

LAKE COUNTY PUBLIC DEFENDER'S OFFICE

NOTICE OF SUPERVISORY MISCONDUCT & FINAL DEMAND

FACSIMILE TRANSMISSION — FAX: (847) 984-5751 — 15 S. County St., Waukegan, IL 60085

TIME-SENSITIVE — RESPONSE REQUIRED BY 5:00 p.m. on Tuesday, June 16, 2026

NOTICE & FINAL DEMAND — WITHDRAW

Final opportunity to cure before an ARDC complaint under Ill. R.P.C. 5.1 is filed

| | |
|---------------------|---|
| TO: | Gregory R. Ticsay, Chief Public Defender Lake County Public Defender's Office 15 S. County St., Waukegan, IL 60085 Fax: (847) 984-5751 |
| CC: | Bailey C. Russell, Appointed Counsel (ARDC 6340962) Lake County Board — Risk Management & Civil Liability Division Lake County Human Resources Department |
| FROM: | Ehab Allababidi, Defendant, Pro Se (Faretta invoked) 8516 W. Winona St., Chicago, IL 60656 (773) 920-0030 — defcon5ready@gmail.com |
| CASE: | 23 CF 1146 — People v. Allababidi, 19th Judicial Circuit, Lake County Related federal: 1:26-cv-06738 (N.D. Ill.); habeas 1:26-cv-01077 (N.D. Ill.) |
| DATE: | June 14, 2026 |
| RESPONSE BY: | 5:00 p.m. on Tuesday, June 16, 2026 |
| RE: | FINAL DEMAND THAT BAILEY C. RUSSELL WITHDRAW AS COUNSEL OF RECORD, INSTANTER. I do NOT want your Office to represent me; I have invoked Faretta and elect to proceed pro se. Your Office's continued counsel-of-record status is the sole administrative barrier the Clerk cites for refusing my pro se filings (Ex. B). Absent withdrawal by the deadline, I will move to amend Allababidi v. Shepherd, No. 1:26-cv-06738 (N.D. Ill.), to add Russell and Ticsay personally, and both ARDC complaints will be filed. |
| PAGES: | Pages: 37 (incl. this cover) |

I DO NOT WANT REPRESENTATION — I WANT YOUR OFFICE OFF MY CASE:

*I never asked for a public defender; your Office assigned me one (Ex. A). She will not act, and your Office will not withdraw — so the Clerk refuses my own filings because I have “counsel of record” (Ex. B), and I am locked out of the courthouse entirely. I have invoked Faretta. I want exactly one thing: that Bailey C. Russell **withdraw**, so I can defend myself. You have already been notified of this abandonment through three oversight channels (Risk Management, Human Resources, and Judicial HR), each cc'ing you (Ex. D). If she does not withdraw by the deadline, I will amend my federal complaint to add Russell and you personally, and both ARDC complaints will be filed. Withdraw, and this all goes away.*

NOTICE OF SUPERVISORY MISCONDUCT AND FINAL DEMAND

To Gregory R. Ticsay, Chief Public Defender of Lake County

Verified and submitted under penalty of perjury, 28 U.S.C. § 1746

I. THE ONLY THING I WANT FROM YOUR OFFICE: WITHDRAW

Mr. Ticsay: read this sentence first, because it is the whole point. **I do not want your Office to represent me. I want your Office off my case.** I am not asking Bailey C. Russell to file a motion, appear at a hearing, or lift a finger on my behalf. I am demanding that she **withdraw** — formally, on the record, instanter — so that the docket reflects my status as a self-represented defendant and the Clerk will finally accept the filings I have been trying to make for myself. I have invoked my right to proceed pro se under *Faretta v. California*, 422 U.S. 806 (1975). Your Office's continued, silent presence on my docket as “counsel of record” is the single administrative obstacle standing between me and the courthouse. Remove it.

II. I NEVER ASKED FOR A PUBLIC DEFENDER — YOUR OFFICE ASSIGNED ME ONE

I did not choose Bailey C. Russell. I did not request a public defender at all. Your own Office assigned her to me and then told me she was mine. When I contacted the Lake County Public Defender's Office intake desk about the active warrant, **they** — not I — informed me that “you are the assigned public defender for this matter” (Exhibit A). I am now saddled, against my will, with an attorney I never selected, who will not communicate with me, will not act for me, and — worst of all — will not let go of my case so that I can act for myself. That is not representation. That is a hostage situation with a docket number.

