

**IN THE CIRCUIT COURT OF THE FIFTH JUDICIAL CIRCUIT  
COLES COUNTY, ILLINOIS**

IN RE APPOINTMENT OF SPECIAL )  
ATTORNEY FOR THE STATE )  
)  
)

Case No. 2020-MR- 276

**FILED**  
AUG 21 2020  
Melissa Hurst  
Circuit Clerk COLES COUNTY, ILLINOIS

**PETITION FOR APPOINTMENT OF SPECIAL ATTORNEY FOR  
THE STATE PURSUANT TO SECTION 3-9008 (55 ILCS 5/3-9008)**

Now come the Petitioners, Mervin Wolfe, Pro Se , and Gregory Shearod,Oliva Jones, Timothy Jones, Tim Olson, Kristina Olson, Alyssa Karras, Joseph Respondi, et. al. pursuant to 55 ILCS 5/3-9008 Petition this Court for the appointment of a special attorney not from the Illinois Appellate Prosecutors Office for the State to prosecute certain individuals for felonious actions not barred by any applicable statute of limitations, stating in support thereof:

**COUNT I**

1. The Petitioners have discovered evidence of multiple felonies which were committed and aided and abetted by attorney Jesse Danley and Ronda Parker. These individuals have used their public office for personal gain and to cause harm.
2. That Illinois Criminal Code provides Official Misconduct is an act is performed in one's official capacity if it is accomplished by exploitation of his public position. People v. Lynn, 223 Ill.App.3d 688, 691, 166 Ill. Dec. 182, 585 N.E.2d 1204 (1992)
3. The Petitioners asserts that a series of actions and omissions by design have

been committed by public officers, Jesse Danley and Ronda Parker, both Coles county employees, in their official capacities, in violation of Illinois law and have individually and jointly:

- (a) Intentionally or recklessly failed to perform a mandatory duty as required by law and knowingly performed a series of acts which they knew, or should have known is forbidden by law to perform; and/or
- (b) have performed a series of acts in excess of their lawful authority with intent to obtain a personal advantage for themselves or others; and
- (c) have solicited and knowingly accepted for the performance of unauthorized acts, a fee or reward which they knew were not authorized by law.
- (d) Mr. Danley, as a public officer and a county employee of a law enforcement agency, has committed misconduct in that Mr. Danley knowingly used and communicated, directly and indirectly, confidential information about the Claimant, acquired in his capacity as the SA, to obstruct, impede, or prevent his own personal liability in a civil matter.
- (e) Mr. Danley, as a public officer and a county employee of a law enforcement agency, has directly communicated information gained from a confidential resource while participating or aiding law enforcement in an ongoing investigation, and disclosed it for personal gain.

#### **Facts In support of Allegations of Abuse of Office for Personal Gain**

4. That CCSA Jesse Danley committed or caused to commit a series of acts in excess of his lawful authority: by employing deceit and concealment, knowingly violating the Illinois Criminal Code. The purpose of Mr. Danley's actions were to obtain money, property, and /or free services from the State of Illinois. Mr. Danley has and continues to use the full weight and authority of his appointed State's Attorney's Office to avoid the payment or loss of money

and to secure a business and professional advantage. Mr. Danley has occupied and used his position of responsibility and trust in local government, the legal profession, and the judiciary for personal gain and to cause injury in violation of Illinois Law. Mr. Danley has wrongfully converted county resources for personal gain. The State's Attorney Jesse Danley has from July, 2019 until present using the Coles County State's Attorney's Office and its staff and resources as his personal office in support of the civil litigation In Re: 2019-SC-583, Wolfe vs Danley. **(See Attached Exhibits Voice Mail, power of attorney for IDNR), specifically: (FOIA response dated )**

5. That Ronda Parker has and continues to use the full weight and authority of her employment with the Coles County State's Attorney's Office to secure a business and professional advantage. Ronda Parker has occupied and used her position of responsibility and trust in local government, the legal profession, and the judiciary for personal gain and to cause injury in violation of Illinois Law. Ronda Parker has wrongfully converted county resources for personal gain. Ronda Parker has aided and abetted Jesse Danley use of the Coles County State's Attorney Office from September 2019 until present and its staff and resources as her personal office in support of her court appointed medication practice. (See Attached Order and Email Ronda Parker to IDNR)

6. That the Petitioners are all are residents of the State of Illinois.

7. Section 3-9008 (55 ILCS 5/3-9008) allows this Court to appoint some competent attorney to prosecute whenever the States Attorney is "sick or absent, or unable to attend, or is interested".

8. In this instance, Coles County States Attorney Jesse Danley has admitted there is a conflict of interest with Petitioner Mervin Wolfe and attempted to refer the matter to the Illinois Appellate Prosecutors Office, twice. See In re Mortimer, 44 Ill.App. 249, 358 N.E. 2d 92 (1 Dist. 1976). The referral by States Attorney Jesse Danley infers the conflict of interest with the Petitioner. In addition, Mr. Danley is the target of the

criminal allegations by the Petitioners.

9. Insofar as Section 3-9008 contemplates an appointment limited to causes or proceedings in which the States Attorney is disqualified (*Aiken v. County of Will*, 321 Ill.App.171, 52 N.E. 2d 607 (2 Dist. 1943)), Petitioners propose that the appointment be for the prosecution of theft of government services, mail fraud, wire fraud, conspiracy to defraud by mail, obstruction of justice and official misconduct, as warranted, against Jesse Danley and Ronda Parker, as a result of further investigation, this Court may reconsider the prosecutor's scope of authority. In re Appointment of Special Prosecutor, 388 Ill.App. 3d 220, 902 N.E. 2d 730 (3 Dist. 2009).

10. The appointment sought may be at any stage of a case, including the period prior to formal charging (*Baxter v. Peterlin*, 156 Ill.App. 3d 564, 509 N.E. 2d 156 (3 Dist. 1987)).

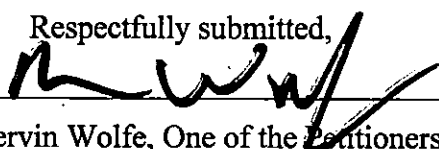
11. Petitioners, as private citizens and in their position as tax payers and citizens harmed by the actions they attribute to the suspects identified herein, have standing to petition the court to appoint a special attorney. *Baxter v. Peterlin*, 156 Ill.App. 3d 564, 509 N.E. 2d 156 (3 Dist. 1987).

12. Petitioner(s) have turned the matter over to law enforcement and the matters are currently being handled by the Illinois State Police.

13. Although not required, a copy of this Petition is being served upon States Attorney Jesse Danley, as States Attorney and agent for the County of Coles. No formal responsive pleading is required.

WHEREFORE, Petitioners pray that this Court appoint a Special Attorney For The State pursuant to Section 3-9008 for the purposes set forth herein.

Respectfully submitted,

  
Mervin Wolfe, One of the Petitioners

COUNT II



1. The Petitioners have discovered evidence of multiple felonies which were committed by ASA Brady Allen and aided and abetted by SA Jesse Danley. These individuals have used their public office for personal gain and to cause irreparable harm to an unknown number of female defendants who have been and are being sexually exploited.
2. That Illinois Criminal Code provides Official Misconduct is an act is performed in one's official capacity if it is accomplished by exploitation of his public position. *People v. Lynn*, 223 Ill.App.3d 688, 691, 166 Ill. Dec. 182, 585 N.E.2d 1204 (1992)
3. The Petitioners asserts that a series of actions and omissions by design have been committed by public officers, ASA Brady Allen and aided and abetted by Coles County States Attorney Jesse Danley, both Coles county employees, in their official capacities, in violation of Illinois law and have individually and jointly:
  - (a) Intentionally or recklessly failed to perform a mandatory duty as required by law and knowingly performed a series of acts which they knew, or should have known is forbidden by law to perform; and/or
  - (b) have performed a series of acts in excess of their lawful authority with intent to obtain a personal advantage for themselves or others; and
  - (c) have solicited and knowingly accepted for the performance of unauthorized acts, a fee or reward which they knew were not authorized by law.
  - (d) ASA Allen, as a public officer and a county employee of a law enforcement agency, has committed misconduct in that Mr. Allen knowingly used and communicated, directly and indirectly, confidential information about the female defendants, acquired in his capacity as the ASA, to obstruct, impede, or prevent investigations for his own personal sexual gratification.
  - (e) ASA Allen, as a public officer and a county employee of a law

enforcement agency has directly communicated information gained from a confidential resources while participating or aiding law enforcement in an ongoing investigation, and disclosed it for personal gain and for the sexual exploitation of young female defendants.

**Facts In support of Allegations of Abuse of Office for Sexual Gain**

4. That the Petitioner's has recently received communications produced by Assistant States Attorney Brady Allen , those communications reasonably cast doubt on the ASA Bradley Allen and CCSA Danley and the impartiality on the pending matters involving any criminal case involving female defendants and this pair of attorneys.

5. The Petitioner's alleges that undisclosed relationship(s) exist in People vs Kara Chumbley and People vs. Brianna Lee, for which no disclosure were made and waivers were provided. The Petitioner's alleges that other undisclosed relationships and agreements between the CCSA Danley and ASA Allen exist that is unethical and directly impacting the female defendants right to an unbiased and non-conflicted justice system. (ASA Allen was attempting to orchestrate a sexual threesome between himself and defendants Kara Chumbley and Brianna Lee via Snap Chat during business hours)

6. That the Coles County States Attorney's Office was the "investigative" body in relation to the charges filed against these two females in their criminal matter(s). Those charges were filed by prosecutor/investigator ASA Brady Allen against the defendant(s) and approved by CCSA Danley. The promised manipulation of those criminal charges by ASA Allen later formed the basis of the ongoing sexual exploitation of the defendant(s) by CCSA Danley and ASA Allen.

7. On or about January, 2019 forward the Coles County States Attorney Jesse Danley, (Hereinafter CCSA Danley) and Assistant States Attorney Brady Allen (Hereinafter ASA Allen) made the following "Accord" as to the Defendant's being sexually exploited by ASA Allen. Upon entering office in January, 2019 appointed CCSA

Danley implemented a policy relating to the "conflict of interest " between female defendants and dating the CCSA prosecutor(s). ASA Brady Allen has stated the activity was allowed by CCSA Danley, further that if any of those relationships with the female defendants became "serious" ASA Allen was to notify CCSA Danley who would then authorize the appointment of a special prosecutor in there cases.

8. That on information and belief CCSA Danley was at all times aware of the relationship(s) between Assistant State's Attorney Brady Allen and the female defendants. CCSA Danley had determined it was not a conflict of interest and no waivers from the State were required nor felt it necessary to advise the female defendants unless CCSA Danley and ASA Allen "felt" the relationship(s) were "serious".

9. That on information and belief CCSA Jesse Danley and ASA Allen believed that dating female defendant(s) was not a per se conflict or any conflict of interest, a simple signed waiver by the female defendants is all that would have been necessary to cure such a conflict and such a waiver would have been sought if the relationship became "serious".

10. That on information and belief the dating relationship(s) with female defendants was a well-known fact among the CCSA Danley and the other assistants and staff attorneys.

11. That on information and belief that conflict of ASA Brady Allen dating defendants was not ignored...but rather was determined to be a non-issue by the CCSA Danley and ASA Allen unless the CCSAO determined the relationship was "serious".

12. That on information and belief CCSA Danley knew that ASA Allen was sexually exploiting female defendants at the time ASA Allen was handling their cases as prosecutor.

13. That Coles County State's Attorney Jesse Danley admits the "rule puts the

responsibility again on the lawyer to determine if such a conflict exists" and by way of affirmative matter asserts each lawyer determined there is no concurrent conflict of interest" in dating the female defendants.

14. That on information and belief Coles County State's Attorney Jesse Danley will deny any conflict, will deny any wrongdoing or manipulation by the Coles County State's Attorney Office and Assistant State's Attorney Allen in these case(s).

15. That CCSA Danley and ASA Allen on behalf of Coles County States Attorney's Office have made representations and/or allegations to the defendant(s) that CCSA Danley has previously waived the conflict of interest created by ASA Brady Allen dating the female defendants.

16. That CCSA Danley and ASA Allen have made representations and allegations to the Defendant that CCSA Danley has expressed view(s) and has already ruled on the legal or factual issues involved in this pending criminal case(s) and on those issues are still pending in this case(s) as to ASA Allen dating these defendants.

17. That on information and belief ASA Allen was using Tinder a dating app and Snap Chat and Facebook and his I phone during the day when ASA Allen was working at CCSAO. The female defendant(s) recognized ASA Brady as there prosecutor.

18. The female defendant(s) raised the concern over the conflict ASA Bradys' job posed, the defendant was told that it wasn't a conflict, yet. The defendant was told that a policy was in place if an when it became serious.

19. That ASA Brady Allen began to repeatedly ask for pornographic photos (including their faces) of the female defendants while simultaneous filing new charges against them.

20. On information and belief ASA Allen promised favorable treatment of their

criminal cases in exchange for sex acts with him or other female defendants.

21. The Defendant believes that a reasonable interpretation that CCSA Danley policy and ASA Allen statements about his "trying to be playful" by exploiting the female defendant. On March 4th, 2020 through the March 8th, 2020 ASA Allen went on a sexually fueled social media blitz of sex based content direct toward the defendant.

22. ASA Allen told the Defendant :

"Then you need to visit me and we can discuss your situation while your ride my cock" (smiley emoji) Or

I can give you advice while your mouth is full" (Emoji)

How's that for a plan? What time do you get off? (See Exhibit A)

Do you not trust me or something? (See Exhibit D)

"I did try and take you out a few time to see if we were connected enough" (See Exhibit E)

" Just to be honest with yourself. You wouldn't want to date a guy who is into the stuff I'm into. " (See Exhibit E)

"I've not tried to hide that I've been interested in getting with either of you since I'm no longer on your cases. She just didn't seem to lose interest like you seemed to around April or whenever it was". (See Exhibit F) (Compare ASA Allen statements to the criminal dockets of each of these girls.)

"I just like a slut for someone I would date. " (See Exhibit F) (Compare ASA Allen statements to the criminal dockets of each of these female defendants.)

Then let's act like friends. Instead of doing stuff like kicking me off of snapchat and such. Im like us being able to talk casually" (See Exhibit G)

23. The Petitioners believe that a reasonable interpretation of ASA Allen's statements to the female defendant that CCSA Danley or his office cannot be impartial in decisions in this matter of the conflict of interest with any female defendant and ASA Allen and the CCSAO.

24. That on information and belief that based upon ex-parte conversations and assurances from CCSA Danley, ASA Allen told the female defendants he had permission to date female defendants appearing opposite him. CCSA Danley's blessing is nexus of the institutionalized sexual exploitation of the female defendants and is the the genesis of the current allegations of sexual exploitation driven by CCSA Danley "hands on " policy.

25. That CCSA Danley recently disclosed that he meets with each ASA attorney individually for the purpose of reaching an unwritten, undocumented, undated, administrative order regarding the waiver of the conflicts between ASA's and the female defendants in all case in which they appeared opposite and adverse.

26. The Petitioners have attached a small sample of the available communications from ASA Brady Allen to this female defendant. (See attached Exhibits A to I)

27. The ASA Allen has from Spring 2019 until present has been using the Coles County State's Attorney's Office staff and resources to select and then sexually exploit young women for personal sexual favors or to acquire pornographic material. (See Attached Exhibits A through I)

28. That ASA Brady Allen committed or caused to commit a series of acts in excess of his lawful authority: by employing deceit and concealment to sexually exploit female defendants for the purpose of personal sexual gratification and to procure pronographic

material.

29. That ASA's Brady Allen actions were designed to obtain sexual acts and pornographic material from female defendants while acting on behalf of the State of Illinois. Mr. Allen has and continues to use the full weight and authority of his State's Attorney's Office position to secure a professional/personal sexual advantage(s) over these female defendants.

30. That ASA Allen has occupied and used his position of responsibility and trust in local government, the legal profession, and the judiciary for personal sexual gain and to cause irreparable injury all in violation of Illinois Law.

31. That ASA Allen has wrongfully used and converted county resources for personal gain by using the Coles County States Attorney Office, phones, files, computers and other resources to identify and communicate with the female defendants/victims during and after business hours, even during the judicial proceeding(s) themselves. (See Attached Affidavits Kara Chumbley and McInzie ).

32. That from Spring 2019 until present Brady Allen acting as Assistant Coles County State's Attorney's acquired confidential information and knowledge of female defendants while working in his official capacity as ASA. ASA Brady then used the information gained by his employment as law enforcement officer to identify and target specific young women who the ASA Brady found sexually attractive.

33. That from Spring 2019 until present in addition to the sexual exploitation component, Assistant States Attorney Brady Allen also began to give legal advice to the female defendants (independently of defense counsel) about their pending criminal case(s) which ASA Brady had filed against them. ASA Brady used "Snap Chat" to prevent and obscure the record of the explicit sexual contact and instructed the female defendants not to call, not to text him. The ASA Brady's use of social media to make

contact with the female defendants was just one in a series of the actions of a sexual predator with a badge.(See attached Exhibit)

34. That during the pendency of the female defendants criminal cases ASA Brady would file adverse criminal pleadings and then instruct the defendants to take the plea deal the State of Illinois had offered .

35. That ASA Brady repeatedly offered to use his position as ASA Coles County State's Attorney's Office and his relationship with the CCSA Jesse Danley to modify or eliminates pending and future criminal charges in exchange for preforming any number of the sexual acts that ASA Brady had previously requested of the defendants, a service not offered to the general public.

36. That on September 2019, forward ASA Brady Allen repeatedly used the Coles County State's Attorney's Office to contact female defendant(s) and victim(s) for the purposes of consulting with them in his official capacity as Coles County State's Attorney. This offical behavior was designed to obscure his real motives in reaching out to the women.

37. During December, 2019 and prior thereto, Petitioner(s) presented evidence of multiple felonies to Coles County Board for investigation for possible prosecutions. It was ignored. As a result of the neglect by the Coles County Board these and other female defendants have been and continue to be exploited.

38. That the Petitioners submit the following factual evidence and exhibits in support of this Petition. (Exhibits

39. That Section 3-9008 (55 ILCS 5/3-9008) allows this Court to appoint some competent attorney to prosecute whenever the States Attorney is "sick or absent, or unable to attend, or is interested". Insofar as Section 3-9008 contemplates an appointment



limited to causes or proceedings in which the States Attorney is disqualified (Aiken v. County of Will, 321 Ill.App.171, 52 N.E. 2d 607 (2 Dist. 1943))

40. Petitioners propose that the appointment be for the prosecution of Official Misconduct, as warranted, against ASA Brady Allen and CCSA Jesse Danley, as a result of further investigation, this Court may reconsider the prosecutor's scope of authority. In re Appointment of Special Prosecutor, 388 Ill.App. 3d 220, 902 N.E. 2d 730 (3 Dist. 2009).

41. The appointment sought may be at any stage of a case, including the period prior to formal charging (Baxter v. Peterlin, 156 Ill.App. 3d 564, 509 N.E. 2d 156 (3 Dist. 1987)).

42. Petitioners, as private citizens and in their position as tax payers and citizens harmed by the actions they attribute to the suspects identified herein, have standing to petition the court to appoint a special attorney. Baxter v. Peterlin, 156 Ill.App. 3d 564, 509 N.E. 2d 156 (3 Dist. 1987).

43. Although not required, a copy of this Petition is being served upon States Attorney Brady Allen, as States Attorney Jesse Danley as agents for the County of Coles. No formal responsive pleading is required.

WHEREFORE, Petitioners pray that this Court appoint a Special Attorney For The State pursuant to Section 3-9008 for the purposes set forth herein.

Respectfully submitted,


  
Mervin Wolfe, Petitioner

### Verification of Certification

I, Mervin Wolfe, under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief and as to such matter I certify that I believe the same to be true. The Affiant is the Citizen of the State of Illinois, and a property owner in Coles County and I am under no legal disability.

A handwritten signature in black ink, appearing to read 'M Wolfe', is written over a horizontal line.

Mervin Wolfe

  
Alek Karros

Petitioner

## VERIFICATION BY CERTIFICATION

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and, as to such matters, the undersigned certifies as aforesaid that I verily believe the same to be true.

DATED: 8-11-20  
Charles n Osborne

Petitioner

## VERIFICATION BY CERTIFICATION

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DATED: 8/11/20  
Joseph Respondi

Petitioner

## VERIFICATION BY CERTIFICATION

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DATED: 8-11-2020

J. Richards  
James V. Richards, Petitioner

VERIFICATION BY CERTIFICATION

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DATED: 8/11/20

Chica Cittadini

Chica Cittadini

Chica Cittadini, Petitioner

VERIFICATION BY CERTIFICATION

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DATED: 8/11/2020

Jason C

Jason C

Jason C, Petitioner

VERIFICATION BY CERTIFICATION

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DATED: 8-11-20

Paula Keller

Paula Keller

KD  
Kristina D/San Petitioner

VERIFICATION BY CERTIFICATION

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DATED: 8-11-20

Angelo E. Karras

Angelo E. Karras  
ANG ELO E Karras Petitioner

VERIFICATION BY CERTIFICATION

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DATED: 8/11/20

Alyssa Karras

Alyssa Karras  
Alyssa Karras Petitioner

VERIFICATION BY CERTIFICATION

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DATED: 8/11/20

[Signature]

Lorelei Keller, Petitioner

VERIFICATION BY CERTIFICATION

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DATED: 8/11/2020

Stacy Pollack

Stacy Pollack

Stacy Pollack, Petitioner

Olivia Jones  
Olivia Jones, Petitioner

VERIFICATION BY CERTIFICATION

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DATED: 8-11-20

Timothy Jones  
Timothy Jones, Petitioner

[Signature]

VERIFICATION BY CERTIFICATION

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DATED: 8-11-20

Tim Olson  
Tim Olson, Petitioner

[Signature]

VERIFICATION BY CERTIFICATION

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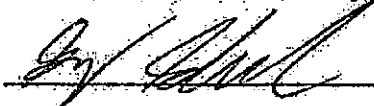
DATED: 8/11/20

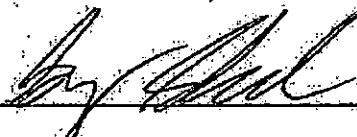
[Signature]

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DATED: 8/11/20



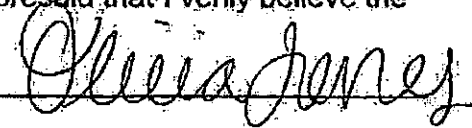


Gregory Sheerhod, Petitioner

VERIFICATION BY CERTIFICATION

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DATED: 8.11.20





**From:** Edwards, Tim  
**To:** RParker@co.coles.il.us  
**Cc:** Brown, Ronda  
**Subject:** FW: Coles County State's Attorney sale of Jon Boat in 2013  
**Date:** Monday, September 23, 2019 8:15:45 AM  
**Attachments:** image001.png  
Power Of Attorney.pdf

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In order for IDNR to transfer ownership of the 1978 Sea Nymph from Jesse Danley to Mervin Wolfe, Mr. Danley will be required to provide Mr. Wolfe with a signed Power of Attorney form in lieu of the lost title. The "POA" will need to be signed and dated when the original sale took place. Once Mr. Wolfe receives the signed "POA," he may then apply for a title and registration in his own name.

Please let me know if further information is needed. Thank you

<https://www.dnr.illinois.gov/boating/Documents/FillWCA.pdf>

**From:** Brown, Ronda

**Sent:** Wednesday, September 18, 2019 11:53 AM

**To:** Edwards, Tim ; McAdams, Deborah L.

**Cc:** Christian, Nicky ; Snow, Renee

**Subject:** FW: Coles County State's Attorney sale of Jon Boat in 2013

Please see email below questioning the process for transferring boat title, effective April 2013.

Please respond to the email below explaining the process.

If you need to discuss options/issues, please give Renee Snow a call.

Thanks.

Ronda



**Ronda Brown**

Administrative Assistant, IDNR Office of Legal Counsel

One Natural Resources Way

Springfield, Illinois 62702

217-782-1809

[ronda.brown@illinois.gov](mailto:ronda.brown@illinois.gov)

**From:** Ronda Parker - Coles Co State's Atty's Office <[RParker@co.coles.il.us](mailto:RParker@co.coles.il.us)>

**Sent:** Tuesday, September 17, 2019 2:33 PM

**To:** Brown, Ronda <[Ronda.Brown@Illinois.gov](mailto:Ronda.Brown@Illinois.gov)>

**Subject:** [External] Coles County State's Attorney sale of Jon Boat in 2013

Dear Ronda:

Consistent with our conversation this date, below is a synopsis of the legal question I posed:

In April 2013 Jesse Danley, now state's attorney of Coles County, sold a Jon Boat to Mervin Wolfe.

Jesse signed the title over the same date as the boat being picked up. Mr. Wolfe never had the transferred title registered with DNR. Three weeks ago Mr. Wolfe filed a small claims complaint against Jesse Danley claiming he refused to transfer the title. I have all the craig's list information from 2013 and the emails of the sale and also a 2018 email from Mr. Wolfe stating he lost the title in 2018.

Question: Jesse Danley wants Mr. Wolfe to have a proper title for the boat but he is unwilling to sign paperwork that would make it appear as if the sale took place today. We need it to show that the sale was, in fact in April of 2013. We are unwilling to surrender the position that the small claims suit is past the 5 year statute of limitations for civil cases and 4 year statute of limitations as to commerce. Is there a way for the title of the Jon boat to be given to Mr. Wolfe? He did buy it and it

was properly signed over to him.

Buyer: Mervin Wolfe, P.O. Box 242, Marshall, IL 62441

Seller: Jesse Danley, Charleston, Illinois

Vessel Registration: IL3182FD

Hull Type: Aluminum

Make: Sea Nymph

Model: BassNJohn

Year: 1978

Hull Identification Number (HIN): #SEAA44310977

Purchase Price: Total amount- \$1,500 single cash payment

Please let me know your thoughts or what actions can occur so Mr. Wolfe can legally use his boat and Mr. Danley can declare this case not just dismissed due to statute of limitations but also because it is moot.

Thank you.

Ronda Parker, Paralegal

Coles County State's Attorney

Coles County Courthouse

651 Jackson Ave., Room 330

Charleston, IL 61920

(217) 348-0568 Work

(217) 273-4536 Cell

(217) 348-0576 Fax

State of Illinois - CONFIDENTIALITY NOTICE: The information contained in this communication is confidential, may be attorney-client privileged or attorney work product, may constitute inside information or internal deliberative staff communication, and is intended only for the use of the addressee. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify the sender immediately by return e-mail and destroy this communication and all copies thereof, including all attachments. Receipt by an unintended recipient does not waive attorney-client privilege, attorney work product privilege, or any other exemption from disclosure.

## FOIA Request

From: DNR. FOIA (dnr.foia@illinois.gov)

To: mervinleewolfe@yahoo.com

Date: Friday, January 3, 2020, 02:15 PM CST

Please see the attached response to your FOIA request.

Hillary Needham

FOIA Coordinator

Office of Legal Counsel

One Natural Resources Way

Springfield, IL 62702



**State of Illinois - CONFIDENTIALITY NOTICE:** The information contained in this communication is confidential, may be attorney-client privileged or attorney work product, may constitute inside information or internal deliberative staff communication, and is intended only for the use of the addressee. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify the sender immediately by return e-mail and destroy this communication and all copies thereof, including all attachments. Receipt by an unintended recipient does not waive attorney-client privilege, attorney work product privilege, or any other exemption from disclosure.



Signed FOIA Response Letter Payment Requested.pdf  
130.2kB



[External] Coles County State's Attorney sale o....pdf  
67.4kB



FW\_ Coles County State's Attorney sale of Jon B...(3).pdf  
104.1kB

## FOIA Request

From: DNR. FOIA (dnr.foia@illinois.gov)

To: mervinleewolfe@yahoo.com

Date: Friday, January 3, 2020, 02:15 PM CST

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Springfield, IL 62702

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Signed FOIA Response Letter Payment Requested.pdf  
130.2kB



[External] Coles County State's Attorney sale o....pdf  
67.4kB



FW\_ Coles County State's Attorney sale of Jon B...(3).pdf  
104.1kB

Jesse Danley  
651 Jackson Ave. Room 330  
Charleston, IL 61920

September 23, 2019

**Via Email** wolfelawoffice@yahoo.com  
Mr. Mervin Wolfe  
PO Box 242  
Marshall, IL 62441

Re: DNR POA- Sea Nymph

Dear Mr. Wolfe:

After communicating with legal counsel for the Illinois Department of Natural Resources I was instructed to provide to you the attached Power of Attorney showing the date of the sale. You are now able to secure a replacement title after completing the necessary application as directed at the bottom of the POA.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Jesse Danley', with a large, stylized flourish extending to the right.

Jesse Danley

rjp  
enclosure

**VALID FOR BOATS CURRENTLY TITLED IN ILLINOIS - NOT VALID FOR OUT-OF-STATE TITLES**



Watercraft Registration and Titling

**POWER OF ATTORNEY**

Know All Men, By These Presents,

THAT (seller(s)) Jesse Danley

whose address is 651 Jackson Ave., Room 330, Charleston, IL 61920

does hereby make, constitute, and appoint Department of Natural Resources

whose address is One Natural Resources Way, Springfield, IL 62702-1271

as his lawful attorney in fact, to sign all papers and documents required to secure Illinois title and registration of, or transfer interest in, the following described watercraft:

Registration No. IL 3182FD

Hull Identification No. SEAA44310977

Manufacturer Sea Nymph

Model Year 1978 Length-Feet 14

Model Name BassNJohn

Date of Purchase April 27, 2013  
on or about  
month/day/year

COMPLETE THE FOLLOWING: (if applicable)

Purchaser's Name Wolfe

Mervin

Purchaser's Address PO Box 242

Marshall

(City)

(Number and Street)

IL

(State)

62441

(Zip Code)

Granting to the aforesaid attorney in fact full power to do all acts as the principal might or could do if personally present; and hereby ratifying and confirming all that said attorney in fact shall lawfully do or cause to be done by virtue of the authority herein given for this purpose.

Such authority shall in no way reflect upon the State of Illinois, Department of Natural Resources, or the Director of the Department.

Seller(s) Jesse Danley

Signature(s)

A handwritten signature of Jesse Danley in black ink.

of sale on or about

Date April 27, 2013  
month/day/year

**Power of Attorney form can only be used if:**

You sold your boat to an Illinois resident-not valid for non-residents.

The previous owner does not have the Illinois watercraft title. The Power of Attorney will take the place of the original (lost) title issued to the previous owner(s). If the lost title is ever recovered, it will not be valid and must be returned to the Department of Natural Resources, Watercraft Registration, One Natural Resources Way, Springfield, IL 62702-1271.

If our records list a lien on the title then you must have a letter from the lienholder releasing the lien. Then submit the Power of Attorney and the lien release letter with your application and fee for a title/registration.

**Instructions:**

The seller(s) must complete and sign the Power of Attorney Form.

The purchaser(s) must complete the watercraft application form and submit with the Power of Attorney form, release of lien (if required), tax form (if required) and fee.

## DNR-POA

From: Ronda Parker - Coles Co State's Atty's Office (rparker@co.coles.il.us)

To: wolfelawoffice@yahoo.com

Date: Monday, September 23, 2019, 04:59 PM CDT

Dear Mervin:

I am attaching hereto correspondence with attachments from Jesse Danley. Please acknowledge receipt of this email. Sometimes when I send emails with attachments it goes to spam. Also, let me know if you have any trouble opening the attachment and I will send in a different format.

Have a good evening.

Ronda Parker

651 Jackson Ave., Room 330

Charleston, IL 61920

Phone(217) 348-0568

Fax (217) 348-0576



Wolfe, Mervin Itr with Attached DNR POA.pdf  
466kB



**IN THE CIRCUIT COURT FOR THE FIFTH JUDICIAL CIRCUIT  
COLES COUNTY, ILLINOIS**

**THE PEOPLE OF  
THE STATE OF ILLINOIS**  
Plaintiff,

vs.

**KARA CHUMBLEY**  
Defendant.

Case No.    **19-DT-76  
19-DT-100**

**AFFIDAVIT**

I, Kara Chumbley, being sworn under oath do hereby state as follows:

1. I am over the age of 18, and I make this affidavit based upon my own personal knowledge.

2. That I am a current client of Todd Reardon and a Defendant in the above captioned cases.

3. That I have had many electronic communications via Snap Chat, texts messages, Facebook, Tinder, as well as cell phone contact with ASA Brady Allen during the pendency of my criminal cases.

