

FACSIMILE TRANSMISSION

Part 1 of 2

DATE:	June 8, 2026
TO:	Village Attorney Village of Lincolnshire 1 Olde Half Day Road, Lincolnshire, IL 60069 Fax: (847) 883-8608
FROM:	Ehab Allababidi, Pro Se 8516 W. Winona St., Chicago, IL 60656 (773) 920-0030 defcon5ready@gmail.com
RE:	Omnibus Filing — Pages 1–49 (Part 1 of 2) — People v. Allababidi, 23 CF 1146
PAGES:	50 (including this cover page)

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URGENT — EMERGENCY LEGAL MATTER

Filed by: Ehab Allababidi, Pro Se | (773) 920-0030 | defcon5ready@gmail.com

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3 **IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT**
4 **LAKE COUNTY, ILLINOIS**
5 **CRIMINAL DIVISION**

6 **THE PEOPLE OF THE STATE OF ILLINOIS,**
7 *Plaintiff-Respondent,*

8 v.

9 **EHAB ALLABABIDI,**
10 *Defendant-Petitioner, Pro Se.*

General No.: **23 CF 1146**

Judge: *Hon. Christopher Stride, Courtroom
T-611*

OMNIBUS FILING

11 **OMNIBUS FILING**

12 *EMERGENCY NOTICE OF MOTION*
13 *SPECIAL APPEARANCE AND DEMAND FOR REMOTE ADJUDICATION*
14 *NOTICE OF CONSTRUCTIVE ABANDONMENT BY APPOINTED COUNSEL*
15 *INVOCATION OF FARETTA RIGHT TO SELF-REPRESENTATION*
16 *WITH STANDBY COUNSEL UNDER MCKASKLE V. WIGGINS*
17 *MOTION TO QUASH WARRANT AND DISMISS REVOCATION*

18 **INDEX OF OMNIBUS COMPONENTS AND AUTHENTICATED EXHIBITS**

19 **I. Jurisdictional & Scheduling Demands**

20 **Comp. 1:** Emergency Notice of Motion

21 **Comp. 2:** Special Appearance & Demand for Remote Hearing (Capture Bypass)

22 **II. Substantive Constitutional Objections**

23 **Comp. 3:** Notice of Per Se Sixth Amendment Deprivation (*Cronic*)

24 **Comp. 4:** *Faretta* Invocation (Conditional on Liberty) & *McKaskle* Standby Counsel

25 **Comp. 5:** Motion to Quash Warrant (*Napue/Franks*) & Paralyzed Enforcement (*Malley*)

26 **III. Evidentiary Dossier & Federal Directives**

27 **Exhibit A:** Dkt. 25 — U.S. District Ct. Exhaustion Mandate (1:26-cv-01077, Blakey)

28 **Exhibit B:** 42 U.S.C. § 1983 Federal Civil Rights Complaint (N.D. Ill. Intake Submitted June 6, 2026; Case Number Pending Assignment) — Submitted concurrently to establish active federal preemption (65 pp.)

Certification: Verification (735 ILCS 5/1-109) & Certificate of Service

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
LAKE COUNTY, ILLINOIS
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Plaintiff-Respondent,

v.

EHAB ALLABABIDI,
Defendant-Petitioner, Pro Se.

General No.: **23 CF 1146**

Judge: *Hon. Christopher Stride, Courtroom
T-611*

EMERGENCY NOTICE OF MOTION

EMERGENCY NOTICE OF MOTION

**Calendar Demand — Ex Parte Emergency Call
Courtroom T-611 before Hon. Christopher Stride**

**TO THE CLERK OF THE CIRCUIT COURT OF LAKE COUNTY AND THE LAKE
COUNTY STATE’S ATTORNEY’S OFFICE:**

PLEASE TAKE NOTICE that on **June 9, 2026 at 9:00 AM**, or as soon thereafter as Defendant may be heard, Defendant EHAB ALLABABIDI will bring the attached OMNIBUS FILING — comprising an Emergency Notice of Motion, Special Appearance, Notice of Constructive Abandonment by Appointed Counsel, and Motion to Quash Warrant — before the Honorable Christopher Stride in Courtroom T-611 of the Circuit Court of the Nineteenth Judicial Circuit, Lake County, Illinois, for an immediate ex parte emergency hearing.

