

# 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)

<b>TO:</b>	Lake County Board, Risk Management & Civil Liability Division Attention: Legal Risk Management Director 18 N. County Street, Waukegan, IL 60085 Fax: 847-984-5859
<b>CC:</b>	Gregory R. Ticsay, Chief Public Defender Bailey Russell, Appointed Counsel County liability fund administrator / excess carrier intake (please route)
<b>FROM:</b>	Ehab Allababidi, Defendant ( <i>Pro Se / Faretta</i> Invocation Pending) 8516 W. Winona St., Chicago, IL 60656   (773) 920-0030   defcon5ready@gmail.com
<b>DATE:</b>	June 11, 2026
<b>SUBJECT:</b>	<b>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)</b>
<b>CASE REFS:</b>	<b>23 CF 1146</b> (19th Jud. Cir., Lake County)   <b>1:26-cv-06738</b> (N.D. Ill., filed 6/6/2026)
<b>PAGES:</b>	<b>PART 1 OF 2 — 50 PAGES</b> (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.

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

**I. PURPOSE OF THIS NOTICE**

This is a formal **notice of occurrence** directed to the office responsible for evaluating and reserving claims against Lake County's liability insurance and risk fund, together with a **litigation hold demand**. Its purpose is practical: to give your office actual notice of a continuing loss event while it is still containable, to enable timely investigation and reserve evaluation, and to identify the two corrective actions — either of which can be completed in a single business day — that stop the exposure from compounding. A federal civil-rights action naming Lake County and its personnel is already pending; the file-stamped complaint is attached as Exhibit F.

**II. THE DOCUMENTED RECORD OF CONSTRUCTIVE ABANDONMENT**

On May 28, 2026, a zero-bond custodial arrest warrant issued against me in *People v. Allababidi*, No. 23 CF 1146, on a Petition for Revocation alleging a positive test for "Amphetamine (illegal substance)". On May 29, 2026, at 5:32 PM --- within 36 hours of the warrant --- I transmitted a written request for emergency assistance directly to my appointed counsel, Assistant Public Defender Bailey Russell (Exhibit E). That transmission delivered to counsel the December 10, 2025 written clearance from Cook County Adult Probation Officer Adison Weeks verifying that the drug result reflected my lawful, disclosed Adderall prescription (Exhibit A) — documentary evidence directly contradicting the sworn allegation on which the warrant rests.

From May 29 through the date of this notice --- twelve consecutive days and counting --- counsel has not responded, has not filed any motion, and has not communicated in any form, despite confirmed facsimile and e-mail transmissions (Exhibits D, E). During that same period, on June 6, 2026, armed officers conducted multiple warrant-execution attempts at my residence. A complete failure of representation at a critical stage of prosecution is a structural Sixth Amendment violation under *United States v. Cronin*, 466 U.S. 648 (1984), and implicates Illinois Rules of Professional Conduct 1.3 (diligence), 1.4 (communication), and 1.16 (withdrawal), as well as supervisory Rule 5.1.

The abandonment is compounded by an administrative lockout: on June 8, 2026, personnel of the Lake County Circuit Clerk (Hanna Becerra; Department Chief Cindy Robers) declined in writing to docket my 32-page pro se Emergency Omnibus Filing and *Faretta* motion, stating that filings must come through the Public Defender's Office because that office remains counsel of record (Exhibit B). Counsel will not act; the clerk will not accept filings except through counsel. The result is that no path exists to put my motions before a judge. This impasse also obstructs my compliance with the United

States District Court's May 29, 2026 order in Case No. 1:26-cv-01077 (Dkt. 25), which directed exhaustion of my defenses in the state forum (Exhibit C).

On June 6, 2026, I filed a federal civil-rights action, *Allababidi v. Shepherd, et al.*, Case No. 1:26-cv-06738 (N.D. Ill.) (Kennelly, J.). The file-stamped complaint is attached in full as **Exhibit F** so that your department has the complete pleading, with the Court's ECF stamp on every page, and can evaluate this notice with full knowledge of the pending claims against Lake County and its personnel.

**III. NOTICE OF OCCURRENCE, RESERVE-RELEVANT FACTS, AND LITIGATION HOLD**

**A. Occurrence summary for your claim file.** Occurrence: complete non-response of appointed counsel (Bailey Russell; supervisory chain to Chief Public Defender Gregory R. Ticsay) during an active zero-bond warrant, May 29, 2026 through the present — a continuing occurrence accruing daily. Notice to the employee was immediate and written (Exhibit E), and included exculpatory documentation (Exhibit A) contradicting the sworn basis of the warrant. Related pending litigation: *Allababidi v. Shepherd, et al.*, No. 1:26-cv-06738 (N.D. Ill., filed 6/6/2026, Doc. 1 attached as Exhibit F), naming Lake County; companion habeas matters Nos. 1:26-cv-01077 and 1:25-cv-15181.

**B. Why early intervention changes the reserve posture.** As your office knows, the Local Governmental and Governmental Employees Tort Immunity Act (745 ILCS 10) does not protect willful and wanton conduct. Day-one written notice to the employee, followed by sustained inaction documented in writing (Exhibits D, E), is the precise record from which willful-and-wanton and ratification findings are built. Every additional day of silence converts what could be evaluated as a contained professional-negligence matter into evidence supporting immunity-piercing allegations and municipal ratification under *Monell* — a categorically different reserve. Conversely, prompt corrective action now is classic mitigation, and it will be reflected in the federal record.

**C. Litigation hold.** Litigation being already pending, Lake County is under a duty to preserve. Demand is hereby made that you direct preservation of: all e-mail, voicemail, telephone logs, facsimile receipt logs, case-management entries, calendar entries, and internal communications of or concerning Bailey Russell, Gregory R. Ticsay, Hanna Becerra, and Cindy Robers relating to *People v. Allababidi*, No. 23 CF 1146, for the period May 1, 2026 to the present, together with any document-retention overrides applied to them. Failure to preserve after this notice carries consequences under Fed. R. Civ. P. 37(e).

**IV. ACTIONS REQUESTED OF YOUR DEPARTMENT (WITHIN THREE BUSINESS DAYS)**

I respectfully request that your department take the following actions within three (3) business days of confirmed receipt:

1. Acknowledge receipt of this notice in writing (e-mail suffices) and provide the claim or occurrence file number assigned.
2. Open an occurrence file and transmit this notice to the county's liability fund administrator and any excess or reinsurance carrier whose policy could be implicated, per your standard occurrence-reporting practice.
3. Issue the litigation hold described in Section III.C and confirm in writing that it has issued.
4. Refer the two available corrective actions to the appropriate authority: (a) the Public Defender's Office files an emergency motion to withdraw, clearing the docket block for my pro se *Faretta* appearance; or (b) it files an emergency motion to quash the May 28, 2026 warrant based on the documented probation clearance (Exhibit A). Either action materially mitigates the county's exposure.

**V. PRESERVATION OF RECORD IF NO RESPONSE IS RECEIVED**

I would far prefer prompt administrative correction to further litigation, and I remain available at the telephone number and e-mail above to assist your review. If no written response is received within three business days, I will: (a) file this notice and its facsimile confirmation pages on the federal docket in Case No. 1:26-cv-06738 as evidence of notice to Lake County; (b) submit a complaint to the Illinois Attorney Registration and Disciplinary Commission concerning the conduct described above, including the supervisory dimension under IRPC 5.1; and (c) cite your department's handling of this notice in support of the municipal-liability allegations already pleaded in the attached complaint. Each of these steps is a matter of record preservation, not rhetoric; each becomes unnecessary upon a timely substantive response.

**VI. INDEX OF EXHIBITS (TRANSMITTED ACROSS PARTS 1 AND 2)**

Ex.	Document	Relevance
A	Cook County Adult Probation (Officer Adison Weeks) e-mail thread, Dec. 8-10, 2025	Written verification clearing the Adierall prescription result later sworn as an "illegal substance".
B	Lake County Circuit Clerk written refusal to docket pro se filings, June 8, 2026	The administrative lockout: filings refused because the PD's Office remains counsel of record.
C	U.S. District Court order, Case No. 1:26-cv-01077, Dkt. 25 (May 29, 2026)	Federal direction to exhaust state remedies — frustrated by the lockout.
D	Correspondence with Clerk personnel documenting counsel's non-response, June 8-9, 2026	Contemporaneous record of the twelve-day silence.
E	Urgent request for representation e-mailed to appointed counsel, May 29, 2026	Day-one actual notice to counsel of the warrant and the exculpatory clearance.
F	File-stamped federal complaint, <i>Ailababidi v. Shepherd</i> , No. 1:26-cv-06738, Doc. 1 (filed 6/6/2026, 65 pages; continues in Part 2)	The pending federal claims against Lake County and its personnel; ECF stamp on every page.

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**VERIFICATION UNDER 28 U.S.C. § 1746**

I, EHAB ALLABABIDI, declare under penalty of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746 that the facts set forth in the foregoing Verified Notice are true and correct based on my personal knowledge.

Respectfully submitted,

/s/ Ehab Allababidi

**EHAB ALLABABIDI, Defendant (Pro Se / *Farehta* Invocation Pending)**

8516 W. Winona St., Chicago, IL 60656

(773) 920-0030 | defoon5ready@gmail.com

Dated: June 11, 2026

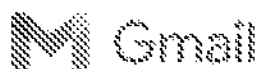
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# EXHIBIT A

## COOK COUNTY ADULT PROBATION DEPARTMENT OFFICER ADISON WEEKS E-MAIL THREAD

Documentary proof of lawful prescription and probation compliance clearance  
(December 8-10, 2025).

EXHIBIT A



Ehab Hilfiger <defcon5ready@gmail.com>

**Re: Prescription Verification & Compliance Letter**

1 message

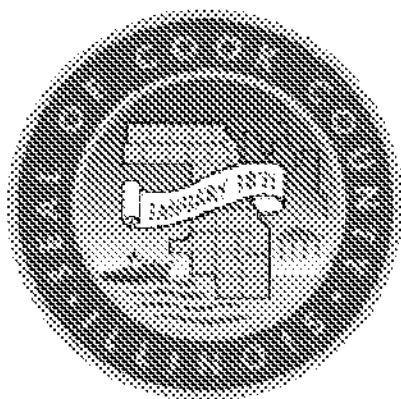
**Adison Weeks (Adult Probation)** <Adison.Weeks@cookcountyil.gov>

Wed, Dec 10, 2025 at 10:32 PM

To: Ehab Hilfiger <defcon5ready@gmail.com>

Thanks so much!!