4. That on February 18, 2020 while I was attending court in my criminal cases, I received text message from ASA Brady Allen on my Apple watch.

5. That during the pendency of this case ASA Brady Allen sent me the following messages attached hereto as Exhibit A to I.

6. That ASA Brady Allen has on multiple occasions requested sexual favors and pornographic material from me in exchange for favorable treatment on my criminal cases.

7. That during the pendency of my case ASA Brady Allen kept asking for pornographic photos from me. I eventually provided him said photo.

8. That ASA Brady Allen stated he would give me advice on my DUI cases while he was having sex with me.

9. That ASA Brady Allen repeatedly told me that I had a alcohol problem and I needed help.

10. That during the pendency of my criminal cases ASA Brady Allen told me to ignore my attorneys advice and take the plea deal being offered by Coles County States Attorneys Office.

11. That I am a personal friend of Brianna Lee and have had multiple conversations about ASA Brady Allen both in person and via social media about her relationship with ASA Brady Allen.

12. That Brianna Lee has made statements to myself and others that ASA Brady Allen has for many months engaged in electronic communications with Brianna Lee during the pendency of her criminal matters also requesting sexual favors and/or

pornographic material.

13. That Brianna Lee has made statements to me that ASA Brady Allen was going to reduce her pending criminal DUI charge to reckless driving in exchange for sexual favors and/or pornographic material.

14. That I questioned ASA Brady Allen about the conflict of interest and his involvement in my cases.

15. That ASA Brady stated that the CCSAO had a policy that the contact with between ASA Brady Allen and the Defendants was permissible as long as the relationship did not get serious.

16. That ASA Brady Allen stated to me that if the relationship became serious he would inform States Attorney Danley who would then get someone else to prosecute her.

**AFFIANT FURTHER SAYETH NAUGHT**

Date: 8-21-20

Respectfully Submitted,

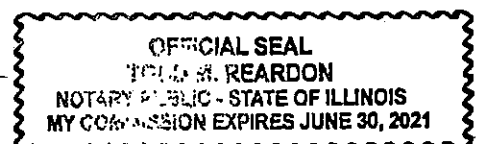
Kara Chumbley  
Kara Chumbley

STATE OF ILLINOIS            )  
  )   SS  
COUNTY OF COLES         )

I, the undersigned, a Notary Public in and for said County, in the State aforementioned do hereby certify that Kara Chumbley, becoming personally known to me to be the same person whose name is subscribed to the foregoing instrument, appeared before me this day in person and acknowledged that she signed, sealed, and delivered the said instrument as her free and voluntary act, for the uses and purposes therein set forth.

Given under my hand this 21<sup>st</sup> day of August, 2020.

John M. Reardon  
Notary Public



**IN THE CIRCUIT COURT FOR THE FIFTH JUDICIAL CIRCUIT  
COLES COUNTY, ILLINOIS**

**THE PEOPLE OF  
THE STATE OF ILLINOIS**  
Plaintiff,

vs.

**KARA CHUMBLEY**  
Defendant.

Case No.   **19-DT-76**  
              **19-DT-100**

**AFFIDAVIT**

I, Mackenzie Crable, being sworn under oath do hereby state as follows:

1.     I am over the age of 22, and I make this affidavit based upon my own personal knowledge.
2.     That I have no cases in pending in Coles County.
3.     That in 2019 a friend of mine, Brianna Lee, advised she was being approached by an Assistant State's Attorney who was wanting to trade sexual favors for her on a case.
4.     That on February 18, 2020, I was in court with Kara Chumbley and saw her receive a text messages while in Court from Brady Allen on her apple watch.
5.     That Kara Chumbley shared with me some of the sexually explicit messages she had received from Mr. Allen.
6.     That Brady Allen was the same person who I learned was pressuring Brianna Lee.

**AFFIANT FURTHER SAYETH NAUGHT**

Date: 8/21/2020

Respectfully Submitted,

Mackenzie Crable

Mackenzie Crable

STATE OF ILLINOIS  
COUNTY OF COLES

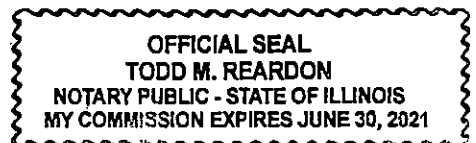
)  
) SS  
)

I, the undersigned, a Notary Public in and for said County, in the State  
aforementioned do hereby certify that Makenzie Crable, becoming personally known to  
me to be the same person whose name is subscribed to the foregoing instrument,  
appeared before me this day in person and acknowledged that she signed, sealed, and  
delivered the said instrument as her free and voluntary act, for the uses and purposes  
therein set forth.

Given under my hand this 21<sup>st</sup> day of August, 2020.



Notary Public

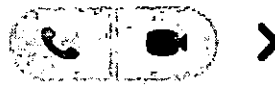


2:36

LTE



Brady Allen



MARCH 3RD

BRADY

Then you need to visit me and we can discuss  
your situation while you ride my cock ;)

Or I can give advice while your mouth is full 🐱

BRADY

How's that for a plan?

BRADY

What time do you get off?

MARCH 4TH

BRADY

Well I don't think I'm going to hear back from  
you tonight. And I was trying to be playful there  
but if you don't like that suggestion, I'd at least  
like to get dinner or something and talk things  
out. I hope you won't take forever to get back to  
me...

You're killing me here.

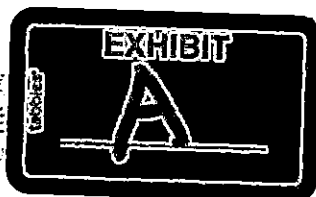
Do you have any interest in getting together?

Damn. I'm out of town Saturday. Let me know  
what your schedule looks like the next week, or  
just whenever you think you're going to have a  
few hours free.

TODAY

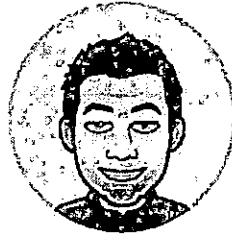


Send



2:48

LTE



**Brady Allen**

wrath1989

+ Accept Friend

### Suggested For You



**Karetzi Nara...**  
RECENTLY JOINED

+ Add



**Hannah Sch...**  
RECENTLY JOINED

+ Add



**HayHay** ❤️  
hayhay5761

+ Add



**Cass**  
IN A G



2:47

◀ Messenger

LTE

< **Brady Allen**



**Brady Allen** (Allen)

Message



🏠 Lives in **Charleston, Illinois**

🕒 Joined **March 2011**

⋮ See Brady's About Info



1:05

< 2



Brady Allen

Active 27m ago



27m

**Brady Allen**

You're friends on Facebook  
Lives in Charleston, Illinois

JUL 14, 12:30 PM



Doing alright?

JUL 24, 3:15 PM



Do you not trust me or something?

JUL 24, 4:07 PM

I do I'm just about to get my first  
dui amended down so i wanting to  
keep my distance until it's final



Why? I have nothing to do with  
that anymore

oh ya!



But I'm glad to hear that.

JUL 28, 2:39 PM



EXHIBIT  
D





1:05

Brady Allen

Active 27m ago

date. And I've told her that. You're a little bit more conservative in that area.

And I DID try to take you out a few times to see if we connected enough where that wouldn't matter but you were busy those few times and then you just seemed to lose interest.

yeah you're right i just don't put out for everyone

whatever i'm over this convo lolol but yeah

And that's fine. I don't hold it against you. That's respectable.

I didn't realize i was hurting your feelings. Just didn't want to waste your time. I still think you're a very cool girl. Just be honest with yourself. You wouldn't want to date a guy who is into the stuff I'm into.

you're right i'm not

Exactly. It wasn't because I didn't like you. It's just, clearly we weren't a good fit. I still wanted to



1:05

Brady Allen

Active 27m ago

JUL 28 2:39 PM

What was that about?

huh

What do you mean, huh?

lol i just sent bri what u said to me  
so we could  
compare lololol

Hell, I'd have shown her if she  
wanted to see that. I've not tried  
to hide that I've been interested in  
getting with either of you since I'm  
no longer on your cases. She just  
didn't seem to lose interest like  
you seemed to around April or  
whenever it was.

i lost interest because you only  
seemed to cared about one thing  
we talked about that

and it hurt my feelings

I tried to be clear about that. Not  
the only thing I cared about. I just  
like a slut for someone I would  
date. And I've told her that. You're  
a little bit more conservative in

EXHIBIT

F

1:05



Brady Allen

Active 26m ago



I'm okay just do your thing with her lol



I get that. But like I said, I'd like us to be able to be friends if you're willing to be open to that.

yeah of course



Then let's act like friends. Instead of doing stuff like kicking me off snapchat and such. I like us being able to talk casually

FRIDAY 10/10/14



Don't suppose you'd want to get lunch tomorrow?

FRIDAY 10/10/14



If not, that's fine. I was going to be in the area around then and thought I'd offer to buy yours if you had nothing going on.

12:11

i'm at work



You mean tomorrow?



12:01

Facebook

Brady Allen

Active now

out sometime and I can buy you  
dinner for the misunderstanding?

I'm okay just do your thing with  
her lol

I get that. But like I said, I'd like us  
to be able to be friends if you're  
willing to be open to that.

yeah of course

Then let's act like friends. Instead  
of doing stuff like kicking me off  
snapchat and such. I like us being  
able to talk casually

FRI 10:00 PM

Don't suppose you'd want to get  
lunch tomorrow?

FRI 10:03 PM

If not, that's fine. I was going to be  
in the area around then and  
thought I'd offer to buy yours if  
you had nothing going on.

i'm at work



12:01

Facebook

Brady Allen

Active now

Lately, it wasn't because I didn't

like you. It's just, clearly we

weren't a good fit. I still wanted to

be good friends, if you'd been

willing to let me.

I like you a lot and I'm sorry you

got the impression. It was never

my intention to hurt your feelings.

Maybe the three of us can all go

out sometime and I can buy you

dinner for the misunderstanding?

I'm okay just do your thing with

her lol

I get that. But like I said, I'd like us

to be able to be friends if you're

willing to be open to that.

yeah of course

Then let's act like friends. Instead

of doing stuff like kicking me off

snapchat and such. I like us being

able to talk casually

FB IMG 11

Don't suppose you'd want to get

lunch tomorrow?



**From:** Todd Reardon  
**Sent:** Friday, July 17, 2020 3:58 PM  
**To:** Mervin Wolfe  
**Subject:** Fw: Notification of Service for Case: 2019SC583, 2019SC583 for filing Notice of Hearing, Envelope Number: 9807169

----- Forwarded Message -----

**From:** no-reply@tylerhost.net <no-reply@tylerhost.net>  
**To:** "toddmreardon@yahoo.com" <toddmreardon@yahoo.com>  
**Sent:** Friday, July 17, 2020, 03:18:01 PM CDT  
**Subject:** Notification of Service for Case: 2019SC583, 2019SC583 for filing Notice of Hearing, Envelope Number: 9807169



ODYSSEY  
**eFileLL**™

## Notification of Service

Case Number: 2019SC583  
Case Style: 2019SC583  
Envelope Number: 9807169

This is a notification of service for the filing listed. Please click the link below to retrieve the submitted document.

Filing Details	
Case Number	2019SC583
Case Style	2019SC583
Date/Time Submitted	7/17/2020 3:12 PM CST
Filing Type	EFileAndServe
Filing Description	Notice of Hearing
Filed By	Richelle Coulter
Service Contacts	MERVIN L WOLFE:  Mervin Wolfe ( <a href="mailto:wolfelawoffice@yahoo.com">wolfelawoffice@yahoo.com</a> )  Todd Reardon ( <a href="mailto:toddmreardon@yahoo.com">toddmreardon@yahoo.com</a> )   JESSE DANLEY:  Jesse Danley ( <a href="mailto:jdandley@co.coles.il.us">jdandley@co.coles.il.us</a> )

	Jacob Smallhorn (jsmallhorn@smallhornlaw.com)
--	---

Document Details	
Served Document	<a href="#">Download Document</a>
This link is active for 45 days.	

If the link above is not accessible, copy this URL into your browser's address bar to view the document:  
<https://illinois.tylerhost.net/ViewServiceDocuments.aspx?ADMIN=0&SID=bf182668-fd6d-4702-b18f-23bf8df7fbd2>

**VALID FOR BOATS CURRENTLY TITLED IN ILLINOIS - NOT VALID FOR OUT-OF-STATE TITLES**



Watercraft Registration and Tilling

**POWER OF ATTORNEY**

Know All Men, By These Presents,

THAT (seller(s)) Jesse Danley

whose address is 651 Jackson Ave., Room 330, Charleston, IL 61920

does hereby make, constitute, and appoint Department of Natural Resources

whose address is One Natural Resources Way, Springfield, IL 62702-1271

as his lawful attorney in fact, to sign all papers and documents required to secure Illinois title and registration of, or transfer interest in, the following described watercraft:

Registration No. IL 3182FD

Hull Identification No. SEAA44310977

Manufacturer Sea Nymph

Model Year 1978 Length-Feet 14

Model Name BassNJohn

Date of Purchase on or about April 27, 2013  
month/day/year

COMPLETE THE FOLLOWING: (if applicable)

Purchaser's Name Wolfe Mervin  
(Last) (First) (Middle Initial)  
Purchaser's Address PO Box 242  
(Number and Street)  
Marshall IL 62441  
(City) (State) (Zip Code)

Granting to the aforesaid attorney in fact full power to do all acts as the principal might or could do if personally present; and hereby ratifying and confirming all that said attorney in fact shall lawfully do or cause to be done by virtue of the authority herein given for this purpose.

Such authority shall in no way reflect upon the State of Illinois, Department of Natural Resources, or the Director of the Department.

Seller(s) Jesse Danley

Signature(s) Jesse Danley

of sale on or about

Date signed April 27, 2013  
month/day/year

**Power of Attorney form can only be used if:**

You sold your boat to an Illinois resident-not valid for non-residents.

The previous owner does not have the Illinois watercraft title. The Power of Attorney will take the place of the original (lost) title issued to the previous owner(s). If the lost title is ever recovered, it will not be valid and must be returned to the Department of Natural Resources, Watercraft Registration, One Natural Resources Way, Springfield, IL 62702-1271.

If our records list a lien on the title then you must have a letter from the lienholder releasing the lien. Then submit the Power of Attorney and the lien release letter with your application and fee for a title/registration.

**Instructions:**

The seller(s) must complete and sign the Power of Attorney Form.

The purchaser(s) must complete the watercraft application form and submit with the Power of Attorney form, release of lien (if required), tax form (if required) and fee.



Jesse Danley  
651 Jackson Ave. Room 330  
Charleston, IL 61920

September 23, 2019

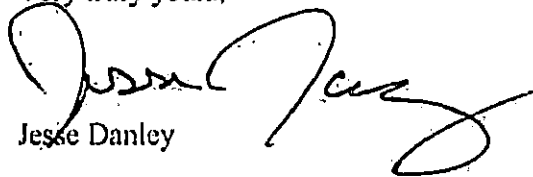
*Via Email* wolfelawoffice@yahoo.com  
Mr. Mervin Wolfe  
PO Box 242  
Marshall, IL 62441

Re: DNR POA- Sea Nymph

Dear Mr. Wolfe:

After communicating with legal counsel for the Illinois Department of Natural Resources I was instructed to provide to you the attached Power of Attorney showing the date of the sale. You are now able to secure a replacement title after completing the necessary application as directed at the bottom of the POA.

Very truly yours,



Jesse Danley

rjp  
enclosure

## **Ronda Parker - Coles Co State's Atty's Office**

---

**From:** Ronda Parker - Coles Co State's Atty's Office  
**Sent:** Monday, September 23, 2019 5:00 PM  
**To:** 'wolfelawoffice@yahoo.com'  
**Subject:** DNR-POA  
**Attachments:** Wolfe, Mervin ltr with Attached DNR POA.pdf

Dear Mervin:

I am attaching hereto correspondence with attachments from Jesse Danley. Please acknowledge receipt of this email. Sometimes when I send emails with attachments it goes to spam. Also, let me know if you have any trouble opening the attachment and I will send in a different format.

Have a good evening.

Ronda Parker  
651 Jackson Ave., Room 330  
Charleston, IL 61920  
Phone(217) 348-0568  
Fax (217) 348-0576

## **Ronda Parker - Coles Co State's Atty's Office**

---

**From:** Ronda Parker - Coles Co State's Atty's Office  
**Sent:** Monday, October 21, 2019 3:24 PM  
**To:** wolfelawoffice@yahoo.com  
**Cc:** Jesse Danley - State's Attorney  
**Subject:** Hearing date

Dear Mr. Wolfe:

I have called your office and left a voice mail and thought it might help to contact you via email also. I would like to coordinate a hearing date in the Small Claims Case of Wolfe vs. Danley 19-SC-583 . Judge Bovard has the following dates available:

Tuesday, November 5, 2019 at 3:00 p.m.

Thursday, November 7, 2019 at 2:30 p.m.

Wednesday, November 13, 2019 at 3:00 p.m.

Please let me know if any of those dates work for you and I'll send Notice.

I look forward to hearing from you.

Have a good day.

Ronda Parker  
(217) 348-0561

Ronda Parker

(217) 348-0561

## **Ronda Parker - Coles Co State's Atty's Office**

---

**From:** Ronda Parker - Coles Co State's Atty's Office  
**Sent:** Tuesday, October 22, 2019 9:16 AM  
**To:** wolfelawoffice@yahoo.com  
**Subject:** RE: Hearing date

Sounds good. Just whenever you have a chance to check your schedule.

Safe travels!

Ronda

---

**From:** wolfelawoffice@yahoo.com <wolfelawoffice@yahoo.com>  
**Sent:** Tuesday, October 22, 2019 9:11 AM  
**To:** Ronda Parker - Coles Co State's Atty's Office <RParker@co.coles.il.us>  
**Subject:** Re: Hearing date

Dear Rhonda,  
I am on the road today. I will respond to your request tomorrow before the close of business.  
MLW

On Monday, October 21, 2019, 03:22:31 PM CDT, Ronda Parker - Coles Co State's Atty's Office  
<[RParker@co.coles.il.us](mailto:RParker@co.coles.il.us)> wrote:

Dear Mr. Wolfe:

I have called your office and left a voice mail and thought it might help to contact you via email also. I would like to coordinate a hearing date in the Small Claims Case of Wolfe vs. Danley 19-SC-583 . Judge Bovard has the following dates available:

Tuesday, November 5, 2019 at 3:00 p.m.

Thursday, November 7, 2019 at 2:30 p.m.

Wednesday, November 13, 2019 at 3:00 p.m.

Please let me know if any of those dates work for you and I'll send Notice.

I look forward to hearing from you.

Have a good day.

Consistent with our conversation this date, below is a synopsis of the legal question I posed:

In April 2013 Jesse Danley, now state's attorney of Coles County, sold a Jon Boat to Mervin Wolfe. Jesse signed the title over the same date as the boat being picked up. Mr. Wolfe never had the transferred title registered with DNR. Three weeks ago Mr. Wolfe filed a small claims complaint against Jesse Danley claiming he refused to transfer the title. I have all the craig's list information from 2013 and the emails of the sale and also a 2018 email from Mr. Wolfe stating he lost the title in 2018.

Question: Jesse Danley wants Mr. Wolfe to have a proper title for the boat but he is unwilling to sign paperwork that would make it appear as if the sale took place today. We need it to show that the sale was, in fact in April of 2013. We are unwilling to surrender the position that the small claims suit is past the 5 year statute of limitations for civil cases and 4 year statute of limitations as to commerce. Is there a way for the title of the Jon boat to be given to Mr. Wolfe? He did buy it and it was properly signed over to him.

Buyer: Mervin Wolfe, P.O. Box 242, Marshall, IL 62441

Seller: Jesse Danley, Charleston, Illinois

Vessel Registration: IL3182FD

Hull Type: Aluminum

Make: Sea Nymph

Model: BassNJohn

Year: 1978

Hull Identification Number (HIN): #SEAA44310977

Purchase Price: Total amount- \$1,500 single cash payment

Please let me know your thoughts or what actions can occur so Mr. Wolfe can legally use his boat and Mr. Danley can declare this case not just dismissed due to statute of limitations but also because it is moot.

Thank you.

Ronda Parker, Paralegal  
Coles County State's Attorney  
Coles County Courthouse  
651 Jackson Ave., Room 330  
Charleston, IL 61920  
(217) 348-0568 Work  
(217) 273-4536 Cell  
(217) 348-0576 Fax

State of Illinois - CONFIDENTIALITY NOTICE: The information contained in this communication is confidential, may be attorney-client privileged or attorney work product, may constitute inside information or internal deliberative staff communication, and is intended only for the use of the addressee. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify the sender immediately by return e-mail and destroy this communication and all copies thereof, including all attachments. Receipt by an unintended recipient does not waive attorney-client privilege, attorney work product privilege, or any other exemption from disclosure.

## **Ronda Parker - Coles Co State's Atty's Office**

---

**From:** Edwards, Tim [Tim.Edwards@Illinois.gov]  
**Sent:** Monday, September 23, 2019 8:16 AM  
**To:** Ronda Parker - Coles Co State's Atty's Office  
**Cc:** Brown, Ronda  
**Subject:** FW: Coles County State's Attorney sale of Jon Boat in 2013  
**Attachments:** Power Of Attorney.pdf

In order for IDNR to transfer ownership of the 1978 Sea Nymph from Jesse Danley to Mervin Wolfe, Mr. Danley will be required to provide Mr. Wolfe with a signed Power of Attorney form in lieu of the lost title. The "POA" will need to be signed and dated when the original sale took place. Once Mr. Wolfe receives the signed "POA," he may then apply for a title and registration in his own name.

Please let me know if further information is needed. Thank you

<https://www.dnr.illinois.gov/boating/Documents/FillWCA.pdf>

---

**From:** Brown, Ronda  
**Sent:** Wednesday, September 18, 2019 11:53 AM  
**To:** Edwards, Tim <Tim.Edwards@Illinois.gov>; McAdams, Deborah L. <Deborah.L.McAdams@illinois.gov>  
**Cc:** Christian, Nicky <Nicky.Christian@Illinois.gov>; Snow, Renee <Renee.Snow@illinois.gov>  
**Subject:** FW: Coles County State's Attorney sale of Jon Boat in 2013

Please see email below questioning the process for transferring boat title, effective April 2013. Please respond to the email below explaining the process.

If you need to discuss options/issues, please give Renee Snow a call.

Thanks.

Ronda



**Ronda Brown**  
Administrative Assistant, IDNR Office of Legal Counsel  
One Natural Resources Way  
Springfield, Illinois 62702  
217-782-1809  
ronda.brown@illinois.gov

---

**From:** Ronda Parker - Coles Co State's Atty's Office <RParker@co.coles.il.us>  
**Sent:** Tuesday, September 17, 2019 2:33 PM  
**To:** Brown, Ronda <Ronda.Brown@Illinois.gov>  
**Subject:** [External] Coles County State's Attorney sale of Jon Boat in 2013

Dear Ronda:

11/29/2019

One Thousand Two Hundred Eighty Five and 11/100



\*\*\*\*NON - NEGOTIABLE\*\*\*\*

\*\*\*\*Direct Deposit Amount\*\*\*\*

RONDA J PARKER

Employee Number		Employee Name		Check Date		Period End		Check Number		Check Amt	
607		RONDA J PARKER		11/28/2019		11/30/2019		167358		\$1,285.11	
Catag	Description	Rate	Hours	Income	Y-T-D	Catag	Description	Deduct	Y-T-D		
SAL	SALARY EARNIN	0.00		\$1,937.50	\$41,750.00	CARDP	BLUECROSS/BLUESH	\$34.65	\$760.10		
		0.00		\$1,937.50	\$41,750.00	DDLTA	BLUE CARE DENTAL D	\$9.08	\$199.76		
						DVISN	DEARBORN NATL VISI	\$2.87	\$63.14		
						FICA	FICA WITHHOLDING	\$117.24	\$2,525.10		
						FWT	FEDERAL WITHHOLDIN	\$289.44	\$6,266.48		
						MED	MEDICARE WITHHOLDI	\$27.42	\$590.50		
						RG03	IMRF- RG03	\$87.19	\$1,878.84		
						SWT	ILLINOIS STATE WITHH	\$84.60	\$1,819.88		
								\$652.38	\$14,103.76		

Coles County

651 Jackson Ave

Room 124

Charleston, IL

61920





**One Thousand Two Hundred Eighty Five and 11/100-----**

\*\*\*\*Direct Deposit Amount\*\*\*\*

**\*\*\*\*NON - NEGOTIABLE\*\*\*\***

**RONDA J PARKER**

Employee Number		Employee Name		Check Date	Period End	Check Number	Check Amt		
607		RONDA J PARKER		10/31/2019	10/31/2019	166899	\$1,285.11		
Categ	Description	Rate	Hours	Income	Y-T-D	Categ	Description	Deduct	Y-T-D
SAL	SALARY EARNIN		0.00	\$1,937.50	\$37,875.00	CARDP	BLUECROSS/BLUESHI	\$34.55	\$691.00
			0.00	\$1,837.50	\$37,875.00	DDLTA	BLUE CARE DENTAL D	\$9.08	\$181.60
						DVISN	DEARBORN NATL VISI	\$2.87	\$57.40
						FICA	FICA WITHHOLDING	\$117.24	\$2,280.62
						FWT	FEDERAL WITHHOLDIN	\$289.44	\$5,687.58
						MED	MEDICARE WITHHOLDI	\$27.42	\$535.66
						RG03	IMRF- RG03	\$87.19	\$1,704.46
						SWT	ILLINOIS STATE WITHH	\$84.60	\$1,650.66
								\$652.39	\$12,788.98

61920



***State's Attorney***

Jesse Danley

***Victim Services***

Shannon M. Hill

Jan Ashmore

***Investigators***

Steve Kelly

Jeff Endsley



***Assistant State's Attorneys***

Joy Wolf

Jenifer L. Schiavone

Brady L. Allen

Maggie Crisman-Wilson

Nathanael Harsy

**COLES COUNTY  
STATE'S ATTORNEY**

651 Jackson Ave., Room 330

Charleston, IL 61920-2074

Phone: (217) 348-0561

Fax: (217) 348-0576

***Paralegal***

Ronda J. Parker

December 27, 2019

Mervin Wolfe  
8789 Country Club Rd.  
Charleston, IL 61920  
[wolfelawoffice@yahoo.com](mailto:wolfelawoffice@yahoo.com)

Re: FOIA Request

Dear Mr. Wolfe:

I am in receipt of your FOIA request and respond as follows:

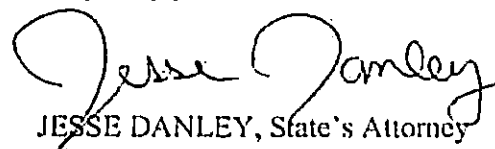
#1. Ronda Parker is a salaried exempt employee. There are no "time in time out" records. Attached are copies of paychecks of Ronda Parker from September 1, 2019 to December 1, 2019 showing payments made.

#2. Attached hereto are copies of the email thread between Ronda Parker and DNR. There are no telephone records.

#3. See Response to #2 hereinabove.

#4. None. All documents and pleadings are on file and of public record in 19-SC-583. Attached are copies of the emails to you, which are already in your possession but I tender in response.

Very truly yours,

  
JESSE DANLEY, State's Attorney

**IN THE CIRCUIT COURT FOR THE FIFTH JUDICIAL CIRCUIT  
COLES COUNTY, ILLINOIS**

Mervin Wolfe,  
Plaintiff,

-vs-

**2019-SC-583**

Jesse Danley,  
Defendant.

**MOTION TO SUBSTITUTE JUDGE**

Now comes the Plaintiff, Mervin Lee Wolfe, and pursuant to 735 ILCS 5/2-1001, moves this Honorable Court for substitution of Judge and in support thereof, states as follows:

1. That the Defendant has entered his Appearance Pro Se and has Answered in this matter in the above captioned case as Jesse Danley, Pro Se.
2. To date no substantive ruling has been entered in this matter.
3. As such the Petitioner is entitled to a substitution of Judge as of right pursuant to 735 ILCS 5/2-1001.

**Wherefore** the Petitioner moves this honorable court for a substitution of judge as of right.

By \_\_\_\_\_  
s/s Mervin L. Wolfe, Plaintiff

Mervin L. Wolfe  
Attorney at Law  
212 N. Michigan Avenue  
P.O. Box 242  
Marshall, IL 62441  
(812) 645-1200

IN THE CIRCUIT COURT OF THE FIFTH JUDICIAL CIRCUIT  
COLES COUNTY, ILLINOIS

Mervin Wolfe

Plaintiff,

vs.

No. 2019-SC-583

Jesse Danley,

Defendant.

**MOTION TO STRIKE**  
**PARAGRAPH 18**  
**OF DEFENDANTS MOTION TO DISMISS**

NOW COMES MERVIN WOLFE, Plaintiff, and moves this Honorable Court to Strike portions of the Motion to Dismiss filed herein specifically paragraph 19 and in support of this Motion states as follows:

1. That Defendant Jesse Danley has placed into the court record the following verified factual statement contained within paragraph 18 of the Motion To Dismiss as follows.

18. That Plaintiff's filing of the underlying Complaint is filed in retaliation to the State's Attorney of Coles County filing battery charges against him in Coles County cause 2019-CM-297 wherein Plaintiff is recorded on video grabbing an elderly woman and pushing her to the ground, bruising her eye. Plaintiff filed his Entry of Appearance in his criminal case 2019-CM-297 the same date as filing his Complaint in this cause on July 30, 2019.

2. That the Defendants knowledge of the factual statements in paragraph 18 were acquired solely through his official capacity as Coles County States Attorney. Further this information was taken from evidence currently being held by the Sheriff's office, based on a case which Coles County States Attorney Jesse Danley dismissed People vs Nancy Barber.
3. The Defendants use and dissemination of the privileged information placed into paragraph 18 is strictly prohibited by the Illinois Rules of Professional Conduct 3.6 (a); 3.6 (b); 3.6 (b) 1; 3.6(b)2; 3.6 (b)3; 3.6 (b) 4; 3.6(b)5; 3.6(b) 6 and 3.6 e.
4. That the Defendant knew that Illinois Rules of Professional Conduct Rule 3.6 were in effect as follows:

RULE 3.6. TRIAL PUBLICITY (a) A lawyer who is participating or has participated

Notwithstanding paragraph (a), a lawyer may make a statement that a reasonable lawyer would believe is required to protect a client from the substantial undue prejudicial effect of recent publicity not initiated by the lawyer or the lawyer's client. A statement made pursuant to this paragraph shall be limited to such information as is necessary to mitigate the recent adverse publicity. (e) No lawyer in a firm, or government agency, or otherwise associated with a lawyer subject to paragraph (a) shall make a statement prohibited by paragraph (a). CREDIT(S) Adopted Feb. 8, 1990, eff. Aug. 1, 1990. Amended Oct. 22, 1999, eff. March 16, 2000. HISTORICAL NOTES Rule 3.6 of the Rules of Professional Conduct was originally amended October 22, 1999, effective December 1, 1999; however, the Supreme Court of Illinois stayed the effect and enforcement of this rule until further order of the Court. The Supreme Court announced March 16, 2000, that the November order "staying the force and effect" of the October order "is lifted," and that the amended rules "are effective immediately.

5. The Defendants use and dissemination of the privileged information in paragraph 18 is strictly prohibited by the Illinois Rules of Professional Conduct 3.8 (a); 3.8(d); 3.8(f).
6. That the Defendant knew that Illinois Rules of Professional Conduct Rule 3.8 were in effect at the time of the filing of paragraph 18.