III. THE CATCH-22 YOUR OFFICE BUILT

What your Office has constructed is a closed loop with no exit, and I can prove every side of it in writing:

- **Side one — the Clerk turns me away because I have a lawyer.** On June 8, 2026 at 6:48 p.m., Hanna Becerra of the Clerk of the Circuit Court wrote to me, in writing: “the motion must be filed by your attorney. I would reach out to your public defender to have this matter added to the call” (Exhibit B). The Clerk will not docket my emergency motion *because* your Office is listed as my counsel.
- **Side two — my lawyer will not file anything.** Bailey C. Russell has not filed a single document, answered a single message, or appeared at a single hearing. The motion the Clerk says “my attorney” must file will never be filed, because my attorney does nothing.
- **Side three — and my lawyer will not leave.** Because your Office will not withdraw, the docket still says I am represented. So the Clerk keeps turning me away, my lawyer keeps doing nothing, and I cannot file for myself. I invoked *Faretta* in writing on June 8, 2026 (Exhibit C); the response was the same procedural wall.

The Clerk says my lawyer must file it. My lawyer files nothing and will not leave. That is not a process — it is a cage.

There is exactly one key to that cage, and your Office is holding it: **withdrawal**. The moment Russell is off the docket, the Clerk's stated objection evaporates and I can file my own defense. You are not being asked to do my legal work. You are being asked to stop blocking me from doing it myself.

IV. YOU HAVE ALREADY BEEN NOTIFIED THROUGH THREE OVERSIGHT CHANNELS

This is not the first time you have heard from me. On June 11, 2026, the verified Notice of Professional Liability Event and Constructive Abandonment was transmitted by facsimile through three separate Lake County oversight channels, each cover sheet copying you, Gregory R. Ticsay, by name (Exhibit D): Risk Management & Civil Liability (Fax 847-984-5859), Human Resources (Fax 847-984-5988), and the 19th Judicial Circuit Court Administrator (Fax 847-984-5626). Through every administrative door available to me, your Office has been told that an indigent defendant was abandoned during an active zero-bond warrant. The response, three times over, was nothing.

V. BAILEY C. RUSSELL'S DOCUMENTED CONDUCT

- 1. She built the trap at sentencing.** On September 8, 2025, Russell personally prepared and signed the \$2,670.86 Order for Restitution (Exhibit E) without investigating the active Allstate policy (Claim 0670868884) that had already paid \$16,557.00 on the very same accident and covered the very same loss. The open balance she left became the State's pretext to revoke my probation.
- 2. She vanished at the hearing.** On May 28, 2026, not one attorney from your Office appeared in Courtroom T-611. A zero-bond bench warrant (Exhibit F) issued for my arrest — a warrant that recites “PD APPOINTED” on its face. It remains outstanding as I write this.
- 3. She ignored me for fourteen days during an armed warrant.** Beginning May 29, 2026 I delivered to Russell the dated Cook County probation records proving the drug allegation was already cleared. Fourteen consecutive days of silence followed. Armed officers attempted to seize me at my home on June 6, 2026. She filed nothing and said nothing.
- 4. So I did her job for her — from my kitchen table.** On June 12, 2026 at 10:26:03 p.m., with no lawyer and a live warrant, I drafted an eleven-page verified *Findings of Fact and [Proposed] Order to Quash Warrant and Dismiss Petition for Revocation with Prejudice* — twenty-two findings of fact, conclusions of law, and a ten-paragraph decree citing *Franks, Napue, Bearden, Turner, Cronin, and Faretta* — and e-filed it myself (Exhibits G and H). That is the work your funded, appointed Office exists to perform. I performed it alone, at night, afraid of arrest. Your Office's contribution to my defense, across nine months and every critical stage, is a single number: zero.

VI. YOU CANNOT FORCE COUNSEL ON ME — AND RUSSELL MUST WITHDRAW

The Sixth Amendment guarantees not only the right to counsel but the correlative right to *refuse* it and proceed pro se. *Faretta v. California*, 422 U.S. 806 (1975); *McKaskle v. Wiggins*, 465 U.S. 168 (1984). A defendant may discharge appointed counsel, and I have. Once a client has discharged counsel and invoked self-representation, counsel's continued appearance on the docket serves no one and obstructs the client; the professional obligation is to move to withdraw. Ill. R.P.C. 1.16 governs that withdrawal, and nothing in it permits an attorney to remain counsel of record over the client's express objection while declining to perform any service whatsoever. By doing exactly that, your Office is not representing me — it is occupying my case and barring my access to the court, in violation of the First and Fourteenth Amendment right of access. The remedy is simple and it is the one I am demanding: withdraw.

