

# INDICTMENT

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS, )

Plaintiff, )

vs. )

BRIAN J. TOWNE, )

Defendant. )

NO. 17CF-

COUNT 1

SEP 05 2017

369  
Guy Vaccaro  
CIRCUIT CLERK

SEP 05 2017  
13TH JUDICIAL CIRCUIT  
LASALLE COUNTY  
CIRCUIT CLERK

**AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS CHARGE THAT:**

ON OR ABOUT THE PERIOD FROM JANUARY 24, 2012 THROUGH AND INCLUDING DECEMBER 1, 2016, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF **OFFICIAL MISCONDUCT (CLASS 3 FELONY)**, IN VIOLATION OF SECTION 33-3(a)(2), ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WHILE ACTING IN HIS OFFICIAL CAPACITY KNOWINGLY PERFORMED AN ACT WHICH HE KNEW HE WAS FORBIDDEN BY LAW TO PERFORM IN THAT **HE INSTRUCTED CERTAIN MEMBERS OF HIS STAFF TO ENGAGE IN PROHIBITED POLITICAL ACTIVITY DURING OFFICE HOURS, INCLUDING WRITING CHECKS FROM HIS CAMPAIGN FUND TO PAY CAMPAIGN-RELATED BILLS, ATTENDING MEETINGS WITH HIS CAMPAIGN MANAGER, PREPARING AND PRINTING LABELS FOR THE CAMPAIGN WITH LABELS AND LABEL MAKER PURCHASED WITH PUBLIC FUNDS, AND PREPARING POSTER BOARDS FOR HIS POLITICAL GOLF OUTINGS, ALL DURING REGULAR WORK HOURS,** IN VIOLATION OF THE COUNTY OF LASALLE ETHICS ORDINANCE (#04-65), WHICH PROVIDES THAT AT NO TIME SHALL ANY OFFICER INTENTIONALLY REQUIRE ANY EMPLOYEE TO PERFORM ANY PROHIBITED POLITICAL ACTIVITY AS PART OF THAT EMPLOYEE'S DUTIES, AS A CONDITION OF EMPLOYMENT, OR DURING ANY COMPENSATED TIME OFF.

AN EXTENDED STATUTE OF LIMITATIONS APPLIES PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

A TRUE BILL.

DATE:

9/5/17

FOREMAN, GRAND JURY

Christa Rumer

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, ILLINOIS 61350

10:15 09062017



INDICTMENT

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS, )  
)  
Plaintiff, )  
)  
vs. )  
)  
BRIAN J. TOWNE, )  
)  
Defendant. )

NO. 17-CF-

COUNT 2

SEP 05 2017

Circuit Clerk

SEP 05 2017

Circuit Clerk

AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS CHARGE THAT:

ON OR ABOUT THE PERIOD FROM JANUARY 24, 2012 THROUGH AND INCLUDING DECEMBER 1, 2016, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF OFFICIAL MISCONDUCT (CLASS 3 FELONY), IN VIOLATION OF SECTION 33-3(a)(3), ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WHILE ACTING IN HIS OFFICIAL CAPACITY AND WITH THE INTENT TO OBTAIN A PERSONAL ADVANTAGE FOR HIMSELF PERFORMED AN ACT IN EXCESS OF HIS LAWFUL AUTHORITY WHEN HE INSTRUCTED CERTAIN MEMBERS OF HIS STAFF TO ENGAGE IN PROHIBITED POLITICAL ACTIVITY DURING OFFICE HOURS, INCLUDING WRITING CHECKS FROM HIS CAMPAIGN FUND TO PAY CAMPAIGN-RELATED BILLS, ATTENDING MEETINGS WITH HIS CAMPAIGN MANAGER, PREPARING AND PRINTING LABELS FOR THE CAMPAIGN WITH LABELS AND LABEL MAKER PURCHASED WITH PUBLIC FUNDS, AND PREPARING POSTER BOARDS FOR HIS POLITICAL GOLF OUTINGS, ALL DURING REGULAR WORK HOURS.

AN EXTENDED STATUTE OF LIMITATIONS APPLIES PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

A TRUE BILL.

DATE: 9/5

FOREMAN, GRAND JURY

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, ILLINOIS 61350

10:13 09062017

INDICTMENT

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
BRIAN J. TOWNE, )  
 )  
Defendant. )

NO. 17-CF-

COUNT 3

13TH JUDICIAL CIRCUIT  
LASALLE COUNTY  
SEP 05 2017  
CIRCUIT CLERK  
GUY VACCARO  
369  
13TH JUDICIAL CIRCUIT  
LASALLE COUNTY  
SEP 05 2017  
CIRCUIT CLERK  
GUY VACCARO  
369

AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS CHARGE THAT:

ON OR ABOUT THE PERIOD FROM DECEMBER 12, 2013 THROUGH AND INCLUDING FEBRUARY 14, 2014, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF OFFICIAL MISCONDUCT (CLASS 3 FELONY), IN VIOLATION OF SECTION 33(a)(3), ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WHILE ACTING IN HIS OFFICIAL CAPACITY AND WITH THE INTENT TO OBTAIN A PERSONAL ADVANTAGE FOR HIMSELF PERFORMED AN ACT IN EXCESS OF HIS LAWFUL AUTHORITY WHEN HE ACCEPTED A FEE HE KNOWS HE IS NOT AUTHORIZED BY LAW TO ACCEPT, NAMELY \$50,000.00 IN FEES FROM THE STATE OF ILLINOIS APPELLATE PROSECUTOR'S OFFICE FOR TEACHING SERVICES RENDERED WHILE IN HIS OFFICIAL CAPACITY AS STATE'S ATTORNEY OF LASALLE COUNTY.