Adison Weeks, Officer  
Cook County Adult Probation Department  
2121 Euclid Ave  
Rolling Meadows, Illinois 60008  
Office: (847)818-2360  
adison.weeks@cookcountyil.gov  
*adison b. weeks*



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

**Sent:** Wednesday, December 10, 2025 1:40 PM

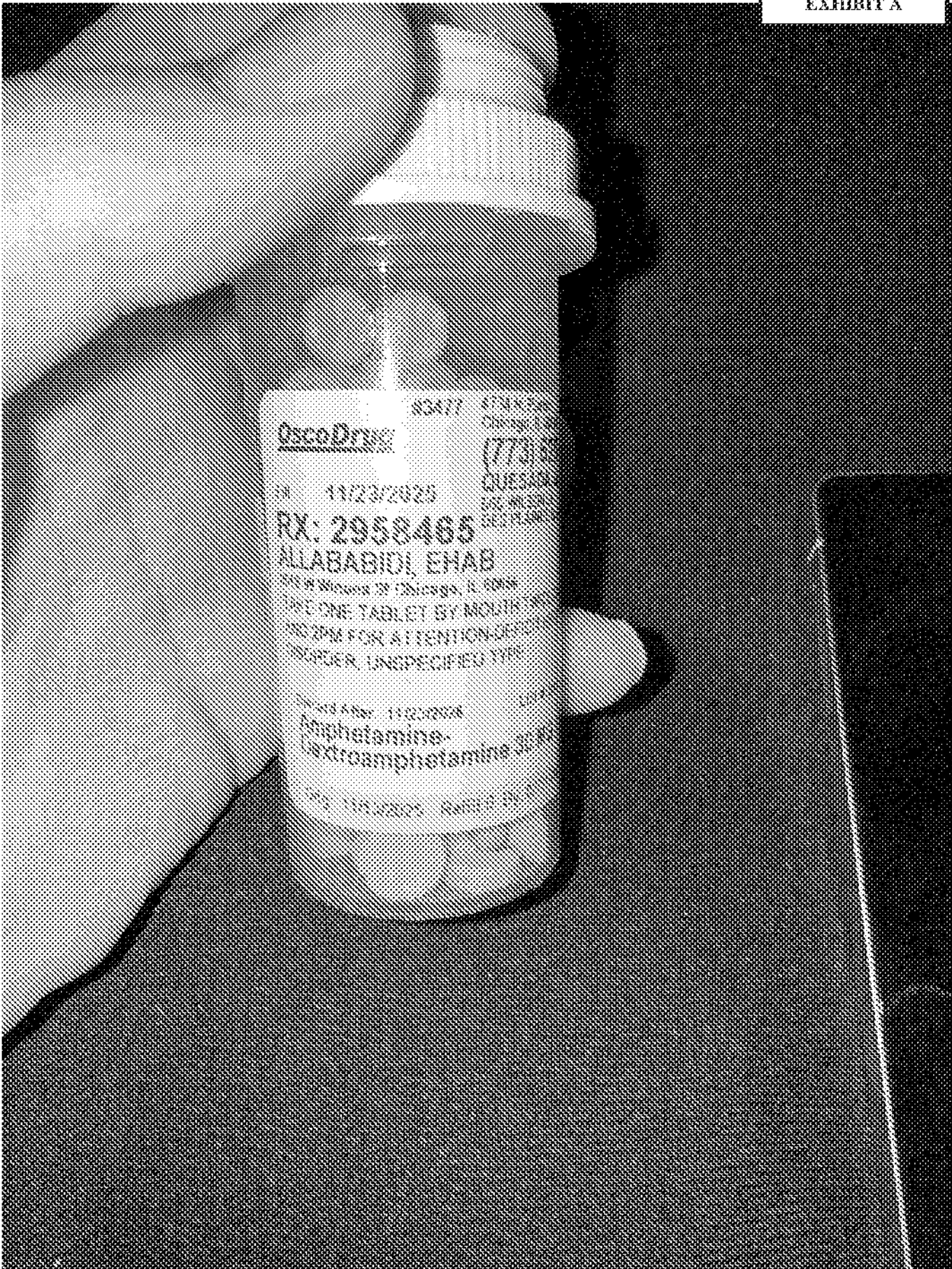
**To:** Adison Weeks (Adult Probation) <Adison.Weeks@cookcountyil.gov>

**Subject:** Re: Prescription Verification & Compliance Letter

**External Message Disclaimer**

This message originated from an external source. Please use proper judgment and caution when opening attachments, clicking links, or responding to this email.

EXHIBIT A



Hi! Here you go ms Adison.

On Wed, Dec 10, 2025 at 12:37 PM Adison Weeks (Adult Probation) <Adison.Weeks@cookcountyil.gov> wrote:

EXHIBIT A

Hey Ehab,

Do you mind still please sending me a picture of your updated Adderall prescription? I know you are still being prescribed it, but I just want to avoid anyone giving you a hard time for taking it. Your drug test results were positive for amphetamine, but it is all negative in my eyes because I know you are still taking the Adderall. I just want to avoid anyone who sees this result though giving you a hard time for future reference.

Thank you!

Best Regards,

Adison Weeks, Standard Caseload Officer

Cook County Adult Probation Department

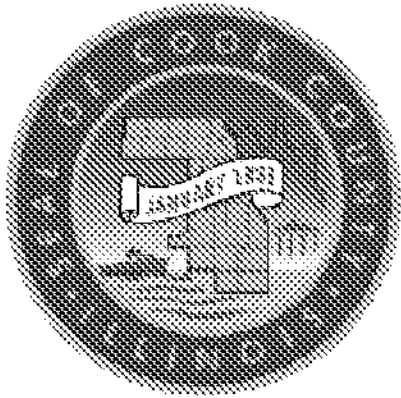
2121 Euclid Ave

Rolling Meadows, Illinois 60008

Office: (847)818-2360

adison.weeks@cookcountyil.gov

*adison b. weeks*



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

**Sent:** Monday, December 8, 2025 5:04 PM

**To:** Adison Weeks (Adult Probation) <Adison.Weeks@cookcountyil.gov>

**Subject:** Re: Prescription Verification & Compliance Letter

**External Message Disclaimer**

This message originated from an external source. Please use proper judgment and caution when opening attachments, clicking links, or responding to this email.

Re: Prescription Verification & Compliance Letter

Hi Adison,

Thank you so much for handling everything so quickly, I really appreciate it. I'll be there on Tuesday, December 23rd at 9 AM in person without fail.

I'll also keep you updated on the Lake matter.

Thanks again for all your help and communication.

EXHIBIT A

Best regards,

Ehab Allababidi

On Mon, Dec 8, 2025 at 12:14 PM Adison Weeks (Adult Probation) <Adison.Weeks@cookcountyil.gov> wrote:

Hi Ehab,

Great! I was literally just about to send you an email just going over what I sent you in the voicemail just now—I know Dr. Quesada also writes and adds the current verified prescriptions you are taking in his updated letters for your case as well—I greatly appreciate you getting back to me so quickly though Ehab, thank you for following up with me!

Good luck in court, please keep me updated and in the loop of things on what they say in Lake.

**Just a reminder as well, your next report will be on Tuesday, December 23<sup>rd</sup> @ 9 AM in person.** You will NOT have to drug test this time, since your drug test results were all negative. Once your Cook case terminates on 12/16 as well, we will discuss moving forward and you being assigned a different officer.

In the meantime, I hope you have a good week now, and I appreciate it once again you getting back to me so fast.

Best Regards,

Adison Weeks, Standard Caseload Officer

Cook County Adult Probation Department

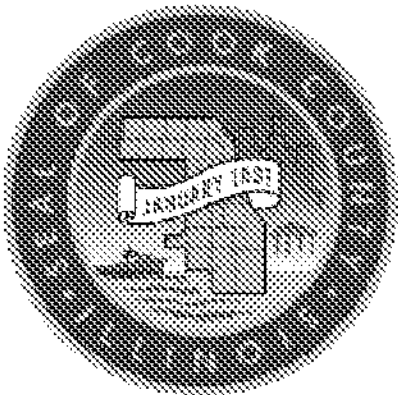
2121 Euclid Ave

Rolling Meadows, Illinois 60008

Office: (847)818-2360

adison.weeks@cookcountyil.gov

*adison b. weeks*



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

**Sent:** Monday, December 8, 2025 12:02 PM

**To:** Adison Weeks (Adult Probation) <Adison.Weeks@cookcountyil.gov>

**Subject:** Prescription Verification & Compliance Letter

EXHIBIT A

**External Message Disclaimer**

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Dear Officer Weeks,

I'm sorry I couldn't answer your call - I am currently at the lake county courthouse. I received your voicemail. I'll send you a photo of my updated prescription today, and I've emailed my doctor to send you a standard letter of compliance as soon as possible.

Please let me know if you need anything else.

Sincerely,

Ehab Allababidi

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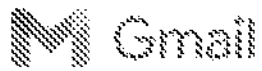
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# EXHIBIT B

## LAKE COUNTY CIRCUIT CLERK REJECTION E-MAIL

Written refusal of pro se Omnibus Filing and Faretta motion by Clerk  
personnel (June 8, 2026).

EXHIBIT B



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

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**Motion**

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**CC No Reply** <CCNoReply@lakecountyil.gov>  
To: "defcon5ready@gmail.com" <defcon5ready@gmail.com>

Mon, Jun 8, 2026 at 6:48 PM

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

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# EXHIBIT C

## FEDERAL COURT ORDER

United States District Court minute entry directing state-court exhaustion  
(Case No. 1:26-cv-01077, Dkt. 25; May 29, 2026).

**UNITED STATES DISTRICT COURT  
FOR THE Northern District of Illinois – CM/ECF NextGen 1.9 (rev. 1.9)  
Eastern Division**

Ehab Allababidi

Plaintiff,

v.

Case No.: 1:26-cv-01077

Honorable John Robert Blakey

Matt Junkin

Defendant.

**NOTIFICATION OF DOCKET ENTRY**

This docket entry was made by the Clerk on Friday, May 29, 2026:

MINUTE entry before the Honorable John Robert Blakey: Petitioner filed an "emergency motion for temporary restraining order and preliminary injunction," [16], claiming that Lake County prosecutors are moving to revoke his supervision in retaliation for filing the instant lawsuit; he seeks an order barring the state case from proceeding and also claims he will be unable to defend his case while detained. Initially, detainees traditionally and consistently litigate their cases while in custody, and his claim of being unable to litigate his case while in jail remains frivolous. Moreover, federal courts may generally not interfere with state court proceedings, see *Younger v. Harris*, 401 U.S. 37 (1971). If Petitioner has legitimate concerns about the state case he must raise them with the state court in the first instance. The Court admonishes Plaintiff that he should refrain from filing pleadings beyond his reply in support of the habeas corpus petition without leave of Court. Additionally, the Office of the Illinois Attorney General has filed a notice of non-involvement [12] and no one from the Office of the Lake County State's Attorney has appeared. The Court, on its own motion, extends Respondent's responsive pleading deadline to 7/10/26, and directs the Clerk to mail a copy of this order to Eric F. Rinehart, State's Attorney, Lake County, 18 N. County Street, 3rd Floor, Waukegan, IL 60085. The Clerk shall also email a copy of this order to [statesattorney@lakecountyil.gov](mailto:statesattorney@lakecountyil.gov). Mailed notice. (evw, )

**ATTENTION:** This notice is being sent pursuant to Rule 77(d) of the Federal Rules of Civil Procedure or Rule 49(c) of the Federal Rules of Criminal Procedure. It was generated by CM/ECF, the automated docketing system used to maintain the civil and criminal dockets of this District. If a minute order or other document is enclosed, please refer to it for additional information.