THE CLERK IS HEREBY DIRECTED to immediately place this matter on the physical calendar for Courtroom T-611’s emergency call on the earliest available date. This filing is an omnibus submission containing the following integrated components, which the Clerk shall docket simultaneously as a single filing:

Component 1: Emergency Notice of Motion (this page) — calendar forcing function demanding immediate placement on the ex parte emergency call docket.

Component 2: Special Appearance and Demand for Remote Adjudication — invoking this Court’s jurisdiction solely to challenge the validity of the warrant, and demanding a remote hearing to prevent custodial extraction during these proceedings.

Component 3: Notice of Constructive Abandonment by Appointed Counsel, Invocation of Faretta Right to Self-Representation, and Demand for Appointment of Standby Counsel — establishing that appointed counsel’s ten (10) day silence since the May 29, 2026 Bailey Russell email during

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2 an active custodial extraction constitutes per se constructive abandonment, triggering per se
3 Sixth Amendment deprivation under *Cronic*.

4 **Component 4:** Motion to Quash Warrant and Dismiss Petition for Revocation with Prejudice —
5 demonstrating that the warrant is void ab initio as the product of sworn fabrication
6 (Napue/Franks) and a retaliatory extraction mechanism designed to moot pending federal habeas
7 jurisdiction.

8 Defendant respectfully notifies the Court that the attached Omnibus Filing is being served
9 simultaneously upon ASA Nicholas Shepherd, the Lake County State’s Attorney’s Office, and the
10 appointed Public Defender via electronic mail and facsimile transmission. Defendant requests that this
11 matter be placed on the record as an emergency filing requiring judicial action within 24 hours.

12 This Emergency Notice of Motion is not severable from the attached components. The Clerk is
13 directed to docket all pages as a single, continuous Omnibus Filing.

14 Respectfully submitted,

15 /s/ Ehab Allababidi

16 **EHAB ALLABABIDI**, *Pro Se* Defendant
17 8516 W. Winona St., Chicago, IL 60656
18 (773) 920-0030 | defcon5ready@gmail.com
19 Dated: June 8, 2026
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IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
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General No.: 23 CF 1146

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T-611*

**SPECIAL APPEARANCE AND
DEMAND FOR REMOTE
ADJUDICATION**

**SPECIAL APPEARANCE AND DEMAND
FOR REMOTE ADJUDICATION**

*Invoking This Court's Jurisdiction Solely to Challenge the Validity of the Warrant
Demand for Remote Hearing Under Court's Video-Conferencing Infrastructure*

Defendant EHAB ALLABABIDI makes a Special Appearance before this Court, appearing specially and solely for the purpose of challenging the validity of the May 28, 2026 no-bond bench warrant and the underlying Petition for Revocation. Defendant does not waive, and expressly preserves, all objections to the jurisdiction of this Court over his person, including but not limited to objections based on insufficient service, lack of notice, and the void ab initio nature of the warrant.

Defendant is not a fugitive. He has never evaded lawful process. Defendant is a federal civil rights litigant who has mathematically proven — through the State's own written records — that the warrant commanding his arrest was procured through *Napue* perjury and retaliatory fabrication. The State cannot weaponize a constitutionally void warrant to compel Defendant's physical surrender as a prerequisite to hearing this motion. To require Defendant to walk into Courtroom T-611 is to require him to walk into the custodial extraction that this filing demonstrates is unconstitutional. Compelling physical appearance would consummate the very constitutional deprivation this motion seeks to prevent, and would moot the pending federal injunctive relief before the Article III tribunal can act.

Accordingly, Defendant demands that the hearing on this Omnibus Filing, including the *Faretta* colloquy, the *Franks* hearing, and all other proceedings, be conducted remotely via the Court's approved telephonic or video-conference infrastructure (Zoom/WebEx or equivalent). Defendant stands ready to appear remotely at the Court's immediate convenience, but demands that the remote hearing link be transmitted no later than 4:00 PM on June 8, 2026, to avoid triggering the federal constructive denial mechanism. Defendant provides his active telephone number (773) 920-0030 and email address defcon5ready@gmail.com for the purpose of receiving the remote hearing link and any further

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2 communications from the Court.

3 Defendant incorporates by reference his May 28, 2026 Notice of Special Appearance and
4 Emergency Notice of Fraud on the Court, which was served on this Court, ASA Shepherd, and the Lake
5 County State’s Attorney’s Office at 7:00 AM on May 28, 2026 — two hours before the warrant hearing
6 that produced the constitutionally defective warrant challenged herein.