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

A TRUE BILL.

DATE: 9-5-17

Christi Roper  
FOREMAN, GRAND JURY

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, ILLINOIS 61350

10:13 09062017



INDICTMENT

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,

Plaintiff,

vs.

BRIAN J. TOWNE,

Defendant.

NO. 17-CF-

COUNT 4

13TH JUDICIAL CIRCUIT  
LA SALLE COUNTY

FILED

SEP 05 2017

C. J. VACCARO  
CIRCUIT CLERK

FILED

NO  
BILL  
Returned

AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS, CHARGE THAT:

ON OR ABOUT JUNE 2, 2015, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF: **OFFICIAL MISCONDUCT (CLASS 3 FELONY)** IN VIOLATION OF SECTION 33-3(a)(3), ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WHILE ACTING IN HIS OFFICIAL CAPACITY AND WITH THE INTENT TO OBTAIN A PERSONAL ADVANTAGE FOR HIMSELF PERFORMED AN ACT IN EXCESS OF HIS LAWFUL AUTHORITY **BY DONATING \$4,000.00 IN PUBLIC FUNDS (FUND 25 DRUG FINE ACCOUNT) TO THE LASALLE-PERU TOWNSHIP HIGH SCHOOL RENAISSANCE CLUB AND SHORTLY THEREAFTER, FOR THE PERIOD JULY 16-19, 2015, ACCEPTED AND RECEIVED A FREE TRIP TO ORLANDO, FLORIDA, AS FOLLOWS: REGISTRATION FEE FOR RENAISSANCE NATIONAL CONFERENCE, PARK TICKETS TO DISNEY WORLD, ROUND TRIP AIR FARE, HOTEL ACCOMMODATIONS AT THE GAYLORD PALMS, AND HOTEL ACCOMMODATIONS AT WALT DISNEY WORLD.**

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

A TRUE BILL.

DATE: \_\_\_\_\_

FOREMAN, GRAND JURY

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, IL 61350

09:24 09072017

# INDICTMENT

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,

Plaintiff,

vs.

BRIAN J. TOWNE,

Defendant.

NO. 17-CF-

COUNT 5

13TH JUDICIAL CIRCUIT  
LA SALLE COUNTY

FILED

SEP 05 2017

*Gay V. Vassar*  
CIRCUIT CLERK

FILED

*NO  
BILL  
Returned*

AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS, CHARGE THAT:

ON OR ABOUT JUNE 2, 2015, IN LASALLE COUNTY, ILLINOIS, **BRIAN J. TOWNE**, DEFENDANT, COMMITTED THE OFFENSE OF: **OFFICIAL MISCONDUCT (CLASS 3 FELONY)** IN VIOLATION OF SECTION 33-3(a)(3), ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, **WHILE ACTING IN HIS OFFICIAL CAPACITY AND WITH THE INTENT TO OBTAIN A PERSONAL ADVANTAGE FOR HIMSELF OR ANOTHER, PERFORMED AN ACT IN EXCESS OF HIS LAWFUL AUTHORITY BY DONATING \$4,000.00 IN PUBLIC FUNDS (FUND 25 DRUG FINE ACCOUNT) TO THE LASALLE-PERU TOWNSHIP HIGH SCHOOL RENAISSANCE CLUB AND SHORTLY THEREAFTER, FOR THE PERIOD JULY 16-19, 2015, ACCEPTED AND RECEIVED ON BEHALF OF HIS WIFE, SARAH TOWNE, A FREE TRIP TO ORLANDO, FLORIDA, AS FOLLOWS: REGISTRATION FEE FOR RENAISSANCE NATIONAL CONFERENCE, PARK TICKETS TO DISNEY WORLD, ROUND TRIP AIR FARE, HOTEL ACCOMMODATIONS AT THE GAYLORD PALMS, AND HOTEL ACCOMMODATIONS AT WALT DISNEY WORLD.**

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

**A TRUE BILL.**

DATE: \_\_\_\_\_

\_\_\_\_\_  
FOREMAN, GRAND JURY

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, IL 61350

09:24 09072017



INDICTMENT

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,

Plaintiff,

vs.

BRIAN J. TOWNE,

Defendant.