For scheduled events, motion practices, recent opinions and other information, visit our web site at [www.ilnd.uscourts.gov](http://www.ilnd.uscourts.gov).

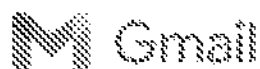
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# EXHIBIT D

## RECORD OF COUNSEL NON-RESPONSE

E-mail correspondence with Clerk personnel documenting the absence of any response from appointed counsel to emergency filings (June 8-9, 2026).

EXHIBIT D



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

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**Re: 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 9:32 PM

To: Cindy Robers &lt;CRobers@lakecountyil.gov&gt;

Cc: "nshepherd@lakecountyil.gov" &lt;nshepherd@lakecountyil.gov&gt;, Bailey Russell &lt;BRussell@lakecountyil.gov&gt;

SUBJECT: Emergency Filing Coordination (Case 23 CF 1146) - Federal Exhaustion Mandate

Ms. Robers,

Thank you for your prompt reply and for taking the time to explain the 19th Judicial Circuit's policies. I completely understand your administrative constraints regarding pro se email filings, and I appreciate your guidance.

Regarding your recommendation to coordinate with the Public Defender's Office, I completely agree that is the proper channel. I transmitted the entire 82-page Omnibus Filing to my appointed counsel, Bailey Russell, via confirmed facsimile yesterday, Sunday, June 8. Unfortunately, due to the extreme time-sensitivity of the active warrant and my inability to secure a response from counsel thus far, I am currently caught in a procedural gap.

The reason for the urgency is that I am actively trying to comply with a directive from United States District Court Judge John Robert Blakey. I have attached his Minute Order (Case 1:26-cv-01077, Dkt. 25), which explicitly instructs me to raise these specific concerns with the state court in the first instance. I am reaching out to your office to fulfill that exact federal mandate.

Because the physical USPS package (Tracking: 9402 6118 9876 5528 9340 61) is currently in transit to your office, and to ensure I am complying with Judge Blakey's order to use the state forum first, is there any administrative mechanism or exception that would allow this emergency motion to be placed on tomorrow morning's 9:00 AM call pending the arrival of the physical mail?

I am simply trying to ensure the state court has the opportunity to review this matter before I am required to return to the federal docket. I appreciate your time and any guidance your office can provide in navigating this unique overlap of state procedure and federal directives.

Respectfully,

Ehab Allababidi Defendant 8516 W. Winona St., Chicago, IL 60656 (773) 920-0030 | defcon5ready@gmail.com

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On Mon, Jun 8, 2026 at 8:48 PM Cindy Robers <CRobers@lakecountyil.gov> wrote:**Mr. Allababidi,**

**Your email has been forwarded to me by one of my employees in an effort to resolve this matter. We here in the 19<sup>th</sup> Judicial Circuit don't accept filings via email, while I understand that you have mailed these documents, we have not received them. Since you are currently represented by the Public Defender's Office I would suggest you reach out to them at (847) 377-3360 to find out who your assigned attorney is and speak with them in regard to any motions you would like them to file on your behalf. I appreciate your understanding. Please reach out to me with any questions, my contact information is below. Thank you.**

EXHIBIT D

Cindy Robers  
 Department Chief of Criminal, Traffic and Records  
 Office of the Circuit Clerk Erin Cartwright Weinstein  
 18 N. County St.  
 Waukegan, IL 60085  
 (847) 377-3289  
[crobers@lakecountyl.gov](mailto:crobers@lakecountyl.gov)

**From:** Ehab Hilfiger <[defcon5ready@gmail.com](mailto:defcon5ready@gmail.com)>  
**Sent:** Monday, June 8, 2026 2:08 PM  
**To:** Circuit Clerk <[CircuitClerk@lakecountyl.gov](mailto:CircuitClerk@lakecountyl.gov)>; Courts <[courts@lakecountyl.gov](mailto:courts@lakecountyl.gov)>  
**Cc:** Nicholas Shepherd <[nshepherd@lakecountyl.gov](mailto:nshepherd@lakecountyl.gov)>; Lake County State's Attorney <[statesattorney@lakecountyl.gov](mailto:statesattorney@lakecountyl.gov)>; Bailey Russell <[BRussell@lakecountyl.gov](mailto:BRussell@lakecountyl.gov)>  
**Subject:** RESPONSE TO PROCEDURAL DENIAL (Case 23 CF 1146): NOTICE OF FARETTA INVOCATION & CONSTRUCTIVE ABANDONMENT

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:

- |                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                 |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>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. Cronic. I cannot rely on counsel that has ceased to perform their constitutional duties.</p> | <p>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.</p> | <p>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.</p> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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.

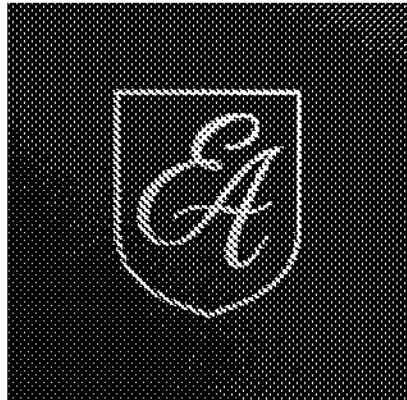
If this office persists in refusing to docket an emergency motion from a pro se defendant whose appointed counsel has constructively abandoned them, please provide a written statement of the

EXHIBIT D

specific policy being applied so I may include it in my immediate federal filing re  
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)

11/19/2023 10:19 AM



**Ehab Allababidi**

Personal Signature

Phone: 773-920-0030 (CAGE 16QC7)

Email: [defcon5ready@gmail.com](mailto:defcon5ready@gmail.com)

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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.



**Ehab Allababidi**

Personal Signature

Phone: 773-920-0030 (CAGE 16QC7)

Email: [defcon5ready@gmail.com](mailto:defcon5ready@gmail.com)

**EXHIBIT D****LEGAL NOTICE & CONFIDENTIALITY**

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**dk25lakeminute.pdf**

32K

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# EXHIBIT E

## URGENT REQUEST FOR REPRESENTATION & COMPLIANCE NOTICE

E-mail transmitted to appointed counsel within 36 hours of the custodial warrant, delivering actual notice of the warrant and the exculpatory probation clearance (May 29, 2026).

EXHIBIT E



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

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

1 message

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

Fri, May 29, 2026 at 5:32 PM

To: Bailey Russell &lt;BRussell@lakecountyl.gov&gt;

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

--

**Ehab Allababidi**

Personal Signature

Phone: 773-920-0030 (CAGE 16QC7)

Email: defcon5ready@gmail.com


**LEGAL NOTICE & CONFIDENTIALITY**


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EXHIBIT E

2 attachments

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

 **NOTICE\_OF\_PERFECTED\_APPEAL\_FULL\_05292026.pdf**  
251K

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# EXHIBIT F

## FILE-STAMPED FEDERAL COMPLAINT (DOC. 1)

Allababidi v. Shepherd, et al., Case No. 1:26-cv-06738 (N.D. Ill.), filed June 6, 2026. 65 pages, each bearing the Court's ECF header stamp. Continues in Part 2 of this transmission.

RECEIVED  
EXHIBIT F  
THOMAS S. BRYANT  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**EHAB ALLABABIDI,**  
*Plaintiff, Pro Se.*

v.

**NICHOLAS SHEPHERD,** Assistant State's  
Attorney, Lake County;  
**MARISA CERVANTES,** Adult Probation Officer,  
Lake County;  
**DESTINY LEE,** Adult Probation Officer,  
Cook County;  
**MARGARET K. FONTANA,** Director, Division of  
Adult Probation Services, 19th Judicial Circuit  
(Lake County);  
**LAKE COUNTY, ILLINOIS,**  
**COOK COUNTY, ILLINOIS,**  
*Municipal Defendants.*

Case No.: **1:26-cv-0**\_\_\_\_\_

1:26-cv-06738  
Judge Matthew P. Kennelly  
Magistrate Judge Nancy L. Bass Elter  
Random/Cat. 3

Judge: *(To Be Assigned)*  
Magistrate: *(To Be Assigned)*

**JURY TRIAL DEMANDED**

**COMPLAINT FOR DEPRIVATION OF CIVIL RIGHTS  
UNDER 42 U.S.C. § 1983**

*First Amendment Retaliation | Fourth Amendment Malicious Prosecution  
Fourteenth Amendment Due Process (Fabrication of Evidence)  
Supervisory Liability | Conspiracy to Deprive Civil Rights  
Jury Trial Demanded*

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EXHIBIT F

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**INDEX OF EXHIBITS**

The following exhibits are attached hereto and incorporated by reference as though fully set forth herein, pursuant to Fed. R. Civ. P. 10(c) and authenticated under Fed. R. Evid. 902(1), 902(13), and 902(14):

- Exhibit 1:** Cook County Adult Probation Drug Test Correspondence — Officer Adison Weeks confirmation emails (December 8 and 10, 2025) establishing prescription verification and “all negative” adjudication
- Exhibit 2:** Petition for Revocation of Probation (May 14, 2026) — filed by ASA Nicholas Shepherd, containing the knowingly false “Amphetamine (illegal substance)” allegation and the Rule 131(b)-violating signature block omitting all contact information
- Exhibit 3:** Pitney Bowes Envelope with USPS Tracking — forensic timestamps proving the two-stage mail delay (May 15 meter stamp, May 18 USPS intake, May 21 delivery)
- Exhibit 4:** Formal Memorialization Email (February 19, 2026) — sent to Director Fontana, documenting the anonymous officer call and requesting identification
- Exhibit 5:** Lake County Court Minute Entry (May 28, 2026) — reflecting Defendant Cervantes’s physical presence at the warrant hearing
- Exhibit 6:** Warrant of Arrest (May 28, 2026) — commanding all peace officers to arrest Plaintiff and hold without bond
- Exhibit 7:** Cervantes Post-Warrant Letter (May 29, 2026) — first and only communication from the assigned probation officer, sent one day after the warrant executed
- Exhibit 8:** Notice of Mandatory Litigation Hold (May 22, 2026) — served on all Defendants, identifying the fabricated drug allegation and forensic spoliation of response time
- Exhibit 9:** Notice of Special Appearance and Fraud on the Court — filed with the Lake County Circuit Clerk identifying Napue perjury
- Exhibit 10:** Emergency Email to Circuit Clerk and All Defendants (May 28, 2026, 7:00 AM) — attaching exculpatory evidence and warning that issuing the warrant would constitute federal witness tampering

## **I. PRELIMINARY STATEMENT**

This case exposes a coordinated, multi-agency retaliatory conspiracy to incarcerate a federal civil rights litigant eight days before his federal habeas deadline. The mechanism was surgically precise: a prosecutor who swore under oath that a lawfully prescribed medication was an “illegal substance”; a probation officer who concealed her identity for 100 days to manufacture a fake “failure to report” default; a second probation officer who demanded impossible physical appearances despite documented vehicle sabotage; and a supervisory director who received written notice of the entire scheme and did nothing.