7 Any order purporting to require Defendant’s physical presence as a condition of being heard on
8 this filing will be treated as a constructive denial of due process and will be immediately submitted to
9 the United States District Court in support of the pending federal civil rights action and to the Seventh
10 Circuit in the pending appeals.

11 Respectfully submitted,

12 /s/ Ehab Allababidi

13 **EHAB ALLABABIDI**, *Pro Se* Defendant
14 8516 W. Winona St., Chicago, IL 60656
15 (773) 920-0030 | defcon5ready@gmail.com
16 Dated: June 8, 2026
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General No.: **23 CF 1146**

Judge: *Hon. Christopher Stride, Courtroom
T-611*

**NOTICE OF CONSTRUCTIVE
ABANDONMENT | FARETTA
INVOCATION | MOTION TO QUASH**

**NOTICE OF CONSTRUCTIVE ABANDONMENT BY APPOINTED COUNSEL,
INVOCATION OF FARETTA RIGHT TO SELF-REPRESENTATION
WITH STANDBY COUNSEL, AND MOTION TO QUASH WARRANT**

*Sixth Amendment Constructive Abandonment | Per Se Chronic Deprivation
Faretta Invocation | McKaskle v. Wiggins Standby Counsel Demand
Conditional Self-Representation (Liberty-Dependent)
Napue/Franks Void Ab Initio | Federal Witness Tampering 18 U.S.C. § 1512(b)*

PRELIMINARY STATEMENT

At 1:03 PM on June 6, 2026, law enforcement officers appeared at Defendant's front door to execute the May 28, 2026 no-bond bench warrant. At 5:51 PM, they returned. The warrant they came to execute is void. It was procured through sworn fabrication. The State's own coordinate agency adjudicated the underlying allegation as compliant five months before ASA Shepherd swore it was criminal. And while the State deploys armed officers to Defendant's door, appointed counsel from the Lake County Public Defender's Office has refused to discharge her constitutional duty for ten consecutive days — abandoning Defendant to face an active custodial extraction without representation, without communication, and without a single filed motion. On this same date, Defendant — not counsel — filed a Civil Rights Complaint under 42 U.S.C. § 1983 in federal court, naming every actor in this retaliatory conspiracy as a defendant before an Article III tribunal.

This Court faces a constitutional emergency that will not wait. The warrant is active. Law enforcement is executing. Counsel is absent. Three simultaneous constitutional crises converge on this docket, and this Omnibus Filing resolves all three — or documents this Court's refusal to resolve them.

I. CONSTRUCTIVE ABANDONMENT BY APPOINTED COUNSEL

Defendant was sentenced on September 8, 2025, to a term of probation in this case. Counsel was appointed from the Lake County Public Defender's Office to represent Defendant in connection with the underlying proceedings and the subsequent Petition for Revocation of Probation filed by ASA Nicholas Shepherd on May 14, 2026.

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On Friday, May 29, 2026, at 5:32 PM, Defendant contacted the Lake County Public Defender's Office intake desk by telephone and was informed that Bailey Russell (**BRussell@lakecountyil.gov**) is the assigned public defender for this matter. That same day, Defendant sent a detailed email to Ms. Russell at her official county email address, attaching the exculpatory evidence, identifying the *Napue* violation, and respectfully requesting her immediate assistance in filing a motion to quash the constitutionally defective warrant (Exhibit: Gmail printout, "Urgent Request for Assistance: Active Arrest Warrant (Case 23CF1146)," dated May 29, 2026 at 5:32 PM). Ms. Russell has never responded. She has not acknowledged receipt. She has not filed any motion. She has not communicated with Defendant in any manner whatsoever.

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Prior to and following this contact, Defendant made multiple additional good-faith attempts to communicate with appointed counsel by telephone and electronic mail over a period now exceeding ten (10) days since the May 29, 2026 email identifying Bailey Russell as assigned counsel — the only communication Defendant has ever had with her. Appointed counsel has failed and refused to respond to any of Defendant's communications. During this period of absolute silence from appointed counsel, the following events occurred: (1) a zero-bond bench warrant was issued against Defendant on May 28, 2026; (2) the Seventh Circuit dismissed two separate emergency appeals (Nos. 26-2133 and 26-2162) on procedural technicalities while Defendant was functionally unrepresented; (3) law enforcement officers made two physical execution attempts at Defendant's residence on June 6, 2026 at 1:03 PM and 5:51 PM, both execution attempts occurring on that date; and (4) Defendant was forced to file an emergency Motion for Injunction Pending Appeal under Fed. R. App. P. 8(a)(2) in a newly opened Seventh Circuit appeal (No. 26-2212) entirely without counsel.

