IN THE CIRCUIT COURT	OF THE THIRTEENTH HELDICHAUTCIRCUIT
LASAI	OF THE THIRTEENT HOLD CHANT CIRCUIT
	F I a Thu
PEOPLE OF THE STATE OF ILLINOIS,	SEP 0 5 2017 E 7 2102 90 das
) E 5 1 2,00 1 X 0.30
Plaintiff,	NO. 1740F- (2004) account = 1
) SHEGOIL CIEUK YND SALLE COUNTY ALL
vs.) 001
)
BRIAN J. TOWNE,	
)
Defendant.) COUNT 1

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, ILLINGOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

DATE: 9|5|17

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

A TRUE BILL.

FOREMAN, GRAND JUR

	ic i mei i
IN THE CIRCUIT COURT OF T	COUNTY, ILLINOIS LA SALLE COUNTY
PEOPLE OF THE STATE OF ILLINOIS,	SEP 0 5 2017 107 9 438
Plaintiff,	NO. 17-CF- CHARLET LINOUS STIVE VI
vs.	3
BRIAN J. TOWNE.)

COUNT 2

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, ILLINNOIS, WAS SWORN INTO THE POSITION ON DECEMBER 1, 2016.

A TRUE BILL.

DATE: 9 5

Defendant.

FOREMAN GRAND JURY

IN THE CIRCUIT COURT	OF THE THIRTEENTHAISANGE SQUATTIRCUIT
	LE COUNTY, ILLINOIS
PEOPLE OF THE STATE OF ILLINOIS,	5 0 V 75 4107/9\0 d3S 7
Plaintiff,	NO. 17-CF-3 CIRCUIT CLERK 3 NO. 17-CF-3 CIRCUIT CLERK 3 LINOS TITLES AT 3
VS.)
BRIAN J. TOWNE,	
Defendant.) COUNT <u>3</u>

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

FOREMAN, GRAND JURY

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

INDICTMENT

PEOPLE OF THE STATE OF ILLINOIS,

Plaintiff.

NO. 17-CF-

13TH JUDICIAL CIRCUIT
LA SALLE COUNTY

VS.

BRIAN J. TOWNE.

Defendant.

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

0907201

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

PEOPLE OF THE ST	ATE OF ILL	INOIS,)		_ 1	3TH JUDICIAL CIRCUI LA SALLE COUNTY	п
	Plaintiff,	į	NO. 17-CF-	F		F
vs.		}	ha	PED	SEP 0 5 2017	L
BRIAN J. TOWNE,		NEW HE	MES		CIRCUIT CLERK	
	Defendant.	reis	COUNT 5	_		

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

PEOPLE OF THE ST	TATE OF ILLIN	OIS,		_ 1	ISTH JUDICIAL CIRCU LA SALLE COUNTY	IIT
	Plaintiff,	}	NO. 17-CF-	[SEP 0 5 2017	F
vs.		10:10	neo	E	GV	ED
BRIAN J. TOWNE,		BILLY	χ.,		CIRCUIT CLERK	_
	Defendant.	Ke;	COUNT 6			

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:		
DITTE	EODEMAN CRAND II IDV	_

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

PEOPLE OF THE ST	TATE OF ILLIN	NOIS,	1	3TH JUDICIAL CIRCL LA SALLE COUNTY	JIT
	Plaintiff,) NO. 17-CF-	F		F
vs.		in ied	Ę	SEP 0 5 2017	LE
BRIAN J. TOWNE,		NO HUNDER		CIRCUIT CLERK	D
	Defendant.	COUNT 7			

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			

09:24 0907201

INDICTMENT

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

PEOPLE OF THE STATE	OF ILLINOIS,		10	3TH JUDICIAL CIRCUI LA SALLE COUNTY	п
Plaintiff,	(NO 17-CF-	F	SEP 0 5 2017	F
vs.	40.12	ned	THC	SEP 03 ZUII	ED
BRIAN J. TOWNE,	BILLIN	ж		CIRCUIT CLERK	
Defendant.	HO.	COUNT 8			

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.