The mathematical timeline is the confession. On April 13, 2026, a federal court set habeas deadlines for June 5, 2026. Exactly thirty-one days later, on May 14, 2026, Defendant Shepherd filed a Petition for Revocation built on a drug allegation that the State’s own coordinate agency had formally adjudicated as compliant five months earlier. The arraignment was scheduled for May 28, 2026 — eight days before the federal deadline. The State’s mailroom then held the notice for 96 hours over Memorial Day weekend, compressing Plaintiff’s window to seek federal emergency intervention to exactly three business days. When Plaintiff sent an Emergency Notice of Fraud on the Court at 7:00 AM on May 28 — two full hours before the warrant hearing — the state court issued a zero-bond bench warrant anyway, without conducting a probable cause hearing, without taking testimony, and without acknowledging the exculpatory evidence served upon it that morning.

This is not a close case. The evidence is not circumstantial. The State’s own written records mathematically disprove the sworn allegation in the Petition for Revocation. The conspiracy is not inferred from parallel conduct — it is demonstrated by cross-jurisdictional data extraction, synchronized court appearances, deliberate mail delays, and a post-warrant lure letter sent the day after the custodial extraction was already consummated. Plaintiff brings this action under 42 U.S.C. § 1983 to obtain declaratory and injunctive relief, compensatory and punitive damages, and to vindicate the constitutional rights that Defendants have conspired to destroy.

## **II. JURISDICTION AND VENUE**

1. This action arises under 42 U.S.C. § 1983 and the First, Fourth, and Fourteenth Amendments to the United States Constitution. This Court has subject-matter jurisdiction under 28 U.S.C. § 1331 (federal question) and 28 U.S.C. § 1343(a)(3) (civil rights).

**EXHIBIT F**

2. Venue is proper in the Northern District of Illinois, Eastern Division, pursuant to 28 U.S.C. § 1391(b) because all Defendants reside in or committed the acts alleged within this District, and the events giving rise to this action occurred substantially within this District.

3. This Court may award declaratory and injunctive relief under 28 U.S.C. §§ 2201–2202 and Fed. R. Civ. P. 57 and 65. Plaintiff seeks compensatory and punitive damages under 42 U.S.C. § 1983 and Fed. R. Civ. P. 38.

### **III. EXCEPTION TO THE ANTI-INJUNCTION ACT AND THE YOUNGER ABSTENTION DOCTRINE**

4. This Court's exercise of jurisdiction is not barred by the Anti-Injunction Act, 28 U.S.C. § 2283, because 42 U.S.C. § 1983 is an Act of Congress that expressly authorizes federal courts to enjoin unconstitutional proceedings in state courts. *Mitchum v. Foster*, 407 U.S. 225, 243 (1972).

5. This Court's intervention is independently required under the bad-faith, harassment, and extraordinary circumstances exceptions to the Younger abstention doctrine. The state prosecution in Lake County Case No. 23 CF 1146 was brought in bad faith because Defendant Shepherd filed a verified Petition for Revocation containing assertions that are mathematically disproven by the written records of the State's own coordinate agency (Exhibit 1). The prosecution is maintained with no reasonable expectation of obtaining a valid revocation on the merits, but is instead explicitly calculated to serve as an instrument of harassment and a jurisdictional race condition to moot active federal habeas dockets before the June 5, 2026, deadline. *Dombrowski v. Pfister*, 380 U.S. 479, 490 (1965); *Huffman v. Pursue, Ltd.*, 420 U.S. 592, 611 (1975).

6. The state court is incapable of providing an adequate forum for adjudication of Plaintiff's federal constitutional rights because the local state apparatus has actively insulated itself from communication by omitting mandatory contact parameters under Illinois Supreme Court Rule 131(b), executing a zero-bond bench warrant without conducting a minimum probable cause hearing or taking testimony, and issuing the warrant despite having received written notice of the Napue perjury two hours before the hearing (Exhibits 9, 10). *Gibson v. Berryhill*, 411 U.S. 564, 577 (1973).

### **IV. PARTIES**

7. Plaintiff **EHAB ALLABABIDI** (DOB: September 24, 1996) is a natural person residing at 8516 W. Winona St., Chicago, Illinois 60656. Plaintiff is a citizen of the United States and is proceeding pro se. Plaintiff is subject to an active no-bond bench warrant issued in Lake County Case No. 23 CF 1146,

EXHIBIT F

executed on May 28, 2026, at 9:00 AM, by the coordinated actions of the Defendant Plaintiff challenges the constitutionality of that warrant and the retaliatory scheme that produced it.

8. **Defendant NICHOLAS SHEPHERD** is an Assistant State's Attorney employed by the Lake County State's Attorney's Office, 18 N. County Street, Waukegan, Illinois 60085. Defendant Shepherd is sued in his individual capacity for damages and in his official capacity for prospective declaratory and injunctive relief. He drafted, signed, and filed the May 14, 2026 Petition for Revocation of Probation in Lake County Case No. 23 CF 1146, which contained a sworn, knowingly false allegation that Plaintiff tested positive for an "illegal substance" when Defendant knew the result was attributable to a lawfully prescribed medication. Defendant Shepherd deliberately omitted his phone number and email address from the pleading in violation of Illinois Supreme Court Rule 131(b), blocking Plaintiff from contacting him to present exculpatory evidence before the warrant issued.

9. **Defendant MARISA CERVANTES** is an Adult Probation Officer employed by the Lake County Adult Probation Department. Defendant Cervantes is sued in her individual capacity for damages and in her official capacity for prospective declaratory and injunctive relief. On information and belief, she was the anonymous officer who contacted Plaintiff on February 19, 2026, at approximately 3:00 PM, deliberately refusing to identify herself by name, supervisory authority, or direct contact information. She executed the "Impossibility Trap" by concealing her identity for 100 days and manufacturing a fake "failure to report" default. She physically appeared in Courtroom T-611 on May 28, 2026, alongside ASA Shepherd to ensure the no-bond warrant was issued. She waited until May 29, 2026 — the day after the warrant was signed --- to finally email Plaintiff, luring him into a custodial extraction that had already been executed.

10. **Defendant DESTINY LEE** is an Adult Probation Officer employed by the Cook County Adult Probation Department. Defendant Lee is sued in her individual capacity for damages and in her official capacity for prospective declaratory and injunctive relief. On January 30, 2026, she demanded an impossible in-person appearance despite possessing actual, written knowledge of the "Mobility Kill" (the deliberately severed serpentine belt on Plaintiff's vehicle on January 14, 2026, documented as Predicate Act 6 in Case No. 1:25-cv-15800). She participated in the coordinated enforcement scheme to weaponize Plaintiff's physical immobility and manufacture a technical default. She only suspended her threat of immediate violation proceedings after Plaintiff explicitly invoked the pending federal RICO action on the recorded call.

**EXHIBIT F**

11. Defendant MARGARET K. FONTANA is the Director of the Division of Services for the 19th Judicial Circuit (Lake County). Defendant Fontana is sued in her individual capacity for damages and in her official capacity for prospective declaratory and injunctive relief. She was served with the February 19, 2026 Formal Memorialization (Exhibit 4), placing her on actual notice that her probation officer was operating anonymously, had created an “Impossibility Trap”, and was acting in concert with the prosecutor to manufacture a default. Defendant Fontana failed to intervene, failed to identify the officer, and failed to correct the communication blockade, thereby ratifying the constitutional deprivation.

**V. FACTUAL ALLEGATIONS**

**A. The Federal Habeas Deadlines (April 13, 2026)**

12. On April 13, 2026, the United States District Court for the Northern District of Illinois entered Minute Orders [Dkt. 11] in two separate federal habeas corpus proceedings: Allababidi v. Junkin, Case No. 1:26-cv-01077 (the Lake County habeas), and Allababidi v. Chief Adult Probation Officer, Case No. 1:25-cv-15181 (the Cook County habeas). Both orders directed the Respondents to “answer or otherwise respond” by June 5, 2026.

13. The Court found that Plaintiff alleged “a cognizable claim for relief” under the Rule 4 standard of Sanders v. Radtke, 48 F.4th 502, 509 (7th Cir. 2022). The State was on notice that Plaintiff’s constitutional claims would be adjudicated by a federal court within 53 days.

**B. The Retaliatory Petition for Revocation (May 14, 2026)**

14. Exactly thirty-one days after the federal habeas deadlines were set, Defendant Shepherd filed a Petition for Revocation of Probation in Lake County Case No. 23 CF 1146, scheduling a mandatory arraignment for May 28, 2026 --- exactly eight days before the June 5, 2026 federal response deadline in both habeas cases.

15. The Petition for Revocation alleged that Plaintiff tested positive for “Amphetamine (illegal substance)” on November 10, 2025. This allegation was knowingly false. The Cook County Adult Probation Department --- a coordinate agency of the State of Illinois --- had already received the identical laboratory result, verified the lawful Adderall prescription, and formally adjudicated the test as compliant on December 10, 2025. Officer Adison Weeks confirmed in writing on December 8, 2025 that Plaintiff’s “drug test results were all negative”, and on December 10, 2025, that “it is all negative in my eyes because I know you are still taking the Adderall.” (See Exhibit 1, attached and incorporated

by reference under Fed. R. Civ. P. 10(c).)

16. Defendant Shepherd's signature block on the Petition for Revocation contains no phone number, no email address, and no office extension --- a direct violation of Illinois Supreme Court Rule 131(b). This omission was not inadvertent. It was a calculated communication blockade designed to prevent Plaintiff from contacting the prosecutor to present exculpatory evidence before the warrant could issue. (See Exhibit 2, attached and incorporated by reference under Fed. R. Civ. P. 10(c).)

17. The State's own internal Pitney Bowes postage meter (ZIP 60085) stamped the physical envelope on Friday, May 15, 2026, one day after notarization. However, the envelope was withheld from the USPS Carol Stream processing facility until Monday, May 18, 2026, at 4:00 PM. Delivery was not completed until Thursday, May 21, 2026. In a 14-day procedural window, the State intentionally consumed exactly 50% of the timeline in transit. Because May 25, 2026, is Memorial Day, the 7-day transit delay compressed Plaintiff's operational window to seek federal emergency injunctive relief to exactly three business days. The Pitney Bowes postage meter stamp (May 15) is a government-audited forensic timestamp proving the State held the envelope for at least one full day after notarization before even applying postage. The USPS barcode confirms a second multi-day hold between the Pitney Bowes meter and actual USPS intake. This deliberate two-stage delay is direct evidence of the forum spoliation component of the conspiracy. (See Exhibit 3, attached and incorporated by reference under Fed. R. Civ. P. 10(c).)