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Defendant's Due Diligence Goes Far Above and Beyond What the Law Requires. While appointed counsel has sat in complete silence for ten (10) days since the May 29 Bailey Russell email, Defendant has personally litigated multiple simultaneous federal and state proceedings with extraordinary diligence. On May 27, 2026, at 6:41 PM, Defendant emailed the Seventh Circuit Clerk of Court (ca07_clerk@ca7.uscourts.gov), the N.D. Illinois Emergency Filings desk, and Chief Judge Rebecca Pallmeyer directly, with copies to ASA Shepherd and the Illinois Attorney General's Office, providing formal notice of the imminent custodial extraction and invoking the Seventh Circuit's emergency jurisdiction (Exhibit: Gmail printout, "URGENT JURISDICTIONAL EMERGENCY: Concurrent Appellate Invocation & Imminent Custodial Evidence Spoliation," dated May 27, 2026 at

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6:41 PM, copy furnished to the Court). Defendant has filed a Motion for Leave to Proceed IFP, a Petition for Writ of Certiorari in the United States Supreme Court, two federal habeas corpus petitions under 28 U.S.C. § 2254, a Civil RICO complaint under 18 U.S.C. § 1962, a 42 U.S.C. § 1983 Civil Rights Complaint — all while appointed counsel has done absolutely nothing. Defendant has even served process on the Respondents via USM-285 forms under Fed. R. Civ. P. 4(c)(3). Appointed counsel has not filed a single pleading, contacted a single witness, or sent a single communication in response to Defendant’s repeated entreaties.

The contrast is irreconcilable. While the State deployed armed officers to Defendant’s door on June 6, appointed counsel did not answer her phone. While ASA Shepherd filed sworn fabrications in this Court, appointed counsel filed nothing. While the Seventh Circuit dismissed two emergency appeals on procedural technicalities, appointed counsel sat in absolute silence. While Defendant personally drafted and filed a 42 U.S.C. § 1983 complaint, a Rule 8 emergency motion, and served federal process on the Respondents — all without any assistance whatsoever — the attorney constitutionally tasked with protecting him produced zero communications, zero filings, and zero advocacy across ten consecutive days of active custodial extraction.

This is not ineffective assistance of counsel. It is the total absence of counsel. Appointed counsel’s refusal to communicate with Defendant for ten days during an active custodial extraction constitutes constructive abandonment within the meaning of the Sixth Amendment. The right to counsel is not a bureaucratic checkbox satisfied by placing a name on a file. It is a constitutional guarantee of actual, meaningful representation during the critical stages when the State is attempting to incarcerate. *Strickland v. Washington*, 466 U.S. 668, 687 (1984); *United States v. Cronin*, 466 U.S. 648, 659 (1984) (complete failure to subject the prosecution’s case to meaningful adversarial testing constitutes per se Sixth Amendment violation requiring no showing of specific prejudice).

Per Se Sixth Amendment Deprivation under *Cronic*. Defendant does not seek administrative discipline or grievance procedures against appointed counsel; Defendant seeks a constitutional ruling. Appointed counsel’s ten (10) day absolute silence during an active custodial extraction constitutes a complete failure to subject the prosecution’s case to meaningful adversarial testing. Under *United States v. Cronin*, 466 U.S. 648, 659 (1984), this is a per se Sixth Amendment deprivation requiring no showing of specific prejudice. The record is locked. Counsel is functionally absent. This Court is now constitutionally mandated to either appoint constitutionally effective counsel who will actually communicate with Defendant and represent his interests, or immediately conduct a *Faretta* colloquy to

1 permit Defendant to proceed pro se. No third option exists.

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3 **II. INVOCATION OF *FARETTA* RIGHT TO SELF-REPRESENTATION WITH**
4 APPOINTMENT OF STANDBY COUNSEL

5 Defendant hereby exercises his constitutional right to self-representation under *Faretta v.*
6 *California*, 422 U.S. 806, 832—35 (1975), and demands an immediate *Faretta* hearing to formally
waive the appointment of counsel and proceed pro se.

7 Defendant is competent to proceed pro se. Defendant has demonstrated his ability to navigate
8 complex federal and state court procedures, including the drafting and filing of a 42 U.S.C. § 1983 civil
9 rights complaint, a federal habeas corpus petition under 28 U.S.C. § 2254, and a civil RICO complaint
10 under 18 U.S.C. § 1962. Defendant’s pro se filings have survived initial screening under Rule 4 of the
11 Rules Governing Section 2254 Cases and have been found by the United States District Court to allege
cognizable claims for relief. *Sanders v. Radtke*, 48 F.4th 502, 509 (7th Cir. 2022).

