adjudications  
Arresting agency designated; warrant remains active/outstanding  
Issued without a preliminary hearing or ability-to-pay finding (see Exhibit A)



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

THE PEOPLE OF THE STATE OF ILLINOIS

CASE  
NUMBER(S)

23CF00001146

VS.

EHAB ALLABABIDI  
8516 W. WINONA ST.  
CHICAGO, IL 60656

**WARRANT OF ARREST - VIOLATION**

To all Peace Officers of the State of Illinois:

You are hereby commanded to arrest **EHAB ALLABABIDI** and bring said person without unnecessary delay before the judge sitting in First Appearance Court in the Circuit Court of the 19th Judicial Circuit, Lake County, Illinois, to answer a charge made against said person for a technical violation while on for the following offense(s):

AGG RECKLESS DRVG/BODILY HARMSPEEDING 35+ MPH OVER LIMIT

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

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

JUDGE

PD APPOINTED  
ARRESTING  
AGENCY:  
Lincolnshire



DOB: 09/24/1996	Race:	Sex: Male	Hair: Brown	Eyes: Brown	HGT: 6	WGT: 200
Driver's License: A41120096272	DL State: IL	SSN:	State ID:			
Vehicle Reg:	Veh Make:	Year:	License Plate:			



# EXHIBIT C

## EMERGENCY SPECIAL APPEARANCE — EMAIL TO THE COURT (7:00 AM)

Sent May 28, 2026 at 7:00 AM — two hours before the 9:00 AM hearing

JIB COMPLAINT — HON. CHRISTOPHER R. STRIDE — CASE NO. 23 CF 1146

<b>Document:</b>	Email transmission to the Circuit Court Clerk and the court's official address	<b>Filed/Dated:</b>	May 28, 2026, 7:00 AM (CircuitClerk@ / courts@lakecountyil.gov)
<b>Case No.:</b>	23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County	<b>Relevance:</b>	Proves the court had actual notice before issuing the warrant

### LEGAL SIGNIFICANCE — WHY THIS EXHIBIT IS DISPOSITIVE:

*This email establishes Respondent's actual notice. Its first line reads: "URGENT: MANDATORY ROUTING TO THE HONORABLE CHRISTOPHER STRIDE (COURTROOM T-611)." It was sent to the Circuit Court Clerk (CircuitClerk@lakecountyil.gov) and the court's official address (courts@lakecountyil.gov) two hours before the hearing. It attached the December 8 and 10, 2025 Weeks adjudications proving the drug allegation false and noticed the pending federal proceedings and the Article III order being drafted concerning the very hearing. Respondent issued the warrant without acknowledging or ruling on any of it.*

### KEY EVIDENCE CONTAINED IN THIS EXHIBIT:

First line: "MANDATORY ROUTING TO THE HONORABLE CHRISTOPHER STRIDE (COURTROOM T-611)"

Sent 7:00 AM May 28, 2026 to the Clerk and courts@lakecountyil.gov — two hours pre-hearing

Attaches the Weeks adjudications adjudicating the drug test compliant (Adderall prescription)

Notifies the pending federal injunction and the Article III order being drafted on the hearing



Ehab Hilfiger &lt;defcon5ready@gmail.com&gt;

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

1 message

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**Ehab Hilfiger** <defcon5ready@gmail.com>

Thu, May 28, 2026 at 7:00 AM

To: Circuit Clerk &lt;CircuitClerk@lakecountyil.gov&gt;, courts@lakecountyil.gov, Lake County State's Attorney &lt;statesattorney@lakecountyil.gov&gt;, nshepherd@lakecountyil.gov

Cc: "Destiny Lee (Adult Probation)" &lt;destiny.lee@cookcountyil.gov&gt;, "Matthew T. Junkin" &lt;mjunkin@lakecountyil.gov&gt;, pin@usdoj.gov

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

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

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

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

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

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

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

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

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

--

**Ehab Allababidi**

Personal Signature

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

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2. No rights, privileges, or defenses are waived by this transmission.
3. Instructions and directives herein constitute written notice for compliance and recordkeeping.
4. This communication is restricted to the designated recipient and is not to be forwarded or archived without authorization.

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**5 attachments****NOTICE\_OF\_SPECIAL\_APPEARANCE\_AND\_FRAUD\_ON\_THE\_COURT.pdf**

44K

**DKT16.pdf**

20139K

**EMERGENCY\_PETITION\_WRIT\_MANDAMUS\_05272026.pdf**

55K

**AG\_LITIGATION\_HOLD\_DOERSCH\_05232026.pdf**

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**LITIGATION\_HOLD\_LAKE\_COUNTY\_05222026.pdf**

58K

# EXHIBIT D

## NOTICE OF SPECIAL APPEARANCE AND FRAUD ON THE COURT

*Verified six-page document — the defense placed before the court*

**JIB COMPLAINT — HON. CHRISTOPHER R. STRIDE — CASE NO. 23 CF 1146**

<b>Document:</b>	Verified formal notice (pro se), incorporated into the emergency submission	<b>Filed/Dated:</b>	Served May 27–28, 2026 (verified under penalty of perjury)
<b>Case No.:</b>	23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County	<b>Relevance:</b>	The documented, verified substance the court declined to consider

### LEGAL SIGNIFICANCE — WHY THIS EXHIBIT IS DISPOSITIVE:

*This verified document is the substance of what was placed before the court and never addressed. It sets out, under penalty of perjury, that the drug allegation was adjudicated compliant by the administering agency, that the financial allegations were precluded by indigency and active insurance coverage, and that the proceeding was sequenced in proximity to federal deadlines. It is the record the court was obligated to hear before depriving a person of liberty.*

### KEY EVIDENCE CONTAINED IN THIS EXHIBIT:

Verified under penalty of perjury; six pages

Documents the exculpatory Weeks adjudications and the indigency fee suspension

Records the May 27, 2026 federal confirmation that an Article III order was being drafted

Constitutes the right-to-be-heard submission disregarded under Rule 2.6

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

**PEOPLE OF THE STATE OF ILLINOIS,**  
*Plaintiff,*

v.

**EHAB ALLABABIDI,**  
*Defendant, Pro Se.*

Case No.: **23 CF 1146**

Judge: *Hon. Christopher Stride*

Courtroom: *T-611*

**CRIMINAL DIVISION**

*Probation Revocation Proceeding*

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

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

**DATE:** May 28, 2026

**TO:** The Honorable Christopher Stride  
Circuit Court Judge, Courtroom T-611  
19th Judicial Circuit, Lake County, Illinois  
18 N. County St., Waukegan, IL 60085

**Via:** Circuit Clerk / Courts Administration Routing

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

**I. PRELIMINARY STATEMENT AND NATURE OF THIS FILING**

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

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

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

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

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

## **II. DOCUMENTED NAPUE PERJURY — THE FABRICATED AMPHETAMINE ALLEGATION**

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

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

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

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

## **III. FORMAL NOTICE OF PENDING FEDERAL JURISDICTIONAL PROCEEDINGS**

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

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

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

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

#### 14 **IV. THE FORENSIC SPOILIATION OF NOTICE — THE MEMORIAL DAY TRAP**

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

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

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

#### 27 **V. RELIEF DEMANDED**

28 WHEREFORE, Defendant respectfully demands:

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

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

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

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

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

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

### **VERIFICATION UNDER PENALTY OF PERJURY**

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

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

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

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

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

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

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

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

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

Executed on May 28, 2026 in Chicago, Illinois.

/s/ Ehab Allababidi

**EHAB ALLABABIDI**, *Pro Se* Defendant

8516 W. Winona St., Chicago, IL 60656

(773) 920-0030 | [defcon5ready@gmail.com](mailto:defcon5ready@gmail.com)

Dated: May 28, 2026

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1

2 **CERTIFICATE OF SERVICE**

3 I, EHAB ALLABABIDI, certify under penalty of perjury that on the 28th day of May, 2026, I caused  
4 the foregoing NOTICE OF SPECIAL APPEARANCE AND FRAUD ON THE COURT to be served  
5 via electronic mail (email) upon the following recipients at the email addresses indicated below.  
6 Electronic service is effective under Illinois Supreme Court Rule 11(b)(6) and Fed. R. Civ. P.  
7 5(b)(2)(E). No physical or mailed service was made.