VII. FINAL DEMAND — WITHDRAW

I demand a **single** action, no later than **5:00 p.m. on Tuesday, June 16, 2026**, confirmed to me in writing at defcon5ready@gmail.com:

- **File an emergency motion to withdraw as counsel of record, instanter**, in *People v. Allababidi*, No. 23 CF 1146, citing my discharge of counsel and my invocation of *Faretta*, so that the Clerk's stated barrier to docketing my pro se filings is removed.

I am not asking your Office to represent me, to file my motion to quash, or to appear on my behalf. **I want nothing from your Office except its absence from my case.** If Russell withdraws by the deadline, this matter is resolved and I will so state on the record. If she does not, her refusal to withdraw — while refusing to act — will stand as documented proof that the lockout was deliberate.

VIII. IF YOU DO NOT WITHDRAW: PERSONAL FEDERAL LIABILITY AND ARDC

I would prefer to end this with a one-page withdrawal. If your Office instead chooses, again, to do nothing, be advised of precisely what follows:

- **Amendment of the pending federal action to add you both, personally.** I will move to amend the operative complaint in *Allababidi v. Shepherd, et al.*, No. 1:26-cv-06738 (N.D. Ill.), to add **Bailey C. Russell and Gregory R. Ticsay as defendants in their individual capacities.** The claims will be pleaded where they are strongest and where no immunity shields them: the First/Fourteenth Amendment **denial of access to the courts** caused by maintaining a counsel-of-record lockout; a 42 U.S.C. § 1985 **conspiracy** with the Clerk's office to bar my pro se filings; and, as to you, Mr. Ticsay, **supervisory and policy liability** for the administrative refusal to withdraw — conduct that is administrative, not advocacy, and therefore outside the protection ordinarily afforded a public defender's litigation decisions.

- **Both ARDC complaints proceed.** The disciplinary complaint against you under Ill. R.P.C. 5.1(a), (b), and (c), 5.3, and 8.4(d), and the complaint against Bailey C. Russell under Rules 1.1, 1.3, 1.4, and 8.4(d), will be filed with the Commission.
- **Safe harbor.** A timely withdrawal moots the emergency entirely. I will not name an attorney who got out of my way, and I will document the withdrawal as mitigation. The choice — and the record it creates — is yours.

I do not want a public defender. I never did. I want the one your Office forced on me to step aside so I can defend myself.

VERIFICATION UNDER 28 U.S.C. § 1746. I, Ehab Allababidi, declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief, and is corroborated by the documents attached and referenced herein.

/s/ Ehab Allababidi

EHAB ALLABABIDI, Defendant, *Pro Se*

8516 W. Winona St., Chicago, IL 60656 — (773) 920-0030 — defcon5ready@gmail.com

Dated: June 14, 2026

IX. INDEX OF EXHIBITS

| Ex. | Document | Relevance |
|-----|--|---|
| A | Email confirming the Office assigned Russell (intake desk: “you are the assigned public defender”) | Proof I never chose her — your Office assigned her to me and told me she was mine. |
| B | Clerk email, Hanna Becerra, June 8, 2026, 6:48 p.m. (“must be filed by your attorney”) | Side one of the catch-22 — the Clerk refuses my pro se filing because I have counsel of record. |
| C | Faretta Invocation / Response to Procedural Denial (email, June 8, 2026, 7:08 p.m.) | My written invocation of self-representation and the procedural wall that met it. |
| D | Three prior transmissions of the abandonment notice (Risk Mgmt, HR, Judicial HR cover sheets), June 11, 2026 | Proof you were notified through three oversight channels, each cc’ing you, and did nothing. |
| E | Order for Restitution, September 8, 2025 (“Prepared by: Bailey C. Russell, ARDC 6340962”) | The trap Russell built at sentencing — the open balance later used to seek the warrant. |
| F | Zero-Bond Bench Warrant of Arrest, issued May 28, 2026 | The live consequence — issued in your Office’s absence; recites “PD APPOINTED.” |
| G | Findings of Fact and [Proposed] Order to Quash Warrant and Dismiss Petition (pro se, June 12, 2026) | The eleven-page verified order I drafted myself — the work your Office never performed. |
| H | Lake County e-Filing Submission and Receipt (JTI Ref. dc5ffb9a07e) | Proof I personally filed Exhibit G at June 12, 2026 at 10:26:03 p.m. — the client did the Office’s job. |

EXHIBIT A

THE OFFICE ASSIGNED HER — I NEVER CHOSE A PUBLIC DEFENDER

Email — intake desk: “you are the assigned public defender for this matter”

NOTICE & FINAL DEMAND — LAKE COUNTY PUBLIC DEFENDER'S OFFICE

| | | | |
|------------------|---|---------------------|--|
| Document: | Email transmission — record that the Office, not the client, assigned counsel | Filed/Dated: | Transmitted to Bailey Russell after the warrant issued |
| Case No.: | 23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County | Relevance: | Proof I did not select Russell — the Office assigned her to me |

WHY THIS EXHIBIT MATTERS:

This email documents that I never chose Bailey C. Russell and never asked for a public defender. When I contacted the Lake County Public Defender's Office intake desk about the active warrant, the Office itself informed me that “you are the assigned public defender for this matter.” I was given this lawyer; I did not pick her. That distinction matters: a defendant cannot be forced to keep counsel he never selected and now expressly rejects.