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09:24 0907201

INDICTMENT

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

PEOPLE OF THE STATE OF ILLINO	ois,)	13TH JUDICIAL CIRCUIT
Plaintiff,	NO. 17-CF-	L SEP 0 5 2017
vs. NOW	med	D Guylaccars
BRIAN J. TOWNE,	JULI I	CIROUN CLERK
Defendant.	COUNT 9	

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

9:24 0907201

INDICTMENT

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

PEOPLE OF THE STATE OF ILLINOIS	5,)	13TH JUDICIAL CIRCUIT LA SALLE COUNTY
Plaintiff,) NO. 17-CF-	F SEP 0 5 2017 L
vs. NOUL	rned	E C.V.
BRIAN J. TOWNE,	rui.	CIRCUIT CLERK
Defendant.) COUNT 10	

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	

IN THE CIRCUIT COURT OF	THE THIRTEEN HUDICE CIRCUIT
	COUNTY, ILLINOIS 17 LIOZ 90 das
PEOPLE OF THE STATE OF ILLINOIS,	D Guylecters Thomas Track Thomas Track Thomas Track Thomas Track Thomas Track Thomas Track
Plaintiff,) NO. CHASTLETERK THOSE AND AND HATEL
vs.	
BRIAN J. TOWNE,)
Defendant.	COUNT II

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

FOREMAN, GRAND JURY

09:25 0

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INDICTMENT

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

PEOPLE OF THE STATE OF ILLINOI	S,) 13TH JUDICIAL CIRCUIT LA SALLE COUNTY	_
Plaintiff,	NO. 17-CF- E SEP 0 5 2017	1
vs. NO , 1	E C.V.	Ē
BRIAN J. TOWNE, BIL	CIRCUIT CLERK	
Defendant.	COUNT 12	

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	

INDICT	MENSALLE COUNTY F
IN THE CIRCUIT COURT OF THE LASALLE COU	
PEOPLE OF THE STATE OF ILLINOIS,	CER O P SOLL TILDERIA
Plaintiff,	NO. 17-CF- QUINDED STIVE VI
vs.	
BRIAN J. TOWNE,	
Defendant.) COUNT <u>13</u>

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: 4-5-17

FOREMAN, GRAND JURY

IN THE CIRCUIT COURT OF THE THE LASALLE COUNT	7 2 2
PEOPLE OF THE STATE OF ILLINOIS,) F d F
Plaintiff,	NO. 17-CF-369 E 9F1000000000000000000000000000000000000
VS.	CHOUT CLERK
BRIAN J. TOWNE,	
Defendant.) COUNT 14_

Vuma

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 (1805-17

FOREMAN, GRAND JURY



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IN THE CIRCUIT COURT OF THE TI LASALLE COUN		ITSEP 0 5 2017	THE
PEOPLE OF THE STATE OF ILLINOIS,)	CIRCUIT CLERK	
Plaintiff,	NO. 17-CF369		
VS.	}		

13TH JUDICIAL CIRCUIT LA SALLE COUNTY

BRIAN J. TOWNE,

Defendant.) 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.

DATE: 9-5-17

A TRUE BILL

FOREMAN, GRAND JURY



IN	ID	C	rM	E	NT

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIR	CUISEP 0 5 2017
LASALLE COUNTY, ILLINOIS	CV

13TH JUDICIAL CIRCUIT LA SALLE COUNTY

CIRCUIT CLERK

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PEOPLE OF THE STATE OF ILLINOIS	,)
Plaintiff,	NO. 17-CF-3/09
vs.	}
BRIAN J. TOWNE,	
Defendant.) 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

FOREMAN, GRAND JURY

INDICTME	N	r

	INDICTMENT	F F F
IN THE CIRCUIT COU	RT OF THE THIRTEENTH JUDIC	IAL CIRCUITEP 0 5 2017
LAS	SALLE COUNTY, ILLINOIS	5 Carles
SE THE OTATE OF HA	21010	CIRCUIT CLERK

PEOPLE OF THE STATE OF ILLINOIS,) CIRCL
Plaintiff,	NO. 17-CF369
vs.	}
BRIAN J. TOWNE,	
Defendant.) 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.