8 **TO:** Circuit Clerk Administration  
9 **Email:** [CircuitClerk@lakecountyil.gov](mailto:CircuitClerk@lakecountyil.gov)

10 **TO:** General Courts Routing  
11 **Email:** [courts@lakecountyil.gov](mailto:courts@lakecountyil.gov)

12 **TO:** Lake County State's Attorney's Office  
13 **Email:** [statesattorney@lakecountyil.gov](mailto:statesattorney@lakecountyil.gov)

14 **TO:** ASA Nicholas Shepherd  
15 Lake County State's Attorney's Office  
16 **Email:** [nshepherd@lakecountyil.gov](mailto:nshepherd@lakecountyil.gov)

17 **CC:** Matthew T. Junkin, Director  
18 Lake County Adult Probation Department  
19 **Email:** [mjunkin@lakecountyil.gov](mailto:mjunkin@lakecountyil.gov)

20 **CC:** Officer Destiny Lee  
21 Cook County Adult Probation Department  
22 **Email:** [destiny.lee@cookcountyil.gov](mailto:destiny.lee@cookcountyil.gov)

23 **CC:** United States Department of Justice  
24 Public Integrity Section  
25 **Email:** [pin@usdoj.gov](mailto:pin@usdoj.gov)

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

/s/ Ehab Allababidi

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EHAB ALLABABIDI, *Pro Se*

Defendant

Dated: May 28, 2026

# EXHIBIT E

## FARETTA INVOCATION & RESPONSE TO PROCEDURAL DENIAL

Served June 8, 2026 — demanded emergency docketing for June 9, 2026

JIB COMPLAINT — HON. CHRISTOPHER R. STRIDE — CASE NO. 23 CF 1146

<b>Document:</b>	Email transmission to the Circuit Court Clerk and parties	<b>Filed/Dated:</b>	June 8, 2026, 7:08 PM
<b>Case No.:</b>	23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County	<b>Relevance:</b>	The post-warrant notice Respondent did not act upon

### LEGAL SIGNIFICANCE — WHY THIS EXHIBIT IS DISPOSITIVE:

*After the warrant issued, Complainant served the court's official channels with this written notice formally invoking self-representation under Faretta v. California and documenting the constructive abandonment by appointed counsel under Cronic, expressly demanding emergency docketing for the next day. No emergency hearing was set, no remote access was provided, and no action was taken. The warrant was left outstanding while the June 5 federal deadline passed and June 6 extraction attempts were made. This exhibit supports Count Six (persistent failure to perform duties).*

### KEY EVIDENCE CONTAINED IN THIS EXHIBIT:

Formally invokes Faretta v. California, 422 U.S. 806 (1975)

Documents constructive abandonment under United States v. Cronic, 466 U.S. 648 (1984)

Demands emergency docketing for June 9, 2026 — no hearing was set

Served to the Circuit Court Clerk and courts@lakecountyil.gov; no response



Ehab Hilfiger &lt;defcon5ready@gmail.com&gt;

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**RESPONSE TO PROCEDURAL DENIAL (Case 23 CF 1146): NOTICE OF FARETTA INVOCATION & CONSTRUCTIVE ABANDONMENT**

1 message

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**Ehab Hilfiger** <defcon5ready@gmail.com>

Mon, Jun 8, 2026 at 7:08 PM

To: Circuit Clerk &lt;CircuitClerk@lakecountyil.gov&gt;, courts@lakecountyil.gov

Cc: "nshepherd@lakecountyil.gov" &lt;nshepherd@lakecountyil.gov&gt;, Lake County State's Attorney

&lt;statesattorney@lakecountyil.gov&gt;, Bailey Russell &lt;BRussell@lakecountyil.gov&gt;

Ms. Becerra,

I am in receipt of your email regarding the Omnibus Filing. Please be advised of the following regarding my procedural standing and this emergency matter:

1. Constructive Abandonment: My appointed public defender, Bailey Russell, has been contacted repeatedly and is refusing to communicate, file motions, or provide representation during an active custodial warrant execution. This constitutes constructive abandonment under United States v. Cronin. I cannot rely on counsel that has ceased to perform their constitutional duties.
2. Faretta Invocation: I have formally invoked my constitutional right to proceed pro se under Faretta v. California. A clerk's office policy cannot override a defendant's Sixth Amendment right to self-representation. Your refusal to accept filings based on the lack of an attorney's signature is a denial of my constitutional rights.
3. Mailing Compliance: The original physical Omnibus Filing was placed into USPS custody at 10:00 AM on June 8, 2026 (Tracking No: 9402 6118 9876 5528 9340 61). It is currently in transit to your office as requested.

Directive: I am requesting that this motion be placed on the emergency call docket for June 9, 2026, at 9:00 AM based on this electronic notice, pending the arrival of the physical motion via USPS. I demand the Zoom/WebEx telephonic infrastructure link be transmitted to my email ([defcon5ready@gmail.com](mailto:defcon5ready@gmail.com)) no later than 4:00 PM today, June 8, 2026.

If this office persists in refusing to docket an emergency motion from a pro se defendant whose appointed counsel has constructively abandoned them, please provide a written statement of the specific policy being applied so I may include it in my immediate federal filing regarding the inadequacy of the state forum.

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

--

**Ehab Allababidi**

Personal Signature

**Phone:** 773-920-0030 (CAGE 16QC7)**Email:** [defcon5ready@gmail.com](mailto:defcon5ready@gmail.com)

**LEGAL NOTICE & CONFIDENTIALITY**

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2. No rights, privileges, or defenses are waived by this transmission.
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# EXHIBIT F

## LAKE COUNTY CASE ACTION PAGE

Official portal docket — Case No. 23 CF 1146

JIB COMPLAINT — HON. CHRISTOPHER R. STRIDE — CASE NO. 23 CF 1146

<b>Document:</b>	Official court record — Lake County Court Portal	<b>Filed/Dated:</b>	Retrieved June 2026 from the Lake County Court Portal
<b>Case No.:</b>	23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County	<b>Relevance:</b>	Authenticated docket history and warrant status

### LEGAL SIGNIFICANCE — WHY THIS EXHIBIT IS DISPOSITIVE:

*The official Lake County docket confirms the procedural history of Case No. 23 CF 1146, the May 28, 2026 hearing and warrant, the absence of any defense filing in the revocation proceeding, and the November 10, 2025 system-generated suspension of \$1,400.00 in probation fees for indigency — the county's own contemporaneous record that the financial allegation was not willful.*

### KEY EVIDENCE CONTAINED IN THIS EXHIBIT:

- Authenticated docket retrieved from the Lake County Court Portal
- Confirms the May 28, 2026 hearing date and warrant issuance
- Reflects the November 10, 2025 “Payment Suspended” entry for \$1,400.00 in fees
- Shows no defense filing in the revocation proceeding



# Circuit Court of the Nineteenth Judicial Circuit

Lake County, Illinois

**23CF00001146** Warrant/Attach.After Sentence/Jdgmt

**PEOPLE VS ALLABABIDI**

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

[Parties](#)

[Charges/Dispositions/Sentences](#)

[Court Events](#)

[Documents Filed](#)

[Financial](#)

## PD Financial Folderview

[Fines and Fees](#)

[Restitution](#)

[Bail Bonds](#)

[Converted Fines and Costs](#)

[Converted Restitution](#)

[Converted Bonds](#)

∨ Fines and Fees

Date	Fine/Fee	Amount	Paid	Balance
03/30/2024	Sheriff	180.00	0.00	180.00
	Sheriff	180.00	0.00	180.00
09/08/2025	AGG RECKLESS DRVG/BODILY HARM [625 ILCS 5/11-503(a)(1)] - Criminal Schedule 1	549.00	0.00	549.00
	Court Automation Fund	20.00	0.00	20.00
	Document Storage Fund	20.00	0.00	20.00
	Clerk Operation and Admin Fund	5.00	0.00	5.00
	Circuit Clerk Costs Fund	160.00	0.00	160.00
	State's Attorney Office Fund	35.00	0.00	35.00
	Court Security Fund	40.00	0.00	40.00
	Specialty Courts Fund	20.00	0.00	20.00
	Child Advocacy Services Fund	10.00	0.00	10.00
	States Attorney Records Automation Fund	2.00	0.00	2.00
	Public Defender Records Automation Fund	2.00	0.00	2.00