NO. 17-CF-

COUNT 6

13TH JUDICIAL CIRCUIT  
LA SALLE COUNTY

FILED

SEP 05 2017

C. V. Kucera  
CIRCUIT CLERK

FILED

NO  
BILL  
Returned

AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS, CHARGE THAT:

ON OR ABOUT MAY 31, 2016, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF: **OFFICIAL MISCONDUCT (CLASS 3 FELONY)** IN VIOLATION OF SECTION 33-3(a)(3), ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, **A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WHILE ACTING IN HIS OFFICIAL CAPACITY AND WITH THE INTENT TO OBTAIN A PERSONAL ADVANTAGE FOR HIMSELF PERFORMED AN ACT IN EXCESS OF HIS LAWFUL AUTHORITY BY DONATING \$4,500.00 IN PUBLIC FUNDS (FUND 25 DRUG FINE ACCOUNT) TO THE LASALLE-PERU TOWNSHIP HIGH SCHOOL RENAISSANCE CLUB AND SHORTLY THEREAFTER, FOR THE PERIOD JULY 14-17, 2016, ACCEPTED AND RECEIVED A FREE TRIP TO ORLANDO, FLORIDA, AS FOLLOWS: REGISTRATION FEE FOR RENAISSANCE NATIONAL CONFERENCE, PARK TICKETS TO DISNEY WORLD, ROUND TRIP AIR FARE, HOTEL ACCOMMODATIONS AT THE CARIBE ROYAL, AND HOTEL ACCOMMODATIONS AT WALT DISNEY WORLD.**

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

**A TRUE BILL.**

DATE: \_\_\_\_\_

\_\_\_\_\_  
FOREMAN, GRAND JURY

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, IL 61350

09:24 09072017

INDICTMENT

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,

Plaintiff,

vs.

BRIAN J. TOWNE,

Defendant.

NO. 17-CF-

COUNT 7

13TH JUDICIAL CIRCUIT  
LA SALLE COUNTY

FILED

FILED

SEP 05 2017

Guy Vaccaro  
CIRCUIT CLERK

NO BILL  
Returned

AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS, CHARGE THAT:

ON OR ABOUT MAY 31, 2016, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF: **OFFICIAL MISCONDUCT (CLASS 3 FELONY)** IN VIOLATION OF SECTION 33-3(a)(3), ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, **A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WHILE ACTING IN HIS OFFICIAL CAPACITY AND WITH THE INTENT TO OBTAIN A PERSONAL ADVANTAGE FOR HIMSELF OR ANOTHER PERFORMED AN ACT IN EXCESS OF HIS LAWFUL AUTHORITY BY DONATING \$4,500.00 IN PUBLIC FUNDS (FUND 25 DRUG FINE ACCOUNT) TO THE LASALLE-PERU TOWNSHIP HIGH SCHOOL RENAISSANCE CLUB AND SHORTLY THEREAFTER, FOR THE PERIOD JULY 14-17, 2016, ACCEPTED AND RECEIVED ON BEHALF OF HIS WIFE, SARAH TOWNE, A FREE TRIP TO ORLANDO, FLORIDA, AS FOLLOWS: REGISTRATION FEE FOR RENAISSANCE NATIONAL CONFERENCE, PARK TICKETS TO DISNEY WORLD, ROUND TRIP AIR FARE, HOTEL ACCOMMODATIONS AT THE CARIBE ROYAL, AND HOTEL ACCOMMODATIONS AT WALT DISNEY WORLD.**

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

**A TRUE BILL.**

DATE: \_\_\_\_\_

\_\_\_\_\_  
FOREMAN, GRAND JURY

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, IL 61350

09:24 09072017



INDICTMENT

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS, )

Plaintiff, )

vs. )

BRIAN J. TOWNE, )

Defendant. )

NO. 17-CF-

COUNT 8

13TH JUDICIAL CIRCUIT  
LA SALLE COUNTY

FILED

SEP 05 2017

Guy Vaccaro  
CIRCUIT CLERK

FILED

NO  
BILL  
Returned

AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS CHARGE THAT:

ON OR ABOUT THE PERIOD FROM JANUARY 24, 2012 THROUGH AND INCLUDING OCTOBER 4, 2016, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF OFFICIAL MISCONDUCT (CLASS 3 FELONY), IN VIOLATION OF SECTION 33-3(a)(3), ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WHILE ACTING IN HIS OFFICIAL CAPACITY AND WITH THE INTENT TO OBTAIN A PERSONAL ADVANTAGE FOR HIMSELF, PERFORMED AN ACT IN EXCESS OF HIS LAWFUL AUTHORITY WHEN HE DONATED A SUM TOTALING \$21,000.00 FROM PUBLIC FUNDS TO THE LASALLE-PERU TOWNSHIP HIGH SCHOOL RENAISSANCE CLUB.

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

A TRUE BILL.

DATE: \_\_\_\_\_

\_\_\_\_\_  
FOREMAN, GRAND JURY

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, ILLINOIS 61350

09:24 09072017



INDICTMENT

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS, )

Plaintiff, )

vs. )

BRIAN J. TOWNE, )

Defendant. )

NO. 17-CF-

COUNT 9

13TH JUDICIAL CIRCUIT  
LA SALLE COUNTY

FILED

SEP 05 2017

Guy Vaccaro  
CIRCUIT CLERK

FILED

NO  
BILL  
Returned

AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS CHARGE THAT:

ON OR ABOUT THE PERIOD FROM JANUARY 24, 2012 THROUGH AND INCLUDING OCTOBER 4, 2016, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF **OFFICIAL MISCONDUCT (CLASS 3 FELONY)**, IN VIOLATION OF SECTION 33-3(a)(2), ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, **A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WHILE ACTING IN HIS OFFICIAL CAPACITY, KNOWINGLY PERFORMED AN ACT WHICH HE KNOWS HE IS FORBIDDEN BY LAW TO PERFORM WHEN HE DONATED A SUM TOTALING \$21,000.00 FROM PUBLIC FUNDS TO THE LASALLE-PERU TOWNSHIP HIGH SCHOOL RENAISSANCE CLUB, IN VIOLATION OF ARTICLE VIII, SECTION 1(a) OF THE CONSTITUTION OF THE STATE OF ILLINOIS, WHICH PROVIDES THAT PUBLIC FUNDS SHALL BE USED ONLY FOR PUBLIC PURPOSES.**

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

A TRUE BILL.