**RULE 3.8: SPECIAL RESPONSIBILITIES OF A PROSECUTOR** The duty of a public prosecutor is to seek justice, not merely to convict. The prosecutor in a criminal case shall: (a) refrain from prosecuting a charge that the prosecutor knows is not supported by probable cause; (b) make reasonable efforts to assure that the accused has been advised of the right to, and the procedure for obtaining, counsel and has been given reasonable opportunity to obtain counsel; (c) not seek to obtain from an unrepresented accused a waiver of important pretrial rights, such as the right to a preliminary hearing; (d) make timely disclosure to the defense of all evidence or information known to the prosecutor that tends to negate the guilt of the accused or mitigates the offense, and, in connection with sentencing, disclose to the defense and to the tribunal all unprivileged mitigating information known to the prosecutor, except when the prosecutor is relieved of this responsibility by a protective order of

in the investigation or litigation of a matter shall not make an extrajudicial statement that a reasonable person would expect to be disseminated by means of public communication if the lawyer knows or reasonably should know that it would pose a serious and imminent threat to the fairness of an adjudicative proceeding. (b) There are certain subjects which would pose a serious and imminent threat to the fairness of a proceeding, particularly when they refer to a civil matter triable to a jury, or a criminal matter. These subjects relate to: (1) the character, credibility, reputation or criminal record of a party, suspect in a criminal investigation or witness, or the identity of a witness, or the expected testimony of a party or witness; (2) in a criminal case, the possibility of a plea of guilty to the offense or the existence or contents of any confession, admission, or statement given by a defendant or suspect or that person's failure to make a statement; (3) the performance or results of any examination or test or the failure of a person to submit to an examination or test, or the nature of physical evidence expected to be presented; (4) any opinion as to the guilt or innocence of a defendant or suspect in a criminal case; (5) information that the lawyer knows or reasonably should know is likely to be inadmissible as evidence in a trial; or (6) the fact that a defendant has been charged with a crime, unless there is included therein a statement explaining that the charge is merely an accusation and that the defendant is presumed innocent unless proven guilty. (c) Notwithstanding paragraph (a), a lawyer may state: (1) the claim, offense or defense involved and, except when prohibited by law, the identity of the persons involved; (2) information contained in a public record; (3) that an investigation of a matter is in progress; (4) the scheduling or result of any step in litigation; (5) a request for assistance in obtaining evidence and information necessary thereto; (6) a warning of danger concerning the behavior of a person involved, when there is reason to believe that there exists the likelihood of substantial harm to an individual or to the public interest; and (7) in a criminal case, in addition to subparagraphs (1) through (6): (i) the identity, residence, occupation, and family status of the accused, (ii) if the accused has not been apprehended, information necessary to aid in apprehension of that person, (iii) the fact, time, and place of arrest, and (iv) the identity of investigating and arresting officers or agencies and the length of the investigation. (d)



the tribunal; (e) not subpoena a lawyer in a grand jury or other criminal proceeding to present evidence about a past or present client unless the prosecutor reasonably believes: (1) the information sought is not protected from disclosure by any applicable privilege; (2) the evidence sought is essential to the successful completion of an ongoing investigation or prosecution; and (3) there is no other feasible alternative to obtain the information; (f) except for statements that are necessary to inform the public of the nature and extent of the prosecutor's action and that serve a legitimate law enforcement purpose, refrain from making extrajudicial comments that pose a serious and imminent threat of heightening public -2- condemnation of the accused and exercise reasonable care to prevent investigators, law enforcement personnel, employees or other persons assisting or associated with the prosecutor in a criminal case from making an extrajudicial statement that the prosecutor would be prohibited from making under Rule 3.6 or this Rule. (g) When a prosecutor knows of new, credible and material evidence creating a reasonable likelihood that a convicted defendant did not commit an offense of which the defendant was convicted, the prosecutor shall: (1) promptly disclose that evidence to an appropriate court or authority, and (2) if the conviction was obtained in the prosecutor's jurisdiction, (i) promptly disclose that evidence to the defendant unless a court authorizes delay, and (ii) undertake further reasonable investigation, or make reasonable efforts to cause an investigation, to determine whether the defendant was convicted of an offense that the defendant did not commit. (h) When a prosecutor knows of clear and convincing evidence establishing that a defendant in the prosecutor's jurisdiction was convicted of an offense that the defendant did not commit, the prosecutor shall seek to remedy the conviction. (i) A prosecutor's judgment, made in good faith, that evidence does not rise to the standards stated in paragraphs (g) or (h), though subsequently determined to have been erroneous, does not constitute a violation of this rule.

7. The use and publication of this privileged information gained in the Defendants official capacity as Coles County States Attorney is a violation of IRPC 3.6 and IRPC 3.8. This is an act of Official Misconduct done for personal gain.
8. That the Defendant knew at the time of placing the factual statements of paragraph 18 into the record, that the statement was false, known to be false at the time the Defendant placed them into the record.

9. That paragraph 18 was by design to be factually incorrect and intentionally misleading. The Defendants unlawful use of the protected information was done with the intent to injure the Plaintiff and for personal; financial gain.
10. That the factual statements contained paragraph 18 are irrelevant, and unnecessarily prejudicial and violations of IRPC 3.6 and IRPC 3.8 as well as a criminal act of Official Misconduct.
11. The Defendant seeks to interject his own persecution fantasies into this matter involving the failure of the Defendant to comply with the terms and conditions of the original sale and subsequent failure of Defendant to act on transfer of the boat.

Wherefore the Plaintiff hereby prays this Court strike paragraph 18 of Defendants Motion to Dismiss filed herein.

---

Mervin Wolfe s/s

IN THE CIRCUIT COURT OF THE FIFTH JUDICIAL CIRCUIT  
COLES COUNTY, ILLINOIS

Mervin Wolfe

Plaintiff,

vs.

No. 2019-SC-583

Jessie Danley,

Defendant.

**MOTION TO STRIKE**  
**COUNT I OF DEFENDANTS MOTION TO DISMISS**  
**PURSUANT TO ILLINOIS SUPREME COURT RULE 287(b)**

NOW COMES MERVIN WOLFE, Plaintiff, and moves this Honorable Court to Strike the Motion to Dismiss Count One pursuant to Illinois Supreme Court Rule 287 (b) and in support states as follows:

1. The Defendant Jesse Danley has placed into the court record a "Motion to Dismiss the Small Claims Case filed by Plaintiff in this matter.
2. The rules relating to small claims actions are set forth in Rules 281 through 289 of the Rules of the Illinois Supreme Court. Copies of these Rules are available on the Internet at <http://www.state.il.us/court/SupremeCourt/Rules/> . These Rules are designed to enable an individual to collect a debt or settle any small legal controversy involving money without having to go through a long, more expensive legal process as is associated with more substantial legal claims.
3. Illinois Supreme Court Rules define Small Clams as follows:

**Rule 281. Definition of Small Claim**

For the purpose of the application of Rules 281 through 288, a small claim is a civil action based on either tort or contract for money not in excess of \$10,000, exclusive of interest and costs, or for the collection of taxes not in excess of that amount.

4. Illinois Supreme Court Rule 287 limits the use of 735 ILCS 2-615 Motions states as follows:

**Rule 287. Depositions, Discovery and Motions**

(a) No depositions shall be taken or interrogatories or other discovery proceeding or requests to admit be used prior to trial in small claims except by leave of court.

**(b) Motions.** Except as provided in sections 2--619 and 2--1001 of the Code of Civil Procedure, no motion shall be filed in small claims cases, without prior leave of court.

5. That the Defendant did not seek leave of Court prior to filing his Motion to Dismiss. Count 1 pursuant to 735 ILCS 5/2-615.

Wherefore the Plaintiff Mervin Wolfe moves the honorable court to strike Count One filed herein in that it violates Illinois Supreme Court Rule 287(b) prohibiting 2-615 Motions in Small Claims matters.

Respectfully submitted,

---

Mervin Wolfe, s/s  
Plaintiff

IN THE CIRCUIT COURT  
FOR THE FIFTH JUDICIAL CIRCUIT OF ILLINOIS  
COLES COUNTY, CHARLESTON, ILLINOIS

MERVIN WOLFE,	)	
	)	
Plaintiff,	)	
	)	
Vs.	)	No. 2019-SC-583
	)	
JESSE DANLEY,	)	
	)	
Defendant.	)	

**RESPONSE TO AMENDED REQUEST TO ADMIT FACT**

Now comes the Defendant, JESSE DANLEY, by and through Jacob N. Smallhorn of Smallhorn Law, LLC, his attorney, and for his Response to Amended Request to Admit Fact states as follows:

1. Admit that you never paid an entry of appearance fee in the above-captioned cause.

**RESPONSE: Objection. This question has absolutely no relevance, nor could it possibly lead to the discovery of any relevant information concerning any of the pending issues in this litigation.**

2. Admit that in the above-captioned case 2019-SC-583, you WERE sued in your individual capacity AND not as the Coles' County State's Attorney.

**RESPONSE: Objection. This question has absolutely no relevance, nor could it possibly lead to the discovery of any relevant information concerning any of the pending issues in this litigation.**

3. Admit that you mailed your motion to dismiss and notices therein to Mr. Wolfe with postage paid by Coles County Tax Payer funds.

**RESPONSE: Objection. This question has absolutely no relevance, nor could it possibly lead to the discovery of any relevant information concerning any of the pending issues in this litigation.**

**CERTIFICATE OF SERVICE**

The undersigned, being first duly sworn on oath, deposes and says that he electronically filed the above document with the Clerk at the <https://illinois.tylerhost.net/ofsw eb> e-filing system and sent true copies thereof via email, on the 4th day of May, 2020.

TO:

Todd Reardon  
518 6th Street  
Charleston, IL 61920  
E : toddmreardon@yahoo.com

/s/ Jacob N. Smallhorn

Jacob N. Smallhorn  
Smallhorn Law LLC  
600 Jackson Avenue  
Charleston, IL 61920  
T: 217-348-5253  
E: jsmallhorn@smallhornlaw.com

4. Admit that Rhonda Parker worked on this case at the State's Attorney's Office.

**RESPONSE: Objection. This question has absolutely no relevance, nor could it possibly lead to the discovery of any relevant information concerning any of the pending issues in this litigation.**

5. Admit that all pro se pleadings produced by you in this case were filed from the state's Attorney's Office's computers to the e-filing system.

**RESPONSE: Objection. This question has absolutely no relevance, nor could it possibly lead to the discovery of any relevant information concerning any of the pending issues in this litigation.**

Dated this 4th day of May, 2020.

JESSE DANLEY, Defendant

By: /s/ Jacob N. Smallhorn  
Of Smallhorn Law  
His attorney.

Prepared by:  
Jacob N. Smallhorn  
Smallhorn Law LLC  
600 Jackson Avenue  
Charleston, Illinois 61920  
T: 217-348-5253  
E: [jsmallhorn@smallhornlaw.com](mailto:jsmallhorn@smallhornlaw.com)

IN THE CIRCUIT COURT  
FOR THE FIFTH JUDICIAL CIRCUIT OF ILLINOIS  
COLES COUNTY, CHARLESTON, ILLINOIS

MERVIN WOLFE,	)	
	)	
Plaintiff,	)	
	)	
Vs.	)	No. 2019-SC-583
	)	
JESSE DANLEY,	)	
	)	
Defendant.	)	

**RESPONSE TO MOTION TO DISMISS**

Now comes the Defendant, JESSE DANLEY, by and through his attorney, Jacob N. Smallhorn of Smallhorn Law, LLC, and in support of his Response to Motion to Dismiss filed by Plaintiff, MERVIN WOLFE, in this Cause on February 28, 2020, states as follows:

1. Defendant is in agreement that he has assisted Mr. Wolfe in the transfer of the boat and that the parties are no longer at issue relating to any allegation contained in the Complaint Plaintiff filed on July 30, 2019.
2. Defendant admits that he has executed a Power of Attorney to Plaintiff for the transfer of the boat.
3. Defendant agrees that the matter of ownership of the boat has been resolved.
4. Defendant is in agreement that the Complaint in this cause should be dismissed.

WHEREFORE, Defendant, JESSE DANLEY, prays that this Court enter an Order dismissing the Complaint as requested by Plaintiff, MERVIN WOLFE, reserving the issue of Defendant's Motion for Sanctions in his September 3, 2019 Motion to Dismiss for further hearing, and for any such further relief this court deems equitable and just under the circumstances.



Dated this 5th day of May, 2020.

JESSE DANLEY, Defendant,

By: /s/ Jacob N. Smallhorn  
Of Smallhorn Law LLC  
His attorney.

Prepared by:  
Jacob N. Smallhorn  
Smallhorn Law LLC  
600 Jackson Avenue  
Charleston, Illinois 61920  
T: 217-348-5253  
E: [jsmallhorn@smallhornlaw.com](mailto:jsmallhorn@smallhornlaw.com)

**CERTIFICATE OF SERVICE**

The undersigned, being first duly sworn on oath, deposes and says that he electronically filed the above document with the Clerk at the <https://illinois.tylerhost.net/ofsw eb> e-filing system and sent true copies thereof via email, on the 5th day of May, 2020.

TO:

Todd Reardon  
518 6th Street  
Charleston, IL 61920  
E : [toddmreardon@yahoo.com](mailto:toddmreardon@yahoo.com)

/s/ Jacob N. Smallhorn

Jacob N. Smallhorn  
Smallhorn Law LLC  
600 Jackson Avenue  
Charleston, IL 61920  
T: 217-348-5253  
E: [jsmallhorn@smallhornlaw.com](mailto:jsmallhorn@smallhornlaw.com)

IN THE CIRCUIT COURT  
FOR THE FIFTH JUDICIAL CIRCUIT OF ILLINOIS  
COLES COUNTY, CHARLESTON, ILLINOIS

MERVIN WOLFE,	)	
	)	
Plaintiff,	)	
	)	
Vs.	)	No. 2019-SC-583
	)	
JESSE DANLEY,	)	
	)	
Defendant.	)	

**NOTICE OF HEARING**

TO: Mervin L. Wolfe  
PO Box 242  
Marshall, IL 62441  
E : [wolfelawoffice@yahoo.com](mailto:wolfelawoffice@yahoo.com)

PLEASE TAKE NOTICE that I shall be and appear before the Presiding Judge of the Circuit Court of Coles County, in the Coles County Courthouse, Charleston, Illinois, at **2:00 p.m. on the 19th day of March, 2020**, or as soon thereafter as counsel can be heard, and then and there request a hearing on Defendant's Motion to Dismiss Pursuant to 735 ILCS 5/2-615 and 735 ILCS 5/2-619 and for Sanctions, at which time you may appear.

YOUR FAILURE TO APPEAR MAY RESULT IN A DEFAULT JUDGMENT BEING ENTERED IN YOUR ABSENCE.

DATED this 4<sup>th</sup> day of March, 2020.

JESSE DANLEY, Defendant,

By: /s/ Jacob N. Smallhorn  
Jacob N. Smallhorn  
Smallhorn Law LLC

Jacob N. Smallhorn  
Smallhorn Law LLC  
600 Jackson Avenue  
Charleston, IL 61920  
T: 217-348-5253  
E: [jsmallhorn@smallhornlaw.com](mailto:jsmallhorn@smallhornlaw.com)  
ARDC: 6307031

IN THE CIRCUIT COURT OF THE FIFTH JUDICIAL CIRCUIT  
COLES COUNTY, ILLINOIS

Mervin Wolfe

Plaintiff,

vs.

No. 2019-SC-583

Jessie Danley,

Defendant.

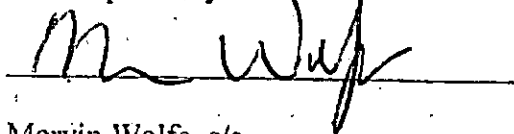
MOTION TO DISMISS

NOW COMES MERVIN WOLFE, Plaintiff, and moves this Honorable Court to Dismiss the Small Claims Complaint filed herein and in support states as follows:

1. The Defendant, Jesse Danley has complied with my March 8, 2018 email request to complete the transaction.
2. That the Defendant, Jesse Danley has executed a power of attorney to Plaintiff.
3. The matter of the ownership status of the boat has been resolved.

Wherefore the Plaintiff Mervin Wolfe moves the honorable court to Dismiss the Complaint filed herein.

Respectfully submitted,



Mervin Wolfe, s/s  
Plaintiff

**CERTIFICATE OF SERVICE**

The undersigned, being first duly sworn on oath, deposes and says that he electronically filed the above document with the Clerk at the <https://illinois.tylerhost.net/ofswweb> e-filing system and sent true copies thereof via email, on the 4th day of March, 2020.

TO:

Mervin L. Wolfe  
PO Box 242  
Marshall, IL 62441  
E : [wolfelawoffice@yahoo.com](mailto:wolfelawoffice@yahoo.com)

/s/ Jacob N. Smallhorn

Jacob N. Smallhorn  
Smallhorn Law LLC  
609 Monroe Avenue  
Charleston, IL 61920  
T: 217-348-5253  
E: [jsmallhorn@smallhornlaw.com](mailto:jsmallhorn@smallhornlaw.com)

IN THE CIRCUIT COURT  
FOR THE FIFTH JUDICIAL CIRCUIT OF ILLINOIS  
COLES COUNTY, ILLINOIS

MERVIN WOLFE,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 2019-SC-583
	)	
JESSE DANLEY,	)	
	)	
Defendant.	)	

**MOTION TO DISMISS PURSUANT TO 735 ILCS 5/2-615 AND 735 ILCS 5/2-619  
AND FOR SANCTIONS**

NOW COMES Defendant, JESSE DANLEY, Pro Se, and Answers the Complaint with Motion to Dismiss and moves this Honorable Court for an order dismissing this cause of action with prejudice pursuant to 735 ILCS 5/2-615 and 735 ILCS 5/2-619 and for an award of sanctions pursuant to Illinois Supreme Court Rule 137, and in support thereof Defendant states as follows:

**I. ANSWER**

1. Defendant admits the allegations contained in paragraph 1 of said Complaint and by way of affirmative matter states the advertisement was placed on Craigslist in April 2013.

2. Defendant admits the allegations contained in paragraph 2 of said Complaint and by way of affirmative matter states Plaintiff responded to the advertisement on Thursday, April 11, 2013. Attached hereto marked as Exhibit A and incorporated herein is a copy of the email response of Plaintiff to the advertisement.

3. Defendant admits the allegations contained in paragraph 3 of said Complaint that the Plaintiff and Defendant entered into a verbal agreement on the sale of the watercraft.

4. Defendant admits the allegations contained in paragraph 4 of said Complaint and affirmatively asserts the cash payment from Plaintiff to Defendant took place simultaneously with the delivery of the boat and the properly assigned certificate of title from Defendant to Plaintiff in April, 2013. Attached hereto marked as Exhibit B and incorporated herein is the Affidavit of Jesse Danley.

5. Defendant admits the allegations contained in paragraph 5 of said Complaint that Defendant did not provide the Plaintiff with a bill of sale and affirmatively asserts that the delivery of the boat simultaneous with the transfer of certificate of title from Defendant to Plaintiff effectuated the sale of the boat and by way of further affirmative matter asserts the parties verbally agreed a bill of sale was not necessary. Exhibit A attached to Plaintiff's Complaint admits he lost the certificate of title that had been tendered upon the sale. Plaintiff's Complaint and attached exhibits confirm the sale, the receipt of the boat, receipt of certificate of title, and admits that he lost the certificate of title.

6. Defendant admits the allegations contained in paragraph 6 of said Complaint and affirmatively asserts that Plaintiff presents evidence of an email dated March 8, 2018, to the work address of Defendant. Defendant affirmatively asserts he has no recollection of viewing said email and further affirmatively asserts that all transactions and emails relating to the boat and advertisement on Craigslist were associated with Defendant's personal email account.

7. Defendant admits the allegations contained in paragraph 7 of said Complaint and affirmatively asserts the parties verbally agreed transfer of certificate of title was sufficient to effectuate the sale and no bill of sale was necessary. By way of further affirmative matter Defendant asserts he did not view any email received at his work email requesting a bill of sale and this law suit is the first Defendant has learned Plaintiff is seeking a bill of sale.

8. Defendant can neither admit nor deny the allegations contained in paragraph 8 of said Complaint that Plaintiff is unable to register/title the watercraft, but by way of affirmative matter states that the certificate of title was properly assigned from Defendant to Plaintiff in April, 2013, and Plaintiff had 15 days in which to register said properly assigned certificate of title with the Illinois Department of Natural Resources.

## **II. MOTION TO DISMISS PURSUANT TO 735 ILCS 5/2-615**

### **Failure to State a Cause of Action**

9. Plaintiff's Complaint fails to state a cause of action upon which relief can be granted. The Complaint does not state a claim for relief and on its face fails to show Defendant owed

Plaintiff a duty that he did not fulfill. The Complaint should be dismissed with prejudice. The well-pleaded factual allegations do not allege that Defendant has breached any contract but clearly evidence the sale of the boat was completed, indicates Plaintiff failed to register the Title with the Illinois Department of Natural Resources, and Plaintiff lost said certificate of title due to his own negligence. (See Exhibit A and Exhibit B attached to Plaintiff's Complaint).

10. Plaintiff's Complaint is barred by the statute of limitations. Paragraph 3 of Plaintiff's complaint admits to the oral contract between Plaintiff and Defendant. The oral contract was effectuated April 2013. More than 6 years has passed since the sale of the boat. Plaintiff's suit is barred pursuant to the 5 year statute of limitations of the Civil Code (735 ILCS 5/13-205) and the 4 year statute of limitations of the Commercial Code (810 ILCS 5/2-725).

11. That it is just and appropriate this matter be dismissed pursuant to 735 ILCS 5/2-615 for failure to state a cause of action and as insufficient as a matter of law.

### **III. MOTION TO DISMISS PURSUANT TO 735 ILCS 5/2-619 Barred by Statute of Limitations**

12. That Plaintiff's Complaint is barred by the Statute of Limitations pursuant to 735 ILCS 5/2-619 (a)(5). (See 735 ILCS 5/2-619.(a)(5) and 810 ILCS 5/2-725(1).

13. That Plaintiff responded to Defendant's Craigslist advertisement on the 11<sup>th</sup> day of April, 2013. (See attached Exhibit A). The sale of the boat was effectuated April 2013 by the simultaneous delivery of the boat and properly assigned Certificate of Title from Defendant and the payment from Plaintiff. See Affidavit of Jesse Danley attached as Exhibit B. (Also see Paragraphs 3 and 4 of Plaintiff's Complaint and Exhibit A attached thereto).

14. That Plaintiff's Complaint, Exhibit A and Exhibit B attached to his Complaint admit that the sale of the boat was completed, indicates Plaintiff failed to register the title with the Illinois Department of Natural Resources, and Plaintiff lost said certificate of title due to his own negligence.

15. That paragraph 3 of Plaintiff's Complaint admits to the oral contract between Plaintiff and Defendant. The oral contract was effectuated April 2013 by the delivery of the boat



with properly assigned Certificate of Title from Defendant to Plaintiff and the exchange of payment.

16. That more than 6 years has passed since the sale of the boat. Plaintiff's suit is barred by the Statute of Limitations pursuant to the 5 year statute of limitations of the Civil Code (735 ILCS 5/13-205) and the 4 year statute of limitations of the Commercial Code (810 ILCS 5/2-725).

17. That it is just and appropriate this matter be dismissed pursuant to 735 ILCS 5/2-619 for failure to commence within the time limited by law. (735 ICS 5/2-619(a)(5)).

#### **IV. MOTION FOR SANCTIONS PURSUANT TO ILCS S. CT. RULE 137**

18. That Plaintiff's filing of the underlying Complaint is filed in retaliation to the State's Attorney of Coles County filing battery charges against him in Coles County cause 19-CM-297 wherein Plaintiff is recorded on video grabbing an elderly woman and pushing her to the ground, bruising her eye. Plaintiff filed his Entry of Appearance in his criminal case 19-CM-297 the same date as filing his Complaint in this cause on July 30, 2019.

19. That the Complaint is improper and was filed in bad-faith solely to harass, to cause unnecessary litigation and is frivolously interposed to delay and create conflict in his criminal case, filed to harass the State's Attorney, and cause needless time and expense to Defendant.

20. That Plaintiff is an attorney licensed to practice law in the State of Illinois. He knew or should have known this cause is barred by the Statute of Limitations and that his Complaint fails to state any cause of action upon which relief could be granted.

21. That Illinois Supreme Court Rules provides for sanctions:

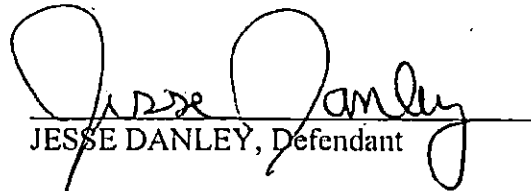
"Illinois Supreme Court Rule 137(a) (eff. Jan. 1, 2018) provides as follows:  
'Every pleading, motion and other document of a party represented by an attorney shall be signed by at least one attorney of record in his individual name, whose address shall be stated. \* \* \* The signature of an attorney or party constitutes a certificate by him that he has read the pleading, motion or other document; that to the best of his knowledge, information, and belief formed after reasonable inquiry it is well grounded in fact and is warranted by existing law or a good-faith argument for the extension, modification, or reversal of existing law, and that it is not interposed for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation. \* \* \* If a pleading, motion, or other document is signed in violation of this rule, the court, upon motion or upon its own initiative, may impose upon the \*\*220 \*1279 person who

signed it, a represented party, or both, an appropriate sanction, which may include an order to pay to the other party or parties the amount of reasonable expenses incurred because of the filing of the pleading, motion or other document, including a reasonable attorney fee.” *Enbridge Pipeline (Illinois), LLC v. Hoke*, 2019 IL App (4th) 150544-B, ¶ 27, 123 N.E.3d 1271, 1278-79

22. That it is just and appropriate Plaintiff be sanctioned pursuant to Rule 137.

WHEREFORE, Defendant, JESSE DANLEY, prays this Honorable Court dismiss this cause with prejudice pursuant to Section 5/2-615 as insufficient and for failure to state a cause of action and/or pursuant to Section 5/2-619 as barred by the Statute of Limitations, prays for an award of sanctions and for such other, further, and different relief as this Court deems just and appropriate

Dated this 3<sup>rd</sup> day of September, 2019.

  
JESSE DANLEY, Defendant

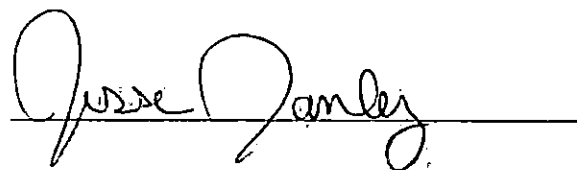
Jesse Danley  
Coles County Courthouse  
651 Jackson Ave., Room 330  
Charleston, IL 61920  
(217) 348-0561  
[jesse.danley@gmail.com](mailto:jesse.danley@gmail.com)  
[jdandley@co.coles.il.us](mailto:jdandley@co.coles.il.us)

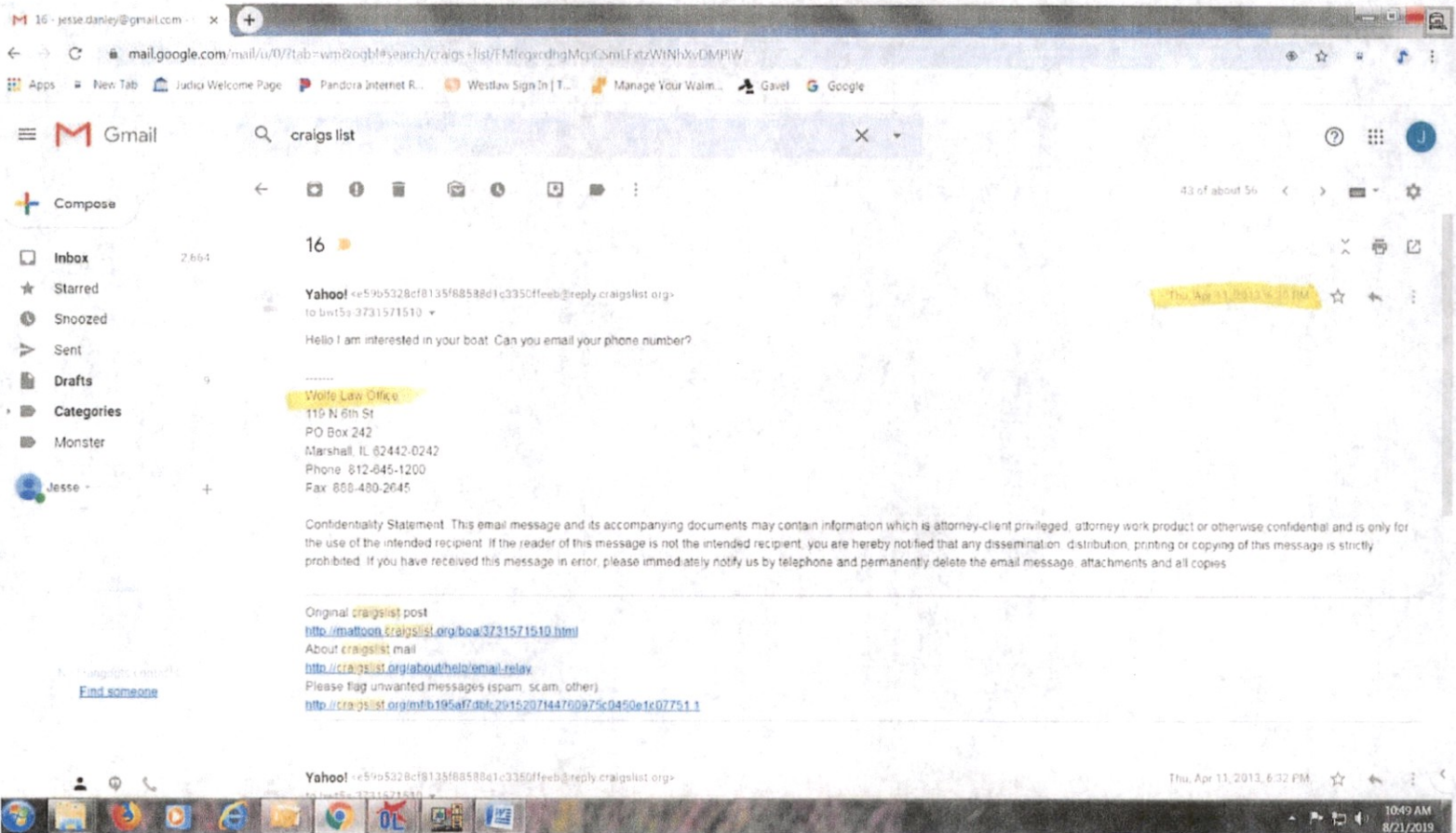
#### CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing has been placed on file herein and that a copy has been served upon Plaintiff, Mervin Wolfe, via email to:

[wolfelawoffice@yahoo.com](mailto:wolfelawoffice@yahoo.com)  
Mervin L. Wolfe  
Attorney At Law  
212 N. Michigan Ave. P.O. Box 242  
Marshall, IL 62441-0242  
Phone: (812) 645-1200  
Fax: (888) 480-2645

DATED this 3<sup>rd</sup> day of September, 2019.





STATE OF ILLINOIS       )  
                                      ) SS  
COUNTY OF COLES       )



**AFFIDAVIT**

JESSE DANLEY, being first duly sworn upon oath, deposes and states as follows:

1. That he is of adult years, under no legal disability and if called as a witness, could competently testify to the contents of this Affidavit.
2. That Affiant posted a boat for sale on Craigslist in April 2013.
3. That Mervin Wolfe responded to the advertisement on April 11, 2013, by way of email to Affiant.
4. That Affiant delivered the advertised boat and properly assigned Certificate of Title to Mervin Wolfe in April 2013 and simultaneously received \$1,500.00 cash as payment for the boat.
5. That the agreement between Affiant and Mervin Wolfe was verbal.

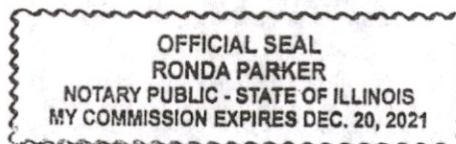
Further this Affiant saith not.

DATED this 30<sup>th</sup> day of September, 2019.

Subscribed and sworn to before me  
this 30<sup>th</sup> day of September, 2019.

  
Notary Public

JESSE DANLEY  
Coles County Courthouse  
651 Jackson Ave., Room 330  
Charleston, IL 61920  
(217) 348-0561  
[jesse.danley@gmail.com](mailto:jesse.danley@gmail.com)  
[jdandley@co.coles.il.us](mailto:jdandley@co.coles.il.us)



**IN THE CIRCUIT COURT  
FOR THE FIFTH JUDICIAL CIRCUIT OF ILLINOIS  
COLES COUNTY, ILLINOIS**

MERVIN WOLFE,

Plaintiff,

v.

No. 19-SC-583

JESSE DANLEY,

Defendant.

**SUMMONS**

To the Defendant: Jesse Danley  
C/O Coles County States Attorney  
Coles County Courthouse  
651 Jackson Ave, #330  
Charleston, IL 61920

**YOU ARE HEREBY SUMMONED** and required to file a written appearance and answer/response before this court at THE COLES COUNTY COURT HOUSE, Charleston, Illinois, within 30 days after service of this summons, not counting the day of service. **IF YOU FAIL TO DO SO A JUDGMENT BY DEFAULT MAY BE TAKEN AGAINST YOU FOR THE RELIEF ASKED IN THE COMPLAINT.**

To the officer:

This summons must be returned by the officer or other person to whom it was given for service, with indorsement of service and fees, if any, immediately after service and not less than three days before the day for appearance. If service cannot be made, this summons shall be returned so indorsed.