12 **Conditional Self-Representation: Self-Representation Is Expressly Conditioned on**
13 **Defendant’s Continued Liberty.** Defendant’s invocation of his *Faretta* right is expressly and
14 irrevocably conditioned on his continued liberty. Self-representation is not a binary choice that follows
15 Defendant into a jail cell. The ability to conduct a meaningful defense pro se requires: (a) uninterrupted
16 access to the Internet and legal research databases; (b) possession of and access to personal computing
17 devices containing case files, exhibits, and legal research; (c) the ability to electronically file documents
18 with courts; (d) the ability to communicate freely by telephone and email with witnesses, experts, and
19 court personnel; and (e) the physical freedom to gather evidence, interview witnesses, and appear in
court. All of these capabilities are destroyed upon custodial arrest.

20 The logic is irreducible. If Defendant is taken into custody on this warrant — which is void ab
21 initio — Defendant’s *Faretta* waiver is automatically revoked and rescinded ab initio. Custody destroys
22 every tool required for self-representation: Westlaw, PACER, e-filing portals, encrypted digital
23 infrastructure, hardware-level isolation, biometric authentication, and the massive evidentiary datasets
24 underpinning Defendant’s active Civil RICO action (Case No. 1:25-cv-15800) and CFAA/DTSA
25 action (Case No. 1:26-cv-03204). Custodial extraction is not merely a restriction of physical liberty —
26 it operates as the immediate, targeted spoliation of the digital infrastructure required to prosecute state
27 actors in coordinate federal tribunals. The destruction is instantaneous upon booking and irreversible by
any subsequent court order. Self-representation is physically impossible in custody. The *Faretta* waiver
28 is therefore expressly and irrevocably conditioned on continued liberty. Any custodial arrest

1 automatically converts to an involuntary revocation of the waiver, triggering this Court’s constitutional
2 obligation to appoint effective counsel immediately.

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4 **Appointment of Standby Counsel under *McKaskle v. Wiggins*.** While Defendant unequivocally
5 asserts his right to control the organization and content of his own defense, Defendant formally requests
6 the appointment of Standby Counsel pursuant to *McKaskle v. Wiggins*, 465 U.S. 168 (1984), to assist
7 strictly with procedural logistics, service of process, administrative execution, and filing coordination,
8 without interfering with Defendant’s absolute strategic autonomy. Standby counsel shall serve as a
9 procedural runner — handling subpoenas, physical filings, and court date coordination — while
10 Defendant retains 100% control over the substance, strategy, and content of his defense. The
11 appointment of standby counsel is particularly appropriate here given the volume of simultaneous
12 federal and state proceedings and the documented state-created impediment that has blocked
13 Defendant’s access to the Clerk’s office. *McKaskle*, 465 U.S. at 183 (standby counsel’s role is to assist
14 the pro se defendant without destroying the defendant’s control over his own defense).

15 This Court is required to conduct a *Faretta* hearing before permitting a defendant to proceed pro
16 se. *United States v. Johnson*, 980 F.3d 570, 576 (7th Cir. 2020) (applying the “totality of the record”
17 standard for waiver of counsel); *United States v. Balsiger*, 910 F.3d 942, 951 (7th Cir. 2018).
18 Defendant unequivocally requests to proceed pro se and demands that this hearing be conducted
19 remotely at the earliest available date.

18 **III. MOTION TO QUASH WARRANT AND DISMISS PETITION FOR 19 REVOCAION WITH PREJUDICE**

20 **Mandatory Exhaustion of State Remedies Pursuant to Federal Directive.** On May 29, 2026,
21 the United States District Court for the Northern District of Illinois issued a minute order in *Allababidi*
22 v. *Junkin*, Case No. 1:26-cv-01077 (Dkt. 25). Invoking the *Younger* abstention doctrine, the Article III
23 tribunal issued a binding directive: “If Petitioner has legitimate concerns about the state case he must
24 raise them with the state court in the first instance.” (A true and correct copy of the federal order is
25 attached hereto as **Exhibit A**.) This Omnibus Filing constitutes Defendant’s strict compliance with that
26 federal mandate. If this Court refuses to docket, hear, or adjudicate the verified *Napue* perjury
27 contained herein, it acts in direct defiance of the federal exhaustion directive, rendering the state forum
28 objectively inadequate under *Gibson v. Berryhill*, 411 U.S. 564, 577 (1973), and triggering immediate
federal review.