### **C. The Anonymous Officer (February 19, 2026)**

18. On February 19, 2026, at approximately 3:00 PM, Plaintiff received a single telephone call from a newly assigned Lake County probation officer who: (a) refused to provide her name; (b) refused to identify her supervising authority; and (c) refused to provide direct contact information. The officer's initial attempt to "command" an in-person appearance on March 10, 2026, was downgraded upon Plaintiff's request for clarification to: "Well, if you are able to make it here on March 10, 2026, I would appreciate it."

19. Plaintiff immediately memorialized this call in a Formal Memorialization email sent to Director Fontana, the Lake County State's Attorney's Office, and the Circuit Clerk. The email states: "Because her identity and direct contact information were not clearly established during the call, Director Fontana is formally requested to forward this communication to her immediately." (See Exhibit 4, attached and incorporated by reference under Fed. R. Civ. P. 10(c).) The State never identified the

EXHIBIT F

officer. She never contacted Plaintiff again.

20. Plaintiff established a Constructive Compliance Window from 12:00 PM to 4:00 PM on March 10, 2026, making himself fully available for a telephonic or video check-in at Plaintiff's verified contact vectors. The State initiated zero calls during this four-hour window. No call logs. No voicemail. No email. No field contact. The State deliberately abandoned its supervisory duty to manufacture the technical default it now prosecutes.

**D. The Mobility Kill (January 14, 2026)**

21. On January 14, 2026, three hours before an in-person hearing on a RICO-related matter, the serpentine belt of Plaintiff's mother's vehicle --- which she was using to drive Plaintiff to court as his sole driver after his license was revoked on October 3, 2025 --- was deliberately severed. This sabotage is documented as Predicate Act 6 in *Allababidi v. Advocate Health, et al.*, N.D. Ill. Case No. 1:25-cv-15800, Dkt. 21. The cut was a clean 90-degree blade cut with no fraying, no tensile deformation, and zero dry rot. The repair cost was \$2,850.00.

22. Defendant Lee possessed actual, written knowledge of this sabotage yet demanded an in-person appearance on January 30, 2026, under threat of immediate violation proceedings. She only suspended the threat after Plaintiff invoked the pending federal RICO action. Defendant Cervantes and Defendant Shepherd also possessed actual knowledge via the February 19, 2026 Formal Memorialization, which documented the vehicle sabotage and Plaintiff's physical inability to travel to Waukegan.

**E. The Litigation Hold (May 22, 2026)**

23. On May 22, 2026, Plaintiff served a Notice of Mandatory Litigation Hold (Exhibit 8, attached and incorporated by reference under Fed. R. Civ. P. 10(c)) on the Lake County State's Attorney's Office, ASA Shepherd, and all Defendants. The Litigation Hold explicitly identified the fabricated drug allegation, the anonymous officer's identity concealment, the deliberate omission of contact information, and the forensic spoliation of Plaintiff's response time. All Defendants had actual, written notice of the constitutional violations six days before the warrant executed. The Litigation Hold specifically demanded that all Defendants: (a) preserve all electronic communications, phone records, text messages, and emails relating to the probation supervision of Plaintiff; (b) preserve all internal memoranda, case notes, and supervisory directives relating to Case No. 23 CF 1146; (c) refrain from destroying, altering, or concealing any records subject to the litigation hold; and (d) immediately cease all retaliatory enforcement actions pending federal adjudication. No Defendant responded to the

**EXHIBIT F**

Litigation Hold. No Defendant acknowledged receipt. No Defendant withdrew or moved for Revocation despite having six full days of actual notice that its central factual allegation was demonstrably false.

**F. The 7:00 AM Fraud Notice (May 28, 2026)**

24. At 7:00 AM on May 28, 2026 — two full hours before the 9:00 AM warrant hearing — Plaintiff sent an Emergency Special Appearance and formal Notice of Fraud on the Court (Exhibit 10) via email to the Lake County Circuit Clerk, ASA Shepherd, the Lake County State's Attorney's Office, and the DOJ Public Integrity Section, with copies to Defendants Lee and Fontana. The email identified the Napue perjury, attached the exculpatory evidence (Exhibit 1), notified the court of pending federal proceedings, and warned that issuing a warrant would constitute participation in a federal witness tampering conspiracy. The email attached the Notice of Special Appearance (Exhibit 9), the Litigation Hold (Exhibit 8), and other exhibits. Every Defendant had the exculpatory evidence in their possession before the warrant hearing.

**G. The Warrant Execution (May 28, 2026)**

25. At 9:00 AM on May 28, 2026, the Lake County Circuit Court (Hon. Christopher Stride, Courtroom T-611) executed a no-bond bench warrant against Plaintiff. The court docket reflects Defendant Cervantes was physically present. (See Exhibit 5.) The full Warrant of Arrest (Exhibit 6) commands all peace officers of Illinois to arrest Plaintiff and hold him in custody without bond.

26. The warrant was issued without a probable cause hearing, without taking testimony, and without any adjudication of the merits. The state court issued the warrant despite having received the Notice of Special Appearance (Exhibit 9) two hours earlier, which explicitly identified the Napue perjury and warned that issuing a warrant would constitute participation in federal witness tampering.

27. Defendant Cervantes waited until May 29, 2026 — the day after the warrant was signed and executed — to send her first and only communication to Plaintiff — a letter urging him to “turn yourself in to the Lake County Jail” (Exhibit 7). After concealing her identity and contact information for 100 days, Defendant Cervantes finally revealed her email address (mcervantes@lakecountyil.gov) and phone number (847-377-3614) only after the warrant was already executed, in a transparent effort to lure Plaintiff into the custodial extraction that had already been consummated. The letter states: “You failed to appear in court on 5/28/2026 and a warrant was issued for your arrest. I encourage you to turn yourself in to the Lake County Jail to resolve this warrant immediately.”

**H. The Causal Nexus: Attorney General Withdrawal and Local Retaliation****EXHIBIT F**

28. Following the April 13, 2026 habeas deadline orders, the Illinois Attorney General's Office filed a "Notice of Non-Involvement" on April 28, 2026, offloading the defense burden onto local Respondents.

29. In response, Plaintiff activated federal service machinery under Fed. R. Civ. P. 4(c)(3). Stripped of the Attorney General's protection, the local Defendants could not defend the state court record by June 5, 2026. Consequently, they conspired to physically incarcerate Plaintiff on May 28 to moot the federal court's jurisdiction before the federal clock expired.

**J. Chronological Timeline of the Conspiracy**

30. The following chronological timeline demonstrates the mathematically impossible alignment of dates that conclusively establishes the retaliatory nature of Defendants' conduct:

Date	Event	Significance
Oct. 3, 2025	License revoked	Plaintiff dependent on family for transport
Nov. 10, 2025	Drug test administered	Amphetamine detected (lawful Adderall Rx)
Dec. 8–10, 2025	Cook County clears test	Officer Weeks: "all negative" (Exhibit 1)
Jan. 14, 2026	Mobility Kill	Serpentine belt severed; \$2,850 repair (Predicate Act 6)
Jan. 30, 2026	Lee demands appearance	Despite written knowledge of vehicle sabotage
Feb. 19, 2026	Anonymous officer call	Refuses name, authority, contact info (Exhibit 4)
Mar. 10, 2026	Compliance Window	Plaintiff available 12–4 PM; zero State contact
Apr. 13, 2026	<b>Federal habeas deadline set</b>	June 5, 2026 response date in both habeas cases
Apr. 28, 2026	AG files Non-Involvement	Local Defendants left unprotected
<b>May 14, 2026</b>	<b>Revocation petition filed</b>	<b>31 days after deadline; false drug allegation</b>
May 15, 2026	Pitney Bowes meter stamp	Envelope held 1+ day before postage applied
May 18, 2026	USPS intake	3-day hold between meter and USPS
May 21, 2026	Delivery to Plaintiff	50% of procedural window consumed in transit
May 22, 2026	Litigation Hold served	All Defendants on actual notice (Exhibit 8)
May 25, 2026	Memorial Day	Business days further compressed
<b>May 28, 2026</b>	<b>7:00 A.M.: Fraud Notice sent</b>	<b>Exculpatory evidence served 2 hrs before hearing</b>
<b>May 28, 2026</b>	<b>9:00 A.M.: Warrant executed</b>	<b>8 days before June 5 federal deadline</b>
May 29, 2026	Cervantes lore letter	First contact after 100 days of concealment (Exhibit 7)

**VI. CLAIMS FOR RELIEF****COUNT I: FIRST AMENDMENT RETALIATION**

*(Brought Against All Defendants in Their Individual Capacities Under 42 U.S.C. § 1983)*

31. Plaintiff repeats and re-alleges each and every allegation set forth in paragraphs fully set forth herein.

32. The First Amendment, made applicable to the states through the Fourteenth Amendment, protects the right of individuals to petition the government for redress of grievances, including the right of access to the courts and the right to prosecute federal civil rights litigation without state-sponsored retaliation. *California Motor Transport Co. v. Trucking Unlimited*, 404 U.S. 508, 510 (1972); *Bill Johnson's Restaurants, Inc. v. NLRB*, 461 U.S. 731, 741 (1983). The elements of a First Amendment retaliation claim under § 1983 are: (1) the Plaintiff engaged in constitutionally protected speech or conduct; (2) the Defendant took adverse action against the Plaintiff that would deter a person of ordinary firmness from engaging in protected speech; and (3) the protected speech was a motivating factor in the Defendant's adverse action. *Bridges v. Gilbert*, 557 F.3d 541, 546 (7th Cir. 2009); *Woodruff v. Mason*, 542 F.3d 545, 551 (7th Cir. 2008).

33. **Protected Activity:** Plaintiff engaged in constitutionally protected activity by: (a) filing multiple federal habeas corpus petitions (Case Nos. 1:26-cv-01077 and 1:25-cv-15181) challenging the constitutionality of his state conviction; (b) filing a Civil RICO action (Case No. 1:25-cv-15800) alleging a multi-year criminal enterprise by state actors; and (c) serving federal process upon the local Defendants under Fed. R. Civ. P. 4(c)(3), compelling them to answer before a federal court. Each of these activities is protected by the Petition Clause of the First Amendment.

34. **Adverse Actions:** Defendants took the following adverse actions that would deter a person of ordinary firmness from continuing to exercise his First Amendment right to petition the federal courts: (a) Defendant Shepherd filed a Petition for Revocation containing a knowingly false drug allegation and scheduled the arraignment exactly eight days before the federal habeas deadline (Exhibits 1–2); (b) Defendant Cervantes concealed her identity for 100 days to manufacture a fake “failure to report” default, then appeared in court on May 28, 2026, to ensure the warrant issued (Exhibits 4–7); (c) Defendant Lee demanded impossible in-person appearances despite actual knowledge of the Mobility Kill; (d) Defendant Fontana, having received actual notice via the February 19, 2026 Formal Memorialization, failed to intervene, train, supervise, or correct the retaliatory scheme (Exhibit 4); and (e) all Defendants, acting in concert, executed a custodial extraction designed to permanently sever Plaintiff's access to federal litigation infrastructure.