DATE: \_\_\_\_\_

\_\_\_\_\_  
FOREMAN, GRAND JURY

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, ILLINOIS 61350

09:24 09072017

INDICTMENT

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS, )

Plaintiff, )

vs. )

BRIAN J. TOWNE, )

Defendant. )

NO. 17-CF-

COUNT 10

13TH JUDICIAL CIRCUIT  
LA SALLE COUNTY

FILED

SEP 05 2017

Guy Vaccaro  
CIRCUIT CLERK

FILED

NO  
BILL  
Returned

AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS CHARGE THAT:

ON OR ABOUT THE PERIOD FROM JANUARY 24, 2012 THROUGH AND INCLUDING OCTOBER 4, 2016, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF **OFFICIAL MISCONDUCT (CLASS 3 FELONY)**, IN VIOLATION OF SECTION 33-3(a)(2), ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, **A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WHILE ACTING IN HIS OFFICIAL CAPACITY, KNOWINGLY PERFORMED AN ACT WHICH HE KNOWS HE IS FORBIDDEN BY LAW TO PERFORM WHEN HE DONATED A SUM TOTALING \$14,000.00 FROM PUBLIC FUNDS, NAMELY FUND 25/DRUG FINE ACCOUNT, TO THE LASALLE-PERU TOWNSHIP HIGH SCHOOL RENAISSANCE CLUB, IN VIOLATION OF 720 ILCS 570/413(c).**

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

A TRUE BILL.

DATE: \_\_\_\_\_

\_\_\_\_\_  
FOREMAN, GRAND JURY

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, ILLINOIS 61350

09:24 09072017



INDICTMENT

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS, )

Plaintiff, )

vs. )

BRIAN J. TOWNE, )

Defendant. )

COUNT 11

AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS CHARGE THAT:

ON OR ABOUT THE PERIOD FROM JANUARY 24, 2012 THROUGH AND INCLUDING OCTOBER 4, 2016, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF OFFICIAL MISCONDUCT (CLASS 3 FELONY), IN VIOLATION OF SECTION 33-3(a)(2), ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WHILE ACTING IN HIS OFFICIAL CAPACITY, KNOWINGLY PERFORMED AN ACT WHICH HE KNOWS HE IS FORBIDDEN BY LAW TO PERFORM WHEN HE DONATED A SUM TOTALING \$7,000.00 FROM PUBLIC FUNDS, NAMELY THE DRUNK DRIVING IMPACT PANEL ACCOUNT, TO THE LASALLE-PERU TOWNSHIP HIGH SCHOOL RENAISSANCE CLUB, IN VIOLATION OF 625 ILCS 5/11-501.01(b).

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

A TRUE BILL.

DATE: 9-5-17

Christa Rimes  
FOREMAN, GRAND JURY

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, ILLINOIS 61350

10:13 09062017

INDICTMENT

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS, )

Plaintiff, )

vs. )

BRIAN J. TOWNE, )

Defendant. )

NO. 17-CF-

COUNT 12

13TH JUDICIAL CIRCUIT  
LA SALLE COUNTY

FILED

SEP 05 2017

Gay Vacco  
CIRCUIT CLERK

FILED

NO  
BILL  
Returned

AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS CHARGE THAT:

ON OR ABOUT THE PERIOD FROM JANUARY 24, 2012 THROUGH AND INCLUDING OCTOBER 4, 2016, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF MISAPPLICATION OF FUNDS (CLASS 3 FELONY), IN VIOLATION OF SECTION 33E-16, ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, KNOWINGLY MISAPPLIED THE TOTAL SUM OF \$21,000.00 FROM PUBLIC FUNDS TO THE LASALLE-PERU TOWNSHIP HIGH SCHOOL RENAISSANCE CLUB.

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

A TRUE BILL.

DATE: \_\_\_\_\_

\_\_\_\_\_  
FOREMAN, GRAND JURY

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, ILLINOIS 61350

09:25 09072017



# INDICTMENT

13TH JUDICIAL CIRCUIT  
LASALLE COUNTY

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,

Plaintiff,

vs.

BRIAN J. TOWNE,

Defendant.

NO. 17-CF-

COUNT 13

AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS, CHARGE THAT:

ON OR ABOUT SEPTEMBER 8, 2014, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF: MISAPPLICATION OF FUNDS (CLASS 3 FELONY) IN VIOLATION OF SECTION 33E-16, ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, KNOWINGLY MISAPPLIED THE TOTAL SUM OF \$21,264.27 FROM PUBLIC FUNDS (SECTION 1505 FORFEITURE ACCOUNT) FOR THE PURCHASE OF A 2011 GMC YUKON SPORT UTILITY VEHICLE FOR HIS OWN PERSONAL USE AND THAT OF HIS FAMILY.

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

A TRUE BILL.

DATE:

9-5-17

FOREMAN, GRAND JURY

Chris Rime

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, IL 61350  
TELEPHONE: (815) 434-8340

10:15 09062017

INDICTMENT

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,

Plaintiff,

vs.