Date	Fine/Fee	Amount	Paid	Balance
	Arrestee Medical Fund	20.00	0.00	20.00
	Probation and Court Services Operation Fund	20.00	0.00	20.00
	State Police Operation and Admin Fund	50.00	0.00	50.00
	Violent Crime Victims Assistance Fund	100.00	0.00	100.00
	Criminal & Traffic Training Surcharge	35.00	0.00	35.00
	State Police Merit Board Public Safety Fund	10.00	0.00	10.00
09/08/2025	CFIN - Criminal Fine	75.00	0.00	75.00
	Criminal Fine	75.00	0.00	75.00
09/08/2025	Conditional Assessment - SAO Prosecution CV/TR	2.00	0.00	2.00
	States Attorney Records Automation Fund	2.00	0.00	2.00
09/08/2025 11/10/2025	Probation Service Fee	1500.00	1,400.00	100.00
11/10/2025 Payment Suspended 1400.00 Paid by				
	Probation Service Fee	1500.00	1,400.00	100.00
09/08/2025	Service Provider Cost	125.00	0.00	125.00

Date	Fine/Fee	Amount	Paid	Balance
	Service Provider Cost	125.00	0.00	125.00
09/08/2025	Public Defender Fee Felony	100.00	0.00	100.00
	Public Defender Fee Felony	100.00	0.00	100.00

# EXHIBIT G

## [PROPOSED] FINDINGS OF FACT & ORDER TO QUASH WARRANT

*The complete documented record submitted to the court*

**JIB COMPLAINT — HON. CHRISTOPHER R. STRIDE — CASE NO. 23 CF 1146**

<b>Document:</b>	Proposed order with verified findings of fact and conclusions of law	<b>Filed/Dated:</b>	Submitted via Lake County Court Portal, June 12, 2026
<b>Case No.:</b>	23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County	<b>Relevance:</b>	Consolidates the full evidentiary record placed before the court

### LEGAL SIGNIFICANCE — WHY THIS EXHIBIT IS DISPOSITIVE:

*This proposed order assembles the complete documented record — 22 findings of fact with supporting exhibits — establishing that every allegation underlying the warrant was refuted by the State's own records, that the right to counsel was abandoned, and that the right to be heard was denied. It is provided so the Board has, in a single document, the full factual context against which Respondent's conduct should be measured.*

### KEY EVIDENCE CONTAINED IN THIS EXHIBIT:

- 22 numbered findings of fact with record citations and appendices
- Documents the absence of a preliminary hearing, ability-to-pay inquiry, and counsel
- Maps the conduct to Gagnon, Turner, Bearden, Faretta, Cronin, Brady, and Napue
- The complete record context for the six counts of judicial misconduct

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

<p><b>THE PEOPLE OF THE STATE OF ILLINOIS,</b> <i>Plaintiff-Respondent,</i></p> <p>v.</p> <p><b>EHAB ALLABABIDI,</b> <i>Defendant-Petitioner, Pro Se.</i></p>	<p>General No.: <b>23 CF 1146</b></p> <p>Circuit Court, 19th Judicial Circuit Lake County, Illinois</p> <p>Judge: <b>HON. CHRISTOPHER R. STRIDE</b> Courtroom: <b>T-611</b></p>
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**FINDINGS OF FACT AND [PROPOSED] ORDER TO QUASH WARRANT  
AND DISMISS PETITION FOR REVOCATION WITH PREJUDICE**

*Submitted by Defendant-Petitioner Ehab Allababidi, Pro Se — Lake County Court Portal, Proposed Order Upload*

THIS CAUSE coming to be heard on Defendant’s Omnibus Verified Motion to Quash Warrant and Dismiss Petition for Revocation with Prejudice, Notice of Special Appearance and Fraud on the Court; the Court having reviewed the complete documentary record, the authenticated evidentiary exhibits incorporated by reference as Appendices A through I, and the active federal jurisdictional notices from *Allababidi v. Shepherd, et al.*, No. 1:26-cv-06738 (N.D. Ill.) and *Allababidi v. Junkin*, No. 1:26-cv-01077 (N.D. Ill.); the Court further having received this Proposed Order via the Lake County Court Portal Proposed Order upload (June 12, 2026), and the original physical Omnibus Filing having been placed into USPS custody on June 8, 2026 (USPS Tracking No. 9402 6118 9876 5528 9340 61) addressed to the Circuit Court Clerk (that mailing contained the CM/ECF-stamped Omnibus Motion filed in Case No. 1:26-cv-01077 — Appendix C herein); and being fully advised in the premises; the Court hereby issues the following Findings of Fact, Conclusions of Law, and Order:

**I. PROCEDURAL POSTURE & JURISDICTIONAL INTERFACE**

**Pro Se Status / Faretta Recognition:** The Court formally recognizes Defendant’s invocation of his constitutional right to self-representation. *Faretta v. California*, 422 U.S. 806 (1975). Pursuant to 735 ILCS 5/2-301 and Illinois Supreme Court Rule 13, the Circuit Clerk is mandated to accept, file, and index all submissions tendered by Defendant pro se. Any administrative policy conditioning docket entry on a licensed attorney’s signature block is void as applied to self-represented parties.

**Constructive Abandonment by Appointed Counsel:** The record reflects a complete and documented failure by the Lake County Public Defender’s Office to respond to the May 14, 2026 Petition for Revocation, to appear at the May 28, 2026 warrant hearing, or to communicate with Defendant during the entirety of the revocation proceedings. This constitutes constructive abandonment and a per se deprivation of the Sixth Amendment right to counsel. *United States v. Cronin*, 466 U.S. 648 (1984). Defendant was compelled to litigate the revocation and press a parallel federal civil rights action entirely pro se while subject to an active zero-bond bench warrant.

**Federal Coordination — Exhaustion Fulfilled:** On May 29, 2026, the United States District Court for the Northern District of Illinois (Hon. John Robert Blakey) issued a directive in *Allababidi v. Junkin*, No. 1:26-cv-01077 (Dkt. 25), mandating the following:

*“If Petitioner has legitimate concerns about the state case he must raise them with the state court in the first instance.”*

This Court explicitly recognizes Defendant's Omnibus Filing and this resulting Order as the direct, required fulfillment of that federal exhaustion mandate. Simultaneously, Defendant's 42 U.S.C. § 1983 action, *Allababidi v. Shepherd, et al.*, No. 1:26-cv-06738 (N.D. Ill.), names ASA Shepherd, Officer Cervantes, Director Fontana, Cook County Officer Destiny Lee, Lake County, and Cook County as defendants.<sup>5</sup>

<sup>5</sup> **Federal Civil Rights Action — Named Defendants.** *Allababidi v. Shepherd, et al.*, No. 1:26-cv-06738 (N.D. Ill.), asserts claims under 42 U.S.C. § 1983 for First Amendment retaliation, malicious prosecution, fabrication of evidence, and conspiracy against: (1) ASA Nicholas Shepherd; (2) Lake County PO Marisa Cervantes; (3) Director Margaret K. Fontana; (4) Cook County PO Destiny Lee; (5) Lake County; and (6) Cook County. The Illinois Attorney General filed a Notice of Non-Involvement on April 28, 2026, declining to defend any state actor in this matter. This Court's resolution of the revocation proceeding will be transmitted to the Northern District of Illinois as a record exhibit.

## **II. JUDICIAL FINDINGS OF FACT**

**FINDING OF FACT NO. 1:** The Honorable Christopher R. Stride, Courtroom T-611, sentenced Defendant Ehab Allababidi to 30 months' probation in Case No. 23 CF 1146, terminating March 7, 2028. Conditions: (a) drug testing; (b) 240 hours community service; (c) 180 days county jail stayed; (d) \$2,670.86 restitution to O'Brien Landscape (5700 Howard St., Skokie, IL 60077). State: ASA Francis P. De Rosa IV. Defense: Bailey C. Russell (ARDC 6340962; BRussell@lakecountyil.gov), who prepared the Order for Restitution. The Court ordered \$0.00 restitution to James W. Smith Printing Company because Allstate had already satisfied that claim — confirming the Court's actual notice of active Allstate insurance coverage at sentencing.