Defendant.

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT SEP 0 5 2017 LASALLE COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,)
Plaintiff,	NO. 17-CF-369
vs.	1
BRIAN J. TOWNE,)

COUNT 8 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

FOREMAN, GRAND JURY

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

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	INDICTMENT	LA SALLE COUNTY
	OF THE THIRTEENTH JUDICIAL C LE COUNTY, ILLINOIS	EIRGUIT L SEP 0 5 2017
PEOPLE OF THE STATE OF ILLINOIS,)	D GAY CLEAN
Plaintiff,	NO. 17-CF-269	
vs.	(
BRIAN J. TOWNE,)	
Defendant.) 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

INDICTMENT	IN	DI	CT	ΓM	EN	IT
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IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT LASALLE COUNTY, ILLINOIS

SEP 0 5 2017

PEOPLE OF THE STATE OF ILLIN	IOIS,)
Plaintiff,	NO. 17-CF-369
vs.	}
BRIAN J. TOWNE,	{
Defendant.) COUNT ZD

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.

DATE: 9-547

FOREMAN, GRAND JURY

A TRUE BILD.

	E DASALLE COUNTY	-
	F THE THIRTEENTH JUDICIAL CIRCUIT SEP 0 5 2017	LILLE
PEOPLE OF THE STATE OF ILLINOIS,) CIRCUIT CLERK	D
Plaintiff,	NO. 17-CF-269	
vs.		
BRIAN J. TOWNE,		
Defendant.) 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: 95-17

FOREMAN, GRAND JURY

A TRUE BILL



IN THE CIRCUIT COURT	OF THE THIRTEENTH JUDICIAL CIRCUIT A SALE COUN	RCUIT TY
LASAL	LE COUNTY, ILLINOIS	F
PEOPLE OF THE STATE OF ILLINOI	SEP 0 5 201	7 L
Plaintiff,	NO. 17-CF- CIRCUIT CLERK	D
vs.	(
BRIAN J. TOWNE,		
Defendant.) COUNT <u>ZZ</u>	

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.

DATE: 9-6-17

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A TRUE BILL

FOREMAN, GRAND JURY

	INDICTMENT	LA SALLE COUNT
IN THE CIRCUIT COUP LAS	SEP 0 5 2017	
PEOPLE OF THE STATE OF ILLIN	iois,	D Convenier
Plaintiff,) NO. 17-	cf-369
VS.	{	
BRIAN J. TOWNE,	}	
Defendant.) 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: 4-617

FOREMAN, GRAND JURY

13TH BIDICIAL OF

IN THE CIR	CUIT COURT OF THE T	HIRTEENTH JUDICIAL C	RCUIT F
	LASALLE COUN	TY, ILLINOIS	SEP 0 5 2017
PEOPLE OF THE STAT	TE OF ILLINOIS,)	5 Gray Lewers 5
P	laintiff,) NO. 17-CF	CHOOT CLERK
vs.)	
BRIAN J. TOWNE,		(
D	efendant.) 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: 9-517

FOREMAN, GRAND JURY

INDI	CIMENI	LA SALLE COUNTY
IN THE CIRCUIT COURT OF TH LASALLE CO	SEP 0 5 2017	
PEOPLE OF THE STATE OF ILLINOIS,		D CANALLONS COROCIT CLERK
Plaintiff,	NO. 17-CF-369	
vs.		
BRIAN J. TOWNE,		
Defendant.)	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:

FOREMAN, GRAND JURY