This summons may not be served later than 30 days before the day for appearance.

WITNESS: 7/31/2019, 2019.

Melissa Hurst

(Clerk of the Circuit Court)

By: \_\_\_\_\_

(Deputy)

Mervin L. Wolfe  
Attorney at Law  
212 N. Michigan Ave.  
PO Box 242  
Marshall, IL 62441-0242  
Office: 812-645-1200  
Fax: 888-480-2645  
wolfelawoffice@yahoo.com

IN THE CIRCUIT COURT  
FOR THE FIFTH JUDICIAL CIRCUIT OF ILLINOIS  
COLES COUNTY, CHARLESTON, ILLINOIS

THE PEOPLE OF THE STATE OF ILLINOIS.	)	
	)	
Plaintiff.	)	
-vs-	)	No. 19-CM-297
	)	
MERVIN WOLFE.	)	
	)	
Defendant.	)	

**ORDER APPOINTING SPECIAL PROSECUTOR**

THIS CAUSE COMES ON FOR HEARING upon the Motion of the State's Attorney for the appointment of a Special Prosecutor, and the Court having examined the Motion, and being fully advised in the premises, FINDS pursuant to the provisions of 55 ILCS 5/3-9008(a-15) that the interest of justice requires the appointment of a Special Prosecutor. The Court further finds that the subject matter of this case involves the offense of Battery.

IT IS NOW THEREFORE ORDERED: That the State's Attorney's Motion for the Appointment of a Special Prosecutor is GRANTED.

A. The Court hereby requests the State's Attorney's Appellate Prosecutor to accept the appointment of Special Prosecutor in this cause. Such designated attorney shall file their entry of appearance in this cause by filing their oath of office with the Circuit Clerk of this Court.

B. In further accordance with the statute, the filing of the oath of office shall constitute a recognition and acknowledgment that service as the Special Prosecutor is at the pleasure of the Illinois Attorney General, who may substitute his office as Special Prosecutor as provided by law.

C. The State's Attorney's Office of Coles County is directed to deliver to the Special Prosecutor all documents, reports or other information related to this case.

ENTER this \_\_\_\_ day of \_\_\_\_\_, 2019.

---

JUDGE

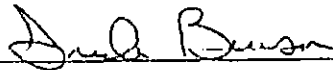


**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing has been placed on file with the Circuit Clerk and a true and correct copy of same has been served electronically via efile to:

Mervin Wolfe  
8789 Country Club Road  
Charleston, IL 61920

DATED this 11<sup>th</sup> day of September, 2019.

  
\_\_\_\_\_

Coles County State's Attorney  
Coles County Courthouse  
651 Jackson, Room 330  
Charleston, IL 61920  
Phone: (217) 348-0561  
Fax: (217) 348-0576  
[jdancy@co.coles.il.us](mailto:jdancy@co.coles.il.us)



IN THE CIRCUIT COURT  
FOR THE FIFTH JUDICIAL CIRCUIT OF ILLINOIS  
COLES COUNTY, CHARLESTON, ILLINOIS

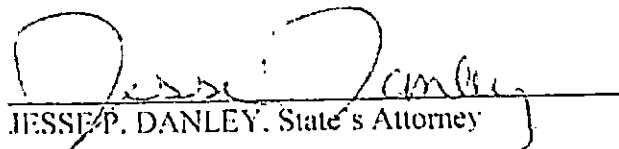
THE PEOPLE OF THE STATE OF ILLINOIS.	)	
	)	
Plaintiff.	)	
-vs-	)	No. 19-CM-297
	)	
MERVIN WOLFE.	)	
	)	
Defendant.	)	

**MOTION FOR APPOINTMENT OF SPECIAL PROSECUTOR**

NOW COMES, JESSE P. DANLEY, Coles County State's Attorney, and pursuant to the provisions of 55 ILCS 5/3-9008(a-15) moves for the appointment of a Special Prosecutor in this case. The prosecution of the defendant by the State's Attorney's Office could be a conflict of interest for the office, or alternatively, could create the appearance of an impropriety. It is in the interest of justice that a Special Prosecutor be appointed to avoid any such appearance. In this particular case the reason for requesting the appointment of a Special Prosecutor is: Defendant has announced his intention to allege official misconduct by State's Attorney, Jesse Danley.

WHEREFORE, the People pray for the appointment of a Special Prosecutor.

Dated this 11<sup>th</sup> day of September, 2019.

  
JESSE P. DANLEY, State's Attorney

EXHIBIT

**VALID FOR BOATS CURRENTLY TITLED IN ILLINOIS - NOT VALID FOR OUT-OF-STATE TITLES**



Watercraft Registration and Titling

**POWER OF ATTORNEY**

Know All Men, By These Presents,

THAT (seller(s)) Jesse Danley

whose address is 651 Jackson Ave., Room 330, Charleston, IL 61920

does hereby make, constitute, and appoint Department of Natural Resources

whose address is One Natural Resources Way, Springfield, IL 62702-1271

as his lawful attorney in fact, to sign all papers and documents required to secure Illinois title and registration of, or transfer interest in, the following described watercraft:

Registration No. IL 3182ED

Hull Identification No. SEAA44310977

Manufacturer Sea Nymph

Model Year 1978 Length-Feet 14

Model Name BassNJohn

Date of Purchase on or about April 27, 2013  
month/day/year

COMPLETE THE FOLLOWING: (if applicable)

Purchaser's Name Wolfe

Mervin

(Last)

(First)

(Middle Initial)

Purchaser's Address PO Box 242

Marshall

(Number and Street)

IL

62441

(City)

(State)

(Zip Code)

Granting to the aforesaid attorney in fact full power to do all acts as the principal might or could do if personally present; and hereby ratifying and confirming all that said attorney in fact shall lawfully do or cause to be done by virtue of the authority herein given for this purpose.

Such authority shall in no way reflect upon the State of Illinois, Department of Natural Resources, or the Director of the Department.

Seller(s) Jesse Danley

Signature(s)

of sale on or about

Date signed April 27, 2013  
month/day/year

**Power of Attorney form can only be used if:**

You sold your boat to an Illinois resident-not valid for non-residents.

The previous owner does not have the Illinois watercraft title. The Power of Attorney will take the place of the original (lost) title issued to the previous owner(s). If the lost title is ever recovered, it will not be valid and must be returned to the Department of Natural Resources, Watercraft Registration, One Natural Resources Way, Springfield, IL 62702-1271.

If our records list a lien on the title then you must have a letter from the lienholder releasing the lien. Then submit the Power of Attorney and the lien release letter with your application and fee for a title/registration.

**Instructions:**

The seller(s) must complete and sign the Power of Attorney Form.

The purchaser(s) must complete the watercraft application form and submit with the Power of Attorney form, release of lien (if required), tax form (if required) and fee.

Jesse Danley  
651 Jackson Ave. Room 330  
Charleston, IL 61920

September 23, 2019

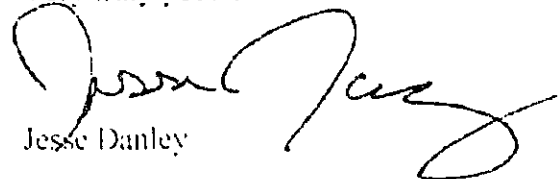
*Via Email wolfelawoffice@a yahoo.com*  
Mr. Mervin Wolfe  
PO Box 242  
Marshall, IL 62441

Re: DNR POA- Sea Nymph

Dear Mr. Wolfe:

After communicating with legal counsel for the Illinois Department of Natural Resources I was instructed to provide to you the attached Power of Attorney showing the date of the sale. You are now able to secure a replacement title after completing the necessary application as directed at the bottom of the POA.

Very truly yours,

  
Jesse Danley

rjp  
enclosure



Coles County State's Attorney  
Coles County Courthouse  
651 Jackson Ave., Room 330  
Charleston, IL 61920-2074

Mr. Mervin Wolfe  
212 N. Michigan Ave., PO Box 242  
Marshall, IL 62441-0242

624410242 8000

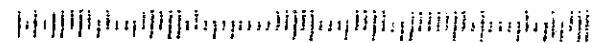


Exhibit "X"

questions in writing will prevent the need for a more invasive approach to answering the questions posed.

1. How many civil case have you scheduled a hearing on behalf of Jesse Danley?
2. To your knowledge were county computers emails systems, paper, personnel and payroll used in this matter to mount a "defense " to Jesse Danley conflict in the underlying civil matters.?
3. Are you aware of the Petition for a Rule to Show cause, now pending in 2019-CM-297
4. Are you aware of the Motion to Quash subpoena filed by Mr Danley still pending in 2019-CM-297.
5. Are you aware your actions in the civil matter are direct contradictory position to the facts alleged by Mr. Danley acting as States Attorney ?
6. What are the times and dates you worked on 2019-SC-583 matter at SA Office.
7. Why did you remove the CCSA letter head from your correspondence and still use the Coles County States Attorney office and address. What was the legal significance or purpose of that action.
8. To your knowledge what County resources were used by you and Jesse Danley in support of his personal case 2019-SC-583 for example county computers, paper, staff, emails, phone ect.
9. What personal knowledge do you have of Jesse Danley refusal to comply my subpoena for People vs Nancy Barber material?
10. Why are you acting on behalf of Mr Danley in this private civil matter?
11. And finally , are you claiming the conversations and actions between you and Jesse Danley over 2019-SC-583 Mervin Wolfe vs Jesse Danley are covered by attorney Client privilege or the immunity of the Coles County States Attorney Office.

In closing, It will be necessary to illicit your sworn testimony in the near future. I apologize for the inconvenience but I did not ask for your involvement, you volunteered. I will not engage in any undocumented contact with Jesse Danley or anyone associated with him. Just Email me your response. Hopefully you will "View" this email and respond to the questions i have raised.  
Have a nice day,

MLW

Mervin L. Wolfe Attorney At Law 212 N. Michigan Ave. P.O. Box 242 Marshall, IL 62441-0242 Phone: 812-645-1200 Fax: 888-480-2645 email: wolfelawoffice@yahoo.com

Exhibit C

**Ronda Parker - Coles Co State's Atty's Office**

---

From: Mervin Wolfe <wolfe1awoffice@yahoo.com>  
Sent: Thursday, October 24, 2019 10:50 AM  
To: Ronda Parker - Coles Co State's Atty's Office  
Subject: your involvement in 2019-SC-583, and 2019-CM-297.

Dear Ronda Parker, Coles County States Attorney Office

This is in response to your attempt at coordinating and setting a hearing in a small claims case in which Jesse Danley is the named Defendant. You are a material fact witness in the ongoing civil and criminal matters titled People vs Mervin Wolfe, 2019-CM-297 also Mervin Wolfe vs Jesse Danley 2019-SC-583. In an effort to prevent compelling your testimony and to avoid subpoenaing you in support of my various pending Motions in both the civil and criminal matters. Your direct involvement have raised some serious questions about the use of the States Attorneys Office for personal gain.

The record demonstrates you have personally been assisting Mr. Danley in personal litigation against me for the last several months. You are a full time employee of Cole's County, who works in the States Attorney Office under the control of appointed States Attorney Jesse Danley. That on information and belief you are well aware of the conflict of interest which exists between the Coles County Office of States Attorney and myself. I have received various communications from you and Mr. Danley in regards to Coles County 2019-SC-583, Mervin Wolfe vs Jesse Danley.

An analysis of your actions to date in this matter have raised relevant questions about your factual involvement in this civil matter. Actions taken by you at Mr. Danleys' direction demonstrate an ongoing violation of the Illinois Rules of Professional Conduct this matter.

Is it true Ronda that the Emails sent to me by you in this civil matter are all on Cole's County States Attorney Server under the control of the Cole's County?

Is it true Ronda the typed letters I received from you had the Cole's County States Attorney letterhead removed? Who instructed you to remove it and for what purpose? Did you mail this letter to Mervin Wolfe?

Ronda, the address on Answer to Small Claims Complaint filed by Mr. Danley in 2019-SC-583 uses the Cole's County Court house and Coles County States Attorney office as the Defendants address. To your knowledge does Jesse Danley reside in the Cole's County Attorney's Office. Ronda, the address on the Power of Attorney to the IDNR also list the CCSA office as Jesse Danley and the Coles County States Attorneys office address of the boat owner.

Who compensated you for the work done on behalf of Mr Danley in 2019-SC-583 . Did Jesse Danley personally approve of payroll for the time periods in which you were working on 2019-SC-583 for his benefit?.

Did you get county board approval to use to state resources for Jesse Danleys' personal gain? These are just a few of the questions which must be answered by you Ronda prior to setting any hearing. I will be filing the appropriate sanctions Motion in People vs Mervin Wolfe 2019-CM-297 over the issues raised herein.

Ronda, part of your correspondence to me in this matter alluded to direct factual knowledge of the email which was sent to Mr. Danley which he later claimed he did not "view" it. Given your statement to me , I now must question your knowledge of how many other emails has Mr. Danley received from any attorney which were not "viewed". Your position in the CCSA office implies knowledge of the pending criminals charges as well as the previous cases in which I was the victim. Your involvement in the civil matter after being removed for an ongoing conflict of which you are a participant. These actions raises concern which will be properly address by a judge. In closing answering the following

Ronda Parker

(217) 348-0561

## **Ronda Parker - Coles Co State's Atty's Office**

---

**From:** Ronda Parker - Coles Co State's Atty's Office  
**Sent:** Tuesday, October 22, 2019 9:16 AM  
**To:** wolfelawoffice@yahoo.com  
**Subject:** RE: Hearing date

Sounds good. Just whenever you have a chance to check your schedule.

Safe travels!

Ronda

**From:** wolfelawoffice@yahoo.com <wolfelawoffice@yahoo.com>  
**Sent:** Tuesday, October 22, 2019 9:11 AM  
**To:** Ronda Parker - Coles Co State's Atty's Office <RParker@co.coles.il.us>  
**Subject:** Re: Hearing date

Dear Rhonda,  
I am on the road today. I will respond to your request tomorrow before the close of business.  
MLW

On Monday, October 21, 2019, 03:22:31 PM CDT, Ronda Parker - Coles Co State's Atty's Office  
<[RParker@co.coles.il.us](mailto:RParker@co.coles.il.us)> wrote:

Dear Mr. Wolfe:

I have called your office and left a voice mail and thought it might help to contact you via email also. I would like to coordinate a hearing date in the Small Claims Case of Wolfe vs. Danley 19-SC-583. Judge Bovard has the following dates available:

Tuesday, November 5, 2019 at 3:00 p.m.

Thursday, November 7, 2019 at 2:30 p.m.

Wednesday, November 13, 2019 at 3:00 p.m.

Please let me know if any of those dates work for you and I'll send Notice.

I look forward to hearing from you.

Have a good day.



00:00:00

1-19

2:36pm

Miss Call

918126451200

918126451200

1059

Backspace

delete digit

mail

918126451200

Call Number:

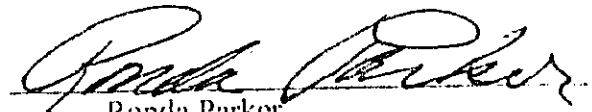


Attached hereto marked as Exhibit B and incorporated herein is a copy of the Email thread (in inverse order) containing said emails.

4. That on October 24, 2019, at 10:50 a.m. Plaintiff emailed a response declining to set a hearing in the matter. Attached hereto marked as Exhibit C and incorporated herein is the email response of Plaintiff, Mervin Wolfe.

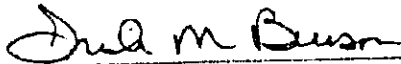
5. Accordingly, at the request of Jesse Danley, Notice of Hearing on the Defendant's Motion to Dismiss was mailed this 25<sup>th</sup> day of October, 2019.

Further this Affiant sayeth not.

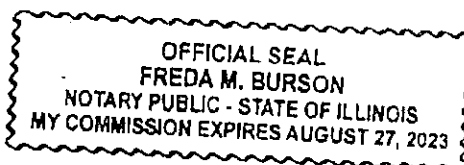
  
Ronda Parker

Subscribed and Sworn to before me this

25<sup>th</sup> day of October, 2019.



Notary Public



STATE OF ILLINOIS

)

) , SS:

COUNTY OF COLES

)

IN THE CIRCUIT COURT  
FOR THE FIFTH JUDICIAL CIRCUIT OF ILLINOIS  
COLES COUNTY, ILLINOIS

MERVIN WOLFE,

)

Plaintiff,

)

)

vs.

)

)

No. 19-SC-583

)

)

JESSE DANLEY,

)

)

Defendant.

)

**AFFIDAVIT OF ATTEMPTED COMPLIANCE WITH LOCAL RULE IV(A)(6)**

Ronda Parker, being first duly sworn upon oath, deposes and states as follows:

1. That she is of adult years, a resident of Coles County, Illinois and is and has been for a number of years a paralegal employed by the State's Attorney's Office of Charleston, Coles County, Illinois.

2. That on October 21, 2019, at 2:36 p.m. this Affiant attempted to schedule a hearing on Defendant's Motion to Dismiss in the above captioned cause by telephoning the law office of Plaintiff, Mervin Wolfe. This Affiant states that at said date and time she left a voice message on the answering machine that picked up the call. Attached hereto marked as Exhibit A and incorporated herein is the call log of said phone call placed to (812) 645-1200.

3. That in addition thereto, on October 21, 2019, at 3:22 p.m. this Affiant sent an email to the email address of record of Plaintiff, Mervin Wolfe attempting to coordinate the hearing date. Plaintiff, Mervin Wolfe responded on the 22<sup>nd</sup> day of October, 2019, at 9:11 a.m. stating he was "on the road" and would respond the following day. At 9:16 a.m. Affiant replied to Plaintiff's response.

**Exhibit "A"**

# questioned under meetings law

DAVE TOPAY  
dave.topay@lee.net

**CHARLESTON** — Coles County Board Chairman Mike Zuffone says the board will readdress two issues after votes that apparently went against state open meeting requirements.

Discussing the matters after that board's meeting Tuesday, Zuffone acknowledged the situation but said it can be corrected.

"We felt there was nothing we did that was inappropriate," he said.

During the meeting Tuesday, the board voted on a roofing bid that wasn't listed on the meeting's agenda. Also, Zuffone confirmed that the board took a vote on a matter while in closed session.

Both are apparent violations of the Illinois Open Meetings Act.

The act doesn't allow a board to vote on a matter not listed on the agenda, though discussion on that matter can take place.

Also, sessions closed to the public are allowed for some situations but any vote must take place after the board returns to open, public session, according to the act.

Tuesday's votes included the bid for work on the Coles County Courthouse roof. The proposed contract was with Industrial Roofing Services of Mattoon for about \$143,000.

The project is part of a group the board is funding with a recently approved bond issue and the roof repairs have already started.

Zuffone said the board's Building and Grounds Committee voted last month to recommend the bid but it didn't come to the board for

a full vote during November.

Tuesday's closed session was for the board to review minutes from previous meetings' closed sessions, which the Open Meetings Act allows.

Zuffone was asked about a vote to approve those minutes after no vote on that took place when the board returned to open session. He said the board did vote during the closed session.

Meanwhile, the board's other votes Tuesday included approval of a new version of rural trash drop off program that ended because county official found it violated state regulations.

The new program allows county townships to apply for grants from a county fund in order to conduct the trash drop off days. It requires the townships to be in compliance with state

requirements.

The board's other votes included:

- Approving an agreement with the Upchurch Group Inc. architectural firm of Mattoon to design a replacement bridge on the Coles-Cumberland county line near Lake Mattoon.

- Authorizing the county's share of funding for repairs to a bridge in North Okaw Township about two miles northeast of Cooks Mills.

- Setting the county supervisor of assessment's salary at \$55,000, an amount that allows for the Illinois Department of Revenue reimbursement for half the amount.

- Approving the annual funding agreement for county townships for road maintenance and other work, set at \$730,000.

## School rules to limit timeouts, restraints

VALERIE WELLS  
valerie.wells@lee.net

**SPRINGFIELD** — The Illinois State Board of Education has submitted its proposed rules for how schools can restrain students who exhibit dangerous behavior.

The rules filed Tuesday seek to protect children and faculty from outbursts but ban the use of prone restraints except as a last resort and the practice of locking such students in timeout rooms all by themselves.

The rules were drafted in response to a report last month by the Chicago Tribune and ProPublica that found that public schools were misusing timeout rooms.

The public will have opportunities to provide feedback on the proposal, which would not be finalized until spring 2020. Public comment is open now until Feb. 4.

The state board put emergency rules in place on Nov. 20 banning isolated seclusion. That emergency ban will expire on April 17. Illinois is the fifth state in the nation with such a ban.

Under the ban, a student presenting dangerous behavior may only be in an unlocked space, with reasonable access to food, medication and toilet facilities and with a trained adult present in the room.

That adult must assess every 15 minutes whether the student has stopped the dangerous behavior.

The proposed rules do not pertain to student-initiated breaks, sensory breaks, brief removals to the hallway or to in-school suspension and detention.

They will ban prone restraints except in emergency situations when less restrictive interventions have not succeeded in stopping the imminent danger to students or staff, and will require that a trained adult who is not involved in the physical restraint of the student observe the student during the entire period of prone restraint.

The rules will also require an additional layer of review by a psychologist, social worker, nurse or behavior specialist if the student is restrained in at least two separate instances within a 30-school-day period.

The restraints must not impair a student's ability to breathe or communicate or be used with students who have medical or psychological limitations that would contraindicate their use.

Public comment may be made via email at rules@isbe.net, by phone at 217-782-4321 or by physical mail or to anyone in the agency. Its Springfield office is at 100 N. 1st St., zip code 62777.

## Prosecutor

from A1

An attorney from the Illinois Appellate Prosecutor's Office is now handling the battery case. A judge approved the appointment of that office to serve as prosecutor after Wolfe filed the small claims case against

Danley.

Attempts to contact Wolfe after the meeting weren't successful.

Meanwhile, Perry continued the group's complaints about the reassessment project, which began three years ago and addressed taxing values of county commercial and industrial property.

He said he understood that the new values were based on properties' replacement cost while basing them on their market value would have been more accurate.

Also, Concerned Tax Payers member Rex Dukeman commented on the board's lack of discussion before votes, which he said doesn't

provide people attending the meeting with much information about the issues.

Dukeman suggested the board reschedule its committee meetings, where voting recommendations are developed, to make public attendance easier. Board Chairman Mike Zuffone said the board would discuss that possibility.

## Cancer

from A1

drug was not tested against others, the response rate is three to four times better than what's usually seen in this situation, Krop said. The median time until cancer worsened was 16 months, and to see anything hold such serious cancers at bay for more than a year is

four died of it. This is a rare side effect with other drugs for this type of cancer, but it was much more common with the experimental drug. Doctors can watch patients closely and give anti-inflammatory medicines if it occurs, Krop said.

Because these cancers generally prove fatal, the drug "is still beneficial for most patients," he said.

An independent expert,

by the drug's developers, Daiichi Sankyo Inc. and AstraZeneca, and they are seeking approval for the medicine in the U.S., Japan and Europe. Krop consults for the companies.

Dana-Farber's Dr. Eric Winer helped lead a study of the other experimental medicine — tucatinib, from Seattle Genetics.

"It's a drug that's particularly able to get into the

All were given usual treatments — Herceptin and the chemo drug Xeloda — plus tucatinib or dummy pills.

After two years, 45% of those on tucatinib were alive versus 27% of the others. Among the women whose cancer had spread to the brain, one quarter were alive with no worsening of those tumors a year later. None of the women in the

## Shelby Co. facility OK'd for growing pot

SCOTT PERRY  
scott.perry@lee.net

**SHELBYVILLE** — Shelby County Community Services in Shelbyville has been added to the list of

Jan. 1.

Adult-use cannabis license applications for craft growers, infusers and transporters will be available through the district

Board Meeting Transcripts 12-10-19 Mr. Perry

48:55 Mr. Perry "Well, what was that all about? Because she's trying to schedule an appointment for you with a personal lawsuit. What's that all about?"

Mr. Danley "Well, I've explained it Mr. Perry."

Mr. Perry "Well, it's not explainable....and it....you know what.....it ties right back into the same thing about the insurance that we've been asking you about. It's the same thing. You have nobody to answer to! Well, what I'm trying to say now is it's time to get a prosecutor down here because I don't believe that's legal. That's what I 49:23 believe. special

Mr. Danley (Unintelligible)

Mr. Perry "It's wrong....cause you don't answer to nobody! The same thing with the insurance. They.....all you did was parade us around the room and tell us nothing and you ain't gonna do nothing about it even though it's illegal. It's just another...another case of (??)...we're dealing with. We can't get straight answers, we can't get law taxpayer. I don't think that stuff oughta go on. I don't think you doesn't belong to you. stereo abided by. I'm a oughta be using postage that



# Prosecutor under fire

County board hears misconduct charge against Danley

DAVE FOPAY  
dave.fopay@lee.net

CHARLESTON — Coles County's state's attorney's handling of a small claims case against him resulted in allegations of misconduct brought to the Coles County Board on Tuesday.

Robb Perry of the Concerned

Taxpayers of Coles County addressed State's Attorney Jesse Danley's use of office resources to handle the case that concerns a private sale in which he was involved.

Danley, however, defended his approach to the small claims case. He said it was a "direct retaliation" because of a criminal charge his office brought against attorney Mervin Wolfe, who's pursuing the small claims case.

During the board's meeting, Perry likened the matter to other issues about which the Concerned

Taxpayers group has complained, such as the county's handling of a property reassessment project and a health insurance matter.

"This is another case and scenario of what we're dealing with," Perry said.

The board didn't respond to Perry's comments. Danley, who attends the board meetings, said he felt the small claims case wasn't a personal matter because it was tied to his office's duties.

"You're entitled to your opinion," Danley said in response to

Perry's contention that the handling of the small claims case was illegal.

After the meeting, Danley said he didn't want to comment in detail because both cases are pending. He said he has "not misused county resources."

Wolfe filed the small claims case against Danley on July 20, which was about 1½ weeks after Wolfe was charged with a misdemeanor battery offense.

In the small claims case, Wolfe accused Danley of never providing

a bill of sale, needed for ownership transfer records, for a boat he brought from Danley in 2013.

Records show that a state's attorney's office staff member did work on the small claims case.

In the battery case, Wolfe is accused of injuring a woman by pushing her to the ground on April 21.

Please see PROSECUTOR, Page A3

■ Read more: Board to revisit disputed votes. Page A3



## Breast cancer drugs lauded

2 show good results in advanced tumors

MARILYNN MARCHIONE  
Associated Press

SAN ANTONIO — Doctors on Wednesday reported unusually

Exhibit "H"

STUDY OF THE EFFECTS OF THE  
FLOODING OF THE RIVER

ON THE FISH AND WILDLIFE  
OF THE RIVER AND THE  
ADJACENT WETLANDS  
AND THE EFFECTS OF THE  
FLOODING OF THE RIVER  
ON THE FISH AND WILDLIFE  
OF THE RIVER AND THE  
ADJACENT WETLANDS

1961-1962

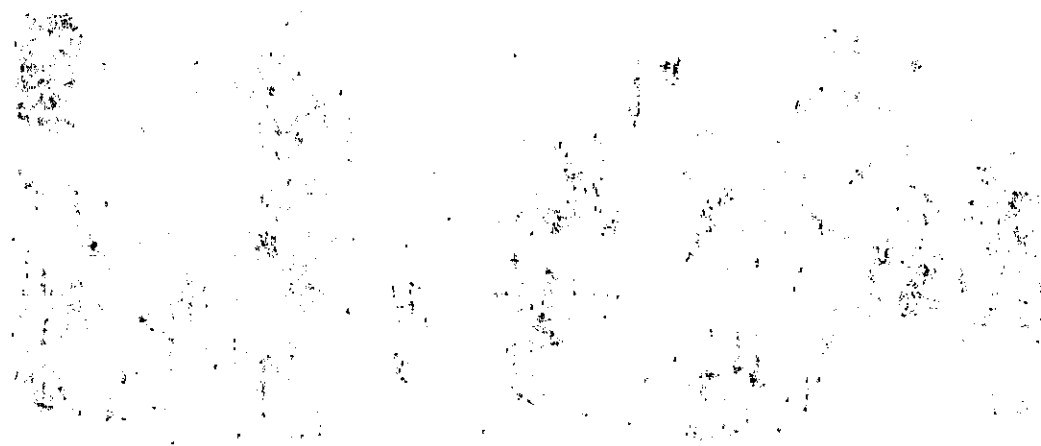
1963-1964

1965-1966

1967-1968

1969-1970

1971-1972





# Board Meeting Transcripts 12-10-19 Mr. Perry

Time	Speaker	Statements
46:15	Board Chair	"Mr. Perry is next on the list"
46:17	Mr. Perry	"We've got something we'd like to play for the Board."
46:21	Unknown	"Will that be OK John to turn it on?"
46:22	Board Chair	"Oh....you're not even going to explain it?"
46:24	Mr. Perry	"No.....no...(unintelligible)..."
46:27	Board Chair	"Huh?"
46:28	Mr. Perry	"Unless you want to explain it"
46:29	Board Chair	"No, I said do you want to explain it?"
46:31	Mr. Perry	"No, you'll want to.....I'll play it"
46:35	Audiotape	"Hi, this is Rhonda Parker at the State's Attorney's office, and I am calling to try to coordinate a hearing in regard to....huh....Wolfe vs. Danley...huh....in the small claims 46:49 case. I have some dates....huh...from Judge Bogard's office....they gave me....huh

TAPE PAUSES/STOPS

	Board Chair	"What?"
47:02	Mr. Perry	"Let me try that again"
47:07		TAPE REPLAYED FROM BEGINNING
		"Hi, this is Rhonda Parker at the State's Attorney's office, and I am calling to try to coordinate a hearing in regard to....huh....Wolfe vs. Danley...huh....in the small claims 47:19 case. I have some dates....huh...from Judge Bovard's office....they gave me.....huh
Tuesday, November 5th, at 3 o'clock, Thursday, November 7th, at 2:30, 47:34		Wednesday, November 13th, at 3 o'clock. They also gave me a date and time on November 22nd it looks like Jesse is not available that day so I apologize. Those are 47:44 dates that I've gotten. Can you please let me know if any of those work, and the drawing board on that. The phone number here is (217) 348-0561 and either you".

48:10	Mr. Perry	"Mr. Danley would you like to explain that?"
	Jesse Danley	"Yes....I think that's fine.....huh...I was...huh....a small claims suit was filed against me....huh...it was a direct retaliation for my filing a 19CM297, in which Defendant was Mervin Wolfe. Huh....he filed a small claim that has passed the 48:32 limitations....clearly....huh....as a retaliation for my job of holding everybody even attorneys. And, huh....I had Ms. Parker schedule a date so have a hearing."
	Mr. Perry	"Are you to use a County employee to conduct personal business?"
	Mr. Danley	"No, I have not used a County employee to conduct personal business".

the statute of accountable, we could

1. The first part of the document is a letter from the

author to the editor of the journal.

2. The second part of the document is a letter from the

editor to the author.

3. The third part of the document is a letter from the

author to the editor.

4. The fourth part of the document is a letter from the

editor to the author.

5. The fifth part of the document is a letter from the

author to the editor.

6. The sixth part of the document is a letter from the editor to the author.

7. The seventh part of the document is a letter from the

author to the editor.

8. The eighth part of the document is a letter from the

editor to the author.

9. The ninth part of the document is a letter from the author to the editor.

10. The tenth part of the document is a letter from the

editor to the author.

11. The eleventh part of the document is a letter from the

author to the editor.

12. The twelfth part of the document is a letter from the

editor to the author.

13. The thirteenth part of the document is a letter from the

author to the editor.