**EXHIBIT F**

35. **Causal Nexus:** The adverse actions were motivated by Plaintiff's protect mathematical timeline is dispositive: (a) April 13, 2026 — federal habeas deadlines set; (b) May 14, 2026 — exactly 31 days later, the revocation petition was filed; (c) May 28, 2026 — arraignment set exactly 8 days before the June 5 federal deadline; (d) the petition contained a knowingly false allegation (Exhibits 1–2); (e) the mail was deliberately delayed to consume 50% of the response window (Exhibit 3); (f) Defendant Fontana received actual notice of the anonymous officer scheme (Exhibit 4) and did nothing; and (g) the warrant was executed on May 28, 2026, at 9:00 AM, with Defendant Cervantes physically present (Exhibits 5–6). The statistical probability that this alignment is coincidental is functionally zero.

36. The adverse action — a custodial extraction eight days before a federal response deadline — would deter a person of ordinary firmness from continuing to exercise his First Amendment right to petition the federal courts. *Collins v. County of Kendall*, 807 F.2d 95, 98 (7th Cir. 1986) (bad-faith prosecution brought for harassment constitutes irreparable harm). Plaintiff has been subjected to an active no-bond arrest warrant and faces imminent incarceration directly resulting from Defendants' retaliatory scheme.

#### **COUNT II: FOURTEENTH AMENDMENT DUE PROCESS**

*(Fabrication of Evidence in Violation of Napue v. Illinois; Brought Against Defendant Shepherd in His Individual Capacity Under 42 U.S.C. § 1983)*

37. Plaintiff repeats and re-alleges paragraphs 1 through 36 as if fully set forth herein.

38. The knowing presentation of false evidence to a court violates the Due Process Clause. *Napue v. Illinois*, 360 U.S. 264, 269 (1959) (“[A] conviction obtained through use of false evidence, known to be such by representatives of the State, must fall under the Fourteenth Amendment.”); *Miller v. Pate*, 386 U.S. 1, 6–7 (1967); *Whitlock v. Brueggemann*, 682 F.3d 567, 580 (7th Cir. 2012).

39. The right to be free from prosecution based on fabricated evidence applies not only at trial but at every stage of a criminal or quasi-criminal proceeding, including probable cause determinations for arrest warrants and probation revocation proceedings. *Franks v. Delaware*, 438 U.S. 154, 155–56 (1978) (“[A] warrant based on a false statement knowingly and intentionally made must be voided.”); *Black v. City of Milwaukee*, 2016 WL 7034014, at \*4 (E.D. Wis. Dec. 1, 2016).

40. Defendant Shepherd knowingly, intentionally, and with reckless disregard for the truth included in a sworn Petition for Revocation the false statement that Plaintiff tested positive for “Amphetamine (illegal substance)” on November 10, 2025. At the time Defendant Shepherd signed, notarized, and

**EXHIBIT F**

filed the Petition, he knew or should have known that: (a) the Cook County Department had received the identical laboratory result; (b) the Cook County Adult Probation Department had verified the lawful Adderall prescription; (c) the Cook County Adult Probation Department had formally adjudicated the test as compliant on December 10, 2025; and (d) Officer Adison Weeks had confirmed in writing that the result was “all negative” and attributable to a lawfully prescribed medication. (See Exhibit 1.)

41. The 185-day delay between the November 10, 2025 drug test and the May 14, 2026 Petition for Revocation is independently dispositive of retaliatory intent. Adderall (mixed amphetamine salts) has a plasma half-life of approximately 10–13 hours, meaning the substance is pharmacologically eliminated from the body within 72 hours of administration. If Defendant Shepherd genuinely believed Plaintiff was using illegal amphetamines, immediate enforcement action would have been warranted. Instead, Defendant Shepherd waited 185 days — allowing Plaintiff to file federal habeas petitions, activate RICO litigation, and serve federal process — before deploying the stale test result as a pretext for incarceration. The 185-day delay is not consistent with legitimate law enforcement; it is consistent with waiting until the federal deadline created an operationally useful window for custodial extraction.

42. The false allegation was material to the warrant determination. The Petition for Revocation relied on the drug allegation as independent grounds for revocation. Removing the false allegation would have substantially reduced the probability that a neutral judicial officer would have found probable cause to issue a no-bond arrest warrant. The remaining allegations in the Petition — the manufactured “failure to report” default created by Defendant Cervantes’s 100-day identity concealment — are themselves constitutionally infirm because they were produced by the very conspiracy alleged herein. Without the fabricated drug allegation and without the manufactured default, there was no lawful basis for the warrant.

43. As a direct and proximate result of Defendant Shepherd’s fabrication of evidence, Plaintiff has suffered: (a) the issuance and execution of a no-bond arrest warrant; (b) the deprivation of his liberty interest in remaining free from custodial detention; (c) the deprivation of his right to access the federal courts; (d) severe emotional distress; and (e) damage to his reputation and standing in the community.

**COUNT III: FOURTH AMENDMENT MALICIOUS PROSECUTION**

*(Unreasonable Seizure / Wrongful Legal Process; Brought Against Defendants Shepherd and Cervantes in Their Individual Capacities Under 42 U.S.C. § 1983)*

EXHIBIT F

44. Defendants Shepherd and Cervantes, acting under color of state law, commenced quasi-criminal judicial proceeding against Plaintiff by filing the May 14, 2026 Petition for Revocation of Probation in Lake County Case No. 23 CF 1146 and securing the issuance of an active, no-bond arrest warrant commanding all peace officers of the State of Illinois to seize Plaintiff's person and hold him in custody. Under *Thompson v. Clark*, 142 S. Ct. 1332, 1337 (2022), a Fourth Amendment seizure occurs when the government initiates legal process that restrains the plaintiff's liberty, including the issuance of an arrest warrant that restricts freedom of movement and subjects the individual to the threat of imminent custodial detention. The active, zero-bond bench warrant in this case constitutes a seizure within the meaning of the Fourth Amendment.

45. Defendants acted entirely without probable cause. The sole factual predicate was a test result that a coordinate state agency had adjudicated as negative and lawful five months prior (Exhibit 1).

46. Defendants acted with objective malice, as demonstrated by the deliberate calculation of the temporal sequence: (a) waiting 185 days after the November 10, 2025, test to file the revocation petition; (b) suppressing the exculpatory coordination record from Cook County Adult Probation; (c) omitting all direct contact fields from the petition to enforce a communication blockade in violation of Illinois Supreme Court Rule 131(b); and (d) delaying mail transit by 96 hours to exhaust Plaintiff's window to seek federal emergency intervention. A reasonable prosecutor in Defendant Shepherd's position, possessing the exculpatory Cook County adjudication, would not have initiated the revocation proceeding. *Whren v. United States*, 517 U.S. 806, 813 (1996); *Gerstein v. Pugh*, 420 U.S. 103, 111–14 (1975).

47. Defendant Cervantes actively participated in the malicious prosecution by: (a) concealing her identity for 100 days to manufacture a fake failure-to-report default; (b) appearing physically in Courtroom T-611 on May 28, 2026, alongside Defendant Shepherd to ensure the warrant issued; and (c) waiting until May 29, 2026 — the day after the warrant was executed — to send her first and only communication to Plaintiff, a transparent effort to lure him into the already-consummated custodial extraction.

48. As a direct and proximate result of the fraudulent commencement of legal process, Plaintiff has suffered a severe deprivation of liberty consistent with a Fourth Amendment seizure, specifically: the issuance of an active, zero-bond arrest warrant commanding all peace officers in Illinois to seize his person; the restriction of his freedom of movement; the targeted deployment of local law enforcement

**EXHIBIT F**

assets to execute a custodial extraction, and the total disruption of his liberty interest from unconstitutional state detention. *Manuel v. City of Joliet*, 580 U.S. 357, 367 (2017) (Fourth Amendment governs claims for pretrial detention without probable cause).

49. The fraudulent legal process was void ab initio due to fabricated evidence, terminating in Plaintiff's favor under *Thompson v. Clark*, 142 S. Ct. at 1341. Alternatively, even if the revocation petition remains technically pending on the state docket, the active zero-bond warrant constitutes an ongoing, unlawful pretrial seizure pursuant to wrongful legal process that violates the Fourth Amendment independently of a final merits adjudication. The warrant itself was procured entirely through verified fraud on the court, lacks any valid probable cause foundation, and operates as an immediate, functional deprivation of Plaintiff's liberty. *Heck v. Humphrey*, 512 U.S. 477, 484 n.2 (1994) (a § 1983 claim for unreasonable seizure pursuant to legal process accrues when the seizure occurs, regardless of the outcome of the underlying prosecution). *Wallace v. Kato*, 549 U.S. 384, 390 (2007).

#### **COUNT IV: SUPERVISORY LIABILITY**

*(Brought Against Defendant Fontana in Her Individual Capacity Under 42 U.S.C. § 1983)*

50. Plaintiff repeats and re-alleges paragraphs 1 through 49 as if fully set forth herein.

51. Defendant Fontana had actual notice on February 19, 2026, that her subordinate was operating anonymously, had severed communication, and was manufacturing a technical default (Exhibit 4). She failed to identify the officer, initiate any contacts, train or supervise, or prevent the retaliatory revocation. Supervisory liability attaches in the Seventh Circuit when an official knows about unconstitutional conduct and facilitates it, approves it, condones it, or turns a blind eye for fear of what they might see. *Kemp v. Liebel*, 877 F.3d 346, 351 (7th Cir. 2017); *Jones v. City of Chicago*, 856 F.2d 985, 992 (7th Cir. 1988). But for her deliberate inaction and ratification, the manufactured defaults would not have existed.

52. Defendant Fontana failed to take any action: (a) she did not identify the anonymous officer; (b) she did not instruct her to use Plaintiff's verified contact vectors; (c) she did not initiate any field contacts, home visits, or telephonic check-ins during the 60-day period before the revocation petition was filed; (d) she did not train or supervise the officer to ensure compliance with constitutional requirements; and (e) she did not intervene to prevent the filing of the retaliatory revocation petition.

#### **COUNT V: CONSPIRACY TO DEPRIVE CIVIL RIGHTS**

*(Brought Against All Defendants in Their Individual Capacities Under 42 U.S.C. § 1983)*

EXHIBIT F

53. Plaintiff repeats and re-alleges paragraphs 1 through 52 as if fully set forth herein.

54. Defendants, acting under color of state law, reached an explicit agreement, meeting of the minds, and operational understanding to deprive Plaintiff of his clearly established constitutional rights, including his First Amendment right of access to the courts, his Fourth Amendment right to be free from unreasonable seizure pursuant to wrongful legal process, and his Fourteenth Amendment right to be free from prosecutions initiated via fabricated evidence. *Daugherty v. Page*, 906 F.3d 606, 614 (7th Cir. 2018).