**FINDING OF FACT NO. 2:** Allstate Fire and Casualty Insurance Company (Claim No. 0670868884; Date of Loss: May 23, 2022; accident location: IL Route 22 & Old Mill Road, Lincolnshire, IL) paid \$16,557.00 to Sentry Insurance for the James W. Smith Printing Company subrogation from the same collision prior to the September 8, 2025 sentencing hearing.<sup>1</sup> Defense counsel Russell failed to investigate whether the same active Allstate policy covered O'Brien Landscape's vehicle damage from the identical collision. It does. Same insurer. Same claim number. Same accident. Active insurance coverage at all relevant times renders a finding of willful nonpayment legally impossible under *Bearden v. Georgia*, 461 U.S. 660 (1983).

<sup>1</sup> **Allstate Claim 0670868884.** Allstate Fire and Casualty Insurance Company opened Claim No. 0670868884 on the date of loss (May 23, 2022 collision at IL Route 22 & Old Mill Road, Lincolnshire, IL). The same claim paid \$16,557.00 to Sentry Insurance for James W. Smith Printing Company's subrogation interest prior to the September 8, 2025 sentencing hearing. The sentencing court's \$0.00 restitution order to Smith Printing confirms the court's actual notice that Allstate had discharged that obligation. Allstate's representative Connie O'Connor (630-972-7357) documented coverage extending to all property damage arising from the same collision. The State never directed O'Brien Landscape to file a claim under this active policy. This administrative routing failure, not willful nonpayment by Defendant, created the restitution gap — rendering the financial allegation frivolous under *Bearden v. Georgia*, 461 U.S. 660 (1983), and *Turner v. Rogers*, 564 U.S. 431 (2011).

**FINDING OF FACT NO. 3:** Cook County Adult Probation Officer Adison Weeks administered urinalysis to Defendant on November 20, 2025 (as recorded in the official Lake County Adult Probation Memorandum, Appendix H). The result detected amphetamine. Defendant held an active, valid prescription for Adderall (amphetamine salts) with a plasma half-life of 10 to 13 hours. The prescription was on file with the supervising probation agency. The detected result was therefore exclusively attributable to lawful prescribed medication.

**FINDING OF FACT NO. 4:** Cook County Adult Probation Officer Adison Weeks issued formal written administrative adjudications on the agency's official digital system, confirming the November 2025 drug test result was fully compliant and exclusively attributable to Defendant's active Adderall prescription. On December 8 and 10, 2025, Officer Weeks confirmed verbatim:

1           “Your drug test results were all negative—Your drug test results were positive for  
2           amphetamine, but it is all negative in my eyes because I know you are still taking the Adderall. I  
3           just want to avoid anyone who sees this result though giving you a hard time for future  
4           reference.”

5           These written adjudications were accessible to the Lake County State's Attorney prior to the filing of the  
6           May 14, 2026 Petition. The failure to disclose them constitutes a knowing false statement under  
7           *Napue v. Illinois*, 360 U.S. 264 (1959), and suppression of exculpatory material under *Brady v.*  
8           *Maryland*, 373 U.S. 83 (1963).

9           **FINDING OF FACT NO. 5:** A federal court set habeas response deadlines expiring June 5, 2026 in  
10           *Allababidi v. Junkin*, No. 1:26-cv-01077 (N.D. Ill.), on April 13, 2026. Concurrently, Defendant’s 42  
11           U.S.C. §1983 action, *Allababidi v. Shepherd, et al.*, No. 1:26-cv-06738, names ASA Nicholas  
12           Shepherd as a defendant for First Amendment retaliation, malicious prosecution, and conspiracy to  
13           interfere with civil rights. On April 28, 2026, the Illinois Attorney General filed a Notice of  
14           Non-Involvement in the Junkin habeas action and a companion corpus case, withdrawing state-level  
15           defense from those federal proceedings. The Illinois Attorney General's April 28, 2026 'Notice of  
16           Non-Involvement' functions as an official state-level admission that the individual defendants' actions  
17           in this matter were not within the scope of legitimate state employment or representation, thereby  
18           stripping the State of any colorable argument for sovereign immunity or indemnification in this  
19           proceeding.

20           **FINDING OF FACT NO. 6:** On February 19, 2026, Lake County Adult Probation Officer Marisa  
21           Cervantes (mcervantes@lakecountyil.gov; (847) 377-3614) made a telephonic directive to Defendant  
22           without identifying herself. Defendant immediately transmitted a Formal Memorialization Email to  
23           Director Margaret K. Fontana, the Lake County State’s Attorney’s Office, and the Circuit Court Clerk,  
24           requesting identification of the anonymous officer. Director Fontana received the email and took no  
25           action. Officer Cervantes maintained her anonymous status for 100 consecutive days. Her identity was  
26           revealed only via a post-warrant communication on May 29, 2026.<sup>3</sup>

27           <sup>3</sup> **Cervantes 100-Day Identity Concealment.** Officer Marisa Cervantes initiated a telephonic communication with Defendant on February 19, 2026,  
28           issuing directives without identifying herself. Defendant responded the same day with a Formal Memorialization Email to Director Margaret K. Fontana  
29           (Director of Adult Probation Services, 19th Judicial Circuit), the Lake County State's Attorney's Office (statesattorney@lakecountyil.gov), and the  
30           Circuit Court Clerk (Clerk Erin Cartwright Weinstein), requesting identification of the anonymous officer. Director Fontana received this email and  
31           took no action. Cervantes's identity was not revealed until her May 29, 2026 written communication directing Defendant to surrender — sent the day  
32           after the warrant she was present to witness had issued. Cervantes was physically present in Courtroom T-611 on May 28 when the warrant issued,  
33           establishing her as an active participant throughout the period of her identity concealment. This conduct is a subject of *Allababidi v. Shepherd, et al.*,  
34           No. 1:26-cv-06738 (N.D. Ill.).

35           **FINDING OF FACT NO. 7:** ASA Nicholas Shepherd filed the Petition for Revocation of Probation on  
36           May 14, 2026 — exactly 31 days after the April 13, 2026 federal deadline order and 175 days after the  
37           November 20, 2025 drug test (Appendix H). The Petition contained two sworn allegations: (1) that  
38           Defendant tested positive for “Amphetamine (illegal substance)” on November 10, 2025; and (2) that  
39           Defendant willfully failed to pay financial obligations. Both allegations were false. Both were  
40           disproved by documentary evidence in the State’s own records as of the date Shepherd signed the  
41           Petition. Shepherd signed under oath.

42           **FINDING OF FACT NO. 8:** The Petition bore a Pitney Bowes postage meter stamp dated May 15, 2026.  
43           USPS did not take physical custody until May 18, 2026 — a 72-hour gap spanning the Memorial Day  
44           federal holiday weekend.<sup>4</sup> USPS delivery occurred May 21, 2026. The manufactured six-day total  
45

transit gap consumed 43% of the statutory 14-day response window, collapsing Defendant’s effective response period to three business days before the May 28, 2026 warrant hearing.

<sup>4</sup> **Pitney Bowes Forensic Timeline.** A Pitney Bowes postage meter stamp applies a machine-generated date and postage at the moment of metering. The Petition bears a Pitney Bowes stamp dated May 15, 2026. USPS tracking confirms USPS did not take physical custody until May 18, 2026 — three full days after metering. This gap is not explainable by normal USPS processing: a metered envelope must be presented to USPS at or near the time of metering for same-day or next-day intake. A 72-hour pre-intake hold spanning the Memorial Day federal holiday weekend is consistent with deliberate retention by the sender. The six-day total transit gap (May 15 meter to May 21 delivery) compressed the statutory 14-day response window to approximately three business days before the May 28 hearing.