KEY CONTENT:

- Intake desk told me Russell was “the assigned public defender for this matter”
- Establishes the representation was imposed by the Office, not requested by me
- Foundation for the Faretta demand: I reject this counsel and elect to proceed pro se



Ehab Hilfiger <defcon5ready@gmail.com>

Urgent Request for Assistance: Active Arrest Warrant (Case 23CF1146)

1 message

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

Fri, May 29, 2026 at 5:32 PM

Dear Ms. Russell,

I hope you are doing well.

I just contacted the Lake County Public Defender's Office intake desk regarding an active arrest warrant issued today in my case (23CF1146). They informed me that you are the assigned public defender for this matter.

I am writing to respectfully request your immediate assistance. I am physically unable to safely travel to Lake County to surrender. My impossibility of transit is currently the subject of an emergency appeal before the Seventh Circuit Court of Appeals. I urgently need your help to review the exculpatory evidence and file a motion to quash the warrant in my absence.

To save your office time, I have attached my active federal appellate filings, which contain the exact state records proving the drug allegation in the State's petition was already cleared by Cook County Probation as a verified, lawful prescription.

- **Attachment 1:** 26-2133_Documents_2.pdf (Please see Pages 39-44 for the written proof from Cook County Probation clearing the drug test, and Pages 45-48 for the State's Petition).
- **Attachment 2:** NOTICE_OF_PERFECTED_APPEAL_FULL_05292026_3.pdf (Please see Pages 10-11 for the active arrest warrant).

Thank you very much for your time and your dedication to this case. Please let me know the best way to coordinate with you on filing this emergency motion.

Sincerely,

Ehab Allababidi Phone: (773) 920-0030


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

This email (and any attachments) is intended solely for the named recipient and may contain confidential, privileged, or proprietary information. Disclosure, distribution, copying, or use without the sender's prior written consent is prohibited. If you received this in error, delete it and notify the sender immediately.

1. Unauthorized use may violate privacy, contract, and intellectual-property laws.
2. No rights, privileges, or defenses are waived by this transmission.
3. Instructions and directives herein constitute written notice for compliance and recordkeeping.
4. This communication is restricted to the designated recipient and is not to be forwarded or archived without authorization.

2 attachments

 **26-2133_Documents.pdf**
1251K

 **NOTICE_OF_PERFECTED_APPEAL_FULL_05292026.pdf**
251K

EXHIBIT B

THE CLERK'S CATCH-22 — “MUST BE FILED BY YOUR ATTORNEY”

Email — Hanna Becerra, Clerk of the Circuit Court — June 8, 2026, 6:48 p.m.

NOTICE & FINAL DEMAND — LAKE COUNTY PUBLIC DEFENDER'S OFFICE

| | | | |
|------------------|--|---------------------|---|
| Document: | Email transmission — Clerk's written refusal to docket a pro se filing | Filed/Dated: | June 8, 2026, 6:48 p.m. — from CC No Reply (Clerk of the Circuit Court) |
| Case No.: | 23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County | Relevance: | The dispositive proof of the lockout — I am barred because I have counsel |

WHY THIS EXHIBIT MATTERS:

This is the single most important document attached. In it, Hanna Becerra of the Clerk of the Circuit Court refuses, in writing, to docket my emergency motion, stating: “the motion must be filed by your attorney. I would reach out to your public defender to have this matter added to the call.” This is side one of the trap: the Clerk will not accept my pro se filing precisely because your Office is listed as my counsel of record. Combined with Russell's refusal to file anything and your Office's refusal to withdraw, it locks me out of the court completely. Withdrawal dissolves this barrier instantly.

KEY CONTENT:

- Clerk: “the motion must be filed by your attorney” — pro se filing refused
- “I would reach out to your public defender to have this matter added to the call”
- Proves the lockout is caused by the Office's counsel-of-record status
- Withdrawal removes the Clerk's stated objection at once



Ehab Hilfiger <defcon5ready@gmail.com>

Motion

CC No Reply <CCNoReply@lakecountyil.gov>

Mon, Jun 8, 2026 at 6:48 PM

To: "defcon5ready@gmail.com" <defcon5ready@gmail.com>

Good Afternoon Mr. Allababidi

We have received your email about adding this case to the call for 06/09/2026, Unfortunately we cannot add this case to the call because we do not have the original motion copy and the motion must be filed by your attorney. I would reach out to your public defender to have this matter added to the call.