Board Meeting Transcripts 12-10-19 Watchdogs

COLES COUNTY BOARD MEETING 12-10-19

Time	Speaker	Statements
42:02	Kraft	"The rule of law is all we've ever asked about. We've got an election coming up.
42:08		Amazingly, over four years ago, five years ago, we exposed Darrel Cox in the gun
42:16		running that he was doing, doing business with the county. And your State's Attorney
42:19		sat on it. He sat on it until three days after the election and then sent out the memo
42:26		to tell all the police to stop selling guns illegally. The State Police confirmed that it
		was a crime and he did nothing. Well now he's going to be one of your future County
42:39		Board members. This is what happens when you don't hold people accountable.
42:42		When you don't prosecute criminals. When you don't prosecute people who violate
		the law and hold them accountable. Now I understand there's a potential Official
42:51		Misconduct with your own State's Attorney using the office on personal matters, and
		if that's true, I would urge that he step down immediately and this board should pass a
		resolution requesting that he step down. You have got to start reading the laws and
		applying them."
43:06		"Mr. Metzger, earlier on you were mentioning ILCS statutes ILCS is the Illinois
43:09		Compiled Statutes. If you haven't read them for your powers and duties as a
43:14		County board member, please do. I would encourage that you do that. One of the
43:19		those.....now I don't know who owns the company, but I understand the accounting
43:23		firm .....that's.....that the.....uses the huh...county.....or that does the County finances
43:29		.....is your brother part of that business?"
43:34	Mr. Metzger	"Huh.....Weston probably does the actual audit now. My....my...Gilgamester (sp?)
		Madigan assists them."
43:38	Kraft	"OK.....".....there's a.....and I'm not saying that there's anything wrong with that, but
		there's requirements for you and the County to do for disclosure. I'm only guessing
		that you never read them.?"
43:53	Mr. Metzger	"I'm not....I'm not an employee...of the County...."
43:54	Kraft	"You don't have to be....County Code talks about members and any family members
		doing business with the County....it's a disclosure requirement. My point is...there's
43:59		a lot of laws out there that apply to you, but nobody's reading them, and that's a
44:06		failure on your legal counsel's part...and in part....I can't all blame the legal
44:10		counsel cause he's a criminal....criminal guy. This local government stuff has taken us
44:15		years to learn, but I'm begging you....don't do something unless you read the law and
		say "Where in the law does it say I can do this?" You hired an engineer....where in the
		law does it say you can do it.....it's in the Local Government Professional
44:28		Services Selection Act. It's under 50ILCS. In that act it tells you the requirements
		that you have to follow in order to hire those people. And when you don't do it what
		happens is the people's trust in their government continues to crumble. We've gotta
		back and the only way to do that is to hold people accountable, follow
		thinng. That's all I'm asking. Thank you."

*[Handwritten signature]*

# THE HISTORY OF THE

REIGN OF KING CHARLES THE FIRST

BY JOHN BURNET

1679

1679

1679

THE HISTORY OF THE REIGN OF KING CHARLES THE FIRST, BY JOHN BURNET, A BISHOP OF THE CHURCH OF ENGLAND. IN TWO VOLUMES. THE FIRST VOLUME. LONDON, Printed by J. Streater, at the Sign of the Gun, in St. Dunstons Church-yard, 1679.

THE SECOND VOLUME. LONDON, Printed by J. Streater, at the Sign of the Gun, in St. Dunstons Church-yard, 1679.

THE HISTORY OF THE REIGN OF KING CHARLES THE FIRST, BY JOHN BURNET, A BISHOP OF THE CHURCH OF ENGLAND. IN TWO VOLUMES. THE SECOND VOLUME. LONDON, Printed by J. Streater, at the Sign of the Gun, in St. Dunstons Church-yard, 1679.

THE HISTORY OF THE REIGN OF KING CHARLES THE FIRST, BY JOHN BURNET, A BISHOP OF THE CHURCH OF ENGLAND. IN TWO VOLUMES. THE THIRD VOLUME. LONDON, Printed by J. Streater, at the Sign of the Gun, in St. Dunstons Church-yard, 1679.

THE HISTORY OF THE REIGN OF KING CHARLES THE FIRST, BY JOHN BURNET, A BISHOP OF THE CHURCH OF ENGLAND. IN TWO VOLUMES. THE FOURTH VOLUME. LONDON, Printed by J. Streater, at the Sign of the Gun, in St. Dunstons Church-yard, 1679.

THE HISTORY OF THE REIGN OF KING CHARLES THE FIRST, BY JOHN BURNET, A BISHOP OF THE CHURCH OF ENGLAND. IN TWO VOLUMES. THE FIFTH VOLUME. LONDON, Printed by J. Streater, at the Sign of the Gun, in St. Dunstons Church-yard, 1679.

THE HISTORY OF THE REIGN OF KING CHARLES THE FIRST, BY JOHN BURNET, A BISHOP OF THE CHURCH OF ENGLAND. IN TWO VOLUMES. THE SIXTH VOLUME. LONDON, Printed by J. Streater, at the Sign of the Gun, in St. Dunstons Church-yard, 1679.

THE HISTORY OF THE REIGN OF KING CHARLES THE FIRST, BY JOHN BURNET, A BISHOP OF THE CHURCH OF ENGLAND. IN TWO VOLUMES. THE SEVENTH VOLUME. LONDON, Printed by J. Streater, at the Sign of the Gun, in St. Dunstons Church-yard, 1679.

THE HISTORY OF THE REIGN OF KING CHARLES THE FIRST, BY JOHN BURNET, A BISHOP OF THE CHURCH OF ENGLAND. IN TWO VOLUMES. THE EIGHTH VOLUME. LONDON, Printed by J. Streater, at the Sign of the Gun, in St. Dunstons Church-yard, 1679.

THE HISTORY OF THE REIGN OF KING CHARLES THE FIRST, BY JOHN BURNET, A BISHOP OF THE CHURCH OF ENGLAND. IN TWO VOLUMES. THE NINTH VOLUME. LONDON, Printed by J. Streater, at the Sign of the Gun, in St. Dunstons Church-yard, 1679.

THE HISTORY OF THE REIGN OF KING CHARLES THE FIRST, BY JOHN BURNET, A BISHOP OF THE CHURCH OF ENGLAND. IN TWO VOLUMES. THE TENTH VOLUME. LONDON, Printed by J. Streater, at the Sign of the Gun, in St. Dunstons Church-yard, 1679.

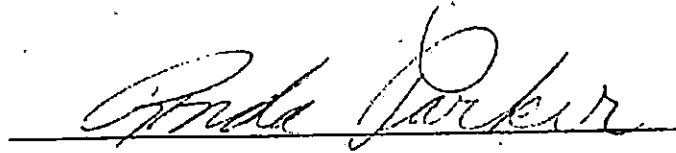


**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing has been placed on file with the Circuit Clerk and a true and correct copy of same has been served by depositing the same in the United States Post Office at Charleston, Illinois, with the proper postage affixed thereto and addressed to:

Mervin Wolfe  
8789 Country Club Road  
Charleston, IL 61920

DATED this 1<sup>st</sup> day of August, 2019.

A handwritten signature in cursive script, appearing to read "Linda Parker", is written over a horizontal line.

Coles County State's Attorney  
Coles County Courthouse  
651 Jackson, Room 330  
Charleston, IL 61920  
Phone: (217) 348-0561  
Fax: (217) 348-0576  
[jdancy@co.coles.il.us](mailto:jdancy@co.coles.il.us)

**State's Attorney**

Jesse Danley

**Victim Services**

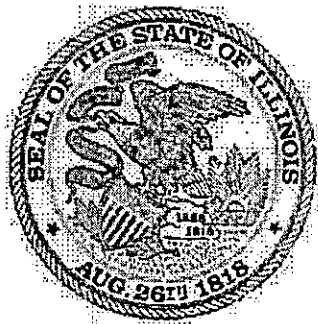
Shannon M. Hill

Jan Ashmore

**Investigators**

Steve Kelly

Jeff Endsley



**Assistant State's Attorneys**

Joy Wolf

Jenifer L. Schiavone

Brady L. Allen

Maggie Crisman-Wilson

Nathanael Harsy

**COLES COUNTY  
STATE'S ATTORNEY**

651 Jackson Ave., Room 330

Charleston, IL 61920-2074

Phone: (217) 348-0561

Fax: (217) 348-0576

**Paralegal**

Ronda J. Parker

December 27, 2019

Mervin Wolfe

8789 Country Club Rd.

Charleston, IL 61920

[wolfelawoffice@yahoo.com](mailto:wolfelawoffice@yahoo.com)

Re: FOIA Request

Dear Mr. Wolfe:

I am in receipt of your FOIA request and respond as follows:

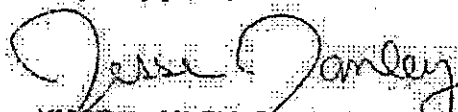
#1. Ronda Parker is a salaried exempt employee. There are no "time in time out" records. Attached are copies of paychecks of Ronda Parker from September 1, 2019 to December 1, 2019 showing payments made.

#2. Attached hereto are copies of the email thread between Ronda Parker and DNR. There are no telephone records.

#3. See Response to #2 hereinabove.

#4. None. All documents and pleadings are on file and of public record in 19-SC-583. Attached are copies of the emails to you, which are already in your possession but I tender in response.

Very truly yours,

  
JESSE DANLEY, State's Attorney





**One Thousand Two Hundred Eighty Five and 11/100-**

\*\*\*\*\*NON - NEGOTIABLE\*\*\*\*\*

\*\*\*Direct Deposit Amount\*\*\*

Employee Number	Employee Name	Check Date	Period End	Check Number	Check Amt				
607	RONDA J PARKER	10/15/2019	10/15/2019	166680	\$1,285.11				
Categ	Description	Rate	Hours	Income	Y-T-D	Categ	Description	Deduct	Y-T-D
SAL	SALARY EARNIN	0.00		\$1,937.50	\$35,937.50	CARDP	BLUECROSS/BLUESHI	\$34.55	\$658.45
		0.00		\$1,937.50	\$35,937.50	DDLTA	BLUE CARE DENTAL D	\$9.08	\$172.52
						DVISN	DEARBORN NATL VISI	\$2.87	\$54.53
						FICA	FICA WITHHOLDING	\$117.24	\$2,173.38
						FWT	FEDERAL WITHHOLDIN	\$289.44	\$5,398.14
						MED	MEDICARE WITHHOLDI	\$27.42	\$508.24
						RG03	IMRF- RG03	\$87.19	\$1,617.27
						SWT	ILLINOIS STATE WITHH	\$84.60	\$1,566.06
								\$652.39	\$12,146.59

61920

**One Thousand Two Hundred Eighty Five and 11/100.**

\*\*\*\*NON - NEGOTIABLE\*\*\*\*

\*\*\*\*Direct Deposit Amount\*\*\*\*

**RONDA J PARKER**

Employee Number	Employee Name	Check Date	Period End	Check Number	Check Amt				
807	RONDA J PARKER	10/31/2019	10/31/2019	166899	\$1,285.11				
Categ	Description	Rate	Hours	Income	Y-T-D	Categ	Description	Deduct	Y-T-D
SAL	SALARY EARNIN	0.00		\$1,937.50	\$37,875.00	CARDP	BLUECROSS/BLUESHI	\$34.55	\$691.00
		0.00		\$1,937.50	\$37,875.00	DDLTA	BLUE CARE DENTAL D	\$9.08	\$181.60
						DVSN	DEARBORN NATL VISI	\$2.87	\$57.40
						FICA	FICA WITHHOLDING	\$117.24	\$2,290.62
						FWT	FEDERAL WITHHOLDIN	\$289.44	\$5,687.58
						MED	MEDICARE WITHHOLDI	\$27.42	\$535.66
						RG03	IMRF- RG03	\$87.19	\$1,704.46
						SWT	ILLINOIS STATE WITHH	\$84.60	\$1,650.86
								\$652.39	\$12,788.98

Coles County

651 Jackson Ave

Room 124

Charleston, IL

61920

11/15/2019

One Thousand Two Hundred Eighty Five and 11/100

CHECK AMOUNT
\$*****1285.11

\*\*\*\*NON - NEGOTIABLE\*\*\*\*

\*\*\*\*Direct Deposit Amount\*\*\*\*

RONDA J PARKER

Employee Number	Employee Name	Check Date	Period End	Check Number	Check Amt
607	RONDA J PARKER	11/15/2019	11/15/2019	167134	\$1,285.11

Categ	Description	Rate	Hours	Income	Y-T-D	Categ	Description	Deduct	Y-T-D
SAL	SALARY EARNIN	0.00		\$1,937.50	\$39,812.50	CARDP	BLUECROSS/BLUESHI	\$34.55	\$725.55
		0.00		\$1,937.50	\$39,812.50	DDLTA	BLUE CARE DENTAL D	\$9.08	\$190.68
						DVISN	DEARBORN NATL VISI	\$2.87	\$60.27
						FICA	FICA WITHHOLDING	\$117.24	\$2,407.86
						FWT	FEDERAL WITHHOLDIN	\$289.44	\$5,977.02
						MED	MEDICARE WITHHOLDI	\$27.42	\$563.08
						RG03	IMRF- RG03	\$87.19	\$1,791.65
						SWT	ILLINOIS STATE WITHH	\$84.60	\$1,735.28
								\$652.39	\$13,451.37

Coles County	651 Jackson Ave	Room 124	Charleston, IL	61920
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**One Thousand Two Hundred Eighty Five and 11/100-**

\*\*\*Direct Deposit Amount\*\*\*

**RONDA J PARKER**

Employee Number	Employee Name	Check Date	Period End	Check Number	Check Amt
607	RONDA J PARKER	11/29/2019	11/30/2019	167358	\$1,285.11

Categ	Description	Rate	Hours	Income	Y-T-D	Categ	Description	Deduct	Y-T-D
SAL	SALARY EARNIN	0.00		\$1,937.50	\$41,750.00	CARDP	BLUECROSS/BLUESHI	\$34.55	\$760.10
		0.00		\$1,937.50	\$41,750.00	DDLTA	BLUE CARE DENTAL D	\$9.08	\$199.76
						DVISN	DEARBORN NATL VISI	\$2.87	\$63.14
						FICA	FICA WITHHOLDING	\$117.24	\$2,525.10
						FWT	FEDERAL WITHHOLDIN	\$289.44	\$6,266.46
						MED	MEDICARE WITHHOLDI	\$27.42	\$590.50
						RG03	IMRF- RG03	\$87.19	\$1,878.84
						SWT	ILLINOIS STATE WITHH	\$84.60	\$1,819.86
								\$652.38	\$14,103.76

Coles County	651 Jackson Ave	Room 124	Charleston, IL	61920
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## **Ronda Parker - Coles Co State's Atty's Office**

**From:** Edwards, Tim [Tim.Edwards@Illinois.gov]  
**Sent:** Monday, September 23, 2019 8:16 AM  
**To:** Ronda Parker - Coles Co State's Atty's Office  
**Cc:** Brown, Ronda  
**Subject:** FW: Coles County State's Attorney sale of Jon Boat In 2013  
**Attachments:** Power Of Attorney.pdf

In order for IDNR to transfer ownership of the 1978 Sea Nymph from Jesse Danley to Mervin Wolfe, Mr. Danley will be required to provide Mr. Wolfe with a signed Power of Attorney form in lieu of the lost title. The "POA" will need to be signed and dated when the original sale took place. Once Mr. Wolfe receives the signed "POA," he may then apply for a title and registration in his own name.

Please let me know if further information is needed. Thank you

<https://www.dnr.illinois.gov/boating/Documents/FillWCA.pdf>

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**From:** Brown, Ronda  
**Sent:** Wednesday, September 18, 2019 11:53 AM  
**To:** Edwards, Tim <Tim.Edwards@Illinois.gov>; McAdams, Deborah L <Deborah.L.McAdams@Illinois.gov>  
**Cc:** Christian, Nicky <Nicky.Christian@Illinois.gov>; Snow, Renee <Renee.Snow@Illinois.gov>  
**Subject:** FW: Coles County State's Attorney sale of Jon Boat In 2013

Please see email below questioning the process for transferring boat title, effective April 2013. Please respond to the email below explaining the process.

If you need to discuss options/issues, please give Renee Snow a call.

Thanks,  
Ronda



**Ronda Brown**  
Administrative Assistant, IDNR Office of Legal Counsel  
One Natural Resources Way  
Springfield, Illinois 62702  
217-782-1809  
[ronda.brown@Illinois.gov](mailto:ronda.brown@Illinois.gov)

---

**From:** Ronda Parker - Coles Co State's Atty's Office <RParker@co.coles.il.us>  
**Sent:** Tuesday, September 17, 2019 2:33 PM  
**To:** Brown, Ronda <Ronda.Brown@Illinois.gov>  
**Subject:** [External] Coles County State's Attorney sale of Jon Boat In 2013

Dear Ronda:

Consistent with our conversation this date, below is a synopsis of the legal question I posed:

In April 2013 Jesse Danley, now state's attorney of Coles County, sold a Jon Boat to Mervin Wolfe. Jesse signed the title over the same date as the boat being picked up. Mr. Wolfe never had the transferred title registered with DNR. Three weeks ago Mr. Wolfe filed a small claims complaint against Jesse Danley claiming he refused to transfer the title. I have all the craig's list information from 2013 and the emails of the sale and also a 2018 email from Mr. Wolfe stating he lost the title in 2018.

Question: Jesse Danley wants Mr. Wolfe to have a proper title for the boat but he is unwilling to sign paperwork that would make it appear as if the sale took place today. We need it to show that the sale was, in fact in April of 2013. We are unwilling to surrender the position that the small claims suit is past the 5 year statute of limitations for civil cases and 4 year statute of limitations as to commerce. Is there a way for the title of the Jon boat to be given to Mr. Wolfe? He did buy it and it was properly signed over to him.

Buyer: Mervin Wolfe, P.O. Box 242, Marshall, IL 62441

Seller: Jesse Danley, Charleston, Illinois

Vessel Registration: IL3182FD

Hull Type: Aluminum

Make: Sea Nymph

Model: BassNJohn

Year: 1978

Hull Identification Number (HIN): #SEAA44310977

Purchase Price: Total amount- \$1,500 single cash payment

Please let me know your thoughts or what actions can occur so Mr. Wolfe can legally use his boat and Mr. Danley can declare this case not just dismissed due to statute of limitations but also because it is moot.

Thank you.

Ronda Parker, Paralegal  
Coles County State's Attorney  
Coles County Courthouse  
651 Jackson Ave., Room 330  
Charleston, IL 61920  
(217) 348-0568 Work  
(217) 273-4536 Cell  
(217) 348-0576 Fax

State of Illinois - CONFIDENTIALITY NOTICE: The information contained in this communication is confidential, may be attorney-client privileged or attorney work product, may constitute inside information or internal deliberative staff communication, and is intended only for the use of the addressee. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify the sender immediately by return e-mail and destroy this communication and all copies thereof, including all attachments. Receipt by an unintended recipient does not waive attorney-client privilege, attorney work product privilege, or any other exemption from disclosure.

**Ronda Parker - Coles Co State's Atty's Office**

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**From:** Ronda Parker - Coles Co State's Atty's Office  
**Sent:** Tuesday, October 22, 2019 9:16 AM  
**To:** wolfelawoffice@yahoo.com  
**Subject:** RE: Hearing date

Sounds good. Just whenever you have a chance to check your schedule.

Safe travels!

Ronda

---

**From:** wolfelawoffice@yahoo.com <wolfelawoffice@yahoo.com>  
**Sent:** Tuesday, October 22, 2019 9:11 AM  
**To:** Ronda Parker - Coles Co State's Atty's Office <RParker@co.coles.il.us>  
**Subject:** Re: Hearing date

Dear Rhonda,

I am on the road today. I will respond to your request tomorrow before the close of business.  
MLW

On Monday, October 21, 2019, 03:22:31 PM CDT, Ronda Parker - Coles Co State's Atty's Office  
<RParker@co.coles.il.us> wrote:

Dear Mr. Wolfe:

I have called your office and left a voice mail and thought it might help to contact you via email also. I would like to coordinate a hearing date in the Small Claims Case of Wolfe vs. Danley 19-SC-583. Judge Bovard has the following dates available:

Tuesday, November 5, 2019 at 3:00 p.m.

Thursday, November 7, 2019 at 2:30 p.m.

Wednesday, November 13, 2019 at 3:00 p.m.

Please let me know if any of those dates work for you and I'll send Notice.

I look forward to hearing from you.

Have a good day.

Ronda Parker

(217) 348-0561



## **Ronda Parker - Coles Co State's Atty's Office**

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**From:** Ronda Parker - Coles Co State's Atty's Office  
**Sent:** Monday, October 21, 2019 3:24 PM  
**To:** wolfelawoffice@yahoo.com  
**Cc:** Jesse Danley - State's Attorney  
**Subject:** Hearing date

Dear Mr. Wolfe:

I have called your office and left a voice mail and thought it might help to contact you via email also. I would like to coordinate a hearing date in the Small Claims Case of Wolfe vs. Danley 19-SC-583 . Judge Bovard has the following dates available:

Tuesday, November 5, 2019 at 3:00 p.m.

Thursday, November 7, 2019 at 2:30 p.m.

Wednesday, November 13, 2019 at 3:00 p.m.

Please let me know if any of those dates work for you and I'll send Notice.

I look forward to hearing from you.

Have a good day.

Ronda Parker  
(217) 348-0561

**Ronda Parker - Coles Co State's Atty's Office**

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**From:** Ronda Parker - Coles Co State's Atty's Office  
**Sent:** Monday, September 23, 2019 5:00 PM  
**To:** 'wolfelawoffice@yahoo.com'  
**Subject:** DNR-POA  
**Attachments:** Wolfe, Mervin ltr with Attached DNR POA.pdf

Dear Mervin:

I am attaching hereto correspondence with attachments from Jesse Danley. Please acknowledge receipt of this email. Sometimes when I send emails with attachments it goes to spam. Also, let me know if you have any trouble opening the attachment and I will send in a different format.

Have a good evening.

Ronda Parker  
651 Jackson Ave., Room 330  
Charleston, IL 61920  
Phone(217) 348-0568  
Fax (217) 348-0576

Jesse Danley  
651 Jackson Ave. Room 330  
Charleston, IL 61920

September 23, 2019

Via Email [wolfe@lawoffice@yahoo.com](mailto:wolfe@lawoffice@yahoo.com)  
Mr. Mervin Wolfe  
PO Box 242  
Marshall, IL 62441

Re: DNR POA- Sea Nymph

Dear Mr. Wolfe:

After communicating with legal counsel for the Illinois Department of Natural Resources I was instructed to provide to you the attached Power of Attorney showing the date of the sale. You are now able to secure a replacement title after completing the necessary application as directed at the bottom of the POA.

Very truly yours,

  
Jesse Danley

rip  
enclosure

**VALID FOR BOATS CURRENTLY TITLED IN ILLINOIS - NOT VALID FOR OUT-OF-STATE TITLES**



Watercraft Registration and Titling

**POWER OF ATTORNEY**

Know All Men, By These Presents,

THAT (seller(s)) Jesse Danley

whose address is 651 Jackson Ave., Room 330, Charleston, IL 61920

does hereby make, constitute, and appoint Department of Natural Resources

whose address is One Natural Resources Way, Springfield, IL 62702-1271

as his lawful attorney in fact, to sign all papers and documents required to secure Illinois title and registration of, or transfer interest in, the following described watercraft:

Registration No. IL 3182ED

Hull Identification No. SEAA44310977

Manufacturer Sea Nymph

Model Year 1978 Length-Feet 14

Model Name BassNJohn

Date of Purchase April 27, 2013  
on or about  
month/day/year

COMPLETE THE FOLLOWING: (If applicable)

Purchaser's Name Wolfe

Mervin

(Last)

(First)

(Middle Initial)

Purchaser's Address PO Box 242

Marshall

(Number and Street)

IL

62441

(City)

(State)

(Zip Code)

Granting to the aforesaid attorney in fact full power to do all acts as the principal might or could do if personally present; and hereby ratifying and confirming all that said attorney in fact shall lawfully do or cause to be done by virtue of the authority herein given for this purpose.

Such authority shall in no way reflect upon the State of Illinois, Department of Natural Resources, or the Director of the Department.

Seller(s) Jesse Danley

of sale on or about

Signature(s) Jesse Danley

Date Signed April 27, 2013  
month/day/year

**Power of Attorney form can only be used if:**

You sold your boat to an Illinois resident-not valid for non-residents.

The previous owner does not have the Illinois watercraft title. The Power of Attorney will take the place of the original (lost) title issued to the previous owner(s). If the lost title is ever recovered, it will not be valid and must be returned to the Department of Natural Resources, Watercraft Registration, One Natural Resources Way, Springfield, IL 62702-1271.

If our records list a lien on the title then you must have a letter from the lienholder releasing the lien. Then submit the Power of Attorney and the lien release letter with your application and fee for a title/registration.

**Instructions:**

The seller(s) must complete and sign the Power of Attorney Form.

The purchaser(s) must complete the watercraft application form and submit with the Power of Attorney form, release of lien (if required), tax form (if required) and fee.

1

SS:

1

## IN THE CIRCUIT COURT

9



**VS.**

No. 19-SC-583



—



- [illegible]

- 1000

- M**

Attached hereto marked as Exhibit B and incorporated herein is a copy of the Email thread (in inverse order) containing said emails.

4. That on October 24, 2019, at 10:50 a.m. Plaintiff emailed a response declining to set a hearing in the matter. Attached hereto marked as Exhibit C and incorporated herein is the email response of Plaintiff, Mervin Wolfe.

5. Accordingly, at the request of Jesse Danley, Notice of Hearing on the Defendant's Motion to Dismiss was mailed this 25<sup>th</sup> day of October, 2019.

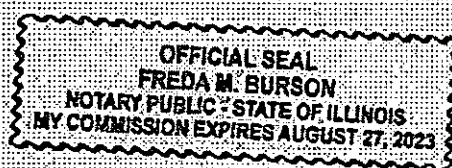
Further this Affiant sayeth not.

  
Ronda Parker

Subscribed and Sworn to before me this

25<sup>th</sup> day of October, 2019.

  
Notary Public





End of Call  
918126451200

Dir

Delete Digit

Backspace

Close

918126451200

918126451200

Made Call

Made 2:36pm

21-OCT-19

Duration 00:01:22

Delete Log Entry

Call History Details

5 of 22

Exhibit B

**Ronda Parker - Coles Co State's Atty's Office**

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**From:** Ronda Parker - Coles Co State's Atty's Office  
**Sent:** Tuesday, October 22, 2019 9:16 AM  
**To:** wolfelawoffice@yahoo.com  
**Subject:** RE: Hearing date

Sounds good. Just whenever you have a chance to check your schedule.

Safe travels!

Ronda

---

**From:** wolfelawoffice@yahoo.com <wolfelawoffice@yahoo.com>  
**Sent:** Tuesday, October 22, 2019 9:11 AM  
**To:** Ronda Parker - Coles Co State's Atty's Office <RParker@co.coles.il.us>  
**Subject:** Re: Hearing date

Dear Rhonda,  
I am on the road today. I will respond to your request tomorrow before the close of business.  
MLW

On Monday, October 21, 2019, 03:22:31 PM CDT, Ronda Parker - Coles Co State's Atty's Office  
<RParker@co.coles.il.us> wrote:

Dear Mr. Wolfe:

I have called your office and left a voice mail and thought it might help to contact you via email also. I would like to coordinate a hearing date in the Small Claims Case of Wolfe vs. Danley 19-SC-583. Judge Bovard has the following dates available:

Tuesday, November 5, 2019 at 3:00 p.m.

Thursday, November 7, 2019 at 2:30 p.m.

Wednesday, November 13, 2019 at 3:00 p.m.

Please let me know if any of those dates work for you and I'll send Notice.

I look forward to hearing from you.

Have a good day.



Ronda Parker

(217) 348-0561

Exhibit C

**Ronda Parker - Coles Co State's Atty's Office**

**From:** Mervin Wolfe <wolfelawoffice@yahoo.com>  
**Sent:** Thursday, October 24, 2019 10:50 AM  
**To:** Ronda Parker - Coles Co State's Atty's Office  
**Subject:** your involvement in 2019-SC-583, and 2019-CM-297.

Dear Ronda Parker, Coles County States Attorney Office

This is in response to your attempt at coordinating and setting a hearing in a small claims case in which Jesse Danley is the named Defendant.

You are a material fact witness in the ongoing civil and criminal matters titled People vs Mervin Wolfe, 2019-CM-297 also Mervin Wolfe vs Jesse Danley 2019-SC-583. In an effort to prevent compelling your testimony and to avoid subpoenaing you in support of my various pending Motions in both the civil and criminal matters. Your direct involvement have raised some serious questions about the use of the States Attorneys Office for personal gain.

The record demonstrates you have personally been assisting Mr. Danley in personal litigation against me for the last several months. You are a full time employee of Cole's County, who works in the States Attorney Office under the control of appointed States Attorney Jesse Danley. That on information and belief you are well aware of the conflict of interest which exists between the Coles County Office of States Attorney and myself. I have received various communications from you and Mr. Danley in regards to Coles County 2019-SC-583, Mervin Wolfe vs Jesse Danley.

An analysis of your actions to date in this matter have raised relevant questions about your factual involvement in this civil matter. Actions taken by you at Mr. Danleys' direction demonstrate an ongoing violation of the Illinois Rules of Professional Conduct this matter.

Is it true Ronda that the Emails sent to me by you in this civil matter are all on Cole's County States Attorney Server under the control of the Cole's County?

Is it true Ronda the typed letters I received from you had the Cole's County States Attorney letterhead removed? Who instructed you to remove it and for what purpose? Did you mail this letter to Mervin Wolfe?

Ronda, the address on Answer to Small Claims Complaint filed by Mr. Danley in 2019-SC-583 uses the Cole's County Court house and Coles County States Attorney office as the Defendants address. To your knowledge does Jesse Danley reside in the Cole's County Attorney's Office. Ronda, the address on the Power of Attorney to the IDNR also list the CCSA office as Jesse Danley and the Coles County States Attorneys office address of the boat owner.

Who compensated you for the work done on behalf of Mr Danley in 2019-SC-583. Did Jesse Danley personally approve of payroll for the time periods in which you were working on 2019-SC-583 for his benefit?

Did you get county board approval to use to state resources for Jesse Danleys' personal gain? These are just a few of the questions which must be answered by you Ronda prior to setting any hearing. I will be filing the appropriate sanctions Motion in People vs Mervin Wolfe 2019-CM-297 over the issues raised herein.

Ronda, part of your correspondence to me in this matter alluded to direct factual knowledge of the email which was sent to Mr Danley which he later claimed he did not "view" it. Given your statement to me, I now must question your knowledge of how many other emails has Mr. Danley received from any attorney which were not "viewed". Your position in the CCSA office implies knowledge of the pending criminals charges as well as the previous cases in which I was the victim. Your involvement in the civil matter after being removed for an ongoing conflict of which you are a participant. These actions raises concern which will be properly address by a judge. In closing answering the following

questions in writing will prevent the need for a more invasive approach to answering the questions posed.

1. How many civil case have you scheduled a hearing on behalf of Jesse Danley?
2. To your knowledge were county computers emails systems, paper, personnel and payroll used in this matter to mount a "defense " to Jesse Danley conflict in the underlying civil matters?
3. Are you aware of the Petition for a Rule to Show cause now pending in 2019-CM-297
4. Are you aware of the Motion to Quash subpoena filed by Mr Danley still pending in 2019-CM-297.
5. Are you aware your actions in the civil matter are direct contradictory position to the facts alleged by Mr. Danley acting as States Attorney?
6. What are the times and dates you worked on 2019-SC-583 matter at SA Office.
7. Why did you remove the CCSA letter head from your correspondence and still use the Coles County States Attorney office and address. What was the legal significance or purpose of that action.
8. To your knowledge what County resources were used by you and Jesse Danley in support of his personal case 2019-SC-583 for example county computers, paper, staff, emails, phone ect.
9. What personal knowledge do you have of Jesse Danley srefusal to comply my subpoena for People vs Nancy Barber material?
10. Why are you acting on behalf of Mr Danley in this private civil matter?
11. And finally , are you claiming the conversations and actions between you and Jesse Danley over 2019-SC-583 Mervin Wolfe vs Jesse Danley are covered by attorney Client privilege or the immunity of the Coles County States Attorney Office.