55. The existence of this conspiracy is not based on speculative inference but is conclusively demonstrated by highly interdependent, cross-jurisdictional actions requiring active communication, joint coordination, and tactical synchronization between separate county agencies:

- (a) **The Data-Bridge Hand-off:** On information and belief, Defendant Lee and Cook County Adult Probation agents extracted the raw November 10, 2025, chemical data from the shared LEADS/probation network, intentionally stripped the accompanying December 10, 2025, exculpatory compliance adjudication and prescription verification records, and transmitted the isolated, un-contextualized data-packet to Defendant Shepherd and Defendant Cervantes to weaponize it as a pretextual charging asset in Lake County. This cross-jurisdictional data extraction and selective suppression of exculpatory context is the mechanism by which the false amphetamine allegation came to appear in the May 14 Petition.
- (b) Cervantes concealed her identity for 100 days, manufacturing a default, while Lee demanded impossible appearances to compound the record of noncompliance.
- (c) Shepherd drafted a revocation petition with a knowingly false drug allegation and omitted his contact information to block exculpatory communication.
- (d) **The Coordinated Court Appearance:** Defendant Cervantes and Defendant Shepherd synchronized their physical presence in Courtroom T-611 at 9:00 AM on May 28, 2026, acting in concert to suppress the fact that Plaintiff had served an Emergency Notice of Fraud on the Court at 7:00 AM that morning, thereby ensuring the immediate issuance of a zero-bond warrant through the mutual presentation of falsified facts and the concealment of the exculpatory record served two hours earlier.
- (e) Fontana received actual notice and took no corrective action, ratifying the conspiracy.

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(f) The State's mailroom delayed the envelope 96 hours to compress Plaintiff's response over Memorial Day.

(g) Cervantes waited until May 29 to send her first communication, a post-warrant letter urging Plaintiff to "turn yourself in".

56. These overt acts directly caused Plaintiff's constitutional injuries.

**COUNT VI: MUNICIPAL LIABILITY (MONELL POLICY, CUSTOM, AND PRACTICE)**

*(Brought Against Lake County, Illinois, and Cook County, Illinois Under 42 U.S.C. § 1983)*

57. Plaintiff repeats and re-alleges paragraphs 1 through 56 as if fully set forth herein.

58. The constitutional violations described herein were caused by the official policies, widespread customs, and systemic practices of Lake County and Cook County, acting through their respective Adult Probation Departments and State's Attorney's Offices.

59. **Failure to Train/Supervise:** Lake County failed to train its Adult Probation Officers on the basic constitutional requirements of transparency, notification, and the prohibition against retaliatory enforcement. This failure to train was a moving force behind the anonymous officer's 100-day concealment and the subsequent manufacture of a technical default (Exhibit 4).

60. **Widespread Custom of Retaliation:** The use of "Impossibility Traps" (demanding impossible physical appearances despite actual notice of vehicle sabotage) and forensic spoliation of mail (the Pimey Bowes/USPS mail delay) represents a widespread, well-settled custom of the Lake County Division of Adult Probation Services, which was known to, or should have been known to, policy-making officials (Exhibit 3).

61. **Systemic Ratification:** Director Fontana, as the final policymaker for Lake County Adult Probation, had actual notice of the anonymous officer scheme on February 19, 2026, and the Napue perjury on May 28, 2026 (Exhibits 4, 10). Her failure to intervene and her subsequent ratification of the retaliatory warrant execution constitutes an official policy of deliberate indifference to the constitutional rights of probationers.

62. **Data-Bridge Policy:** The cross-jurisdictional extraction and transmission of un-contextualized chemical data between Cook County and Lake County is a result of a formalized, deficient inter-agency data sharing practice that creates a "trap" for the accused by suppressing exculpatory adjudication

records. This policy is the moving force behind the Napue fabrication (Exhibit 1).

EXHIBIT F

## VII. DAMAGES

63. Plaintiff repeats and incorporates by reference paragraphs 1 through 62.

64. As a direct and proximate result of Defendants' unconstitutional conduct, Plaintiff has suffered and continues to suffer the following damages:

(a) **Deprivation of Liberty:** Plaintiff is subject to an active no-bond arrest warrant and faces imminent incarceration as a direct result of Defendants' retaliatory and false-evidence scheme.

(b) **Deprivation of Access to Courts:** Plaintiff's ability to prosecute multiple pending federal actions—including habeas corpus petitions, a Civil RICO action, and an interlocutory appeal before the Seventh Circuit—has been severely impaired by the threatened and executed custodial extraction.

(c) **Emotional Distress:** Plaintiff has suffered severe emotional distress, anxiety, and psychological harm as a result of the retaliatory prosecution, the false accusation of illegal drug use, the active arrest warrant, and the imminent threat of custodial detention.

(d) **Reputational Harm:** The false accusation of "illegal substance" use, sworn under oath and filed in a public court record, has damaged Plaintiff's reputation in the community, among his professional contacts, and before the federal courts in which he appears.

(e) **Loss of Evidence:** The custodial extraction threatens the permanent destruction of encrypted digital evidence central to Plaintiff's Civil RICO action (Case No. 1:25-cv-15800) and his Tencent cyber-intrusion action (Case No. 1:26-cv-03204, CFAA/DTSA). This evidence, if destroyed, constitutes irreparable harm that no monetary award can remedy.

(f) **Costs and Attorneys' Fees:** Plaintiff is entitled to reasonable costs and attorneys' fees under 42 U.S.C. § 1988.

(g) **Vehicle Repair Costs:** The Mobility Kill (Predicate Act 6) resulted in \$2,850.00 in documented vehicle repair costs. This sabotage was a precondition to the manufactured "failure to report" default that Defendants Cervantes and Lee weaponized to compound the revocation petition. These costs are directly traceable to the retaliatory scheme and are recoverable as consequential damages.

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(h) **Lost Employment and Economic Harm:** The active no-bond arrest warrant Plaintiff from maintaining normal employment, conducting business activities, and traveling freely within the state. The stigma of the false drug accusation, filed as a sworn public record, has created ongoing economic harm that will continue until the unconstitutional warrant is vacated.

(i) **Interference with Federal Litigation:** Defendants' retaliatory scheme has directly interfered with Plaintiff's ability to prosecute the following federal actions: *Allababidi v. Junkin*, Case No. 1:26-cv-01077 (Lake County habeas); *Allababidi v. Chief Adult Probation Officer*, Case No. 1:25-cv-15181 (Cook County habeas); *Allababidi v. Advocate Health, et al.*, Case No. 1:25-cv-15800 (Civil RICO); and *Allababidi v. Tencent Cloud LLC, et al.*, Case No. 1:26-cv-03204 (CFAA/DTSA cyber-intrusion action). The custodial extraction was designed to sever Plaintiff's access to his litigation infrastructure, destroy encrypted digital evidence, and create a jurisdictional *fait accompli* before the federal courts could act.

## **VIII. ANTICIPATORY REBUTTAL OF IMMUNITY DEFENSES**

65. Plaintiff anticipates immunity defenses and affirmatively pleads:

**A. Defendant Shepherd — No Absolute Prosecutorial Immunity.** While prosecutors generally enjoy absolute immunity from § 1983 damages for conduct within the scope of their prosecutorial functions, *Imbler v. Pachtman*, 424 U.S. 409, 430–31 (1976), that immunity does not apply where the prosecutor acts as a complaining witness, performs investigatory or administrative functions, or knowingly fabricates evidence. *Rehberg v. Paulk*, 566 U.S. 356, 369 (2012) (absolute immunity does not extend to acts outside the scope of legitimate advocacy, “such as fabricating evidence”). *Buckley v. Fitzsimmons*, 509 U.S. 259, 273 (1993) (prosecutors receive only qualified immunity when acting in an investigatory capacity or performing administrative duties). Defendant Shepherd is not entitled to absolute immunity because he functioned as an administrative verifier or complaining witness when he attested to the factual falsity of the chemical test results despite having constructive possession of the coordinate agency records that disproved his allegation. *Kalina v. Fletcher*, 522 U.S. 118, 129 (1997) (a prosecutor acts as a complaining witness when personally attesting to the truth of factual statements in a charging document, and receives only qualified immunity for that function). The signature block on the Petition for Revocation does not merely initiate proceedings—it attests under penalty of perjury to a specific factual proposition (“Amphetamine (illegal substance)”) that is mathematically false. By knowingly including a false allegation of illegal drug use in a sworn Petition for Revocation, Defendant Shepherd

EXHIBIT F

stepped outside the scope of legitimate advocacy and forfeited any claim to absolute fabrication of evidence is not a prosecutorial function—it is a constitutional tort.

**B. Defendants Cervantes, Lee, and Fontana --- No Qualified Immunity.** Qualified immunity protects government officials only where their conduct does not violate clearly established statutory or constitutional rights of which a reasonable person would have known. *Harlow v. Fitzgerald*, 457 U.S. 800, 813 (1982). The right to be free from retaliatory prosecution based on fabricated evidence was clearly established long before 2026. *Napue v. Illinois*, 360 U.S. 264, 269 (1959); *Franks v. Delaware*, 438 U.S. 154, 155–56 (1978); *Whitlock v. Brueggemann*, 682 F.3d 567, 580 (7th Cir. 2012).

No reasonable probation officer could believe that the following conduct was lawful: (a) Defendant Cervantes --- concealing her identity for 100 days to manufacture a technical default while simultaneously coordinating with the prosecutor to schedule the warrant hearing eight days before the federal deadline; (b) Defendant Lee — demanding impossible in-person appearances despite documented vehicle sabotage and then transmitting un-contextualized drug test data to Lake County through the cross-jurisdictional data-bridge while suppressing the exculpatory compliance adjudication; (c) Defendant Fontana — receiving actual, written notice of the anonymous officer scheme, the Impossibility Trap, and the manufactured default, and taking zero corrective action over a 98-day period from February 19 through May 28, 2026. Each Defendant’s conduct independently satisfies both prongs of the qualified immunity analysis: the conduct violated clearly established law, and no reasonable official could have believed the conduct was lawful.

**C. The Joint Action Doctrine.** Even if Defendant Cervantes were acting within her official duties, she abandoned her neutral role and conspired with Defendant Shepherd to manufacture a default and execute a retaliatory arrest. Under the joint action doctrine, a state official who willfully participates in a joint conspiracy with another state actor to deprive a person of constitutional rights acts under color of state law for purposes of § 1983 regardless of whether the specific act falls within the official’s formal job description. *Lugar v. Edmondson Oil Co.*, 457 U.S. 922, 942 (1982); *Dennis v. Sparks*, 449 U.S. 24, 27–28 (1980) (private persons who jointly engage with state officials in a conspiracy to deprive constitutional rights act under color of law). The coordinated court appearance on May 28, 2026, where both Defendant Cervantes and Defendant Shepherd were physically present in Courtroom T-611 to suppress the 7:00 AM fraud notice and ensure the warrant issued, is direct evidence of joint action.