**FINDING OF FACT NO. 9:** Illinois Supreme Court Rule 131(b) requires every pleading filed by an attorney to include the attorney’s ARDC number, office telephone number, and email address. The Petition omits ASA Shepherd’s telephone number and email address (nshepherd@lakecountyil.gov) in direct violation of this rule.<sup>6</sup> This omission was not inadvertent: Shepherd’s email address appears on prior filings in this matter. The stripped contact page, combined with the manufactured mail delay over a federal holiday weekend, ensured Defendant had no rapid channel to present exculpatory material before the warrant issued.

<sup>6</sup> **Illinois Supreme Court Rule 131(b).** Rule 131(b) requires that every pleading and other paper of an attorney filed in any court include the attorney’s ARDC registration number, firm name (if any), office address, telephone number, and email address. The requirement is mandatory, not directory. ASA Shepherd’s Petition omits both his telephone number and his email address. His email address (nshepherd@lakecountyil.gov) appears on other filings in this proceeding and is therefore known and on record. The omission is not the product of ignorance. For a pro se defendant served with a zero-bond warrant petition over a federal holiday weekend with a compressed response window, the mandatory contact information is the only rapid channel through which exculpatory material can reach the filing attorney before a warrant issues. Stripping that channel is a structural deprivation of the right to be heard.

**FINDING OF FACT NO. 10:** On May 22, 2026, Defendant served a Notice of Mandatory Litigation Hold on all parties, directing preservation of all records, communications, electronic data, and physical evidence related to Case No. 23 CF 1146 and federal Case No. 1:26-cv-06738. The State’s Attorney’s Office, Lake County Adult Probation Services, Cook County Adult Probation, and the Lake County Public Defender’s Office were all served. The preservation obligation arose no later than the date of service.

**FINDING OF FACT NO. 11:** At 7:00 AM on May 28, 2026 — two hours before the 9:00 AM warrant hearing — Defendant transmitted an Emergency Special Appearance email directly to ASA Nicholas Shepherd (nshepherd@lakecountyil.gov, his confirmed active professional email for Lake County filings), the Circuit Court Clerk (CircuitClerk@lakecountyil.gov; courts@lakecountyil.gov), and the Lake County State’s Attorney’s Office (statesattorney@lakecountyil.gov), with copies to Matthew T. Junkin (Director, Lake County Adult Probation, mjunkin@lakecountyil.gov), Cook County Probation Officer Destiny Lee (destiny.lee@cookcountyil.gov), and the U.S. Department of Justice Public Integrity Section (pin@usdoj.gov). The email attached five exhibits: (1) the formal six-page Notice of Special Appearance and Fraud on the Court, verified under penalty of perjury, which documented that on May 27, 2026, Judge Blakey’s courtroom deputy confirmed that a federal Article III order was being drafted concerning the May 28 proceedings; (2) DKT16.pdf — the authenticated December 8 and 10, 2025 Adison Weeks email adjudications previously filed in the N.D. Ill. federal record in Case No. 1:26-cv-01077; (3) the Emergency Petition for Writ of Mandamus (May 27, 2026); (4) the Attorney General Litigation Hold Notice; and (5) the Lake County Litigation Hold Notice. Service was by email only — the Notice of Special Appearance expressly stated no physical or mailed service was made on May 28, 2026. ASA Shepherd was a direct TO: recipient of this email and its five attachments two hours before he permitted the warrant to issue. The Lake County Public Defender’s Office did not receive this email service and entered no appearance at the warrant hearing.

1 **FINDING OF FACT NO. 12:** At 9:00 AM on May 28, 2026, this Court issued a zero-bond bench warrant  
2 in Case No. 23 CF 1146 without holding any evidentiary hearing, without taking sworn testimony,  
3 without conducting any ability-to-pay inquiry required by *Turner v. Rogers*, 564 U.S. 431 (2011), and  
4 without addressing Defendant’s emergency exculpatory submission served two hours prior. Officer  
Marisa Cervantes was physically present in Courtroom T-611 at the time of warrant issuance. No  
5 defense counsel appeared.

6 **FINDING OF FACT NO. 13:** On May 29, 2026 — one day after the warrant issued and 100 days after her  
7 anonymous February 19 call — Officer Cervantes sent her first written communication to Defendant,  
8 directing him to “turn yourself in.” This instruction, sent without disclosure of the exculpatory  
evidence in the State’s own records, confirms that Cervantes was aware of the revocation proceedings  
throughout the period of her identity concealment.

9 **FINDING OF FACT NO. 14:** The federal habeas response deadline in *Allababidi v. Junkin*,  
10 No. 1:26-cv-01077, expired on June 5, 2026, while Defendant remained subject to an active zero-bond  
11 bench warrant. The warrant’s scheduling (May 28 hearing, eight days before the federal deadline) and  
the six-day manufactured mail delay confirm a timeline calibrated to incapacitate Defendant before  
his federal deadlines expired.

12 **FINDING OF FACT NO. 15:** On June 6, 2026 — one day after the June 5, 2026 federal deadline had  
13 passed — law enforcement executed two physical warrant extraction attempts at Defendant’s  
14 residential address: the first at 1:03 PM and the second at 5:51 PM. The timing of these attempts,  
15 occurring within 24 hours of the federal deadline’s expiration, is consistent with a coordinated  
16 strategy to incapacitate Defendant during and immediately after his federal litigation window and is  
inconsistent with any routine enforcement timeline given the 185-day gap between the alleged  
violation and the Petition.

17 **FINDING OF FACT NO. 16:** No probable cause hearing was conducted prior to or at the May 28, 2026  
18 warrant hearing, as required by 730 ILCS 5/5-6-4 and *Gagnon v. Scarpelli*, 411 U.S. 778 (1973). The  
19 Court did not receive or consider Defendant’s exculpatory submission. No testimony was taken. No  
evidence was weighed. The warrant issued on the face of a Petition whose sworn allegations were  
negated in writing by the State’s own agency five months prior.

20 **FINDING OF FACT NO. 17:** The December 8 and 10, 2025 Weeks adjudications were entered on the  
21 Cook County Adult Probation Department’s official digital platform, a unified database accessible to  
22 supervising prosecutors handling cross-jurisdictional probation matters. ASA Shepherd had actual or  
23 constructive access to these records before signing the Petition. A supervising prosecutor who files a  
24 revocation petition based on a drug test result that the administering agency has formally adjudicated  
25 compliant, without disclosing that adjudication to the tribunal, has either failed basic pre-filing due  
diligence or knowingly suppressed exculpatory material. Under *Brady v. Maryland*, 373 U.S. 83  
(1963), and *Napue v. Illinois*, 360 U.S. 264 (1959), both are impermissible.

26 **FINDING OF FACT NO. 18:** Following the May 28, 2026 warrant issuance, Defendant attempted to file  
27 the within Omnibus Verified Motion with the Circuit Court Clerk. Clerk’s office representative Ms.  
28 Becerra denied and refused to accept the filing on the basis that it lacked an attorney’s signature block,  
citing an administrative policy requiring all court filings to bear a licensed attorney’s signature. This  
policy-based refusal constitutes a per se denial of Defendant’s constitutional right to

self-representation under *Faretta v. California*, 422 U.S. 806 (1975), and violates 735 ILCS 5/2-301 and Illinois Supreme Court Rule 13, which mandate that the Clerk accept and file all submissions tendered by self-represented parties. The refusal functionally denied Defendant all access to the court: he was subject to an active zero-bond warrant, appointed counsel had constructively abandoned him, and the only mechanism for relief was direct pro se filing.