In closing, It will be necessary to illicit your sworn testimony in the near future. I apologize for the inconvenience but I did not ask for your involvement, you volunteered. I will not engage in any undocumented contact with Jesse Danley or anyone associated with him. Just Email me your response. Hopefully you will "View" this email and respond to the questions i have raised. Have a nice day,

MLW

Mervin L. Wolfe Attorney At Law 212 N. Michigan Ave. P.O. Box 242 Marshall, IL 62441-0242 Phone: 812-645-1200 Fax: 888-480-2645 email: wolfelawoffice@yahoo.com

***State's  
Attorney***

Jesse Danley

***Victim Services***

Shannon M. Hill  
Jan Ashmore

***Investigators***

Steve Kelly  
Jeff Endsley



**COLES COUNTY  
STATE'S ATTORNEY**

651 Jackson Ave., Room 330  
Charleston, IL 61920-2074  
Phone: (217) 348-0561  
Fax: (217) 348-0576

***First Assistant  
State's Attorney***

Jenifer L. Schiavone

***Assistant State's  
Attorneys***

Brady L. Allen  
Nathanael Harsy  
Sarah D. Hocking  
Lawrence D. Brandel

***Paralegal***

Ronda J. Parker

August 11, 2020

Via Email:

[wolfelawoffice@yahoo.com](mailto:wolfelawoffice@yahoo.com)

Mr. Mervin Wolfe

8789 Country Club Road  
Charleston, IL 61920

Re: FOIA Request

Dear Mr. Wolfe:

I am in receipt of a copy of your FOIA request received by our FOIA officer August 6, 2020. I respond as follows:

1. All emails with attachments, phone logs, documentation, all written correspondence to or from the "Illinois State's Attorney Appellate Prosecutor's Office" from January 1, 2019 until January 1, 2020 to or from Coles County States Attorney Office regarding an opinion or analysis of the conflict of interest created when ASA Maggie Wilson appearing opposite and adverse to her public defender mother Terese Matthews in hundred of criminal cases was a "non-issue."

**RESPONSE:** There are no emails with attachments, phone logs, documentation, written correspondence to or from the Illinois State's Attorney Appellate Prosecutor's Office from January 1, 2019 until January 1, 2020 to or from Coles County States Attorney Office regarding an opinion or analysis of a conflict of interest.

2. All emails with attachments and any and all written communications with attachments between Special Prosecutor Brian Towne and Coles County States Attorney Jesse Danley from January 1, 2019 until January 1, 2020 relating to analysis or opinion of the

conflict of interest between defense attorney Teresa Matthews and her daughter prosecutor Maggie Wilson.

**RESPONSE:** There are no emails with attachments written communications with attachments between Special Prosecutor Brian Towne and Coles County States Attorney Jesse Danley from January 1, 2019 until January 1, 2020 relating to analysis or opinion of a conflict of interest.

3. Any and all Orders executed by any Judge prepared or submitted by Coles County States Attorney Jesse Danley from January 1, 2019 until January 1, 2020 appointing a special prosecutor in any case involving a conflict of interest between the Coles County States Attorneys Office and any defendant.

**RESPONSE:** All Orders executed by any judge prepared or submitted by Coles County State's Attorney Jesse Danley from January 1, 2019 until January 1, 2020 appointing a special prosecutor in any case involving a conflict of interest between the Coles County State's Attorney's Office and any defendant are contained within the CM and CF public records located at the Office of the Circuit Clerk and available for public viewing within the cases set forth on Attachment A.

4. Any and all Motions or Petitions prepared or submitted by Coles County States Attorney Jesse Danley from January 1, 2019 to January 1, 2020 requesting the appointment of a special prosecutor in any Coles County Case involving a conflict of interest between the Coles County States Attorneys Office and any defendant.

**RESPONSE:** All Motions or Petitions prepared or submitted by Coles County States Attorney Jesse Danley from January 1, 2019 until January 1, 2020 requesting the appointment of a special prosecutor in any Coles County Case involving a conflict of interest between the Coles County States Attorney's Office and any defendant are contained within the CM and CF public records located at the Office of the Circuit Clerk and available for public viewing within the cases set forth on Attachment A.

5. Any and all Oaths of Office executed by any Illinois State's Attorney Appellate Prosecutor's Office prosecutor accepting their appointment in any case from January 1, 2019 to January 1, 2020 in any Coles County case involving a conflict of interest between the Coles County States Attorneys Office and any defendant.

**RESPONSE:** Any and all Oaths of Office executed by any Illinois State's Attorney Appellate Prosecutor's Office prosecutor accepting their appointment in any case from January 1, 2019 to January 1, 2020 in any Coles County case involving a conflict of interest between the Coles County State's Attorney's Office and any defendant are contained within the CM and CF public records located at the Office of the Circuit Clerk and available for public viewing within the cases set forth on Attachment A.

6. Any and all Motions or Petitions prepared or submitted by Coles County States Attorney Jesse Danley from January 1, 2019 to October 1, 2020 requesting the

appointment of a special prosecutor in any Coles County Case involving Jesse Danley prior representation of the Defendant(s).

**RESPONSE:** Any and all Motions or Petitions prepared or submitted by Coles County State's Attorney Jesse Danley from January 1, 2019 to present are contained within the Court files located at the Office of the Circuit Clerk and are available for public viewing. This request is a repeat request of # 4 hereinabove. This request seeks prospective documents to October 1, 2020, and it is assumed this date is a scrivener's error.

7. All emails with attachments, phone logs, documentation, all written correspondence to and from the Illinois A.R.D.C. from January 1, 2019 until July 17, 2019 to or from Coles County States Attorney Office regarding an opinion or analysis of the conflict of interest created when ASA Maggie Wilson appearing opposite and adverse to her public defender mother Terese Matthews in hundred of criminal cases in which it was a "non-issue."

**RESPONSE:** There are no emails with attachments, phone logs, documentation, or correspondence to and from the Illinois A.R.D.C. from January 1, 2019 until July 17, 2019 to or from the Coles County State's Attorney's Office.

8. Any and all "motions to quash subpoenas" which prepared or submitted by "State's Attorney Appellate Prosecutor" from January 1, 2019 to January 1, 2020 in response to the subpoena that was served in 2019-CM-297 to Maggie Wilson.

**RESPONSE:** Any and all motions to quash subpoenas which were prepared or submitted by State's Attorney Appellate Prosecutor from January 1, 2019 to January 1, 2020 in response to a subpoena that was served in 2019-CM-297 to Maggie Wilson, if the same exists, would be contained within the Court files located at the Office of the Circuit Clerk and available for public viewing. Motion to Quash Subpoena was filed by State's Attorney Jesse Danley in 2019-CM-297 and is contained within the file located in the Office of the Circuit Clerk and is available for public viewing

9. All emails with attachments, phone logs, notes, calendars, documentation, any and all written correspondence to and from judge Brian O'Brien from January 1, 2019 until July 17, 2019 to or from Coles County States Attorney Office regarding an opinion or analysis of the conflict of interest created when ASA Maggie Wilson appearing opposite and adverse to her public defender mother Terese Matthews was a "non-issue."

**RESPONSE:** There are no emails with attachments, phone logs, notes, calendars, documentation, or written correspondence to and from Judge Brien O'O'Brien from January 1, 2019 until July 17, 2019 to or from Coles County State's Attorney's Office regarding an opinion or analysis of a conflict of interest.

Very truly yours,

  
JESSE DANLEY, State's Attorney

## ATTACHMENT A

DEFENDANT	CASE NUMBER(S)
-----------	-------------------

Adams, John	14-CF-284
Adams, Michael	17-CF-375
	18-CF-214;18-DT-36
Anderson, Erika	18-TR-1143,1144
	17CF502; 18TR871;
	17TR449; 14DT138;
	14TR2930-2932;
	12TR4381;
Arthur, Derek	11TR5014-5016
	18-CF-396 & CCSO
Austin, Benjamin	12-171802
Ayers, Adam C.	15-CF-299
Bailey, Craig	17-CF-306
Baker, Nathaniel	18-CF-649
Baldwin, Niki	18-CF-426
Barnes, Stacey L	18-CF-83
Bell, Diana	18-CF-486
Bennett, Bradley	18-CF-32
Benton, Dorian	14-CF-92
Berning, Gage O	18-CF-609
Berry, Jon	17-CF-512
Bickers, Timothy	16-CF-108,233
Blevins(Staudinger), Rebecca	18-CF-265
Boswell, William	16-CF-210
Brewster, Hunter	18-CF-87,142,143

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Brown, Robert	18-CF-8
Burns, Jacob	18-CF-164
Butera, Tiffany	18-CF-430
Campos, Mysti	18-CF-596
Carey, Julie	18-CF-330
Carlen, Joseph	16-CF-430;17-CF-426
Chancellor, John	18-CF-510
Conlin, Sheri	17-CF-137
Cors, Richard	15-CF-116
Cowger, Michael	18-CF-411 16-CM-346;17-CM-443 18-CM-445;17-CF-428
Cox, Timothy	17-CF-265
Cox, William	18-CF-656
Craig, Dustin	18-CF-98
Cripe, Billy J	12-CM-609
Cross, Deontae	17-CF-285
Culver, Joshua	17-CF-95
Curtis, Kayla	18-CF-627
Custer, Rachel	



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Cutright, Austin	18-CF-568
	17-CF-248;18-CF-445
	16-CM-363;18-CM-52
Dare, Zachary	18-CM-230,484
	16-CF-235;17-CM-
Darling, Matthew	143
Dawkins, Demonte	16-CF-246
Decker, Danielle	17-CF-477
Dearnbarger, Jessica	18-CM-282
Derixson, Anna	17-CF-253,254
Donaldson, Forrest	18-CF-2;17-CF-419
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Dundee, Scott	17-TR-2829
Dye, Ashley	15-CF-215,472
Dyer, Melvin	18-CF-399
England, Matthew	18-CF-475
Estell, Virginia	17-CF-482
	17-CF-331;18-CM-
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Estes, Matthew	18-CM-426
Fasig, Glen	16-CF-328
Fulkerson, Harmony	18-CF-386
Galloway, Melvin	18-CF-314
Gauna, Consuela	18-CF-159
Geer, Michelle	18-CF-157
Godinez, Anthony	17-CF-117

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Gottman, Gunner L	18-CF-150,75 & MPD 1900705
Grady, Brandon	17-CF-171
Grant, Jasmine	18-CF-170,244
Grayling, Jacob	16-CF-40,453
Gristy, Dylan	18-CF-18
Grove, Kory	17-CF-207
Groves, Amber	17-TR-3573
Hampton, Tyler	15-CF-32
Hanton, Da'Shawn	17-CF-323
Harpster, Malachi	17-CF-374;15-CF-185
Harris, James	16-CF-376
Harris, Melissa	16-CF-386,378 17-CM-298
Hatten, Douglas L.	16-CF-442
Hellman, Dustin	18-CF-208
Henry, Kayla	18-CF-168,280
Hensley, Myles	18-CF-319
Henson, Phillip B	18-CF-544
Hershberger, Brandon	18-CF-298

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Hodges, John	13-CF-384;;11-CF-555
Holland, Andrew	17-CF-354
Hopley, Zachary	17-CF-227
Huddleston, Robby	17-CF-66
Imlay, Amanda	18-CF-468
Inman, Elisabeth	18-CF-519
Ixtepan, Amber	18-CF-595;18-CM-303
Jackson, Nicholas	14-CF-371,372
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James, Demonte	17-CM-623
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Jenkins, Roy	17-CF-51,45;16-TR-3756
Johnson, Dequan	16-TR-3757
	18-CF-200, 18-CM-575, 17-CF-15 & 19-CF-118
Kamali (Stites), Dusty	CCSO 01-051903
Kamali (Stites), Dusty	CCSO 12-081802
Kamali (Stites), Dusty	
Kemper, Rick	18-CF-125;17-CF-503
	17-CM-632
Killen, Shonna	17-CF-269
Koester, Christina	17-CF-494
Krukewitt, Camilla	18-CF-145
Lacey, Sherri	18-CF-380
Langenhorst, Chelsie	18-CF-305;17-CF-333
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Latch, Joey E	17-CF-334
Ledwig, Diana	18-CF-57
Legg, Denzle	18-CF-663
Lemons, Daryl	18-CF-174;18-TR-874
Lemons, Fernando	18-CF-713
Lovelace, Gary	18-CF-597
Lynch, Otis	17-CF-159
Macaluso, James	18-CF-581
Malone, Blake	18-CM-385
Mason, Joshua	18-CF-593;18-CM-317
Maus, Dalton	17-CF-198
Mc Connell, Katherine	15-CF-514
Mc Coy, William	18-CF-502
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Mc Whorter, Blake	18-CF-68;16-CF-73
Miller, Aaron	18-CM-522,566
Miller, Chad	18-CF-556,361;18-
Miller, Jon	CM-457
Mingus, Abby	18-CF-321
Miskel, Ricky	18-CF-480;14-CF-306
Mitchell, Amanda	18-CF-638
Montgomery, Javauris	17-CF-408
Moore, Deonte	18-CF-306;18-CM-283

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Mounce, Joseph	18-DT-34
Murphy, Guy	17-CF-304
Myers, Alicia	16-CF-238
Myers, Gregg	18-CF-205
Myers, Rachel (Degironne)	18-CF-671, 18-CF-292 & 17-CF-301
Nadolny, Levi	17-CF-141
Nation, Matthew	17-CF-47
Nichols, Heather	14-CF-576
O'Quinn, Develle	16-CF-292
Paddock, Katie	18-CF-352
Paden, Darrel	18-CF-255
Parks, Daniel	17-CF-84,238
Peoples, Jaison	18-CF-307
Pettyjohn, Jessica	18-CF-585
Pieper, Jeremy	18-CF-316
Pinkstaff, Trevor	18-CF-554 & 18-TR-943
Plew, Larry II	18-CF-163,100
Poffinbarger, Douglas	18-CF-283;17-CF-380,344;16-CF-56;
Quast, Miranda	18-CF-632
Rajkumar, Casey	17-CF-413

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Ray, Walter	16-CF-97;15-CF-261
Reddicks, Jeffrey	18-CF-670;17-CF-335
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Reed, Gerald	18-CF-407
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Richards, Nicholas	18-CF-301
Roberts, Jeremy	17-CF-240
Robinson, Raynar	17-CF-369 18-CF-198;18-DT-32
Rogers, Luke	18-TR-1065-1067
Rogers, Michael S	18-CF-686
Schoeneman, Taylor	18-CF-446,333
Seafler, Natalie	17-CF-365,129 16-CF-466; 17-CM-527; 16-TR-4548
Seals, Amber	
Shaffer, Frank III	18-CF-610
Shirley, Eric	18-CF-288, 16-DT-194, 16-TR-3889
Shoot, Anthony	18-CF-373
Shupe, Christopher	18-CF-99
Silas, James	18-CF-366

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Simpson, David W	17-CF-422 (13-CF-235,151 attached due to tracking)
Simpson, Kenneth	15-CF-207
Simpson, Willie	16-CF-316
Smiley, Travis	17-CF-486
Speas, Beth	18-CF-372
Stephens, Corey	18-CF-263; 18-DT-48; 18-TR-1721-1726
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Stutts, Timothy	18-CF-540
Thomason, Kelsey	16-CF-471
Thompson, Douglas	18-CF-340
Thompson, Idris	17-CM-69;18-DT-3 17-CF-457,384 18-CF-20;17-CM-531
Thompson, Laurence	17-TR-3891 & CPD 16-01693
Tipsword, Anna	18-CF-215
Tirado, Tiffany	18-CF-273, 626 18-CF-312; 18-CM-106
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Vance, Michael	18-CF-367
Vogel, Amanda	17-DT-106
Wagner, Dalton	18-CF-339
Walker, Alex	18-CF-334
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Walsh, Jeffrey	DT-191
Walton, Toimail	18-CF-140
Watts, John	14-CF-424
Wease, Chassity K	17-CF-247
White, Darrion	17-CF-124
Williams, Alan	17-CF-328
Williams, Jonathan	15-CF-74
Wilson, Sarah	18-CF-614
Wishard, Drew	18-CF-302;16-CF-111
Wolfe, Mervin	19-CM-297
Woodworth, Dylan	18-CF-156
	17-CF-303;17-TR-
	3206
Wright, Michael	17-TR-3207
Wright, Yvonne	18-CF-67



**LIST OF COURT-APPROVED MEDIATORS  
FIFTH JUDICIAL CIRCUIT**

(Updated 3/2019)

**Angus, Robert M.**

108 Valley Rd., Marshall, IL 62441, (217)251-3616

**Baker, Judy (Winter-Black & Baker)**

201 N Logan, P.O. Box 835, Mattoon, IL 61938, (217)235-3400

**Brown, Amy S., M.Ed.**

16 W Madison St., Danville, IL 61832, (217)443-3400

**DeYoung, Lori A., LCSW, PhD.**

PO Box 266, Fithian, IL 61844, (217)497-7484

**Dumas, Carla E. (Center for Youth and Family Solutions)**

102 N Robinson, Danville, IL 61832, (217)443-1772

**Dunaway, Chasity J. (Compass Counseling)**

204 S Meridian, Toledo, IL 62468, (217)259-5852

**Eberspacher Nohren, Elizabeth (Dove & Dove)**

151 S Morgan St., P.O.Box 647, Shelbyville, IL 62565 (217)774-2137

**Ferguson, Jay W. (Law Office of Mark E. Ferguson)**

712 Broadway Ave., Mattoon, IL 61938, (217)235-2323

**Ferguson, Mark E. (Law Office of Mark E. Ferguson)**

712 Broadway Ave., Mattoon, IL 61938, (217)235-2323

**Gano, Ken**

303 6<sup>th</sup> St #1, Charleston, IL 61920-1558, (217)345-6111

**George, Joy (Prairie Land Conflict Mediation Center)**

206 N Randolph, Ste 6, Champaign, IL 61820, (217)552-2813, cell (217)552-3690

**Hawkins, Deborah A. (Hawkins Law Office, P.C.)**

101 W Vandalia St., Ste 150, Edwardsville, IL 62025, (618)659-3900

**Hedges, Tawne J. (Kesler, Nelson, Garman, Brougher, & Townsley)**

220 N Vermilion St., Danville, IL 61832. (217)446-0880, (217) 260-1803

**Hussman Rogers, Liya (Lietz & Hussman Rogers)**  
48 N Vermilion St., Danville, IL 61832, (217)446-9436

**Kingery, Linda S. (Cygnat Family Conflict Resolution Services)**  
15 Co Rd 1200 N, Neoga, IL 62447, (217)690-1359

**McMasters, Shannon M.**  
1022 N Vermilion St., P.O. Box 974, Danville, IL 61834-0974, (217)442-8112

**Parker, Ronda J. (Coles County Courthouse)**  
651 Jackson Ave., Rm. 330, Charleston, IL 61920, (217)273-4536

**Payne, Troy G. (LeFevre, Oldfield, Myers, Apke & Payne)**  
215 N Fourth St., Effingham, IL 62401, (217)347-3034

**Pondenis, Brian D. (Brainard Law Offices, LLC)**  
600 Jackson Ave., Charleston, IL 61920, (217)345-3929

**Russell Orr, Twila J. (Orr Law, LLC)**  
215 N Fourth St., Effingham, IL 62401, (217)342-1212

**Uppencamp, Heath (Heller Holmes & Associates)**  
1101 Broadway, PO Box 889, Mattoon, IL 6138, (217) 235-2700

**Vandeventer, Angela C. (Armstrong, Grove & Shoaff, LLC)**  
1400 Charleston Ave., Ste 200, P.O. Box 1425, Mattoon, IL 61938, (217)234-7123

**Wieck, Paul E. (Bennett, Schroeder & Wieck)**  
517 N Locust St., P.O. Box 98, Marshall, IL 62441, (217)826-8051

**Winter-Black, Janett S. (Winter-Black & Livesay)**  
201 N Logan, P.O. Box 835, Mattoon, IL 61938, (217)235-3400

**IN THE CIRCUIT COURT FOR THE FIFTH JUDICIAL CIRCUIT  
COLES COUNTY, ILLINOIS**

**SIERRA M. SHUMARD,**

**Petitioner,**

**v.**

**BRAEDAN J. YOUNG,**

**Respondent.**

**Case No. 2020-D-47**

**MEDIATION ORDER**

This matter coming before this Court on the issue of mediation and the Court being fully advised in the premises FINDS:

That one or more of the issues of allocation of parental responsibilities, allocation of parenting time, removal, or access to the minor child are present and in dispute between the parties and that at this time this action is not otherwise determined to be ineligible for mediation.

That this case/relevant petition was filed on: April 7, 2020

**IT IS THEREFORE ORDERED:**

- A. That the parties hereto shall participate in the Mediation Program of the Fifth Judicial Circuit with regard to the issue of Parenting Time, Parental Responsibilities, and Child Support.

Mediator's Name: Ms. Rhonda Parker

Mediator's Address: 651 Jackson Ave, Room 330 Charleston, IL 61920

Mediator's Phone: (217) 826-8051

- B. That the Clerk shall immediately forward a copy of this Order to the appointed mediator and each of the parties or their counsel.
- C. That each party shall contact the appointed mediator within seven (7) days of the date of this Order to schedule mediation and each party is directed to cooperate in scheduling mediation.

- D. That the Petitioner shall pay 50% percent, and the Respondent shall pay 50% percent of the mediator's fees, when due. The court reserves the right to reallocate the cost of mediation during or at the conclusion of this litigation, as justice requires.
- E. The mediation shall be conducted in accordance with the Mediation Program Rules for the Fifth Judicial Circuit.
- F. This case is set for a status hearing on mediation status on August 11, 2020, at 9:00 a.m.

Entered this \_\_\_\_\_ day of \_\_\_\_\_, 2020.

---

Judge of the Circuit Court

#### **CONTACT INFORMATION**

**Petitioner:**

Sierra M. Shumard  
Charleston, IL 61920

**Attorney:**

Caitlin Isbell  
737 Windsor Road  
Charleston, IL 61920  
Phone: (217)883-4355  
[cisbell@lincolnlegal.org](mailto:cisbell@lincolnlegal.org)

**Respondent:**

Braedan J. Young  
Sullivan IL 61951

**Attorney:**

Todd Reardon  
518 6<sup>th</sup> Street  
Charleston, IL 61920  
(217)345-5291  
[toddmreardon@yahoo.com](mailto:toddmreardon@yahoo.com)

**Jesse Danley - Coles Co State's Atty's Office**

---

**From:** Terese Matthews [teresemathews@gmail.com]  
**Sent:** Wednesday, January 16, 2019 11:47 AM  
**To:** Jesse Danley - Coles Co Public Defender's Office; Joy Wolf - Coles Co State's Atty's Office  
**Subject:** Andrea Shoot

Jesse and Joy;

Which of you is handling this case? My client will waive her right to preliminary hearing on January 17.

She has previously participated in dual diagnosis treatment at Heritage in Decatur, and she is eager to return there for further treatment.

She has [REDACTED]

[REDACTED] While at the jail, she is unable to take most of her medications.

She will lose her SSI benefits if she is incarcerated past January 25.

Is this a case where you might consider a quick plea deal of first offender probation or even regular probation?  
She is willing to accept responsibility for her charge.

Thank you.

Sincerely,

Terese

**Jesse Danley - Coles Co State's Atty's Office**

---

**From:** Terese Matthews [teresemattews@gmail.com]  
**Sent:** Thursday, January 31, 2019 12:06 PM  
**To:** Jesse Danley - Coles Co State's Atty's Office  
**Subject:** Keywanna Torry - court February 7

Jesse:

Brian was handling this case. Are you handling it now?

May Keywanna be excused from court on February 7? She lives in the Chicago area and is doing fine on pretrial. She recently gave birth. Also, I have no offer in the case.

Thank.

Terese

**Jesse Danley - Coles Co State's Atty's Office**

---

**From:** Terese Matthews [teresemattews@gmail.com]  
**Sent:** Tuesday, February 19, 2019 11:51 AM  
**To:** Jesse Danley - Coles Co State's Atty's Office  
**Subject:** Demonte James - is there a special prosecutor yet?

.....If so, would you let them know that the Demonte James Krankel/status hearing has been taken off Judge Glenn's calendar for tomorrow (Wednesday) at 3:00 due to a jury trial.

I am not sure yet about a new court date. If you can provide me with the special prosecutor's contact info, I will communicate directly with them.

Thanks.

.....Terese

---

**Jesse Danley - Coles Co State's Atty's Office**

---

**From:** Terese Matthews [teresemattews@gmail.com]  
**Sent:** Tuesday, February 19, 2019 1:53 PM  
**To:** Jesse Danley - Coles Co State's Atty's Office; Jade McDowell - Coles Co State's Atty's Office  
**Subject:** Add Demonte James to Thursday at 1:00

Jesse and Jade:

Becky from Court Administration asked me to email your office to request that you add Demonte James to the CF call for Thursday at 1:00.

I do not know who the special prosecutor is, but I will be in court at that time to reschedule the Krankel hearing.

Thanks.

Terese



**Jesse Danley - Coles Co State's Atty's Office**

---

**From:** Terese Matthews [terese.matthews@gmail.com]  
**Sent:** Tuesday, March 12, 2019 9:12 AM  
**To:** Jesse Danley - Coles Co State's Atty's Office  
**Cc:** Jim Glenn - Coles Co Circuit Court; Jennifer Mudge; btowne@ilsaap.org; snate@atg.state.il.us; vlinson@atg.il.us; Anthony Ortega - Coles Co Public Defender's Ofc; Stephanie Corum - Coles Co Public Defender's Ofc; Pam Kelly - Coles & Cumberland Crt Svcs; Mitch Shick - Coles Co Circuit Court; Brien O'Brien - Coles Co Circuit Court; Mark Bovard - Coles Co Circuit Court  
**Subject:** Re: Probation Order; Supreme Court Rule 452

I have concerns with #25 and #26 - the prohibition against consumption of alcohol and entering bars.

Have these been standard terms of probation all along? It seems more appropriate to impose these conditions in specific cases.

Just my two cents worth.

Terese Matthews

On Tue, Mar 12, 2019 at 8:52 AM Jesse Danley - Coles Co State's Atty's Office <[jdanley@co.coles.il.us](mailto:jdanley@co.coles.il.us)> wrote:

Ladies and Gentlemen,

I have attached an updated sentencing order. As you are all probably aware, in accordance with the updated Supreme Court Rules, prosecutors are required to complete the sentencing order prior to any negotiated plea. I have spoken with Mrs. Kelly in Probation as well as the Public Defender's Office and this draft represents the fruits of those discussions. I am happy to hear any concerns or constructive criticisms. Enjoy.

Sincerely,

*Jesse Danley*

Coles County State's Attorney

**Jesse Danley - Coles Co State's Atty's Office**

---

**From:** Terese Matthews [teresemathews@gmail.com]  
**Sent:** Thursday, March 28, 2019 8:37 AM  
**To:** Jesse Danley - Coles Co State's Atty's Office  
**Subject:** Kinsel disposition hearing - Friday

My client, Reva Kinsel, has no objection to the dispositional recommendations.

TM



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**Jesse Danley - Coles Co State's Atty's Office**

---

**From:** Jesse Danley - Coles Co State's Atty's Office  
**Sent:** Friday, May 24, 2019 2:25 AM  
**To:** 'Terese Matthews'  
**Subject:** Kevin Johnson

Terese,

Please give me an appropriate, Probationable, offense that Mr. Johnson could plead to for 30 months probation, \$350 fine plus costs and mandatory assessments, order that he remain in the Jesus House program for its duration, and 180 days stayed jail time. You have persuaded me but I am failing to find an appropriate offense that fits our fact pattern. I am anxious to hear what you come up with. Please and thank you.

*Jesse Danley*  
Coles County State's Attorney

**Jesse Danley - Coles Co State's Atty's Office**

---

**From:** Terese Matthews [teresemathews@gmail.com]  
**Sent:** Friday, May 24, 2019 6:51 AM  
**To:** Jesse Danley - Coles Co State's Atty's Office  
**Subject:** Re: Kevin Johnson

Thank you, Jesse. I'll work on it.

On Fri, May 24, 2019, 2:24 AM Jesse Danley - Coles Co State's Atty's Office <[jdanley@co.coles.il.us](mailto:jdanley@co.coles.il.us)> wrote:

Terese,

Please give me an appropriate, Probationable, offense that Mr. Johnson could plead to for 30 months probation, \$350 fine plus costs and mandatory assessments, order that he remain in the Jesus House program for its duration, and 180 days stayed jail time. You have persuaded me but I am failing to find an appropriate offense that fits our fact pattern. I am anxious to hear what you come up with. Please and thank you.

*Jesse Danley*

**Coles County State's Attorney**

## **Jesse Danley - Coles Co State's Atty's Office**

---

**From:** Terese Matthews [teresematthews@gmail.com]  
**Sent:** Friday, May 24, 2019 2:22 PM  
**To:** Jesse Danley - Coles Co State's Atty's Office  
**Subject:** Kevin Johnson

**Here is my idea:**

Have him admit one of the PTR's in 16-CF-240 and extend his probation, including all the terms you require. You could even file another PTR alleging the facts of 18-CF-376 (possession of an unloaded gun) if you really wanted him to admit that.

I suggest you Nolle Prose the gun case (18-CF-376). That way, you can revive the charge if Kevin screws up on probation. One thing that bothers me about that case is that officers went to the address in Mattoon in response to a report of a "suspicious black male standing next to a black Jeep." If that case moved forward, I would file a motion to suppress.

If you really, really, really want him to plead to something stemming from the 18-CF-376 incident, how about obstruction of justice? (He did not immediately tell the officer that he was in possession of the unloaded gun.)

Thanks for working with me on this one. I am in regular communication with Dustin Brown at the Jesus House, who reports that Kevin continues to do well. He has new employment, and he seems to be thriving under the structure of the Jesus House and in a new community.

Terese

**Jesse Danley - Coles Co State's Atty's Office**

---

**From:** Terese Matthews [teresemathews@gmail.com]  
**Sent:** Monday, July 01, 2019 4:33 PM  
**To:** Anthony Ortega - Coles Co Public Defender's Ofc  
**Cc:** Jim Glenn - Coles Co Circuit Court; Jesse Danley - Coles Co State's Atty's Office; Stephanie Corum - Coles Co Public Defender's Ofc; Dolorita May - Coles Co Public Defender's Office; Todd Reardon; Joy Wolf - Coles Co State's Atty's Office; Jenifer Schiavone - Coles Co State's Atty's Office; Jessica Elliott - Coles Co Circuit Clerk's Office  
**Subject:** Re: fee waiver and order

Thank you!

On Mon, Jul 1, 2019, 3:22 PM Anthony Ortega - Coles Co Public Defender's Ofc <AOrtega@co.coles.il.us> wrote:

Attached is the new fee waiver and order.

Anthony

**Jesse Danley - Coles Co State's Atty's Office**

---

**From:** Terese Matthews [teresemathews@gmail.com]  
**Sent:** Tuesday, August 06, 2019 8:51 AM  
**To:** Stephanie Corum - Coles Co Public Defender's Ofc  
**Cc:** Jesse Danley - Coles Co State's Atty's Office  
**Subject:** Re: Friday

Stephanie and Jesse:

I agree that we have a bad situation on our hands. Later today, I should have time to look at my specific Friday cases to see if anything looks problematic about continuing them.

Terese

On Tue, Aug 6, 2019 at 8:43 AM Stephanie Corum - Coles Co Public Defender's Ofc  
<[SCorum@co.coles.il.us](mailto:SCorum@co.coles.il.us)> wrote:

What will we be doing on Friday? How are we going to handle the absence of a GAL? My barrier to success (and recognizing that none of this is your problem) is that I am double booked because I have a 115-10 with a special prosecutor in Courtroom at 9. Thank God it's Jen Mudge... so I have some wiggle room. I also just would like to see if we can communicate with the agencies and parents before court so people are not uber pissed about not being able to proceed.

*Stephanie Corum, Attorney*

Coles County Public Defender's Office

(217) 345-3540

**Jesse Danley - Coles Co State's Atty's Office**

---

**From:** Terese Matthews [teresemathews@gmail.com]  
**Sent:** Thursday, August 22, 2019 10:10 AM  
**To:** Jesse Danley - Coles Co State's Atty's Office  
**Subject:** Cody Endsley

Jesse:

Since you handled this case in court this morning, I assume that you are now handling the case.

We are hoping for a probation offer.

Cody has been doing well. He has completed treatment and has been residing at the Hour House 3/4 house for men for all of 2019. He is committed to sobriety.

He is working full-time at J J Collings.

What do you think?

Thanks.

Terese



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**Coles County, IL**

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**2020D47 SHUMARD, SIERRA M**

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Date Entry

Entered Under: YOUNG, BRAEDAN J

07/02/2020 Mediation Order entered and on file.

Entered Under: SHUMARD, SIERRA M

07/02/2020 Mediation Order entered and on file.

06/30/2020 Atty Reardon and Isbell appear telephonically. Ronda Parker appointed mediator court determines low income matter. Atty Isbell to prepare mediation order. Cause cont for post mediation and property issues 8/11/2020 at 9:00am

UNASSIGNED

BLB

06/01/2020 Atty Reardon prst on behalf of Petr. Atty Isbell prst on behalf of Resp. Cause called to hearing on a Motion to Transfer and Consolidate. The response filed in 20F8 on 05/11/2020 should be transfered to and refiled in 2020D47. On motion of Petr, the petition for Paternity Testing is dismissed without prejudice. cause cont in 20D47 to 06/30/2020 at 8:45am.