## IX. PRAYER FOR RELIEF

WHEREFORE, Plaintiff Ehab Allababidi respectfully requests that this Court:

EXHIBIT F

**A. Declaratory Relief**

(1) Enter a declaratory judgment under 28 U.S.C. §§ 2201–2202 declaring that Defendants’ conduct, as alleged herein, violated Plaintiff’s rights under the First, Fourth, and Fourteenth Amendments to the United States Constitution.

(2) Declare that the May 14, 2026 Petition for Revocation and the May 28, 2026 arrest warrant issued in Lake County Case No. 23 CF 1146 are void ab initio as products of unconstitutional conduct, including the knowing submission of fabricated evidence in violation of *Napue v. Illinois*.

**B. Injunctive Relief (Pursuant to *Ex Parte Young*)**

(3) Issue a permanent injunction enjoining Defendants Nicholas Shepherd, Marisa Cervantes, Destiny Lee, and Margaret K. Fontana, in their official capacities, along with their subordinates, deputies, and any peace officers acting under their direct instruction or in concert with them, from taking any affirmative action to execute, enforce, or process the arrest warrant issued on May 28, 2026, in Lake County Case No. 23 CF 1146.

(4) Issue a mandatory injunction ordering Defendants Shepherd and Cervantes to take all necessary administrative steps within their personal authority to formally move the Circuit Court of Lake County to withdraw the facially fraudulent May 14, 2026 Petition for Revocation of Probation in Case No. 23 CF 1146 and to dismiss with prejudice all revocation proceedings arising therefrom.

(5) Order Defendant Fontana to implement mandatory training on constitutional requirements for probation supervision, including the duty to identify supervising officers, the prohibition against retaliatory enforcement actions, and the requirement to accept and respond to documented Constructive Compliance Window submissions.

**C. Compensatory Damages**

(6) Award Plaintiff compensatory damages against each Defendant, jointly and severally, in an amount to be determined at trial for the deprivation of his constitutional rights, emotional distress, reputational harm, and loss of liberty, together with pre-judgment and post-judgment interest.

**D. Punitive Damages**

EXHIBIT F

(7) Award Plaintiff punitive damages against each Defendant, jointly and severally sufficient to deter future unconstitutional conduct, given that Defendants' actions were motivated by an evil motive or intent or involved reckless or callous indifference to Plaintiff's federally protected rights. *Smith v. Wade*, 461 U.S. 30, 56 (1983).

**E. Attorneys' Fees and Costs**

(8) Award Plaintiff his reasonable costs and attorneys' fees under 42 U.S.C. § 1988, and any other applicable fee-shifting statute.

**F. Such Other Relief**

(9) Grant such other and further relief as this Court deems just, proper, and necessary to remedy the constitutional violations alleged herein.

**X. JURY DEMAND**

Plaintiff demands a trial by jury on all issues so triable, pursuant to Fed. R. Civ. P. 38(b).

**DECLARATION UNDER PENALTY OF PERJURY (28 U.S.C. § 1746)**

I, EHAB ALLABABIDI (DOB: September 24, 1996), declare under penalty of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746 that the facts set forth in the foregoing Complaint are true and correct based on my personal knowledge, except those matters stated on information and belief, which I believe to be true.

I further declare that the exhibits referenced herein and incorporated by reference under Fed. R. Civ. P. 10(c) are true and correct copies of the originals, authenticated under Fed. R. Evid. 902(1), 902(13), and 902(14).

Respectfully submitted,

/s/ Ehab Aliababidi

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

8516 W. Winona St., Chicago, IL 60656

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

Dated: June 6, 2026

EXHIBIT F

**CERTIFICATE OF SERVICE**

I, EHAB ALLABABIDI, certify under penalty of perjury that on the date set forth above, I caused the foregoing COMPLAINT FOR DEPRIVATION OF CIVIL RIGHTS UNDER 42 U.S.C. § 1983, together with the exhibits incorporated herein by reference, to be filed with the Clerk of the United States District Court for the Northern District of Illinois via the N.D. Illinois Pro Se filing portal, which transmits electronic notice to all parties upon appearance. Executed under Fed. R. Civ. P. 5(b)(2)(E) and N.D. Ill. Local Rule 5.9.

A copy of this Complaint has been served upon each Defendant via certified mail, return receipt requested, at the following addresses:

**ASA Nicholas Shepherd**

Lake County State's Attorney's Office  
18 N. County Street, Waukegan, IL 60085

**Marisa Cervantes**

Lake County Adult Probation Department  
18 N. County Street, Waukegan, IL 60085

**Destiny Lee**

Cook County Adult Probation Department  
2121 Euclid Ave., Rolling Meadows, IL 60008

**Margaret K. Fontana, Director**

Division of Adult Probation Services  
19th Judicial Circuit, 215 W. Water Street  
Waukegan, IL 60085

**Lake County, Illinois**

c/o Lake County State's Attorney's Office  
18 N. County Street, Waukegan, IL 60085

**Cook County, Illinois**

c/o Cook County State's Attorney's Office  
69 W. Washington St., Chicago, IL 60602

/s/ Ehab Allababidi

EHAB ALLABABIDI, *Pro Se* Plaintiff

Dated: June 6, 2026

**EXHIBIT F**

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

**Allababidi v. Shepherd, Cervantes, Lee, Fontana,  
LAKE COUNTY, ILLINOIS, and COOK COUNTY, ILLINOIS | Case No. 1:26-cv-0\_\_\_\_\_**

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**EXHIBIT PACKET**

Filed in Support of Plaintiff's Complaint for Deprivation of  
Civil Rights Under 42 U.S.C. § 1983  
(Filed Concurrently Herewith)

**TABLE OF EXHIBITS**

- EXHIBIT 1:** The Adison Weeks Email Thread — Proof of Lawful Prescription  
**EXHIBIT 2:** Petition for Revocation of Probation — Signed May 14, 2026  
**EXHIBIT 3:** Piney Bowes Postage Meter Envelope --- Forensic Timeline Spoliation  
**EXHIBIT 4:** Formal Memorialization of 3:00 PM Telephonic Directive --- Anonymous Officer Notice  
**EXHIBIT 5:** Warrant Minute Entry --- May 28, 2026, 9:00 AM --- Courtroom T-611  
**EXHIBIT 6:** Warrant of Arrest — The Instrument of Constitutional Deprivation  
**EXHIBIT 7:** Cervantes Letter — “Turn Yourself In” Post-Warrant Luring  
**EXHIBIT 8:** Notice of Mandatory Litigation Hold --- Actual Notice to All Defendants  
**EXHIBIT 9:** Notice of Special Appearance and Fraud on the Court — May 28, 2026, Filed Before the  
Warrant Issued  
**EXHIBIT 10:** 7:00 AM Email --- Emergency Special Appearance & Notice of Fraud on the Court ---  
Served Before the 9:00 AM Warrant Hearing

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**INCORPORATION BY REFERENCE UNDER FED. R. CIV. P. 10(c)**

The exhibits attached hereto are incorporated into the Complaint as if fully set forth therein, pursuant to Fed. R. Civ. P. 10(c). Each exhibit is self-authenticating under Fed. R. Evid. 902(1) (domestic public documents), 902(13) (certified electronic records), and 902(14) (certified data copied from electronic device, storage medium, or file). The Complaint expressly references each exhibit and adopts its contents as part of the pleadings.

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*Dated: June 6, 2026 | N.D. Illinois, Eastern Division | Ehab Allababidi, Pro Se Plaintiff*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

EXHIBIT F

Allababidi v. Shepherd, et al. | Case No. 1:26-cv-0\_\_\_\_\_  
LAKE COUNTY, ILLINOIS; COOK COUNTY, ILLINOIS: Municipal Defendants

EXHIBIT 1

The Adison Weeks Email Thread — Proof of Lawful Prescription

December 8–10, 2025

Email thread: Ehab Allababidi and Officer Adison Weeks, Cook County Adult Probation Department

**EVIDENTIARY PURPOSE:**

This exhibit is the complete Gmail thread between Plaintiff and Cook County Adult Probation Officer Adison Weeks, spanning December 8–10, 2025. Officer Weeks confirms in writing that Plaintiff’s November 10, 2025 drug test results were “all negative” and that any positive smphetamine result was attributable to a lawfully prescribed Adderall prescription. Officer Weeks states: “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.” This mathematically proves that Defendant Shepherd’s May 14, 2026 Petition for Revocation contains a knowingly false allegation of “illegal substance” use.

**RELEVANT LEGAL AUTHORITY:**

Electronic records are self-authenticating under Fed. R. Evid. 902(13) and 902(14). The email thread is authenticated by Plaintiff’s declaration under 28 U.S.C. § 1746 and Fed. R. Evid. 901(b)(1). Officer Weeks’s statements are admissions of a party’s agent under Fed. R. Evid. 801(d)(2)(D). The emails are incorporated into the Complaint by reference under Fed. R. Civ. P. 10(c).

**APPLICATION TO CASE FACTS:**

This exhibit proves: (1) the Cook County Adult Probation Department received the identical laboratory result as ASA Shepherd; (2) Officer Weeks confirmed in writing that the result was “all negative” on December 8, 2025; (3) Officer Weeks confirmed on December 10, 2025, that any positive result was from a lawfully prescribed Adderall prescription; (4) Defendant Shepherd’s Petition for Revocation, filed May 14, 2026, knowingly characterized this result as “positive for Amphetamine (illegal substance)”; and (5) the Cook County adjudication occurred five months before the Lake County prosecution.

**PROBATIVE CONCLUSION:**

This exhibit conclusively proves a Napue v. Illinois violation. Defendant Shepherd knowingly presented false evidence to a court. The fabrication is not ambiguous — it is mathematically refuted by the State’s own coordinate agency’s written record. See Napue v. Illinois, 360 U.S. 264, 269 (1959).

**KEY EVIDENCE INDICATORS:**

Dec 8: “Your drug test results were all negative” | Dec 10: “it is all negative in my eyes because I know you are still taking the Adderall” | Officer: Adison Weeks, Cook County Adult Probation | Office: (847)818-2360 | Prescription: Adderall (lawful) | Shepherd’s false claim: “Amphetamine (illegal substance)” | Napue violation: knowingly false sworn statement

*This exhibit is a true and correct copy of the Gmail thread exported from Plaintiff’s email account (defendantready@gmail.com). Plaintiff is a participant in the email thread. Plaintiff certifies under penalty of perjury that this record has not been altered or modified.*

*SMOKING GUN EXHIBIT 1. This document alone disproves the central factual allegation in the Petition for Revocation: The State’s own probation officer executed the test - nearly five months before Defendant Shepherd swore the opposite under oath. This independently establishes Count II (Fabrication of Evidence) and the bid-fifth element of Count I (First Amendment Retaliation).*