Thank you.

Hanna Becerra
Criminal/Traffic Court Services Representative
Clerk of The Circuit Court Erin Cartwright-Weinstein
[18 N. County St](#)
Waukegan IL 60085
(847)377-3282

EXHIBIT C

FARETTA INVOCATION & RESPONSE TO PROCEDURAL DENIAL

Email — June 8, 2026, 7:08 p.m. — written invocation of self-representation

NOTICE & FINAL DEMAND — LAKE COUNTY PUBLIC DEFENDER'S OFFICE

| | | | |
|------------------|---|---------------------|---|
| Document: | Email transmission — Faretta invocation answering the clerk's procedural denial | Filed/Dated: | June 8, 2026, 7:08 p.m. — Russell among the recipients |
| Case No.: | 23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County | Relevance: | My written election to proceed pro se — the right the lockout defeats |

WHY THIS EXHIBIT MATTERS:

Here I formally invoked my Sixth Amendment right to self-representation under Faretta v. California and stated that my appointed public defender “is refusing to communicate, file motions, or provide representation.” The clerk's office answered with the same procedural wall — filings must come through counsel. This exhibit shows I have done everything a pro se defendant can do to assert his rights, and that the only remaining obstacle is your Office's refusal to withdraw.

KEY CONTENT:

- Formal invocation of Faretta v. California, 422 U.S. 806 (1975)
- States appointed counsel “is refusing to communicate, file motions, or provide representation”
- Demonstrates the lockout persists despite my written pro se election



Ehab Hilfiger <defcon5ready@gmail.com>

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

1 message

Ehab Hilfiger <defcon5ready@gmail.com>

Mon, Jun 8, 2026 at 7:08 PM

To: Circuit Clerk <CircuitClerk@lakecountyil.gov>, courts@lakecountyil.gov

Cc: "nshepherd@lakecountyil.gov" <nshepherd@lakecountyil.gov>, Lake County State's Attorney

<statesattorney@lakecountyil.gov>, Bailey Russell <BRussell@lakecountyil.gov>

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) 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

--

**Ehab Allababidi**

Personal Signature

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

LEGAL NOTICE & CONFIDENTIALITY

This email (and any attachments) is intended solely for the named recipient and may contain confidential, privileged, or proprietary information. Disclosure, distribution, copying, or use without the sender's prior written consent is prohibited. If you received this in error, delete it and notify the sender immediately.

1. Unauthorized use may violate privacy, contract, and intellectual-property laws.
2. No rights, privileges, or defenses are waived by this transmission.
3. Instructions and directives herein constitute written notice for compliance and recordkeeping.
4. This communication is restricted to the designated recipient and is not to be forwarded or archived without authorization.

EXHIBIT D

PRIOR NOTICE THROUGH THREE OVERSIGHT CHANNELS

Facsimile cover sheets, June 11, 2026 — Risk Management, Human Resources, Judicial HR

NOTICE & FINAL DEMAND — LAKE COUNTY PUBLIC DEFENDER'S OFFICE

| | | | |
|------------------|--|---------------------|--|
| Document: | Three facsimile cover sheets (actually sent) — each cc Gregory R. Ticsay | Filed/Dated: | June 11, 2026 — Fax 847-984-5859 / 847-984-5988 / 847-984-5626 |
| Case No.: | 23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County | Relevance: | Proof the Office was already notified through three channels and did nothing |

WHY THIS EXHIBIT MATTERS:

These are the cover sheets of three facsimiles actually transmitted on June 11, 2026 — to the Lake County Board Risk Management & Civil Liability Division, the Human Resources Department, and the 19th Judicial Circuit Court Administrator. Each cover sheet lists Gregory R. Ticsay, Chief Public Defender, as a copied recipient. The Office has therefore been on written notice of this abandonment and lockout, through three independent oversight channels, since June 11, 2026. This demand is not a surprise; it is the last of many notices.