UNASSIGNED

Entered Under: YOUNG, BRAEDAN J

06/01/2020 Atty Reardon prst on behalf of Petr. Atty Isbell prst on behalf of Resp. Cause called to hearing on a Motion to Transfer and Consolidate. The response filed in 20F8 on 05/11/2020 should be transfered to and refiled in 2020D47. On motion of Petr, the petition for Paternity Testing is dismissed without prejudice. cause cont in 20D47 to 06/30/2020 at 8:45am.

UNASSIGNED

Entered Under: SHUMARD, SIERRA M

05/11/2020 Motion To Transfer and Consolidate filed.  
Response To Petition For Dissolution Of Marriage filed.

UNASSIGNED

Entered Under: YOUNG, BRAEDAN J

05/11/2020 Response To Petition For Dissolution Of Marriage filed.

UNASSIGNED

04/27/2020 certificate of mailing filed.

UNASSIGNED

Fee waiver for Petitioner filed.

04/07/2020 Petition for Dissolution of Marriage filed.

UNASSIGNED

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**2019TR3049 CHUMBLEY, KARA E**

Last Search | Information | Dispositions | History | Payments | Fines &amp; Fees

Date	Entry	Judge
	Entered Under: CHUMBLEY, KARA E	
07/29/2020	Status hearing set for 08/25/2020 at 2:00 in courtroom 2.	UNASSIGNED
07/28/2020	19DT100, 76, 19TR3049, 3050 called. ASA Brandel prst. Deft prst with Mr. Reardon Sr. Contd to Aug 25, 2020 at 2pm. DOTA.	MEB
06/12/2020	Status hearing set for 07/28/2020 at 2:00 in courtroom 2.	UNASSIGNED
06/09/2020	19DT100, 76, 19TR3049, 3050: ASA Brandel prst. Deft DNA. Atty Reardon prst. Contd to July 28, 2020 at 2 pm. Atty Reardon ntc.	MEB
03/31/2020	19DT76, 100, 19TR3049, 3050: Due to COVID-19 restrictions, 04/22/20 hearing is cancelled. Case reset to 06/09/20 at 2 pm. Atty Reardon ntc. Status hearing set for 6/09/2020 at 02:00 in courtroom 2.	MEB
03/16/2020	19DT76, 100, 19TR3049, 3050: Status hrg set 03/18/20 at 2:30 pm is contd to 04/22/20 at 2 pm. Atty Reardon to ntc Deft. Status hearing set for 4/22/2020 at 02:00 in courtroom 2.	MEB
02/19/2020	Status hearing set for 03/18/2020 at 2:30 in courtroom 2.	UNASSIGNED
02/18/2020	19DT100, 19TR3049, 3050, 19DT76 called. ASA Allen prst. Deft prst with Atty Reardon. 19DT76: Eval filed in open court. Cases contd to 03/18/20 at 2:30 pm. DOTA.	MEB
01/06/2020	19DT100, 19TR3049, 3050, 19DT76 called. ASA Allen prst. Deft prst. Status set 02/18/20 at 2 pm. DOTA.	MEB
01/06/2020	Status hearing set for 02/18/2020 at 2:00 in courtroom 2.	UNASSIGNED
11/06/2019	19DT100, 19TR3049, 3050, 19DT76 called. ASA Allen prst. Deft prst with Atty Reardon. State tenders an offer. Status set 01/06/20 at 2 pm. DOTA.	MEB
11/06/2019	Status hearing set for 01/06/2020 at 2:00 in courtroom 2.	UNASSIGNED
09/26/2019	Status hearing set for 11/06/2019 at 2:00 in courtroom 2.	UNASSIGNED
09/25/2019	19DT100, 19TR3049, 3050 called. ASA Allen prst. Deft prst with Atty Reardon. Status set 11/6/19 at 2pm. DOTA.	MEB
09/03/2019	19DT100, 19TR3050, 3049 called. ASA Allen prst. Deft & Counsel DNA. Contd to 09/25/19 at 2 pm. Mr. Reardon ntc.	MEB
09/03/2019	Hearing set for 09/25/2019 at 2:00 in courtroom 2.	UNASSIGNED
08/07/2019	Complaint filed on 08/07/2019. First appearance set for 09/03/2019 at 9:00 in courtroom 2.	UNASSIGNED

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## 2019TR3050 CHUMBLEY, KARA E

Last Search | Information | Dispositions | History | Payments | Fines & Fees

Date	Entry	Judge
	Entered Under: CHUMBLEY, KARA E	
07/29/2020	Status hearing set for 08/25/2020 at 2:00 in courtroom 2.	UNASSIGNED
07/28/2020	19DT100, 76, 19TR3049, 3050 called. ASA Brandel prst. Deft prst with Mr. Reardon Sr. Contd to Aug 25, 2020 at 2pm. DOTA.	MEB
06/12/2020	Status hearing set for 07/28/2020 at 2:00 in courtroom 2.	UNASSIGNED
06/09/2020	19DT100, 76, 19TR3049, 3050: ASA Brandel prst. Deft DNA. Atty Reardon prst. Contd to July 28, 2020 at 2 pm. Atty Reardon ntc.	MEB
03/31/2020	19DT76, 100, 19TR3049, 3050: Due to COVID-19 restrictions, 04/22/20 hearing is cancelled. Case reset to 06/09/20 at 2 pm. Atty Reardon ntc. Status hearing set for 6/09/2020 at 02:00 in courtroom 2.	MEB
03/16/2020	19DT76, 100, 19TR3049, 3050: Status hrg set 03/16/20 at 2:30 pm is contd to 04/22/20 at 2 pm. Atty Reardon to ntc Deft. Status hearing set for 4/22/2020 at 02:00 in courtroom 2.	MEB
02/19/2020	Status hearing set for 03/18/2020 at 2:30 in courtroom 2.	UNASSIGNED
02/18/2020	19DT100, 19TR3049, 3050, 19DT76 called. ASA Allen prst. Deft prst with Atty Reardon. 19DT76: Eval filed in open court. Cases contd to 03/18/20 at 2:30 pm. DOTA.	MEB
01/06/2020	19DT100, 19TR3049, 3050, 19DT76 called. ASA Allen prst. Deft prst. Status set 02/18/20 at 2 pm. DOTA.	MEB
01/06/2020	Status hearing set for 02/18/2020 at 2:00 in courtroom 2.	UNASSIGNED
11/06/2019	19DT100, 19TR3049, 3050, 19DT76 called. ASA Allen prst. Deft prst with Atty Reardon. State tenders an offer. Status set 01/06/20 at 2 pm. DOTA.	MEB
11/06/2019	Status hearing set for 01/06/2020 at 2:00 in courtroom 2.	UNASSIGNED
09/26/2019	Status hearing set for 11/06/2019 at 2:00 in courtroom 2.	UNASSIGNED
09/25/2019	19DT100, 19TR3049, 3050 called. ASA Allen prst. Deft prst with Atty Reardon. Status set 11/6/19 at 2pm. DOTA.	MEB
09/03/2019	19DT100, 19TR3050, 3049 called. ASA Allen prst. Deft & Counsel DNA. Contd to 09/25/19 at 2 pm. Mr. Reardon ntc.	MEB
09/03/2019	Hearing set for 09/25/2019 at 2:00 in courtroom 2.	UNASSIGNED
08/07/2019	Complaint filed on 08/07/2019. First appearance set for 09/03/2019 at 9:00 in courtroom 2.	UNASSIGNED

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## 2019TR4076 LEE, BRIANNA N

Last Search | Information | Dispositions | History | Payments | Fines & Fees

Date	Entry	Judge
	Entered Under: LEE, BRIANNA N	
07/16/2020	Status hearing set for 09/01/2020 at 9:00 in courtroom 2.	UNASSIGNED
07/14/2020	18DT93, 18TR2833-2835, 19TR4075-4077: ASA Brandel prst. Deft prst. Contd to 09/01/20 at 9 am. DOTA.	MEB
08/17/2020	Notice to Appear filed and mailed to deft Status hearing set for 07/14/2020 at 10:00 in courtroom 2.	UNASSIGNED
06/16/2020	18DT93, 18TR2833-2835, 19TR4075-4077: ASA Brandel prst. Deft DNA. Status set 07/14/20 at 10 am. Clerk ntc. Warrant under advisement.	MEB
04/27/2020	18DT93, 18TR2833-2835, 19TR4075-4077: Due to COVID-19, 05/05/20 court date is cancelled. Case contd to 06/16/20 at 11 am. Status hearing set for 6/16/2020 at 11:00 in courtroom 2.	MEB
03/19/2020	Notice to Appear filed and mailed to deft Status hearing reset to 05/05/2020 at 9:00 in courtroom 2.	UNASSIGNED
03/18/2020	18DT93, 18TR2833-2835, 19TR4075-4077: Due to COVID-19 restrictions, traffic court of 03/24/20 is cancelled. Cases reset for 05/05/20 at 9 am. Clerk ntc.	MEB
02/06/2020	Status hearing set for 03/24/2020 at 9:00 in courtroom 2.	UNASSIGNED
02/04/2020	18DT93, 18TR2833-2835, 19TR4075-4077 called. ASA Allen prst. Deft prst. Status set 03/24/20 at 9 am. DOTA w/ copy of eval.	MEB
12/18/2019	Notice filed	UNASSIGNED
12/17/2019	18DT93, 18TR2833-2835, 19TR4075-4077 called. ASA Allen prst. Deft excused. Contd to 02/04/20 at 9 am. State ntc.	MEB
12/17/2019	Arraignment set for 02/04/2020 at 9:00 in courtroom 2.	UNASSIGNED
11/26/2019	19TR4075-4077 called. ASA Allen prst. Deft prst. Deft plans to represent herself. State to provide an offer. Arnmnt set 12/17/19 at 9 am. DOTA.	MEB
11/26/2019	Arraignment set for 12/17/2019 at 9:00 in courtroom 2.	UNASSIGNED
10/18/2019	Complaint filed on 10/18/2019. First appearance set for 11/26/2019 at 9:00 in courtroom 2.	UNASSIGNED

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**2019TR4075 LEE, BRIANNA N**

Last Search | Information | Dispositions | History | Payments | Fines &amp; Fees

Date	Entry	Judge
	Entered Under: LEE, BRIANNA N	
07/16/2020	Status hearing set for 09/01/2020 at 9:00 in courtroom 2.	UNASSIGNED
07/14/2020	18DT93, 18TR2833-2835, 19TR4075-4077: ASA Brandel prst. Deft prst. Contd to 09/01/20 at 9 am. DOTA.	MEB
06/17/2020	Notice to Appear filed and mailed to deft Status hearing set for 07/14/2020 at 10:00 in courtroom 2.	UNASSIGNED
06/16/2020	18DT93, 18TR2833-2835, 19TR4075-4077: ASA Brandel prst. Deft DNA. Status set 07/14/20 at 10 am. Clerk ntc. Warrant under advisement.	MEB
04/27/2020	18DT93, 18TR2833-2835, 19TR4075-4077: Due to COVID-19, 05/05/20 court date is cancelled. Case contd to 06/16/20 at 11 am. Status hearing set for 6/16/2020 at 11:00 in courtroom 2.	MEB
03/19/2020	Notice to Appear filed and mailed to deft Status hearing reset to 05/05/2020 at 9:00 in courtroom 2.	UNASSIGNED
03/18/2020	18DT93, 18TR2833-2835, 19TR4075-4077: Due to COVID-19 restrictions, traffic court of 03/24/20 is cancelled. Cases reset for 05/05/20 at 9 am. Clerk ntc.	MEB
02/06/2020	Status hearing set for 03/24/2020 at 9:00 in courtroom 2.	UNASSIGNED
02/04/2020	18DT93, 18TR2833-2835, 19TR4075-4077 called. ASA Allen prst. Deft prst. Status set 03/24/20 at 9 am. DOTA w/ copy of eval.	MEB
12/18/2019	Notice filed	UNASSIGNED
12/17/2019	18DT93, 18TR2833-2835, 19TR4075-4077 called. ASA Allen prst. Deft excused. Contd to 02/04/20 at 9 am. State ntc.	MEB
12/17/2019	Arraignment set for 02/04/2020 at 9:00 in courtroom 2.	UNASSIGNED
11/26/2019	19TR4075-4077 called. ASA Allen prst. Deft prst. Deft plans to represent herself. State to provide an offer. Arrmt set 12/17/19 at 9 am. DOTA.	MEB
11/26/2019	Arraignment set for 12/17/2019 at 9:00 in courtroom 2.	UNASSIGNED
10/18/2019	Complaint filed on 10/18/2019. First appearance set for 11/26/2019 at 9:00 in courtroom 2.	UNASSIGNED

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**2019TR3752 LEE, BRIANNA N**[Last Search](#) | [Information](#) | [Dispositions](#) | [History](#) | [Payments](#) | [Fines & Fees](#)**Date**      **Entry****Judge**

Entered Under: LEE, BRIANNA N

06/03/2020 46-day notice returned, unable to forward filed.

UNASSIGNED

05/27/2020 The court has reviewed the records of the Coles County Circuit Clerk with regard to the above-intentioned matter. The court finds that the debt has failed to appear and has failed to pay the applicable fine by the date set forth in the Citation and Complaint. Accordingly, an ex parte judgment is entered against the debt in the amount of schedule 10 plus \$25 fine pursuant to Supreme Court Rule 556(b).  
A/R added with total of \$251.00.  
Account Status Report generated.

UNASSIGNED

05/27/2020 Notice of Failure to Pay Issued.

UNASSIGNED

05/27/2020 46-day notice set for 07/13/2020 at 9:00.

UNASSIGNED

09/26/2019 Complaint filed on 09/26/2019.

UNASSIGNED

Time to pay set for 10/29/2019 at 9:00.

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**2019TR1685 LEE, BRIANNA N**[Last Search](#) | [Information](#) | [Dispositions](#) | [History](#) | [Payments](#) | [Fines & Fees](#)**Date**      **Entry****Judge**

Entered Under: LEE, BRIANNA N

10/09/2019 Payment of \$155.00 made through EPay.  
A/R added with total of \$155.00.  
Account Status Report generated.

UNASSIGNED

10/08/2019 Notice of Compliance Issued (ADR)

UNASSIGNED

08/20/2019 Order of FTA sent to SOS.

UNASSIGNED

07/19/2019 30-day notice set for 08/19/2019 at 9:00.

UNASSIGNED

07/19/2019 Notice of Failure to Appear Issued.

UNASSIGNED

04/24/2019 Complaint filed on 04/24/2019.  
Time to pay set for 05/21/2019 at 9:00.

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**2018TR3330 LEE, BRIANNA N**[Last Search](#) | [Information](#) | [Dispositions](#) | [History](#) | [Payments](#) | [Fines & Fees](#)**Date**      **Entry****Judge**

Entered Under: LEE, BRIANNA N

10/30/2019 NOLLE PROSS'D.

UNASSIGNED

10/30/2018 ASA Schiavone prst. Deft prst.  
On motion of ASA, case nolle prossed.

MEB

10/03/2018 Complaint filed on 10/03/2018.  
First appearance set for 10/30/2018 at 9:00 In courtroom 2.

UNASSIGNED

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**2018TR2835 LEE, BRIANNA N**

Last Search | Information | Dispositions | History | Payments | Fines &amp; Fees

Date	Entry	Judge
Entered Under: LEE, BRIANNA N		
07/16/2020	Status hearing set for 09/01/2020 at 9:00 in courtroom 2.	UNASSIGNED
07/14/2020	18DT93, 18TR2833-2835, 19TR4075-4077: ASA Brandel prst. Deft prst. Contd to 09/01/20 at 9 am. DOTA.	MEB
06/17/2020	Notice to Appear filed and mailed to deft Status hearing set for 07/14/2020 at 10:00 in courtroom 2.	UNASSIGNED
06/16/2020	18DT93, 18TR2833-2835, 19TR4075-4077: ASA Brandel prst. Deft DNA. Status set 07/14/20 at 10 am. Clerk ntc. Warrant under advisement.	MEB
04/27/2020	18DT93, 18TR2833-2835, 19TR4075-4077: Due to COVID-19, 05/05/20 court date is cancelled. Case contd to 06/16/20 at 11 am. Status hearing set for 6/16/2020 at 11:00 in courtroom 2.	MEB
03/19/2020	Notice to Appear filed and mailed to deft Status hearing reset to 05/05/2020 at 9:00 in courtroom 2.	UNASSIGNED
03/18/2020	18DT93, 18TR2833-2835, 19TR4075-4077: Due to COVID-19 restrictions, traffic court of 03/24/20 is cancelled. Cases reset for 05/05/20 at 9 am. Clerk ntc.	MEB
02/06/2020	Status hearing set for 03/24/2020 at 9:00 in courtroom 2.	UNASSIGNED
02/04/2020	18DT93, 18TR2833-2835, 19TR4075-4077 called. ASA Allen prst. Deft prst. Status set 03/24/20 at 9 am. DOTA w/ copy of eval.	MEB
12/18/2019	Notice filed	UNASSIGNED
12/17/2019	18DT93, 18TR2833-2835, 19TR4075-4077 called. ASA Allen prst. Deft excused. Contd to 02/04/20 at 9 am. State ntc.	MEB
12/17/2019	Status hearing set for 02/04/2020 at 9:00 in courtroom 2.	UNASSIGNED
10/30/2019	Status hearing set for 12/17/2019 at 9:00 in courtroom 2.	UNASSIGNED
10/29/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft FTA. Cases passed. Cases recalled. ASA Allen prst. Deft prst LATE. Deft is still waiting on sworn report to get eval. State to follow up with Officer. Status set 12/17/19 at 9 am. DOTA.	MEB
09/25/2019	Status hearing set for 10/29/2019 at 9:00 in courtroom 2.	UNASSIGNED
09/24/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Status set 10/29/19 at 9 am. DOTA.	MEB
08/08/2019	Status hearing set for 09/24/2019 at 9:00 in courtroom 2.	UNASSIGNED
08/06/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Deft is waiting on Sworn Report to get eval. Status set 09/24/19 at 9 am. DOTA.	MEB
07/02/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Court confirms labs were received by the State and officer has not submitted Sworn Report. Contd to 08/06/19 at 9 am. DOTA.	MEB
07/02/2019	Status hearing set for 08/06/2019 at 9:00 in courtroom 2.	UNASSIGNED
06/06/2019	Status hearing set for 07/02/2019 at 9:00 in courtroom 2.	UNASSIGNED
06/05/2019	18DT93, 18TR2833, 2834, 2835 called. ASA Allen prst. Deft prst. Status set 07/02/19 at 9 am. DOTA.	MEB
04/30/2019	Hearing set for 06/05/2019 at 9:00 in courtroom 2.	UNASSIGNED
04/24/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Contd to June 5, 2019 at 9 am. DOTA with copy of eval.	MEB
03/07/2019	Hearing set for 04/24/2019 at 9:00 in courtroom 2.	UNASSIGNED
03/06/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Contd to 04/24/19 at 9 am. DOTA with copy of eval.	MEB

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Coles County, IL | Case History

01/14/2019	Hearing set for 03/06/2019 at 9:00 in courtroom 2.	UNASSIGNED
01/09/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Contd until 3/6/19 at 9am. DOTA	MEB
11/30/2018	Hearing set for 01/09/2019 at 9:00 in courtroom 2.	UNASSIGNED
11/27/2018	18DT93, 18TR2833-2835 called. ASA Schiavone prst. Deft prst. Deft plans to represent herself. State provides an offer. Contd to 01/09/19 at 9 am. DOTA.	MEB
10/04/2018	Bond forfeiture set for 11/27/2018 at 9:00 in courtroom 2.	UNASSIGNED
10/03/2018	18dt93, 18tr2833, 2834, 2835 called: ASA Schiavone prst. Deft FTA. Warrant to issue \$3,000 (10%) BF hearing 11/27/18 at 9 am. Clk ntc.	MEB
10/02/2018	First appearance set for 10/03/2018 at 9:00 in courtroom 2.	UNASSIGNED
08/27/2018	Complaint filed on 08/27/2018.	UNASSIGNED

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**2018TR2834 LEE, BRIANNA N**

Last Search | Information | Dispositions | History | Payments | Fines &amp; Fees

Date	Entry	Judge
	Entered Under: LEE, BRIANNA N	
07/16/2020	Status hearing set for 09/01/2020 at 9:00 in courtroom 2.	UNASSIGNED
07/14/2020	18DT93, 18TR2833-2835, 19TR4075-4077: ASA Brandel prst. Deft prst. Contd to 09/01/20 at 9 am. DOTA.	MEB
06/17/2020	Notice to Appear filed and mailed to deft Status hearing set for 07/14/2020 at 10:00 in courtroom 2.	UNASSIGNED
06/16/2020	18DT93, 18TR2833-2835, 19TR4075-4077: ASA Brandel prst. Deft DNA, Status set 07/14/20 at 10 am. Clerk ntc. Warrant under advisement.	MEB
04/27/2020	18DT93, 18TR2833-2835, 19TR4075-4077: Due to COVID-19, 05/05/20 court date is cancelled. Case contd to 06/16/20 at 11 am. Status hearing set for 6/16/2020 at 10:00 in courtroom 2.	MEB
03/19/2020	Notice to Appear filed and mailed to deft Status hearing reset to 05/05/2020 at 9:00 in courtroom 2.	UNASSIGNED
03/18/2020	18DT93, 18TR2833-2835, 19TR4075-4077: Due to COVID-19 restrictions, traffic court of 03/24/20 is cancelled. Cases reset for 05/05/20 at 9 am. Clerk ntc.	MEB
02/06/2020	Status hearing set for 03/24/2020 at 9:00 in courtroom 2.	UNASSIGNED
02/04/2020	18DT93, 18TR2833-2835, 19TR4075-4077 called. ASA Allen prst. Deft prst. Status set 03/24/20 at 9 am. DOTA w/ copy of eval.	MEB
12/18/2019	Notice filed	UNASSIGNED
12/17/2019	18DT93, 18TR2833-2835, 19TR4075-4077 called. ASA Allen prst. Deft excused. Contd to 02/04/20 at 9 am. State ntc.	MEB
12/17/2019	Status hearing set for 02/04/2020 at 9:00 in courtroom 2.	UNASSIGNED
10/30/2019	Status hearing set for 12/17/2019 at 9:00 in courtroom 2.	UNASSIGNED
10/29/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft FTA. Cases passed. Cases recalled. ASA Allen prst. Deft prst LATE. Deft is still waiting on sworn report to get eval. State to follow up with Officer. Status set 12/17/19 at 9 am. DOTA.	MEB
09/25/2019	Status hearing set for 10/29/2019 at 9:00 in courtroom 2.	UNASSIGNED
09/24/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Status set 10/29/19 at 9 am. DOTA.	MEB
08/08/2019	Status hearing set for 09/24/2019 at 9:00 in courtroom 2.	UNASSIGNED
08/06/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Deft is waiting on Sworn Report to get eval. Status set 09/24/19 at 9 am. DOTA.	MEB
07/02/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Court confirms labs were received by the State and officer has not submitted Sworn Report. Contd to 08/06/19 at 9 am. DOTA.	MEB
07/02/2019	Status hearing set for 08/06/2019 at 9:00 in courtroom 2.	UNASSIGNED
06/06/2019	Status hearing set for 07/02/2019 at 9:00 in courtroom 2.	UNASSIGNED
06/05/2019	18DT93, 18TR2833, 2834, 2835 called. ASA Allen prst. Deft prst. Status set 07/02/19 at 9 am. DOTA.	MEB
04/30/2019	Hearing set for 06/05/2019 at 9:00 in courtroom 2.	UNASSIGNED
04/24/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Contd to June 5, 2019 at 9 am. DOTA with copy of eval.	MEB
03/07/2019	Hearing set for 04/24/2019 at 9:00 in courtroom 2.	UNASSIGNED
03/06/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Contd to 04/24/19 at 9 am. DOTA with copy of eval.	MEB

8/10/2020

Coles County, IL | Case History

01/14/2019	Hearing set for 03/06/2019 at 9:00 in courtroom 2.	UNASSIGNED
01/09/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Contd until 3/6/19 at 9am. DOTA	MEB
11/30/2018	Hearing set for 01/09/2019 at 9:00 in courtroom 2.	UNASSIGNED
11/27/2018	18DT93, 18TR2833-2835 called. ASA Schiavone prst. Deft prst. Deft plans to represent herself. State provides an offer. Contd to 01/09/19 at 9 am. DOTA.	MEB
10/04/2018	Bond forfeiture set for 11/27/2018 at 9:00 in courtroom 2.	UNASSIGNED
10/03/2018	18dt93, 18tr2833, 2834, 2835 called: ASA Schiavone prst. Deft FTA. Warrant to issue \$3,000 (10%) BF hearing 11/27/18 at 9 am. Clk ntc.	MEB
10/02/2018	First appearance set for 10/03/2018 at 9:00 in courtroom 2.	UNASSIGNED
08/27/2018	Complaint filed on 08/27/2018.	UNASSIGNED

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# Coles County, IL

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2018TR2833 LEE, BRIANNA N

Last Search | Information | Dispositions | History | Payments | Fines & Fees

Date	Entry	Judge
Entered Under: LEE, BRIANNA N		
07/16/2020	Status hearing set for 09/01/2020 at 9:00 in courtroom 2.	UNASSIGNED
07/14/2020	18DT93, 18TR2833-2835, 19TR4075-4077: ASA Brandel prst. Deft prst. Contd to 09/01/20 at 9 am. DOTA.	MEB
06/17/2020	Notice to Appear filed and mailed to deft Status hearing set for 07/14/2020 at 10:00 in courtroom 2.	UNASSIGNED
06/16/2020	18DT93, 18TR2833-2835, 19TR4075-4077: ASA Brandel prst. Deft DNA. Status set 07/14/20 at 10 am. Clerk ntc. Warrant under advisement.	MEB
04/27/2020	18DT93, 18TR2833-2835, 19TR4075-4077: Due to COVID-19, 05/05/20 court date is cancelled. Case contd to 06/16/20 at 11 am. Status hearing set for 6/16/2020 at 11:00 in courtroom 2.	MEB
03/19/2020	Status hearing reset to 05/05/2020 at 9:00 in courtroom 2. Notice to Appear filed and mailed to deft	UNASSIGNED
03/18/2020	18DT93, 18TR2833-2835, 19TR4075-4077: Due to COVID-19 restrictions, traffic court of 03/24/20 is cancelled. Cases reset for 05/05/20 at 9 am. Clerk ntc.	MEB
02/06/2020	Status hearing set for 03/24/2020 at 9:00 in courtroom 2.	UNASSIGNED
02/04/2020	18DT93, 18TR2833-2835, 19TR4075-4077 called. ASA Allen prst. Deft prst. Status set 03/24/20 at 9 am. DOTA w/ copy of eval.	MEB
12/18/2019	Notice filed	UNASSIGNED
12/17/2019	18DT93, 18TR2833-2835, 19TR4075-4077 called. ASA Allen prst. Deft excused. Contd to 02/04/20 at 9 am. State ntc.	MEB
12/17/2019	Status hearing set for 02/04/2020 at 9:00 in courtroom 2.	UNASSIGNED
12/12/2019	Status hearing set for 12/17/2019 at 9:00 in courtroom 2.	UNASSIGNED
10/29/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft FTA. Cases passed. Cases recalled. ASA Allen prst. Deft prst LATE. Deft is still waiting on sworn report to get eval. State to follow up with Officer. Status set 12/17/19 at 9 am. DOTA.	MEB
09/25/2019	Status hearing set for 10/29/2019 at 9:00 in courtroom 2.	UNASSIGNED
09/24/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Status set 10/29/19 at 9 am. DOTA.	MEB
08/08/2019	Status hearing set for 09/24/2019 at 9:00 in courtroom 2.	UNASSIGNED
08/06/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Deft is waiting on Sworn Report to get eval. Status set 09/24/19 at 9 am. DOTA.	MEB
07/02/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Court confirms labs were received by the State and officer has not submitted Sworn Report. Contd to 08/06/19 at 9 am. DOTA.	MEB
07/02/2019	Status hearing set for 08/06/2019 at 9:00 in courtroom 2.	UNASSIGNED
06/06/2019	Status hearing set for 07/02/2019 at 9:00 in courtroom 2.	UNASSIGNED
06/05/2019	18DT93, 18TR2833, 2834, 2835 called. ASA Allen prst. Deft prst. Status set 07/02/19 at 9 am. DOTA.	MEB
04/30/2019	Hearing set for 06/05/2019 at 9:00 in courtroom 2.	UNASSIGNED
04/24/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Contd to June 5, 2019 at 9 am. DOTA with copy of eval.	MEB
03/07/2019	Hearing set for 04/24/2019 at 9:00 in courtroom 2.	UNASSIGNED
03/06/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Contd to 04/24/19 at 9 am. DOTA with copy of eval.	MEB

8/10/2020

Coles County, IL | Case History

01/14/2019	Hearing set for 03/06/2019 at 9:00 in courtroom 2.	UNASSIGNED
01/09/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Contd until 3/6/19 at 9am. DOTA	MEB
11/30/2018	Hearing set for 01/09/2019 at 9:00 in courtroom 2.	UNASSIGNED
11/27/2018	18DT93, 18TR2833-2835 called. ASA Schiavone prst. Deft prst. Deft plans to represent herself. State provides an offer. Contd to 01/09/19 at 9 am. DOTA.	MEB
10/04/2018	Bond forfeiture set for 11/27/2018 at 9:00 in courtroom 2.	UNASSIGNED
10/03/2018	18dt93, 18tr2833, 2834, 2835 called: ASA Schiavone prst. Deft FTA. Warrant to issue \$3,000 (10%) BF hearing 11/27/18 at 9 am. Clk ntc.	MEB
10/02/2018	First appearance set for 10/03/2018 at 9:00 in courtroom 2.	UNASSIGNED
08/27/2018	Complaint filed on 08/27/2018.	UNASSIGNED

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**Coles County, IL**

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**2018DT93 LEE, BRIANNA N**

Last Search | Information | Dispositions | History | Payments | Fines &amp; Fees

Date	Entry	Judge
Entered Under: LEE, BRIANNA N		
07/16/2020	Status hearing set for 09/01/2020 at 9:00 in courtroom 2.	UNASSIGNED
07/14/2020	18DT93, 18TR2833-2835, 19TR4075-4077: ASA Brandel prst. Deft prst. Contd to 09/01/20 at 9 am. DOTA.	MEB
06/17/2020	Notice to Appear filed and mailed to deft Status hearing reset to 07/14/2020 at 10:00 in courtroom 2.	UNASSIGNED
06/16/2020	18DT93, 18TR2833-2835, 19TR4075-4077: ASA Brandel prst. Deft DQA. Status set 07/14/20 at 10 am. Clerk ntc. Warrant under advisement.	MEB
04/27/2020	18DT93, 18TR2833-2835, 19TR4075-4077: Due to COVID-19, 05/05/20 court date is cancelled. Case contd to 06/16/20 at 11 am. Status hearing set for 6/16/2020 at 11:00 in courtroom 2.	MEB
03/19/2020	Notice to Appear filed and mailed to deft Status hearing reset to 05/05/2020 at 9:00 in courtroom 2.	UNASSIGNED
03/18/2020	18DT93, 18TR2833-2835, 19TR4075-4077: Due to COVID-19 restrictions, traffic court of 03/24/20 is cancelled. Cases reset for 05/05/20 at 9 am. Clerk ntc.	MEB
02/06/2020	Status hearing set for 03/24/2020 at 9:00 in courtroom 2.	UNASSIGNED
02/04/2020	18DT93, 18TR2833-2835, 19TR4075-4077 called. ASA Allen prst. Deft prst. Status set 03/24/20 at 9 am. DOTA w/ copy of eval.	MEB
12/30/2019	Confirmation of Statutory Summary Suspension filed.	UNASSIGNED
12/18/2019	Notice filed	UNASSIGNED
12/17/2019	18DT93, 18TR2833-2835, 19TR4075-4077 called. ASA Allen prst. Deft excused. Contd to 02/04/20 at 9 am. State ntc.	MEB
12/17/2019	Status hearing set for 02/04/2020 at 9:00 in courtroom 2.	UNASSIGNED
12/06/2019	Warning to Motorist filed. Law Enforcement Sworn Report filed.	UNASSIGNED
11/07/2019	Status hearing reset to 12/17/2019 at 9:00 in courtroom 2.	UNASSIGNED
10/30/2019	Status hearing set for 12/19/2019 at 9:00 in courtroom 2.	UNASSIGNED
10/29/2019	Deft called at 10:15 am She is on her way, running late.	UNASSIGNED
10/29/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft FTA. Cases passed. Cases recalled. ASA Allen prst. Deft prst LATE. Deft is still waiting on sworn report to get eval. State to follow up with Officer. Status set 12/17/19 at 9 am. DOTA.	MEB
09/25/2019	Status hearing set for 10/29/2019 at 9:00 in courtroom 2.	UNASSIGNED
09/24/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Status set 10/29/19 at 9 am. DOTA.	MEB
08/08/2019	Status hearing set for 09/24/2019 at 9:00 in courtroom 2.	UNASSIGNED
08/06/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Deft is waiting on Sworn Report to get eval. Status set 09/24/19 at 9 am. DOTA.	MEB
07/02/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Court confirms labs were received by the State and officer has not submitted Sworn Report. Contd to 08/06/19 at 9 am. DOTA.	MEB
07/02/2019	Status hearing set for 08/06/2019 at 9:00 in courtroom 2.	UNASSIGNED
06/06/2019	Status hearing set for 07/02/2019 at 9:00 in courtroom 2.	UNASSIGNED
06/05/2019	18DT93, 18TR2833, 2834, 2835 called. ASA Allen prst. Deft prst. Status set 07/02/19 at 9 am. DOTA.	MEB
04/30/2019	Hearing set for 06/05/2019 at 9:00 in courtroom 2.	UNASSIGNED