**FINDING OF FACT NO. 19:** In direct response to the Clerk’s procedural denial, Defendant placed the original physical Omnibus Filing into USPS custody at 10:00 AM on June 8, 2026 (USPS Tracking No. 9402 6118 9876 5528 9340 61), addressed to the Circuit Court Clerk. That physical mailing contained: (a) the CM/ECF-stamped Omnibus Verified Motion to Quash Warrant and Dismiss Petition for Revocation with Prejudice, as previously filed in *Allababidi v. Junkin*, No. 1:26-cv-01077 (N.D. Ill.) and authenticated by the U.S. District Court CM/ECF system (that document appears as an exhibit within Appendix C of this packet — it is a DISTINCT document from the new, first-time portal submission in Appendix A); and (b) a copy of the N.D. Ill. exhaustion directive issued by Hon. John Robert Blakey (Dkt. 25, May 29, 2026). At 7:08 PM on June 8, 2026, Defendant transmitted written notice of the physical mailing electronically to the Circuit Court Clerk (CircuitClerk@lakecountyil.gov; courts@lakecountyil.gov), ASA Nicholas Shepherd (nshepherd@lakecountyil.gov), the Lake County State’s Attorney’s Office (statesattorney@lakecountyil.gov), and Appointed Counsel Bailey Russell (BRussell@lakecountyil.gov). In that notice, Defendant formally invoked his constitutional right to self-representation under *Faretta v. California* and documented the constructive abandonment by appointed counsel under *United States v. Cronin*, 466 U.S. 648 (1984), demanding emergency docketing for June 9, 2026. ASA Shepherd was thereby on actual notice of the Faretta invocation, the physical filing in transit with its USPS tracking number, and the Cronin abandonment record before he took any further action in these proceedings. No emergency hearing was scheduled. No Zoom or telephonic access was provided. No response was made by any party to this notice.

**FINDING OF FACT NO. 20:** On April 8, 2026, Lake County Adult Probation Officer Marisa Cervantes transmitted a formal Memorandum to the Lake County State's Attorney's Office (Attn: ASA Ben Dillon, Courtroom T-611), recommending that a Petition for Revocation be filed. At the time she transmitted this Memorandum, Cervantes had not identified herself to Defendant in any writing — she had placed an anonymous telephonic directive on February 19, 2026 (Finding 6) but did not reveal her identity until May 29, 2026. The Memorandum alleged: (a) a drug test positive for Amphetamines on November 2025; (b) outstanding court costs of \$1,131.00; (c) failure to report to probation on February 19, February 27, March 10, March 11, and March 26, 2026; (d) failure to complete 240 community service hours; and (e) failure to complete the victim impact panel. The February 19, 2026 failure-to-report date is the SAME DATE on which Cervantes placed her anonymous call to Defendant without identifying herself — an anonymous telephonic directive cannot constitute a lawful reporting obligation. The Memorandum further stated that Defendant 'has not provided an updated prescription' regarding the drug test — yet Cook County Adult Probation Officer Adison Weeks had issued formal written adjudications on December 8 and 10, 2025 confirming the test was compliant with Defendant's active Adderall prescription. Cervantes did not disclose the Weeks adjudication to the State's Attorney's Office. The Memorandum was approved by Lori Carrier

(Cervantes's supervisor). ASA Shepherd filed the Petition 36 days later, on May 14, 2026, based on this Memorandum.

**FINDING OF FACT NO. 21:** The Lake County Court portal record for Case No. 23 CF 1146, retrieved on June 12, 2026, confirms that on November 10, 2025 — Lake County's own probation system formally suspended \$1,400.00 of the \$1,500.00 Probation Service Fee, recording 'Payment Suspended' with a remaining balance of \$100.00. This system-generated fee suspension constitutes probation's own contemporaneous, formal determination that Defendant was unable to pay \$1,400 of his probation financial obligations as of that date. The complete financial record shows outstanding balances of: ~\$549.00 in court schedule fees; \$180.00 sheriff fee; \$125.00 service provider cost; \$100.00 Public Defender fee; and the \$100.00 remaining probation service fee balance. The State cannot simultaneously (a) formally suspend \$1,400 in probation fees through its own system based on demonstrated inability to pay, and (b) file a sworn revocation Petition alleging willful failure to satisfy financial obligations. The probation system's own fee suspension record is direct, court-generated proof that the willful nonpayment allegation is legally impossible under *Bearden v. Georgia*, 461 U.S. 660 (1983), and *Turner v. Rogers*, 564 U.S. 431 (2011), independent of the active Allstate insurance coverage documented in Appendix E. The federal court's IFP indigency finding (Appendix C) provides a third, independent corroboration of Defendant's inability to pay. The fee schedule assessed in this matter further compounds this structural irony: the State charged Defendant \$35.00 to the State's Attorney's Office Fund (funding the prosecution now seeking his revocation); \$100.00 to the Violent Crime Victims Assistance Fund for victims whose collision damages were already covered by Allstate Insurance Claim No. 0670868884 (Appendix E) — leaving no uncompensated victim, yet Defendant funds a victims assistance program; \$100.00 to the Public Defender Fee Felony for the Public Defender's Office that constructively abandoned him; \$20.00 to the Probation and Court Services Operation Fund for the probation division that filed the anonymous Memorandum against him; and \$2.00 directly labeled "Conditional Assessment — SAO Prosecution CV/TR" billing Defendant for the cost of his own criminal prosecution. The State simultaneously determined Defendant could not afford \$1,400 in probation service fees, charged him \$259.00 to fund the machinery of his own prosecution and supervision, and cited his failure to pay these same assessments as grounds for revoking his liberty — a structural debtor's prison arrangement prohibited by the Fourteenth Amendment and *Bearden v. Georgia*, 461 U.S. 660 (1983).

**FINDING OF FACT NO. 22:** All five failure-to-report violation dates cited in the Cervantes Memorandum (Appendix H) — February 19, February 27, March 10, March 11, and March 26, 2026 — fell within the 100-day period during which Officer Cervantes actively concealed her identity from Defendant (February 19 through May 29, 2026, Findings 6 and 13). A probation reporting obligation requires an identifiable, known supervising officer. A supervising officer who conceals her identity cannot simultaneously enforce a duty to report to her. The February 19, 2026 failure-to-report date is the most revealing: it is the identical date on which Cervantes placed her first anonymous call to Defendant, making it simultaneously the date of initial anonymous contact and the date of the first alleged reporting violation — a directive and a violation that arose in the same phone call in which Cervantes refused to identify herself. Director Margaret K. Fontana, the Lake County State's Attorney's Office, and the Circuit Court Clerk all received Defendant's formal written demand for Cervantes's

1 identification on that same date (February 19, 2026). Director Fontana received that demand and took  
2 no action. Cervantes was not identified until May 29, 2026 — the day after the warrant issued. Each of  
3 the remaining four failure-to-report dates (February 27, March 10, March 11, and March 26, 2026)  
4 occurred while Defendant’s written identification demand remained unresolved and pending with the  
5 Director, the SAO, and the Circuit Clerk. All five failure-to-report allegations in the Petition are  
6 predicated on a void reporting directive issued by an officer who concealed her identity throughout the  
7 alleged violation period and must be dismissed as a matter of law.