KEY CONTENT:

- Transmission 1: Risk Management & Civil Liability — Fax 847-984-5859
- Transmission 2: Human Resources — Fax 847-984-5988
- Transmission 3: 19th Judicial Circuit Court Administrator — Fax 847-984-5626
- Each cover sheet copies Gregory R. Ticsay, Chief Public Defender, by name

FACSIMILE TRANSMISSION — PART 1 OF 2

LAKE COUNTY BOARD — RISK MANAGEMENT & CIVIL LIABILITY DIVISION NOTICE OF OCCURRENCE & LITIGATION HOLD — ACTIVE PROFESSIONAL LIABILITY EVENT (PUBLIC DEFENDER'S OFFICE)

| | |
|-------------------|--|
| TO: | Lake County Board, Risk Management & Civil Liability Division Attention: Legal Risk Management Director 18 N. County Street, Waukegan, IL 60085 Fax: 847-984-5859 |
| CC: | Gregory R. Ticsay, Chief Public Defender Bailey Russell, Appointed Counsel County liability fund administrator / excess carrier intake (please route) |
| FROM: | Ehab Allababidi, Defendant (<i>Pro Se / Faretta</i> Invocation Pending) 8516 W. Winona St., Chicago, IL 60656 (773) 920-0030 defcon5ready@gmail.com |
| DATE: | June 11, 2026 |
| SUBJECT: | NOTICE OF OCCURRENCE AND LITIGATION HOLD — CONTINUING PROFESSIONAL-LIABILITY LOSS EVENT, PUBLIC DEFENDER'S OFFICE; PENDING FEDERAL ACTION NO. 1:26-cv-06738 (COMPLAINT ATTACHED AS EXHIBIT F) |
| CASE REFS: | 23 CF 1146 (19th Jud. Cir., Lake County) 1:26-cv-06738 (N.D. Ill., filed 6/6/2026) |
| PAGES: | PART 1 OF 2 — 50 PAGES (including this cover). Companion Part 2 (40 pages) is transmitted separately under the same subject line. Complete notice: 90 pages. |

TRANSMISSION AND RECORD NOTICE

This transmission is directed to the department named above in its official capacity. It is a formal written notice intended for administrative action; please route it to the named recipient immediately upon receipt. This transmission, its facsimile confirmation page, and the department's response (or non-response) will be preserved and may be filed on the docket of the United States District Court for the Northern District of Illinois in Case No. 1:26-cv-06738 as proof of notice to Lake County. If any page is missing or illegible, contact the sender at (773) 920-0030 or defcon5ready@gmail.com for immediate re-transmission.

FACSIMILE TRANSMISSION — PART 1 OF 2

LAKE COUNTY HUMAN RESOURCES DEPARTMENT FORMAL COMPLAINT — EMPLOYEE NONFEASANCE AND SUPERVISORY FAILURE (PUBLIC DEFENDER'S OFFICE)

| | |
|-------------------|---|
| TO: | Lake County Human Resources Department Attention: Director of Human Resources 18 N. County Street, Waukegan, IL 60085 Fax: 847-984-5988 |
| CC: | Gregory R. Ticsay, Chief Public Defender Bailey Russell, Appointed Counsel Lake County Board, Risk Management & Civil Liability Division |
| FROM: | Ehab Allababidi, Defendant (<i>Pro Se / Faretta</i> Invocation Pending) 8516 W. Winona St., Chicago, IL 60656 (773) 920-0030 defcon5ready@gmail.com |
| DATE: | June 11, 2026 |
| SUBJECT: | FORMAL WRITTEN COMPLAINT REGARDING EMPLOYEE CONDUCT AND SUPERVISION — REQUEST FOR ROUTING, DOCUMENTATION, AND WRITTEN ACKNOWLEDGMENT; PENDING FEDERAL ACTION NO. 1:26-cv-06738 (COMPLAINT ATTACHED AS EXHIBIT F) |
| CASE REFS: | 23 CF 1146 (19th Jud. Cir., Lake County) 1:26-cv-06738 (N.D. Ill., filed 6/6/2026) |
| PAGES: | PART 1 OF 2 — 50 PAGES (including this cover). Companion Part 2 (40 pages) is transmitted separately under the same subject line. Complete notice: 90 pages. |

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FACSIMILE TRANSMISSION — PART 1 OF 2

19TH JUDICIAL CIRCUIT — OFFICE OF THE CIRCUIT COURT ADMINISTRATOR

REQUEST FOR ADMINISTRATIVE REMEDIATION — CLERK DOCKETING LOCKOUT BARRING COURT
ACCESS (PRO SE LITIGANT)