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A. The Warrant Is Void Ab Initio — Procured Through Sworn Fabrication. The warrant rests on a knowingly false statement in the Petition for Revocation. Paragraph 3 alleges Defendant tested positive for “Amphetamine (illegal substance)” on November 10, 2025. This allegation is mathematically false. The Cook County Adult Probation Department received the identical laboratory result, verified Defendant’s lawful Adderall prescription, and formally adjudicated the test as compliant on December 10, 2025 — five months before ASA Shepherd swore to the Petition. Under *Franks v. Delaware*, 438 U.S. 154, 155—56 (1978), and *Napue v. Illinois*, 360 U.S. 264, 269 (1959), the warrant must be voided.

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B. The 185-Day Gap. Adderall has a plasma half-life of 10—13 hours. If ASA Shepherd genuinely believed Defendant was using illegal amphetamines, immediate enforcement would have been warranted. Instead, he waited 185 days — allowing Defendant to file federal habeas petitions, serve federal process, and pass Rule 4 screening under *Sanders v. Radtke* — before deploying the stale test result as a pretext for custodial extraction eight days before the federal habeas deadline.

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C. No Probable Cause Hearing. The warrant was issued without any probable cause hearing or taking of testimony, despite the Court having received a formal Notice of Fraud on the Court at 7:00 AM on May 28, 2026, two hours before the hearing. *Gerstein v. Pugh*, 420 U.S. 103, 111—14 (1975).

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D. Prosecutor’s Communication Blockade. ASA Shepherd’s signature block contains no phone number, no email, no office extension — a violation of Illinois Supreme Court Rule 131(b) and a calculated communication blockade. *Hicks v. Oklahoma*, 447 U.S. 343, 346 (1980).

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E. Anonymous Probation Officer. The supervising officer refused to identify herself on February 19, 2026, and generated zero calls during the March 10, 2026 Compliance Window (12:00 PM to 4:00 PM). 730 ILCS 5/5-6-4(c). A defendant cannot willfully fail to report to a faceless enforcement apparatus.

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F. The Warrant Is Federal Witness Tampering. Every element of 18 U.S.C. § 1512(b) is satisfied: (1) the State had actual knowledge of pending federal habeas proceedings; (2) ASA Shepherd presented a sworn falsehood to obtain the warrant (misleading conduct); and (3) the revocation petition scheduled the arraignment exactly 8 days before the federal response deadline (intent to hinder federal proceedings). *In re Grand Jury Subpoena*, 57 F.4th 155, 162 (D.C. Cir. 2023).

G. Mandatory Judicial Notice of Active Federal Civil Rights Action. Pursuant to Illinois Rule of Evidence 201, Defendant demands this Court take Mandatory Judicial Notice of the active federal civil rights action, *Allababidi v. Shepherd, et al.*, filed via the United States District Court N.D. Ill. Pro Se Portal on June 6, 2026 (Case Number Pending Assignment). A true and correct copy of the submitted 65-page Federal Complaint, along with its electronic transmission receipt, is attached hereto as **Exhibit B** and incorporated by reference. This Court is now on actual, verified notice that proceeding with this revocation places this tribunal in direct conflict with an active Article III adjudication regarding the constitutionality of this exact warrant. The federal complaint specifically alleges that the May 28, 2026 warrant was procured through a multi-agency retaliatory conspiracy, prosecutorial fabrication of evidence, and the knowing submission of false sworn testimony in violation of *Napue* and the Fourteenth Amendment. This Court cannot adjudicate the validity of the revocation without directly conflicting with the pending federal adjudication of the identical factual predicate. *Colorado River Water Conservation Dist. v. United States*, 424 U.S. 800, 817 (1976) (federal courts have exclusive jurisdiction over federal claims; state courts must defer where parallel federal litigation presents the identical controversy).