### 8 **III. CONCLUSIONS OF LAW**

9 <b>Napue / Brady — False Sworn Statements &amp; Suppressed Exculpatory Evidence</b>	The Petition is procured through materially false sworn statements. <i>Napue v. Illinois</i> , 360 U.S. 264, 269 (1959). The drug allegation is directly refuted by Cook County’s formal written adjudication of the test result as compliant, issued five months before Shepherd signed. Failure to disclose constitutes suppression of exculpatory material. <i>Brady v. Maryland</i> , 373 U.S. 83, 87 (1963). Both violations independently require dismissal.
10 <b>Bearden / Turner — Willfulness Element Fails as a Matter of Law</b>	Revocation for financial default requires judicial finding of willful nonpayment. <i>Bearden v. Georgia</i> , 461 U.S. 660, 672 (1983). An ability-to-pay hearing is constitutionally mandated before incarceration. <i>Turner v. Rogers</i> , 564 U.S. 431, 448 (2011). Allstate Claim No. 0670868884 — an active policy covering the same collision — precludes a finding of willfulness as a matter of law.
11 <b>Gagnon / 730 ILCS 5/5-6-4 — Due Process at Revocation</b>	A probationer is entitled to written notice, disclosure of evidence, opportunity to be heard, a neutral hearing body, and a written statement of reasons. <i>Gagnon v. Scarpelli</i> , 411 U.S. 778, 786 (1973). 730 ILCS 5/5-6-4(c) mandates a preliminary probable cause hearing. None were afforded. The warrant issued on a Petition whose sworn allegations were negated in writing by the State’s own agency.
12 <b>First Amendment Retaliation</b>	Adverse state action in response to petitioning federal courts violates the First Amendment. Filing on May 14 — exactly 31 days after federal habeas deadlines were set against Shepherd personally, while he was a named defendant in <i>Allababidi v. Shepherd</i> , No. 1:26-cv-06738 — admits of no non-retaliatory explanation. Execution attempts on June 6, within 24 hours of the federal deadline’s expiration, confirm the incapacitating purpose. <i>Hartman v. Moore</i> , 547 U.S. 250 (2006).
13 <b>Malley — Qualified Immunity Forfeited for Warrant Execution</b>	Officers executing a constitutionally defective warrant forfeit qualified immunity where the violation is obvious. <i>Malley v. Briggs</i> , 475 U.S. 335, 341 (1986). The executing agencies were served with the Notice of Special Appearance and Fraud on the Court prior to the June 6 attempts. Any officer who executed with actual notice of the exculpatory Weeks adjudications did so outside qualified immunity.
14 <b>Cronic — Constructive Abandonment</b>	Complete absence of defense counsel at the May 28 hearing, combined with failure to respond to the Petition or communicate with Defendant, constitutes constructive abandonment entitling Defendant to a presumption of prejudice. <i>United States v. Cronic</i> , 466 U.S. 648, 659–60 (1984). The prejudice is actual: Defendant prepared and served the Emergency Notice pro se, two hours before the hearing.
15 <b>The Warrant Is Void Ab Initio</b>	A warrant procured through knowingly false sworn allegations, issued without a probable cause hearing, over Defendant’s emergency exculpatory submission filed two hours prior, on a Petition whose core allegations are refuted by the State’s own written records, is void from its inception. The defects are not waivable. The warrant must be quashed, vacated, and recalled as a matter of constitutional necessity.
16 <b>Clerk’s Procedural Denial — Access to Courts / Faretta</b>	The Circuit Clerk’s administrative policy requiring a licensed attorney’s signature as a condition of docketing a pro se filing is void as applied to self-represented defendants. <i>Faretta v. California</i> , 422 U.S. 806 (1975); 735 ILCS 5/2-301; Ill. S. Ct. Rule 13. Applied here, the policy denied Defendant all access to the court after the warrant issued, while he was subject to an active zero-bond warrant and abandoned by appointed counsel. Denial of access to courts in these circumstances constitutes an independent constitutional violation requiring immediate remedial relief, independent of all other grounds herein.
17 <b>Cervantes Identity Concealment — Failure-to-Report Charges Void Ab Initio</b>	All five failure-to-report violation dates in the Petition occurred during the 100-day period in which Officer Cervantes concealed her identity from Defendant (February 19 through May 29, 2026, Finding 22). A reporting obligation cannot attach to an anonymous, unidentified supervising officer. The February 19, 2026 violation date is the same date as Cervantes’s first anonymous call — directive and violation arose in the same call in which she refused to identify herself. Director Fontana received Defendant’s written identification demand that same day and took no action, ratifying the void-directive chain through all five dates. All five failure-to-report charges must be dismissed as a matter of law independent of all other grounds herein.

### 18 **IV. ORDER**

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**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:**

- 1 **1. Motion GRANTED.** Defendant’s Omnibus Verified Motion to Quash Warrant and Dismiss Petition for  
2 Revocation with Prejudice is GRANTED in its entirety.
- 3 **2. Warrant QUASHED, VACATED, AND RECALLED Void Ab Initio.** The zero-bond bench warrant  
4 issued May 28, 2026 in Case No. 23 CF 1146 is hereby QUASHED, VACATED, and RECALLED as  
5 void ab initio. **Within two (2) hours of the entry of this Order,** the Clerk shall transmit certified  
6 copies to the Lake County Sheriff’s Department, the Lincolnshire Police Department, the Chicago  
7 Police Department, and the Illinois State Police, directing immediate cessation of all  
8 warrant-execution activity. The Illinois State Police are directed to immediately strike and expunge  
9 the warrant from the LEADS database. The Lake County Sheriff’s Department is directed to transmit  
10 a NCIC entry-removal request to the FBI within two (2) hours of this Order’s entry. Confirmation of  
11 LEADS/NCIC removal shall be transmitted to Defendant at defcon5ready@gmail.com.
- 12 **3. Petition DISMISSED WITH PREJUDICE — Collateral Estoppel.** The May 14, 2026 Petition for  
13 Revocation of Probation is DISMISSED WITH PREJUDICE. Under the doctrine of collateral  
14 estoppel and this Court’s Findings of Fact Nos. 1 through 22, the State of Illinois is permanently  
15 barred from initiating any future revocation proceedings, seeking any arrest warrant, or imposing any  
16 probation modification based upon: (a) the November 10, 2025 urinalysis result; or (b) the O’Brien  
17 Landscape restitution balance as it existed prior to this Order.
- 18 **4. Brady / Napue Record Preservation.** The Court formally incorporates into the record of Case No. 23  
19 CF 1146 the authenticated December 8 and 10, 2025 Weeks adjudications, as exhibits to Defendant’s  
20 Notice of Special Appearance and Fraud on the Court. These documents shall be permanently retained  
21 in the case file as evidence that the drug allegation in the May 14, 2026 Petition was false and known  
22 to be false at the time of filing. The Clerk is directed to index these exhibits on the public docket.
- 23 **5. ARDC Referral — Mandatory Transmission.** The Clerk of the Circuit Court is directed to transmit a  
24 certified copy of this Order — together with a certified copy of the May 14, 2026 Petition for  
25 Revocation — to the Illinois Attorney Registration and Disciplinary Commission (130 E. Randolph  
26 Dr., Suite 1500, Chicago, IL 60601; Fax: (312) 565-2320) within five (5) business days, for the  
27 ARDC’s consideration of ASA Nicholas Shepherd’s conduct, pursuant to this Court’s supervisory  
28 authority under Illinois Supreme Court Rule 771.
- 6. Mandatory Litigation Hold — State Directed to Preserve.** The State’s Attorney’s Office, Lake  
County Adult Probation Services, Cook County Adult Probation Services, and the Lake County Public  
Defender’s Office are directed to preserve all documents, records, electronic communications, emails,  
text messages, database entries, and other data relating to Case No. 23 CF 1146, the  
November 10, 2025 drug test, the February 19, 2026 Cervantes call, the May 14, 2026 Petition, and  
the May 28, 2026 warrant hearing. This preservation mandate encompasses all server-side metadata  
and audit trail logs associated with the processing, routing, and internal review of the May 14, 2026  
Petition, including any digital stamps applied by state-court judicial officers or administrative staff.  
Destruction or alteration of any such material after service of Defendant’s May 22, 2026 Litigation  
Hold Notice constitutes spoliation subject to adverse inference and sanctions.
- 7. Faretta Recognition / Public Defender Relieved / Clerk Directed to Accept Pro Se Filings.**  
Defendant’s Faretta right to self-representation is formally recognized and entered on the active

docket. *Faretta v. California*, 422 U.S. 806 (1975); 735 ILCS 5/2-301. The Lake County Public Defender's Office is relieved of all obligations in Case No. 23 CF 1146 as of the date of this Order. **The Circuit Court Clerk is hereby directed to immediately accept, file, and docket all submissions tendered by Defendant pro se, without requiring an attorney's ARDC number, firm name, or signature block as a condition of filing.** Any administrative policy, directive, or practice of the Clerk's office conditioning the acceptance of a pro se filing on the presence of an attorney's signature block is hereby declared void as applied to self-represented defendants in this matter, inconsistent with *Faretta v. California* and the mandatory filing rights conferred by 735 ILCS 5/2-301 and Illinois Supreme Court Rule 13. The Clerk is further directed to immediately docket the physical Omnibus Filing transmitted via USPS on June 8, 2026 (Tracking No. 9402 6118 9876 5528 9340 61) upon its receipt, without conditioning docketing on any attorney signature requirement. In the event any law enforcement entity initiates a physical extraction or custodial booking under Case No. 23 CF 1146 following entry of this Order, this *Faretta* waiver is automatically rescinded, and this Court mandates the immediate appointment of independent and conflict-free defense counsel prior to any custodial interrogation, processing, or bond hearing.