BRIAN J. TOWNE,

Defendant.

NO. 17-CF-369

COUNT 14

FILED  
13TH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS  
CIRCUIT CLERK  
GUY VACCARO  
CIRCUIT CLERK

AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS, CHARGE THAT:

ON OR ABOUT SEPTEMBER 8, 2014, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF: **OFFICIAL MISCONDUCT (CLASS 3 FELONY)** IN VIOLATION OF SECTION 33-3(a)(2), ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, **A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WHILE ACTING IN HIS OFFICIAL CAPACITY, KNOWINGLY PERFORMED AN ACT WHICH HE KNOWS HE IS FORBIDDEN BY LAW TO PERFORM WHEN HE DIRECTED AND AUTHORIZED THE PAYMENT OF \$21,264.27 FROM PUBLIC FUNDS (SECTION 1505 FORFEITURE ACCOUNT) FOR THE PURCHASE OF A 2011 GMC YUKON SPORT UTILITY VEHICLE FOR HIS OWN PERSONAL USE AND THAT OF HIS FAMILY, IN DIRECT VIOLATION OF ARTICLE VIII, SECTION 1(a) OF THE CONSTITUTION OF THE STATE OF ILLINOIS, WHICH PROVIDES THAT PUBLIC FUNDS SHALL BE USED ONLY FOR PUBLIC PURPOSES.**

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

A TRUE BILL

DATE

9-5-17

Chris Rimes  
FOREMAN, GRAND JURY

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, IL 61350  
TELEPHONE: (815) 434-8340

10:15 09062017



INDICTMENT

13TH JUDICIAL CIRCUIT  
LA SALLE COUNTY

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

FILED

SEP 05 2017

C. Vaccaro  
CIRCUIT CLERK

FILED

PEOPLE OF THE STATE OF ILLINOIS,

Plaintiff,

vs.

BRIAN J. TOWNE,

Defendant.

NO. 17-CF

369

COUNT 15

AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS, CHARGE THAT:

ON OR ABOUT SEPTEMBER 8, 2014, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF: **OFFICIAL MISCONDUCT (CLASS 3 FELONY)** IN VIOLATION OF SECTION 33-3(a)(3), ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, **A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WHILE ACTING IN HIS OFFICIAL CAPACITY AND WITH THE INTENT TO OBTAIN A PERSONAL ADVANTAGE FOR HIMSELF, PERFORMED AN ACT IN EXCESS OF HIS LAWFUL AUTHORITY WHEN HE DIRECTED AND AUTHORIZED THE PAYMENT OF \$21,264.27 FROM PUBLIC FUNDS (SECTION 1505 FORFEITURE ACCOUNT) FOR THE PURCHASE OF A 2011 GMC YUKON SPORT UTILITY VEHICLE FOR HIS OWN PERSONAL USE AND THAT OF HIS FAMILY.**

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

A TRUE BILL

DATE:

9-5-17

Chris Rimes  
FOREMAN, GRAND JURY

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, IL 61350  
TELEPHONE: (815) 434-8340

10:13 09062017

INDICTMENT

13TH JUDICIAL CIRCUIT  
LA SALLE COUNTY

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

FILED

SEP 05 2017

Guy Vaccaro  
CIRCUIT CLERK

FILED

PEOPLE OF THE STATE OF ILLINOIS, )

Plaintiff, )

vs. )

BRIAN J. TOWNE, )

Defendant. )

NO. 17-CF-3609

COUNT 16

**AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS CHARGE THAT:**

ON OR ABOUT THE PERIOD FROM JANUARY, 2012 THROUGH AND INCLUDING NOVEMBER, 2016, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF **OFFICIAL MISCONDUCT (CLASS 3 FELONY)**, IN VIOLATION OF SECTION 33-3(a)(2), ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, **A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WHILE ACTING IN HIS OFFICIAL CAPACITY, KNOWINGLY PERFORMED AN ACT WHICH HE KNEW HE WAS FORBIDDEN BY LAW TO PERFORM IN THAT HE AUTHORIZED AND DIRECTED VARIOUS PAYMENTS FROM PUBLIC FUNDS TOTALING \$2,692.72 FOR WI-FI INTERNET SERVICE FOR HIS OWN PERSONAL USE AND THAT OF HIS FAMILY, IN VIOLATION OF ARTICLE VIII, SECTION 1(a) OF THE CONSTITUTION OF THE STATE OF ILLINOIS, WHICH PROVIDES THAT PUBLIC FUNDS, PROPERTY OR CREDIT SHALL BE USED ONLY FOR PUBLIC PURPOSES.**

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

A TRUE BILL.