| | |
|-------------------|--|
| TO: | 19th Judicial Circuit Administrative Services / Judicial HR Attention: Circuit Court Administrator 18 N. County Street, Waukegan, IL 60085 Fax: 847-984-5626 |
| CC: | Gregory R. Ticsay, Chief Public Defender Bailey Russell, Appointed Counsel Lake County Board, Risk Management & Civil Liability Division |
| FROM: | Ehab Allababidi, Defendant (<i>Pro Se / Faretta</i> Invocation Pending) 8516 W. Winona St., Chicago, IL 60656 (773) 920-0030 defcon5ready@gmail.com |
| DATE: | June 11, 2026 |
| SUBJECT: | REQUEST FOR ADMINISTRATIVE REMEDIATION — WRITTEN CLERK REFUSAL TO DOCKET TENDERED PRO SE FILINGS (FARETTA MOTION) CREATING A COURT-ACCESS IMPASSE; PENDING FEDERAL ACTION NO. 1:26-cv-06738 (COMPLAINT ATTACHED AS EXHIBIT F) |
| CASE REFS: | 23 CF 1146 (19th Jud. Cir., Lake County) 1:26-cv-06738 (N.D. Ill., filed 6/6/2026) |
| PAGES: | PART 1 OF 2 — 50 PAGES (including this cover). Companion Part 2 (40 pages) is transmitted separately under the same subject line. Complete notice: 90 pages. |

TRANSMISSION AND RECORD NOTICE

This transmission is directed to the department named above in its official capacity. It is a formal written notice intended for administrative action; please route it to the named recipient immediately upon receipt. This transmission, its facsimile confirmation page, and the department's response (or non-response) will be preserved and may be filed on the docket of the United States District Court for the Northern District of Illinois in Case No. 1:26-cv-06738 as proof of notice to Lake County. If any page is missing or illegible, contact the sender at (773) 920-0030 or defcon5ready@gmail.com for immediate re-transmission.

EXHIBIT E

ORDER FOR RESTITUTION — THE TRAP RUSSELL BUILT

Filed September 8, 2025 — “Prepared by: Bailey C. Russell, ARDC 6340962”

NOTICE & FINAL DEMAND — LAKE COUNTY PUBLIC DEFENDER'S OFFICE

| | | | |
|------------------|---|---------------------|---|
| Document: | Filed court order — 19th Judicial Circuit, Lake County | Filed/Dated: | Filed September 8, 2025 — entered by Hon. Christopher R. Stride |
| Case No.: | 23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County | Relevance: | Russell's sentencing failure that became the revocation predicate |

WHY THIS EXHIBIT MATTERS:

This filed order bears the legend “Prepared by: Bailey C. Russell, ARDC 6340962.” She subscribed the \$2,670.86 restitution obligation without investigating the active Allstate policy (Claim 0670868884) that had already paid \$16,557.00 on the same accident and covered the loss. The open balance she left is exactly what the State later used to seek the revocation and the warrant.

KEY CONTENT:

- Legend: “Prepared by: Bailey C. Russell ... ARDC: 6340962”
- Restitution of \$2,670.86 entered without investigating active Allstate coverage
- The open balance later used to seek revocation and the zero-bond warrant

EXHIBIT F

ZERO-BOND BENCH WARRANT OF ARREST

Issued May 28, 2026 — in the office-wide non-appearance

NOTICE & FINAL DEMAND — LAKE COUNTY PUBLIC DEFENDER'S OFFICE

| | | | |
|------------------|---|---------------------|--|
| Document: | Bench warrant — 19th Judicial Circuit, Lake County | Filed/Dated: | Issued May 28, 2026 — Hon. Christopher R. Stride |
| Case No.: | 23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County | Relevance: | The live consequence — issued because your Office did not appear |

WHY THIS EXHIBIT MATTERS:

This warrant issued because no attorney from your Office appeared at the May 28, 2026 hearing, though the Office was counsel of record. It recites “PD APPOINTED” on its face. It remains outstanding, and it is the liberty interest that makes this demand urgent.

KEY CONTENT:

- Zero-bond warrant — immediate custodial seizure upon any encounter
- Recites “PD APPOINTED” while no attorney from the Office appeared
- Still outstanding — the reason this cannot wait



**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 G

FINDINGS OF FACT AND [PROPOSED] ORDER TO QUASH WARRANT

Eleven-page verified order, drafted and e-filed pro se — the work the Office never did

NOTICE & FINAL DEMAND — LAKE COUNTY PUBLIC DEFENDER'S OFFICE

| | | | |
|------------------|--|---------------------|--|
| Document: | Proposed judicial order (11 pp.) — drafted pro se by Ehab Allababidi | Filed/Dated: | Submitted June 12, 2026, 10:26 p.m. — Lake County Court Portal |
| Case No.: | 23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County | Relevance: | The measure of the abandonment — the client did the office's job |

WHY THIS EXHIBIT MATTERS:

While your funded, appointed, counsel-of-record Office produced nothing, I produced this: an eleven-page verified judicial instrument — twenty-two numbered findings of fact, conclusions of law, and a ten-paragraph decree citing Franks, Napue, Bearden, Turner, Cronin, Malley v. Briggs, and Faretta. It is the exact work product your Office exists to generate. I drafted it alone, at night, under threat of arrest — then could not even file it without fighting the lockout your Office created.