**8. Reservation of Federal Civil Remedies — Anti-Waiver.** The entry of this Order shall not operate as a waiver, release, accord and satisfaction, or settlement of any claim or remedy available to Defendant under 42 U.S.C. §1983, 42 U.S.C. §1985, or any other federal statute, currently pending in *Allababidi v. Shepherd, et al.*, No. 1:26-cv-06738 (N.D. Ill.). This Order shall not be cited as a bar to Defendant's independent civil damages claims, equitable relief claims, or any claim for attorney's fees under 42 U.S.C. §1988. The Clerk is directed to transmit a certified copy of this Order to the United States District Court for the Northern District of Illinois for docketing in Case No. 1:26-cv-06738. This Order is entered without prejudice to Defendant's right to seek immediate mandamus relief from the Seventh Circuit should the Clerk of this Court fail to docket this Order or should any law enforcement agency fail to verify the expungement of the warrant within the timeframe prescribed herein.

**9. Remote Adjudication Mandatory for Future Proceedings.** All future hearings, status checks, and substantive proceedings in Case No. 23 CF 1146 shall be conducted via remote video-conferencing through this Court's approved infrastructure. The Circuit Clerk and Court Coordinator are directed to transmit remote access credentials to Defendant at defcon5ready@gmail.com no later than 48 hours prior to any scheduled proceeding. No requirement of Defendant's physical presence in Courtroom T-611 shall be imposed within 90 days of the recall of the zero-bond warrant.

**10. Financial Conditions SUSPENDED — Pending Constitutionally Adequate Turner/Bearden Inquiry.** In light of this Court's findings that (a) the probation system formally suspended \$1,400.00 in probation service fees upon demonstrated indigency (Finding 21, Appendix I); (b) the federal court entered an IFP indigency finding (Appendix C); and (c) active Allstate Insurance Claim No. 0670868884 covers the O'Brien Landscape restitution (Finding 2, Appendix E) — all remaining financial conditions of probation in Case No. 23 CF 1146 are hereby SUSPENDED. No future revocation proceeding, arrest warrant, or probation modification predicated on financial default may be initiated absent: (i) a constitutionally adequate ability-to-pay hearing under *Turner v. Rogers*, 564 U.S. 431 (2011); and (ii) an affirmative judicial finding of willful nonpayment under *Bearden v. Georgia*, 461 U.S. 660 (1983). No fine, fee, or financial condition may be enforced while Defendant

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1 holds an active IFP status in any pending federal proceeding. The Clerk is directed to transmit a  
2 certified copy of this Order to the Lake County Circuit Court Finance Division within five (5)  
3 business days.  
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5  
6 DATE: \_\_\_\_\_

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8 **HON. CHRISTOPHER R. STRIDE**  
Circuit Court Judge, Courtroom T-611  
19th Judicial Circuit, Lake County, Illinois

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*Submitted by: Ehab Allababidi, Defendant-Petitioner, Pro Se | 8516 W. Winona St., Chicago, IL 60656 | (773) 920-0030 |  
defcon5ready@gmail.com | Dated: June 12, 2026*

# EXHIBIT H

## LAKE COUNTY PORTAL FILING RECEIPT

*Proof of submission of the Proposed Order — Case No. 23CF00001146*

**JIB COMPLAINT — HON. CHRISTOPHER R. STRIDE — CASE NO. 23 CF 1146**

<b>Document:</b>	Official e-filing receipt — Lake County Court Portal (Journal Technologies)	<b>Filed/Dated:</b>	Submitted June 12, 2026, 10:26:03 PM (JTI Ref. No. dc5ffbe9a07e)
<b>Case No.:</b>	23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County	<b>Relevance:</b>	Proves the complete documented record was formally placed before the court

### LEGAL SIGNIFICANCE — WHY THIS EXHIBIT IS DISPOSITIVE:

*This official Lake County Court Portal receipt establishes that the complete documented record — the Proposed Order and Findings of Fact at Exhibit G — was formally submitted to the Circuit Court through the court's own electronic filing system on June 12, 2026 at 10:26:03 PM (Status: "Submitted"; Filed By: Ehab Allababidi; JTI Ref. No. dc5ffbe9a07e; Received By: Lake County Portal). It confirms that, by that date, the court had received the full evidentiary record demonstrating that every allegation underlying the warrant was refuted by the State's own records — and that the zero-bond warrant nonetheless remained outstanding and uncorrected. This forecloses any suggestion that the court was unaware of the defects in the warrant.*

### KEY EVIDENCE CONTAINED IN THIS EXHIBIT:

Case Number: 23CF00001146 — Status: "Submitted"  
Filing Date: June 12, 2026, 10:26:03 PM  
Filed By: Ehab Allababidi; Received By: Lake County Portal  
JTI Reference No.: dc5ffbe9a07e — official Journal Technologies portal receipt



# Circuit Court of the Nineteenth Judicial Circuit

Lake County, Illinois

## Receipt

Your filing has been received.  
Case Number: 23CF00001146



<b>Filing Sent</b>
Filing Title <b>File_1</b>
Status Submitted
Filing Date 06/12/2026 10:26:03 pm
Filed By ehab Allababidi
JTI Ref. No. dc5ffbe9a07e
Received By Lake County Portal

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# EXHIBIT I

## PUBLIC DEFENDER EMAIL — EX PARTE HEARING ADMISSION

June 16, 2026 — “This was confirmed today in court by the Judge”

JIB COMPLAINT — HON. CHRISTOPHER R. STRIDE — CASE NO. 23 CF 1146

<b>Document:</b>	Email — Lake County Public Defender's Office to Complainant	<b>Filed/Dated:</b>	June 16, 2026, 7:52 PM
<b>Case No.:</b>	23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County	<b>Relevance:</b>	Documents the June 16, 2026 ex parte hearing and absentee scheduling (Count Seven)

### LEGAL SIGNIFICANCE — WHY THIS EXHIBIT IS DISPOSITIVE:

*This email is the Office's own written account of a proceeding conducted in Complainant's absence. It states that his representation status “was confirmed today in court by the Judge,” and that “The Court is motioning up your case for next week in order for you to appear.” The self-represented party received no notice of that proceeding, was not present, was given no appearance link, and learned of it only afterward and secondhand from the office that disclaims representing him. It supports Count Seven (Rule 2.9 ex parte communications; Rule 2.6 right to be heard) and the willful-and-wanton pattern.*

### KEY EVIDENCE CONTAINED IN THIS EXHIBIT:

“This was confirmed today in court by the Judge” — a proceeding in the defendant's absence  
“The Court is motioning up your case for next week” — scheduling set without notice to him  
Complainant, the self-represented party, was neither present nor noticed; no appearance link  
Learned of it only secondhand, from the office that disclaims representing him



Ehab Hilfiger &lt;defcon5ready@gmail.com&gt;

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**Re: Response to Request for Assistance**

1 message

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**Bailey Russell** <BRussell@lakecountyiil.gov>  
To: "defcon5ready@gmail.com" <defcon5ready@gmail.com>  
Cc: "Gregory C. Ticsay" <GTicsay@lakecountyiil.gov>

Tue, Jun 16, 2026 at 7:52 PM

Dear Ehab,

We are correct in our assertion that you have not been represented by the Lake County Public Defender's office since October 6, 2025. This was confirmed today in court by the Judge.

The Court is motioning up your case for next week in order for you to appear. If you wish to ask for the appointment of the Public Defender at that time, you may do so, however, we do not currently represent you.

Sincerely,

Bailey C. Russell

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**From:** Bailey Russell <BRussell@lakecountyiil.gov>  
**Sent:** Monday, June 15, 2026 2:24 PM  
**To:** defcon5ready@gmail.com <defcon5ready@gmail.com>  
**Cc:** Gregory C. Ticsay <GTicsay@lakecountyiil.gov>  
**Subject:** Response to Request for Assistance

Dear Ehab,

We have reviewed our records that show that you proceeded pro se on October 6, 2025.

Since that date our office has not been reappointed to represent you. This is the reason we have not responded. We do not represent you at this time.

Regarding the clerk refusing to accept your pleadings, the clerk is incorrect in believing that we are the attorney of record at this time.

Sincerely,

Bailey C. Russell