DATE: 9-5-17

Chris Rimes  
FOREMAN, GRAND JURY

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, ILLINOIS 61350  
TELEPHONE: (815) 434-8340

10:13 09062017



INDICTMENT

13TH JUDICIAL CIRCUIT  
LA SALLE COUNTY

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

FILED

SEP 05 2017

*Guy Vaccaro*  
CIRCUIT CLERK

FILED

PEOPLE OF THE STATE OF ILLINOIS, )

Plaintiff, )

vs. )

BRIAN J. TOWNE, )

Defendant. )

NO. 17-CF

369

COUNT

17

AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS CHARGE THAT:

ON OR ABOUT THE PERIOD FROM JANUARY, 2012 THROUGH AND INCLUDING NOVEMBER, 2016, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF OFFICIAL MISCONDUCT (CLASS 3 FELONY), IN VIOLATION OF SECTION 33-3(a)(3), ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WHILE ACTING IN HIS OFFICIAL CAPACITY AND WITH THE INTENT TO OBTAIN A PERSONAL ADVANTAGE FOR HIMSELF, PERFORMED AN ACT IN EXCESS OF HIS LAWFUL AUTHORITY WHEN HE AUTHORIZED AND DIRECTED VARIOUS PAYMENTS FROM PUBLIC FUNDS TOTALING \$2,692.72 FOR WI-FI INTERNET SERVICE FOR HIS OWN PERSONAL USE AND THAT OF HIS FAMILY.

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

A TRUE BILL.

DATE:

9-5-17

*Christine*  
FOREMAN, GRAND JURY

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, ILLINOIS 61350  
TELEPHONE: (815) 434-8340

10:15 09062017

INDICTMENT

13TH JUDICIAL CIRCUIT  
LA SALLE COUNTY

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

FILED

SEP 05 2017

Guy Vaccaro  
CIRCUIT CLERK

FILED

PEOPLE OF THE STATE OF ILLINOIS, )

Plaintiff, )

vs. )

BRIAN J. TOWNE, )

Defendant. )

NO. 17-CF-369

COUNT 18

AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS CHARGE THAT:

ON OR ABOUT THE PERIOD FROM JANUARY, 2012 THROUGH AND INCLUDING NOVEMBER, 2016, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF MISAPPLICATION OF FUNDS (CLASS 3 FELONY), IN VIOLATION OF SECTION 33E-16, ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, KNOWINGLY MISAPPLIED THE TOTAL SUM OF \$2,692.72 FROM PUBLIC FUNDS (SECTION 1505 FORFEITURE FUND) FOR WI-FI INTERNET SERVICE FOR HIS OWN PERSONAL USE AND THAT OF HIS FAMILY.

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

A TRUE BILL.

DATE: 9-5-17

Chris Humes  
FOREMAN, GRAND JURY

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, ILLINOIS 61350  
TELEPHONE: (815) 434-8340

10:14 09062017



# INDICTMENT

13TH JUDICIAL CIRCUIT  
LA SALLE COUNTY

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

SEP 05 2017

G. Vaccaro  
CIRCUIT CLERK

PEOPLE OF THE STATE OF ILLINOIS, )

Plaintiff, )

vs. )

BRIAN J. TOWNE, )

Defendant. )

NO. 17-CF-

369

COUNT

19

**AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS CHARGE THAT:**

ON OR ABOUT THE PERIOD FROM DECEMBER 12, 2013 THROUGH AND INCLUDING FEBRUARY 14, 2014, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF OFFICIAL MISCONDUCT (CLASS 3 FELONY), IN VIOLATION OF SECTION 33(a)(3), ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WHILE ACTING IN HIS OFFICIAL CAPACITY AND WITH THE INTENT TO OBTAIN A PERSONAL ADVANTAGE FOR HIMSELF PERFORMED AN ACT IN EXCESS OF HIS LAWFUL AUTHORITY WHEN HE AUTHORIZED PAYMENTS TOTALING \$1,393.43 FROM PUBLIC FUNDS (SECTION 1505 FORFEITURE FUND) TO HIMSELF FOR: (1) "PER DIEM" PAYMENT, (2) HOTEL ACCOMMODATIONS, (3) ROUNDTRIP AIRFARE, AND (4) REGISTRATION FEE FOR A GANG UNDERCOVER NARCOTICS INVESTIGATORS TRAINING CONFERENCE PROGRAM HOSTED BY THE HEARTLAND LAW ENFORCEMENT TRAINING INSTITUTE IN LAS VEGAS, NEVADA FOR PRIVATE EMPLOYMENT OUTSIDE OF THE OFFICE OF LASALLE COUNTY STATE'S ATTORNEY WHEREIN HE WAS PERSONALLY PAID THE SUM OF \$1,000.00 TO BE AN INSTRUCTOR.

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

A TRUE BILL.

DATE:

9-5-17

FOREMAN, GRAND JURY

Chris Rume

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, ILLINOIS 61350

10:14 09062017

INDICTMENT

13TH JUDICIAL CIRCUIT  
LA SALLE COUNTY

FILED

SEP 05 2017

Guy Vaccaro  
CIRCUIT CLERK

FILED

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS, )

Plaintiff, )

vs. )

BRIAN J. TOWNE, )

Defendant. )

NO. 17-CF-369

COUNT 20

**AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS CHARGE THAT:**

ON OR ABOUT THE PERIOD FROM DECEMBER 12, 2013 THROUGH AND INCLUDING FEBRUARY 14, 2014, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF MISAPPLICATION OF FUNDS (CLASS 3 FELONY), IN VIOLATION OF SECTION 33E-16, ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, KNOWINGLY MISAPPLIED THE TOTAL SUM OF \$1,393.43 FROM PUBLIC FUNDS (SECTION 1505 FORFEITURE FUND) TO HIMSELF FOR: (1) "PER DIEM" PAYMENT, (2) HOTEL ACCOMMODATIONS, (3) ROUNDTRIP AIRFARE, AND (4) REGISTRATION FEE FOR A GANG UNDERCOVER NARCOTICS INVESTIGATORS TRAINING CONFERENCE PROGRAM HOSTED BY THE HEARTLAND LAW ENFORCEMENT TRAINING INSTITUTE IN LAS VEGAS, NEVADA FOR PRIVATE EMPLOYMENT OUTSIDE OF THE OFFICE OF LASALLE COUNTY STATE'S ATTORNEY WHEREIN HE WAS PERSONALLY PAID THE SUM OF \$1,000.00 TO BE AN INSTRUCTOR.