KEY CONTENT:

- Eleven pages: 22 findings of fact, conclusions of law, and a 10-paragraph decree
- Quashes the warrant void ab initio and dismisses the Petition with prejudice
- Drafted and e-filed by the client — the publicly funded work the Office omitted

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

| | |
|---|---|
| THE PEOPLE OF THE STATE OF ILLINOIS, <i>Plaintiff-Respondent,</i> | General No.: 23 CF 1146 |
| v. | Circuit Court, 19th Judicial Circuit Lake County, Illinois |
| EHAB ALLABABIDI, <i>Defendant-Petitioner, Pro Se.</i> | Judge: HON. CHRISTOPHER R. STRIDE Courtroom: T-611 |

**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.⁵

⁵ **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.¹ 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).

¹ **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, 2026.³

27 ³ **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.⁴ USPS delivery occurred May 21, 2026. The manufactured six-day total

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.

⁴ **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@lakecountyl.gov) in direct violation of this rule.⁶ 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.

⁶ **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@lakecountyl.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@lakecountyl.gov, his confirmed active professional email for Lake County filings), the Circuit Court Clerk (CircuitClerk@lakecountyl.gov; courts@lakecountyl.gov), and the Lake County State’s Attorney’s Office (statesattorney@lakecountyl.gov), with copies to Matthew T. Junkin (Director, Lake County Adult Probation, mjunkin@lakecountyl.gov), Cook County Probation Officer Destiny Lee (destiny.lee@cookcountyl.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
5 Marisa Cervantes was physically present in Courtroom T-611 at the time of warrant issuance. No
6 defense counsel appeared.

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

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

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

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

FINDING OF FACT NO. 17: The December 8 and 10, 2025 Weeks adjudications were entered on the
Cook County Adult Probation Department’s official digital platform, a unified database accessible to
supervising prosecutors handling cross-jurisdictional probation matters. ASA Shepherd had actual or
constructive access to these records before signing the Petition. A supervising prosecutor who files a
revocation petition based on a drug test result that the administering agency has formally adjudicated
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.

FINDING OF FACT NO. 18: Following the May 28, 2026 warrant issuance, Defendant attempted to file
the within Omnibus Verified Motion with the Circuit Court Clerk. Clerk’s office representative Ms.
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**

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| 9 Napue / Brady — False Sworn Statements & Suppressed Exculpatory Evidence | 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 Bearden / Turner — Willfulness Element Fails as a Matter of Law | 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 Gagnon / 730 ILCS 5/5-6-4 — Due Process at Revocation | 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 First Amendment Retaliation | 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 Malley — Qualified Immunity Forfeited for Warrant Execution | 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 Cronic — Constructive Abandonment | 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 The Warrant Is Void Ab Initio | 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 Clerk’s Procedural Denial — Access to Courts / Faretta | 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 Cervantes Identity Concealment — Failure-to-Report Charges Void Ab Initio | 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**

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

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.
4

5
6 **DATE:**

7
8 **HON. CHRISTOPHER R. STRIDE**
Circuit Court Judge, Courtroom T-611
19th Judicial Circuit, Lake County, Illinois

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

LAKE COUNTY e-FILING SUBMISSION AND RECEIPT

Portal submission + official receipt — JTI Ref. dc5ffb9e9a07e — June 12, 2026

NOTICE & FINAL DEMAND — LAKE COUNTY PUBLIC DEFENDER'S OFFICE

| | | | |
|------------------|---|---------------------|--|
| Document: | Official Lake County Portal records — submission page and receipt | Filed/Dated: | Filed June 12, 2026, 10:26:03 p.m. — Status: Submitted |
| Case No.: | 23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County | Relevance: | Proof the client, not the Office, filed Exhibit G |

WHY THIS EXHIBIT MATTERS:

These authenticated portal records prove I filed Exhibit G myself. The Receipt confirms: “Your filing has been received,” Status “Submitted,” Filed By “ehab Allababidi,” JTI Ref. No. dc5ffb9e9a07e, time-stamped June 12, 2026 at 10:26:03 p.m.. The answer to who did the Office's work is on the receipt: I did.

KEY CONTENT:

- Official Receipt: “Your filing has been received” — Status “Submitted”
- Filed By “ehab Allababidi” — the client, not the Office
- JTI Ref. No. dc5ffb9e9a07e — time-stamped June 12, 2026 at 10:26:03 p.m.



Circuit Court of the Nineteenth Judicial Circuit

Lake County, Illinois

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