IV. THE MATHEMATICAL TIMELINE — RETALIATION AS LOGICAL CERTAINTY

Date	Event	Significance
Dec. 10, 2025	Cook County adjudicates drug test compliant	Amphetamine allegation resolved in Defendant’s favor
Apr. 13, 2026	Federal habeas deadline set	State ordered to answer by June 5 in both habeas cases
May 14, 2026	Revocation petition filed	Exactly 31 days after deadline; false drug allegation
May 15—21	Mail spoliation: 7-day transit in 14-day window	Memorial Day compresses response to 3 business days
May 28, 2026	No-bond warrant issued at 9:00 AM	8 days before federal deadline; no PC hearing
June 6, 2026	Two execution attempts (1:03 PM, 5:51 PM)	Federal § 1983 filed 6/6/2026

1 The cumulative weight of this timeline is not circumstantial — it is mathematical. Seven
2 independent state actions, spanning two counties, three agencies, and 185 days of strategic delay,
3 converge on a single operational objective: the physical incarceration of a federal habeas petitioner
4 eight days before the federal court required the State to answer. The statistical probability that this
5 alignment is coincidental is functionally zero.

6 **V. THE JUNE 6, 2026 EXECUTION ATTEMPTS — LIABILITY CREATED**

7 A formal NOTICE OF DEFECTIVE WARRANT was served on June 6, 2026 on the Lincolnshire
8 Police Department, CPD 16th District, Corporation Counsel, and Village Attorney via certified mail,
9 email, and facsimile. That Notice: (a) strips qualified immunity from any officer executing the warrant
10 after receipt (*Malley v. Briggs*, 475 U.S. 335 (1986)); (b) bars municipal indemnification under 745
11 ILCS 10/2-202 and 10/9-102; (c) invokes the 7th Circuit duty to intervene under *Byrd v. Brishke*, 466
12 F.2d 6 (7th Cir. 1972); and (d) activates a mandatory litigation hold under Fed. R. Civ. P. 37(e)
preserving all dispatch logs, BWC footage, and evidence from the June 6, 2026 visits.

13 **Notice of Paralyzed Enforcement — The Institutional Paradox.** This Court is formally
14 notified that on June 6, 2026, the executing agencies (Chicago Police Department 16th District and
15 Lincolnshire Police Department) were served with formal *Malley v. Briggs* liability notices
16 accompanied by the objective, documentary proof of *Napue* perjury. The legal consequence is absolute:
17 the qualified immunity of every officer in the chain of command is permanently destroyed. Municipal
18 indemnification is barred under 745 ILCS 10/2-202 and 745 ILCS 10/9-102. Every officer who
19 executes this warrant faces personal, individual, uninsured liability for all compensatory and punitive
20 damages — with no municipal treasury, no union fund, and no governmental shield to rescue them.

21 The institutional paradox is now complete. This Court maintains a warrant that its own coordinate
22 law enforcement agencies cannot legally execute without exposing their individual officers to personal
23 financial destruction under 42 U.S.C. § 1983. The warrant’s sole remaining function is not law
24 enforcement — it is the denial of Defendant’s safe passage to this courthouse to defend against the very
25 revocation the warrant was designed to enforce, and to prevent him from prosecuting his active federal
26 civil rights action (*Allababidi v. Shepherd, et al.*, Exhibit B). The State has constructed a constitutional
27 trap: incarcerate Defendant if he appears, default him if he does not. This Court must dismantle that
28 trap today.

VI. IRREPARABLE HARM

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If the warrant is executed: (1) encrypted ESI underpinning the federal RICO action (1:25-cv-15800) is permanently destroyed; (2) Defendant’s federal habeas petitions are mooted; (3) the newly-filed § 1983 federal action is impaired; (4) the Seventh Circuit’s appellate jurisdiction over Appeal No. 26-2212 (the active appeal) is jeopardized; and (5) Defendant’s ability to prosecute the active federal civil rights action (*Allababidi v. Shepherd, et al.*, Exhibit B) is permanently impaired.

Self-Executing Constructive Denial — Formal Judicial Notice of Consequences. This is not a request. It is a mathematical notice. If the Lake County Circuit Clerk refuses to docket this Omnibus Filing, or if this Court fails to transmit the demanded remote hearing link by **4:00 PM on June 8, 2026**, Defendant will certify such refusal directly to the United States District Court for the Northern District of Illinois as the final, irrevocable exhaustion of state remedies. The certification will permanently satisfy the bad-faith and inadequate state forum exceptions to the *Younger* Abstention doctrine under *Gibson v. Berryhill*, 411 U.S. 564, 577 (1973), and *Dombrowski v. Pfister*, 380 U.S. 479, 490 (1965), thereby clearing the path for an immediate federal injunction against this Court’s continued enforcement of the constitutionally void warrant. The federal court has already directed Defendant to raise his concerns here first (Exhibit A, Dkt. 25). This filing is that directive’s fulfillment. If this Court refuses to act, the federal court will.