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

A TRUE BILL.

DATE: 9-5-17

Chris Skene  
FOREMAN, GRAND JURY

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, ILLINOIS 61350

10:14 09062017



INDICTMENT

13TH JUDICIAL CIRCUIT  
LA SALLE COUNTY

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

FILED

SEP 05 2017

Guy Vaccaro  
CIRCUIT CLERK

FILED

PEOPLE OF THE STATE OF ILLINOIS, )

Plaintiff, )

vs. )

BRIAN J. TOWNE, )

Defendant. )

NO. 17-CF-369

COUNT 21

AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS CHARGE THAT:

ON OR ABOUT THE PERIOD FROM DECEMBER 12, 2013 THROUGH AND INCLUDING FEBRUARY 14, 2014, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF OFFICIAL MISCONDUCT (CLASS 3 FELONY), IN VIOLATION OF SECTION 33-3(a)(2), ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WHILE ACTING IN HIS OFFICIAL CAPACITY, KNOWINGLY PERFORMED AN ACT WHICH HE KNEW HE WAS FORBIDDEN BY LAW TO PERFORM IN THAT HE AUTHORIZED PAYMENTS TOTALING \$1,393.43 FROM PUBLIC FUNDS (SECTION 1505 FORFEITURE FUND) TO HIMSELF FOR: (1) "PER DIEM" PAYMENT, (2) HOTEL ACCOMMODATIONS, (3) ROUNDTRIP AIRFARE, AND (4) REGISTRATION FEE FOR A GANG UNDERCOVER NARCOTICS INVESTIGATORS TRAINING CONFERENCE PROGRAM HOSTED BY THE HEARTLAND LAW ENFORCEMENT TRAINING INSTITUTE IN LAS VEGAS, NEVADA FOR PRIVATE EMPLOYMENT OUTSIDE OF THE OFFICE OF LASALLE COUNTY STATE'S ATTORNEY WHEREIN HE WAS PERSONALLY PAID THE SUM OF \$1,000.00 TO BE AN INSTRUCTOR, IN VIOLATION OF ARTICLE VIII, SECTION 1(a) OF THE CONSTITUTION OF THE STATE OF ILLINOIS, WHICH PROVIDES THAT PUBLIC FUNDS SHALL BE USED ONLY FOR PUBLIC PURPOSES.

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

DATE: 9-5-17

A TRUE BILL.

FOREMAN, GRAND JURY

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, ILLINOIS 61350

10:14 09062017

INDICTMENT

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

13TH JUDICIAL CIRCUIT  
LA SALLE COUNTY

SEP 05 2017

G. J. Kneass  
CIRCUIT CLERK

PEOPLE OF THE STATE OF ILLINOIS,

Plaintiff,

vs.

BRIAN J. TOWNE,

Defendant.

NO. 17-CF-

369

COUNT 22

AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS, CHARGE THAT:

ON OR ABOUT THE PERIOD FROM MARCH 23, 2012 THROUGH AND INCLUDING NOVEMBER 15, 2013, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF: **OFFICIAL MISCONDUCT (CLASS 3 FELONY)** IN VIOLATION OF SECTION 33-3(a)(3), ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, **A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WHILE ACTING IN HIS OFFICIAL CAPACITY AND WITH THE INTENT TO OBTAIN A PERSONAL ADVANTAGE FOR HIMSELF PERFORMED AN ACT IN EXCESS OF HIS LAWFUL AUTHORITY WHEN HE AUTHORIZED PAYMENTS TOTALING \$2,154.00 OF PUBLIC FUNDS FROM THE DRUNK DRIVING IMPACT PANEL ACCOUNT TO HIMSELF AS "PER DIEM" PAYMENTS FOR PRIVATE EMPLOYMENT OUTSIDE THE OFFICE OF LASALLE COUNTY STATE'S ATTORNEY.**

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

A TRUE BILL

DATE:

9-5-17

FOREMAN, GRAND JURY

Christa Rumer

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, IL 61350  
TELEPHONE NO.: (815) 434-8340

10:14 09062017



INDICTMENT

13TH JUDICIAL CIRCUIT  
LA SALLE COUNTY

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

FILED

SEP 05 2017

C. J. Vancura  
CIRCUIT CLERK

PEOPLE OF THE STATE OF ILLINOIS,

Plaintiff,

vs.

BRIAN J. TOWNE,

Defendant.