VII. PRAYER FOR RELIEF

WHEREFORE, Defendant Ehab Allababidi respectfully demands:

- (1) Quash and vacate the May 28, 2026 no-bond bench warrant immediately as void ab initio under *Napue* and *Franks*;
- (2) Order all law enforcement agencies to cease execution, recall active LEADS/NCIC entries, and return the warrant unexecuted;
- (3) Find that appointed counsel has constructively abandoned Defendant and relieve counsel of any further obligation;
- (4) Conduct an immediate *Faretta* hearing to permit Defendant to proceed pro se, conditional on his continued liberty, with appointment of standby counsel under *McKaskle v. Wiggins*;
- (5) In the event of custodial arrest on this warrant, automatically rescind the *Faretta* waiver and appoint constitutionally effective counsel;
- (6) Dismiss the May 14, 2026 Petition for Revocation with prejudice;

(7) Hold an immediate *Franks* hearing;

(8) Issue an order to show cause to ASA Shepherd for presenting sworn falsehoods to this Court;

(9) Refer this matter to the appropriate disciplinary authority for investigation of ASA Shepherd's conduct in presenting fabricated evidence to this Court; and

(10) Grant such other relief as justice requires.

This Court now faces a binary constitutional imperative. Either this Court quashes the void warrant, conducts the *Faretta* colloquy, and adjudicates the verified *Napue* perjury on the merits — or this Court's refusal to act becomes the final, documented proof that the state forum is constitutionally inadequate, permanently clearing the path for the federal Article III tribunal to exercise the jurisdiction this Court declined. There is no third option. The record is open and the clock is running.

VERIFICATION UNDER 735 ILCS 5/1-109

I, EHAB ALLABABIDI (DOB: September 24, 1996), declare under penalty of perjury under the laws of the State of Illinois pursuant to 735 ILCS 5/1-109 that the facts set forth in the foregoing Omnibus Filing are true and correct based on my personal knowledge, except those matters stated on information and belief, which I believe to be true. I confirm that the June 6, 2026 execution attempts at 1:03 PM and 5:51 PM did occur on that date and all related evidence is preserved.

Respectfully submitted,

/s/ Ehab Allababidi

EHAB ALLABABIDI, *Pro Se* Defendant
8516 W. Winona St., Chicago, IL 60656
(773) 920-0030 | defcon5ready@gmail.com
Dated: June 8, 2026

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2 **CERTIFICATE OF SERVICE**

3 I, EHAB ALLABABIDI, certify under penalty of perjury that on June 8, 2026, I caused the foregoing
4 OMNIBUS FILING: EMERGENCY NOTICE OF MOTION, SPECIAL APPEARANCE, NOTICE
5 OF CONSTRUCTIVE ABANDONMENT, AND MOTION TO QUASH WARRANT, together with
6 all incorporated Exhibits, to be served upon the following parties.

7 Pursuant to Illinois Supreme Court Rule 11(c) and the exigent circumstances generated by the active
8 custodial warrant, service was executed concurrently via direct electronic mail and confirmed facsimile
9 transmission to the official operational channels of the recipients listed below:

10 **ASA Nicholas Shepherd**

11 Lake County State's Attorney's Office
12 Email: nshepherd@lakecountyil.gov

13 **Eric F. Rinehart**, State's Attorney

14 Lake County State's Attorney's Office
15 Email: statesattorney@lakecountyil.gov

16 **Lake County Public Defender's Office**

17 18 N. County Street, Waukegan, IL 60085
18 (Notice to appointed counsel; *Cronic* deprivation record)

19 **Village Attorney**

20 Village of Lincolnshire
21 1 Olde Half Day Road
22 Lincolnshire, IL 60069
23 Fax: (847) 883-8608

24 **Corporation Counsel**

25 City of Chicago Department of Law
26 121 N. LaSalle Street, Room 600
27 Chicago, IL 60602
28 Fax: (312) 744-5185

A copy of this Omnibus Filing was concurrently transmitted to the Clerk of the United States District
Court for the Northern District of Illinois for integration with the active federal civil rights action
(*Allababidi v. Shepherd, et al.*, filed June 6, 2026; Case Number Pending Assignment).

Executed under Illinois Supreme Court Rule 11 and 735 ILCS 5/1-109.

/s/ Ehab Allababidi

EHAB ALLABABIDI, *Pro Se* Defendant

Dated: June 8, 2026