NO. 17-CF-

369

COUNT 23

AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS, CHARGE THAT:

ON OR ABOUT THE PERIOD FROM MARCH 23, 2012 THROUGH AND INCLUDING NOVEMBER 15, 2013, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF: **OFFICIAL MISCONDUCT (CLASS 3 FELONY)** IN VIOLATION OF SECTION 33-3(a)(2), ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, **A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WHILE ACTING IN HIS OFFICIAL CAPACITY, KNOWINGLY PERFORMED AN ACT WHICH HE KNOWS HE IS FORBIDDEN BY LAW TO PERFORM WHEN HE AUTHORIZED PAYMENTS TOTALING \$2,154.00 OF PUBLIC FUNDS FROM THE DRUNK DRIVING IMPACT PANEL ACCOUNT TO HIMSELF AS "PER DIEM" PAYMENTS FOR PRIVATE EMPLOYMENT OUTSIDE THE OFFICE OF LASALLE COUNTY STATE'S ATTORNEY, IN VIOLATION OF ARTICLE VIII, SECTION 1(a) OF THE CONSTITUTION OF THE STATE OF ILLINOIS, WHICH PROVIDES THAT PUBLIC FUNDS, PROPERTY OR CREDIT SHALL BE USED ONLY FOR PUBLIC PURPOSES.**

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

A TRUE BILL

DATE: 9-6-17

Chris Rimes  
FOREMAN, GRAND JURY

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, IL 61350

10:14 09062017

INDICTMENT

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

13TH JUDICIAL CIRCUIT  
LASALLE COUNTY

SEP 05 2017

*Guy Vaccaro*  
CIRCUIT CLERK

PEOPLE OF THE STATE OF ILLINOIS,

Plaintiff,

vs.

BRIAN J. TOWNE,

Defendant.

NO. 17-CF

COUNT 24

AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS, CHARGE THAT:

ON OR ABOUT THE PERIOD FROM MARCH 23, 2012 THROUGH AND INCLUDING NOVEMBER 15, 2013, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF: MISAPPLICATION OF FUNDS (CLASS 3 FELONY) IN VIOLATION OF SECTION 33E-16, ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, KNOWINGLY MISAPPLIED THE TOTAL SUM OF \$2,154.00 OF PUBLIC FUNDS FROM THE DRUNK DRIVING IMPACT PANEL ACCOUNT TO HIMSELF AS "PER DIEM" PAYMENTS FOR PRIVATE EMPLOYMENT OUTSIDE THE OFFICE OF LASALLE COUNTY STATE'S ATTORNEY.

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

A TRUE BILL

DATE: 9-5-17

*Christa Rumez*  
FOREMAN, GRAND JURY

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, IL 61350  
TELEPHONE: (815) 434-8340

10:14 09062017



# INDICTMENT

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
LASALLE COUNTY, ILLINOIS

13TH JUDICIAL CIRCUIT  
LA SALLE COUNTY

FILED

SEP 05 2017

Greg Vancura  
CIRCUIT CLERK

FILED

PEOPLE OF THE STATE OF ILLINOIS, )

Plaintiff, )

vs. )

BRIAN J. TOWNE, )

Defendant. )

NO. 17-CF-369

COUNT 25

**AT LEAST NINE MEMBERS OF THE GRAND JURY HAVING CONCURRED,  
THE GRAND JURORS OF LASALLE COUNTY, ILLINOIS CHARGE THAT:**

ON OR ABOUT THE PERIOD FROM MARCH 23, 2012 THROUGH AND INCLUDING NOVEMBER 15, 2013, IN LASALLE COUNTY, ILLINOIS, BRIAN J. TOWNE, DEFENDANT, COMMITTED THE OFFENSE OF OFFICIAL MISCONDUCT (CLASS 3 FELONY), IN VIOLATION OF SECTION 33-3(a)(2), ACT 5 OF CHAPTER 720 OF THE ILLINOIS COMPILED STATUTES, IN THAT SAID DEFENDANT, A PUBLIC OFFICER, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WHILE ACTING IN HIS OFFICIAL CAPACITY, KNOWINGLY PERFORMED AN ACT WHICH HE KNOWS HE IS FORBIDDEN BY LAW TO PERFORM WHEN HE DIRECTED AND AUTHORIZED PAYMENTS TOTALING \$2,154.00 OF PUBLIC FUNDS FROM THE DRUNK DRIVING IMPACT PANEL ACCOUNT TO HIMSELF AS "PER DIEM" PAYMENTS FOR PRIVATE EMPLOYMENT OUTSIDE THE OFFICE OF LASALLE COUNTY STATE'S ATTORNEY, IN DIRECT VIOLATION OF 625 ILCS 5/11-501.01(b).

AN EXTENDED STATUTE OF LIMITATIONS APPLIES HEREIN PURSUANT TO 720 ILCS 5/3-6(b) SINCE BRIAN TOWNE WAS AT THE TIME OF THE ALLEGED MISCONDUCT HEREIN A PUBLIC OFFICER, AND THIS PROSECUTION IS BEING COMMENCED WITHIN ONE YEAR AFTER DISCOVERY OF THE ALLEGED MISCONDUCT OR WITHIN ONE YEAR AFTER THE PROPER PROSECUTING OFFICER HAS BECOME AWARE OF THE OFFENSE IN THAT KAREN DONNELLY, STATE'S ATTORNEY OF LASALLE COUNTY, ILLINOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

A TRUE BILL.

DATE: 9-5-17

FOREMAN, GRAND JURY

KAREN DONNELLY, STATE'S ATTORNEY  
LASALLE COUNTY GOVERNMENTAL COMPLEX  
707 ETNA ROAD, SUITE 251  
OTTAWA, ILLINOIS 61350

10:14 09062017