8/10/2020

Coles County, IL | Case History

04/24/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Contd to June 5, 2019 at 9 am. DOTA with copy of eval.	MEB
03/07/2019	Hearing set for 04/24/2019 at 9:00 in courtroom 2.	UNASSIGNED
03/06/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Contd to 04/24/19 at 9 am. DOTA with copy of eval.	MEB
01/14/2019	Hearing set for 03/06/2019 at 9:00 in courtroom 2.	UNASSIGNED
01/09/2019	18DT93, 18TR2833-2835 called. ASA Allen prst. Deft prst. Contd until 3/6/19 at 9am. DOTA	MEB
11/30/2018	Hearing set for 01/09/2019 at 9:00 in courtroom 2.	UNASSIGNED
11/27/2018	18DT93, 18TR2833-2835 called. ASA Schiavone prst. Deft prst. Deft plans to represent herself. State provides an offer. Contd to 01/09/19 at 9 am. DOTA.	MEB
10/25/2018	Warrant returned. FTA Warrant served on 10/25/2018. Coles County Sheriff's Office Fee Adjustment (Warrant Service Fee) filed. \$115 added to Sheriff A/R. A/R added with total of \$15.00.	UNASSIGNED
10/24/2018	Bond of \$300.00 posted on 10/24/2018. Bond of \$75.00 posted on 10/24/2018. (FTA fee to CCS&DC) Bond papers filed.	UNASSIGNED
10/09/2018	FTA Warrant issued on 10/09/2018.	UNASSIGNED
10/04/2018	Bond forfeiture set for 11/27/2018 at 9:00 in courtroom 2. BF notice sent.	UNASSIGNED
10/03/2018	18d193, 18tr2833, 2834, 2835 called: ASA Schiavone prst. Deft FTA. Warrant to issue \$3,000 (10%) BF hearing 11/27/18 at 9 am. Clk ntc.	MEB
08/27/2018	Complaint Count I filed on 08/27/2018. Complaint Count II filed on 08/27/2018. DCN sealed and filed. Bond of \$300.00 posted on 08/27/2018. First appearance set for 10/03/2018 at 9:00 in courtroom 2. Bond papers filed.	UNASSIGNED

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**Coles County, IL**

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**2018CM247 LEE, BRIANNA N**

Last Search | Information | Dispositions | History | Payments | Fines &amp; Fees

Date	Entry	Judge
	Entered Under: LEE, BRIANNA N	
07/30/2020	Notice Filed.	UNASSIGNED
07/29/2020	ASA Allen prst. Deft exc. Cause cont to Oct 14, 2020 at 9 am. DOTA. State to notice.	BJO
07/29/2020	Compliance set for 10/14/2020 at 9:00 in courtroom 1.	UNASSIGNED
07/24/2020	Petition To Revoke Judicial Supervision filed.	UNASSIGNED
07/08/2020	Compliance set for 07/29/2020 at 9:00 in courtroom 1.	UNASSIGNED
08/08/2018	Court Services Department Instructions for Completing Conditional Discharge/ Judicial Supervision filed.	UNASSIGNED
08/06/2018	Compliance set for 07/29/2020 at 9:00 in courtroom 3.	UNASSIGNED
08/01/2018	ASA Guido prst, Deft prst, provided with copy of Information. Deft proceeds pro se, entered GP. Pursuant to agreement, deft placed on 2 yrs Supervision, \$200 fine plus court costs, \$75 VCVA, \$30 CASA, \$10 Pro Ops, \$5 Drug Court, 50 hrs CSW, restitution in the amount of \$365 to Kara Chumbley, issue letter of apology and submit to CC's office. Appeal rights given. Supervision Order entered and on file. POC set for July 29, 2020 at 9:00am.	JTB
08/01/2018	Judgment of Restitution entered and on file.	UNASSIGNED
06/25/2018	Warrant served on 06/18/2018. Coles County Sheriff's Office Fee Adjustment filed. \$115.00 increase to sheriff fees.	UNASSIGNED
06/21/2018	DCN sealed and filed. Bail Bond Sheet (Bond Paper Only) filed. Hearing set for 08/01/2018 at 9:00 in courtroom 3.	UNASSIGNED
05/31/2018	Cause comes before the court on a verified complaint. ASA Guido present and examined under oath. Court finds probable cause for issuance of arrest warrant. Warrant issued on 05/31/2018.	UNASSIGNED
05/29/2018	Information Count I filed.	UNASSIGNED

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**2018CL114 LEE, BRIANNA N**[Last Search](#) | [Information](#) | [Dispositions](#) | [History](#) | [Payments](#) | [Fines & Fees](#)

Date	Entry	Judge
Entered Under: LEE, BRIANNA N		
03/08/2019	ASA Allen prst. Deft FTA. Case sent to collections.	MEB
03/08/2019	Referral to Collection Agency Entered.	UNASSIGNED
03/08/2019	36.00 added SA Collections. New balance is 156.00.	UNASSIGNED
12/11/2018	Pay or appear set for 03/08/2019 at 9:00. Notice to Appear Issued and mailed to deft at address on file.	UNASSIGNED
12/07/2018	ASA Schiavone prst. Deft FTA. Default Judgment entered \$120 F&C. POP set 03/08/19 at 9 am. Clerk ntc.	MEB
11/09/2018	Complaint filed on 11/09/2018. Pay or appear set for 12/07/2018 at 9:00.	UNASSIGNED

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**Coles County, IL**

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**2019TR4077 LEE, BRIANNA N**

Last Search | Information | Dispositions | History | Payments | Fines &amp; Fees

Date	Entry	Judge
	Entered Under: LEE, BRIANNA N	
07/16/2020	Status hearing set for 09/01/2020 at 9:00 in courtroom 2.	UNASSIGNED
07/14/2020	18DT93, 18TR2833-2835, 19TR4075-4077: ASA Brandel prst. Deft prst. Contd to 09/01/20 at 9 am. DOTA.	MEB
06/17/2020	Notice to Appear filed and mailed to deft Status hearing set for 07/14/2020 at 10:00 in courtroom 2.	UNASSIGNED
06/16/2020	18DT93, 18TR2833-2835, 19TR4075-4077: ASA Brandel prst. Deft DNA. Status set 07/14/20 at 10 am. Clerk ntc. Warrant under advisement.	MEB
04/27/2020	18DT93, 18TR2833-2835, 19TR4075-4077: Due to COVID-19, 05/05/20 court date is cancelled. Case contd to 06/16/20 at 11 am. Status hearing set for 6/16/2020 at 11:00 in courtroom 2.	MEB
03/19/2020	Notice to Appear filed and mailed to deft Status hearing reset to 05/05/2020 at 9:00 in courtroom 2.	UNASSIGNED
03/18/2020	18DT93, 18TR2833-2835, 19TR4075-4077: Due to COVID-19 restrictions, traffic court of 03/24/20 is cancelled. Cases reset for 05/05/20 at 9 am. Clerk ntc.	MEB
02/06/2020	Status hearing set for 03/24/2020 at 9:00 in courtroom 2.	UNASSIGNED
02/04/2020	18DT93, 18TR2833-2835, 19TR4075-4077 called. ASA Allen prst. Deft prst. Status set 03/24/20 at 9 am. DOTA w/ copy of eval.	MEB
12/18/2019	Notice filed	UNASSIGNED
12/17/2019	18DT93, 18TR2833-2835, 19TR4075-4077 called. ASA Allen prst. Deft excused. Contd to 02/04/20 at 9 am. State ntc.	MEB
12/17/2019	Arraignment set for 02/04/2020 at 9:00 in courtroom 2.	UNASSIGNED
11/26/2019	19TR4075-4077 called. ASA Allen prst. Deft prst. Deft plans to represent herself. State to provide an offer. Arrmt set 12/17/19 at 9 am. DOTA.	MEB
11/26/2019	Arraignment set for 12/17/2019 at 9:00 in courtroom 2.	UNASSIGNED
10/18/2019	Complaint filed on 10/18/2019. First appearance set for 11/26/2019 at 9:00 in courtroom 2.	UNASSIGNED

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**2018CM247 LEE, BRIANNA N**

Last Search | Information | Dispositions | History | Payments | Fines &amp; Fees

Date	Entry	Judge
Entered Under:	LEE, BRIANNA N	
07/30/2020	Notice Filed.	UNASSIGNED
07/29/2020	ASA Allen prst. Deft exc. Cause cont to Oct 14, 2020 at 9 am. DOTA. State to notice.	BJO
07/29/2020	Compliance set for 10/14/2020 at 9:00 in courtroom 1.	UNASSIGNED
07/24/2020	Petition To Revoke Judicial Supervision filed.	UNASSIGNED
07/08/2020	Compliance set for 07/29/2020 at 9:00 in courtroom 1.	UNASSIGNED
08/08/2018	Court Services Department Instructions for Completing Conditional Discharge/ Judicial Supervision filed.	UNASSIGNED
08/06/2018	Compliance set for 07/29/2020 at 9:00 in courtroom 3.	UNASSIGNED
08/01/2018	ASA Guido prst. Deft prst, provided with copy of Information. Deft proceeds pro se, entered GP. Pursuant to agreement, deft placed on 2 yrs Supervision, \$200 fine plus court costs, \$75 VCVA, \$30 CASA, \$10 Pro Ops, \$5 Drug Court, 50 hrs CSW, restitution in the amount of \$365 to Kara Chumbley, issue letter of apology and submit to CC's office. Appeal rights given. Supervision Order entered and on file. POC set for July 29, 2020 at 9:00am.	JTB
08/01/2018	Judgment of Restitution entered and on file.	UNASSIGNED
06/25/2018	Warrant served on 06/18/2018. Coles County Sheriff's Office Fee Adjustment filed. \$115.00 increase to sheriff fees.	UNASSIGNED
06/21/2018	DCN sealed and filed. Bail Bond Sheet (Bond Paper Only) filed. Hearing set for 08/01/2018 at 9:00 in courtroom 3.	UNASSIGNED
05/31/2018	Cause comes before the court on a verified complaint. ASA Guido present and examined under oath: Court finds probable cause for issuance of arrest warrant. Warrant issued on 05/31/2018.	UNASSIGNED
05/29/2018	Information Count I filed.	UNASSIGNED

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**State's Attorney**  
Jesse Danley

**Victim Services**  
Shannon M. Hill  
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**Investigators**  
Steve Kelly  
Jeff Endsley



**Assistant State's Attorneys**

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Nathanael Harsy

**COLES COUNTY  
STATE'S ATTORNEY**  
651 Jackson Ave., Room 330  
Charleston, IL 61920-2074  
Phone: (217) 348-0561  
Fax: (217) 348-0576

**Paralegal**  
Ronda J. Parker

November 26, 2019

Via email: [wolfelawoffice@yahoo.com](mailto:wolfelawoffice@yahoo.com)  
Mervin Wolfe  
8789 Country Club Road  
Charleston, IL 61920  
Re: FOIA

Dear Mr. Wolfe:

This letter is in response to your FOIA request dated November 26, 2019.

1. All Emails with attachments, documentation, plea offers, any and all written correspondence to and from Assistant State's Attorney Maggie Wilson from January 1, 2019 until October 1, 2019 for Coles County Case 2019-CM-195, People vs Nancy Barber.

Response: See attached email dated July 2, 2019 and email dated July 17, 2019

2. All Emails with attachments and any and all written communications with attachments between Coles County Public Defender Teresa Mathews and Assistant States Attorney Maggie Wilson from January 1, 2019 until October 1, 2019 from Coles County cases 2019-CM-01 to 2019-CM-300.

Response: See attached emails consisting of 47 pages

3. All Emails with attachments and any and all written communications with attachments between Coles County Public Defendant Teresa Mathews and Coles County States Attorney Jesse Danley from January 1, 2019 until October 1, 2019 for any case.

Response: See attached emails consisting of 12 pages.

Page 2  
Mervin Wolfe  
November 26, 2019

4. Any and all waivers of conflict executed by any Defendant represented by Public Defender Teresa Matthews from January 1, 2019 to October 1, 2019 for Coles County Cases 2019-CM-01 to 2019-CM-300.

Response: None

Very truly yours,



JESSE DANLEY, State's Attorney

rjp  
enclosure

cc: County Board

f/Wolfe,Mervin/BatteryCase/FOIA/Response/rjp11-26-19

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresemathews@gmail.com>  
**Sent:** Tuesday, July 2, 2019 8:48 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Nancy Barber

I think I mentioned this to you in court, but just to be sure - we definitely would like to see the videos.

Thanks.

TM



Virus-free: [www.avast.com](http://www.avast.com)

## **Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresemathews@gmail.com>  
**Sent:** Wednesday, July 17, 2019 3:05 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Nancy Barber

Maggie:

I met with Nancy today, and I have watched the video of the altercation between Mervin Wolfe and her.

The video does show Nancy slapping or pushing his face, but then Mervin immediately pushed her hard - causing her to land on the ground. She has photos of her eye which became blackened from this injury.

Would you have any interest in pleading this out to disorderly??

Thanks..

TM



Virus-free: [www.avast.com](http://www.avast.com)



**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresematthews@gmail.com>  
**Sent:** Monday, February 25, 2019 3:57 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Re: office email

Awesome!

On Mon, Feb 25, 2019, 3:56 PM Maggie Crisman-Wilson - Coles Co State's Atty's Office  
<[MWilson@co.coles.il.us](mailto:MWilson@co.coles.il.us)> wrote:

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresematthews@gmail.com>  
**Sent:** Friday, March 1, 2019 2:25 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Re: 18-CM-331 (Thomas Bloomquist)

Thank you!

On Fri, Mar 1, 2019 at 11:59 AM Maggie Crisman-Wilson - Coles Co State's Atty's Office  
<MWilson@co.coles.il.us> wrote:

Counsel,

I will be NP'ing this one on 3/6/19.

Maggie Crisman-Wilson

Assistant State's Attorney

Coles County State's Attorney's Office

217-348-0561

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresemattthews@gmail.com>  
**Sent:** Friday, March 1, 2019 2:27 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Re: 18-CM-263 (Lenzi Sewell)

Thank you.

On Fri, Mar 1, 2019 at 12:02 PM Maggie Crisman-Wilson - Coles Co State's Atty's Office <MWilson@co.coles.il.us> wrote:

Counsel,

The State will be NP'ing this one on 3/6/19.

Maggie Crisman-Wilson

Assistant State's Attorney

Coles County State's Attorney's Office

217-348-0561

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresemattthews@gmail.com>  
**Sent:** Friday, March 1, 2019 2:32 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Re: 18-CM-228 (Jadyn Kolpin)

The phone number I have for my client is NIS, so I may not have an answer until I see her in court next Wednesday.

TM

On Fri, Mar 1, 2019 at 12:00 PM Maggie Crisman-Wilson - Coles Co State's Atty's Office <MWilson@co.coles.il.us> wrote:

Counsel,

Would your client be interested in diversion? The State would be willing to give her a reasonable amount of time (90 days perhaps) to tender \$100.00 to victim Judy Whiting.

Maggie Crisman-Wilson

Assistant State's Attorney

Coles County State's Attorney's Office

217-348-0561

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresemathews@gmail.com>  
**Sent:** Monday, March 11, 2019 12:29 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** offer form

I love the new form!

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresematthews@gmail.com>  
**Sent:** Monday, March 11, 2019 12:31 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** John Harris 2018-CM-518 court - 3-27-19

**Maggie:**

My client will accept your offer if you are inclined to change probation to c.d. and eliminate the \$250.00 fine. He is going to have trouble paying the mandatory costs and fees on his fixed income.

Thanks for your consideration.

TM

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresemathews@gmail.com>  
**Sent:** Tuesday, March 12, 2019 9:41 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Re: 19-CM-97 (Cloey Neece)

It looks like she was given a zero dollar bond so she will not be in custody on our case.

March 20 is fine.

TM

On Tue, Mar 12, 2019 at 9:17 AM Maggie Crisman-Wilson - Coles Co State's Atty's Office <MWilson@co.coles.il.us> wrote:

Dear Counsel,

This morning in bond court, you were appointed in 19-CM-97. Ms. Neece was given a future court date of 3/20/19. How should I handle this, next week? Or, will you be asking that the case be kicked to a new date? Let me know if I can be of any help.

Maggie Crisman-Wilson

Assistant State's Attorney

Coles County State's Attorney's Office

217-348-0561

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresematthews@gmail.com>  
**Sent:** Tuesday, March 12, 2019 9:48 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Re: 19-CM-97 (Cloey Neece)

Oh crap. You are way smarter than I am.

Very true. You are looking at my schedule!!!!

You can handle it either way - let her show up on March 20 and give her another date - or send her notice of a different day.

On Tue, Mar 12, 2019 at 9:43 AM Maggie Crisman-Wilson - Coles Co State's Atty's Office <MWilson@co.coles.il.us> wrote:

Okay, I know you won't be in Coles on 3/20, so I just wanted to give you a heads up.

**From:** Terese Matthews [mailto:teresematthews@gmail.com]  
**Sent:** Tuesday, March 12, 2019 9:41 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Re: 19-CM-97 (Cloey Neece)

It looks like she was given a zero dollar bond so she will not be in custody on our case.

March 20 is fine.

TM

On Tue, Mar 12, 2019 at 9:17 AM Maggie Crisman-Wilson - Coles Co State's Atty's Office <MWilson@co.coles.il.us> wrote:

Dear Counsel,



This morning in bond court, you were appointed in 19-CM-97. Ms. Neece was given a future court date of 3/20/19. How should I handle this, next week? Or, will you be asking that the case be kicked to a new date? Let me know if I can be of any help.

**Maggie Crisman-Wilson**

**Assistant State's Attorney**

**Coles County State's Attorney's Office**

**217-348-0561**

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresemathews@gmail.com>  
**Sent:** Monday, March 18, 2019 11:43 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Re: 19-CM-99 (Kaleb Brown)

I noticed that he was picked up on a new case. If he is still in custody on March 20, please bump it to March 27 when I will be there. Thanks.

On Mon, Mar 18, 2019, 11:41 AM Maggie Crisman-Wilson - Coles Co State's Atty's Office  
<[MWilson@co.coles.il.us](mailto:MWilson@co.coles.il.us)> wrote:

FYI: You were appointed on another case up on 3/20. Defendant is in custody.

Maggie Crisman-Wilson

Assistant State's Attorney

Coles County State's Attorney's Office

217-348-0561

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresemathews@gmail.com>  
**Sent:** Monday, March 25, 2019 3:53 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Aaron Conrad 3-27-19 We have an agreement.



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## **Maggie Crisman-Wilson - Coles Co State's Atty's Office**

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**From:** Terese Matthews <terese.matthews@gmail.com>  
**Sent:** Monday, March 25, 2019 3:58 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Angel Dare

We have an agreement. As for the No Contact, she will agree to it, but I will make a representation in court that she and the victim live in the same apartment building, and that Angel has to walk by the victim's apartment door to go outside with her dog. ;)



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## **Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresemathews@gmail.com>  
**Sent:** Tuesday, April 9, 2019 2:16 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Mia Lang first appearance May 1 category 3

Maggie:

I represented Mia Lang at bond court on Sunday and I was appointed to represent her. She posted bond and is back at EIU, where she is a pre-law student. She has already begun counseling at EIU as a result of this incident.

I have spoken with Mia and her mother today. Her mother, Ella Tate, is a medical assistant at Northwestern Memorial Hospital in Chicago (for 23 years) and she is also a pastor. She and Mia are beside themselves with worry and apprehension over this incident.

According to Mia, the victim told her that he had cheated on her, and then he grabbed her keys and phone to prevent her from leaving. She pepper sprayed him in order to get her things back. I believe the pepper spray was attached to her keys. Anyway, it was a big mess, but I am hoping that you see this as just one bad night in the life of an EIU co-ed. :)

TM



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## **Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <terese.matthews@gmail.com>  
**Sent:** Wednesday, April 10, 2019 4:44 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Carlotta Baharlou and Leah McPherson

Counsel:

I am meeting these two defendants (separately) at the courthouse tomorrow (Thursday) afternoon to discuss their cases.

I have offers in both cases. I will assume that they are firm unless you contact me with different information.

Thanks.

TM



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**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresemathews@gmail.com>  
**Sent:** Thursday, April 11, 2019 2:01 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Carlotta Baharlou

She will accept your revised offer of js on May 1.

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <terese.matthews@gmail.com>  
**Sent:** Thursday, April 11, 2019 2:02 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Leah McPherson

No deal. This chick fight could be our first jury trial. :)



**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresemathews@gmail.com>  
**Sent:** Monday, April 29, 2019 4:16 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Re: Caroline Minard 16-CM-448

Yes, and we also skipped Jamie Brown - it is first appearance for him so cat 2.



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On Mon, Apr 29, 2019 at 3:34 PM Maggie Crisman-Wilson - Coles Co State's Atty's Office  
<[MWilson@co.coles.il.us](mailto:MWilson@co.coles.il.us)> wrote:

We still need to discuss this one, as well—it's up on Wednesday. I mistakenly skipped it while we were talking.

Maggie Crisman-Wilson

Assistant State's Attorney

Coles County State's Attorney's Office

217-348-0561

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresematthews@gmail.com>  
**Sent:** Tuesday, April 30, 2019 10:16 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Re: list update

We are so related it's not even funny. I'm on judici right now trying to figure them out.

On Tue, Apr 30, 2019, 10:14 AM Maggie Crisman-Wilson - Coles Co State's Atty's Office  
<[MWilson@co.coles.il.us](mailto:MWilson@co.coles.il.us)> wrote:

Hudson, Parrott, and Spiers are now in custody. I'll have to open these files again to get up to speed. I'll email you as soon as possible...

Maggie Crisman-Wilson

Assistant State's Attorney

Coles County State's Attorney's Office

217-348-0561

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresemathews@gmail.com>  
**Sent:** Tuesday, April 30, 2019 10:34 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Re: list update

None of the 3 are on the jail list that was generated at 3:00 am today. Did they all come in since then??? Or is it an error that they are on the list?

On Tue, Apr 30, 2019, 10:32 AM Maggie Crisman-Wilson - Coles Co State's Atty's Office  
<MWilson@co.coles.il.us> wrote:

You've given me a lot of great advice—some of the best was to always know what's going on with those inmates!

Maggie Crisman-Wilson

Assistant State's Attorney

Coles County State's Attorney's Office

217-348-0561

**From:** Terese Matthews [mailto:teresemathews@gmail.com]  
**Sent:** Tuesday, April 30, 2019 10:16 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Re: list update

We are so related it's not even funny. I'm on judici right now trying to figure them out.

On Tue, Apr 30, 2019, 10:14 AM Maggie Crisman-Wilson - Coles Co State's Atty's Office  
<MWilson@co.coles.il.us> wrote:

Hudson, Parrott, and Spiers are now in custody. I'll have to open these files again to get up to speed. I'll email you as soon as possible...

Maggie Crisman-Wilson

Assistant State's Attorney

Coles County State's Attorney's Office

217-348-0561

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresemattthews@gmail.com>  
**Sent:** Wednesday, May 1, 2019 2:14 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Larry Edwards; 19-CM-17, 125

Maggie:

On May 8, 2019, I plan to ask for a bond modification in 19-CM-125.

That bond prohibits my client from going to 912 Fuller in Charleston. Nici Jo Wright no longer lives there. My client believes that Shannon may have received information from Nici Jo indicating that she no longer lives at that address.

Let me know if you plan to object so that I can file a motion.

Thanks.

Terese Matthews

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresemattthews@gmail.com>  
**Sent:** Thursday, May 2, 2019 9:07 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** 2005pfc.pdf  
**Attachments:** 2005pfc.pdf

## LEGISLATIVE RESEARCH UNIT

Published  
January 2005

## PENALTIES FOR CRIMES IN ILLINOIS

Classification of crime	Usual prison or jail term	Possible extended term <sup>1</sup>	Probation term instead <sup>2</sup>	Mandatory supervised release term <sup>3</sup>	Maximum fine <sup>4</sup>
MURDER					
1st degree	(Death) <sup>5</sup> Life, no parole <sup>6</sup> 20-60 years <sup>7</sup>	— — 60-100 years	Not allowed Not allowed Not allowed	— 3 years 3 years	\$25,000
2nd degree	4-20 years	15-30 years	4 years	2 years	
HABITUAL CRIMINAL <sup>8</sup>	Life, no parole	—	Not allowed	—	—
FELONY					
Class X	6-30 years	30-60 years	Not allowed	3 years	\$25,000, or more if specified
1	4-15 years	15-30 years <sup>9</sup>	Up to 4 years <sup>10</sup>	2 years	
2	3-7 years	7-14 years <sup>9</sup>	Up to 4 years <sup>10</sup>	2 years	
3	2-5 years	5-10 years	Up to 2½ years	1 year	
4	1-3 years	3-6 years	Up to 2½ years	1 year	
MISDEMEANOR					
Class A	Under 1 year	—	Up to 2 years	—	\$2,500
B	Up to 6 months	—	Up to 2 years	—	\$1,500
C	Up to 30 days	—	Up to 2 years	—	\$1,500
PETTY OFFENSE	—	—	Up to 6 months	—	Amount stated up to \$1,000
BUSINESS OFFENSE	—	—	—	—	Amount stated

\* Most fines are subject to mandatory surcharges of at least one-eighth the amount fined. Note 4 on the reverse side gives details.

Note: This is only a summary of Illinois' complex sentencing provisions. The laws defining some crimes set higher penalties than usually apply to crimes of their class.

See also the numbered notes on reverse side.

LRU ☐ ☐ ☐ ☐

## PENALTIES FOR CRIMES IN ILLINOIS

- EXTENDED TERM.** The court may impose an extended term in lieu of the usual term on a person convicted of any of a number of crimes, or of crimes committed in types of circumstances that are listed in 730 ILCS 5/5-5.3-2(b) to (d). An extended term can also be imposed on a person who committed a murder with "... wanton cruelty" or committed any felony with an aggravating factor described in Note 5 below present.
- PROBATION.** Except for the most serious crimes, an offender can be sentenced to a term of probation in lieu of prison. Maximum probation terms for each class of crime are listed in the column marked with this footnote. Among numerous other statutory conditions, a person on probation is forbidden to possess a firearm or other dangerous weapon, or to leave the state without permission, and must pay a \$50 monthly probation fee and any fees for court-ordered treatment if able. Courts may add other conditions. Note 10 below describes situations in which probation is not allowed as an alternative to prison.
- MANDATORY SUPERVISED RELEASE (MSR).** This is a period of parole that automatically follows a prison term for a felony. A person convicted of a repeat sex crime involving force or threat of force against a victim under 18, must serve 4 or 5 years of MSR, with the first 2 being in electronic home detention. The Prisoner Review Board can discharge from MSR a person whom it considers likely to obey the criminal laws.
- FINES.** Whenever a fine is imposed, except for a nonmoving traffic offense or a pedestrian offense, there is added to it a penalty of \$5 for each \$40 or fraction of \$40. Thus the amounts shown must be increased by one-eighth to approximate maximum base fines. In addition, surcharges on fines are required for several specific kinds of crimes, listed principally in 730 ILCS 5/5-9-1.4 to 5/5-9-1.12.
- DEATH PENALTY.** A person who was at least 18 at the time may be sentenced to death for committing first-degree murder by killing: (1) a peace officer or fireman who was performing official duties, or to prevent or retaliate for such performance; (2) an employee, prisoner, or other authorized person in a prison or jail; (3) more than one person (at either the same or different times) if done with separate intent or by separate acts; (4) as a result of a hijacking; (5) for hire, or by hiring another person; (6) intentionally, either alone or in concert with another, and in the course of an "inherently violent" felony; (7) a person under age 12 with "... wanton cruelty;" (8) to prevent or retaliate for the victim's participation in or aiding a criminal investigation or prosecution; (9) intentionally as part of a drug crime, or by causing another person to kill as part of such a crime; (10) while in prison for a felony and in the course of committing or conspiring to commit another felony; (11) in a "cold, calculated, and premeditated manner" as part of a scheme to take a human life illegally; (12) an emergency medical worker employed by government, while performing, or to prevent or retaliate for performance of duties; (13) as the kingpin in a criminal drug conspiracy who caused the victim to be killed; (14) intentionally in a way that involved torture; (15) in a drive-by shooting; (16) a person 60 or older, with "... wanton cruelty;" (17) a disabled person; (18) because the victim was a community policing volunteer or to deter service as such a volunteer; (19) a person protected by an order of protection issued against the murderer; (20) a teacher or other school employee, in or near a school; or (21) as a result of a terrorist act.

- LIFE IN PRISON.** A first-degree murderer may be sentenced to life in prison without possibility of parole if (a) the killing was done with "... wanton cruelty" or (b) any factor listed in note 5 above was present. Unless death is imposed, the court *must* sentence to life in prison without parole any first-degree murderer who killed (1) after being earlier convicted of first-degree murder in any U.S. jurisdiction; (2) more than one person, or a person under age 12 if the murderer was at least 17; (3) a peace officer or fireman who was performing official duties, or to prevent or retaliate for such performance; (4) an employee of a prison or jail who was performing official duties, or to prevent or retaliate for such performance; (5) an emergency medical worker employed by a government, who was performing official duties or to prevent or retaliate for such performance; (6) a person under 12 during an aggravated criminal sexual assault, criminal sexual assault, or aggravated kidnapping, if the murderer was under 17; or (7) because the victim was a community policing volunteer or to prevent such service.
- The range of possible prison sentences for first-degree murder is 20 to 60 years unless a fact justifying life in prison or death is present. But if the murderer was armed with a firearm, the term is automatically increased by 15 years; if the murderer fired it during the crime, by 20 years; and if the firing caused great bodily harm, permanent disability or disfigurement, or death, by 25 years to life.
- HABITUAL CRIMINALITY.** This is not an offense, but an adjudication of a person who, twice in succession, has committed and been convicted in U.S. courts of first-degree murder, a Class X felony, aggravated kidnapping, or criminal sexual assault; and who, less than 20 years after release from custody for the first offense, again commits and is convicted of any of those crimes (except aggravated kidnapping).
- A person who, on two separate occasions after January 1978, committed and was convicted of Class 2 or more serious felonies, and when over age 21 commits a third such felony, is to be sentenced as a Class X felon.
- Probation is not ordinarily allowed for a Class 2 or more serious felony committed within 10 years after conviction of another Class 2 or more serious felony. Probation is also barred for numerous other kinds of crimes or conditions listed in 730 ILCS 5/5-5.3(c)(2). But if the offender is addicted; the crime was nonviolent; and none of several excluding conditions apply, the court can allow the offender to choose probation under the supervision of a drug-treatment program approved by the Department of Human Services.

Sources: This chart is based principally on the following sections of Illinois law in effect as of December 2004: 720 ILCS 5/9-1 and 5/33B-1 ff.; 730 ILCS 5/3-3.3, 5/3-3.8, 5/5-5.1, 5/5-5.3, 5/5-5.3.2, 5/5-6-1 ff., 5/5-8-1 ff., and 5/5-9-1 ff.; and 20 ILCS 301/40-5 ff.



**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresemattews@gmail.com>  
**Sent:** Thursday, May 9, 2019 8:20 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Ditrell Jordan

I am waiting for an offer that encompasses all 5 of his cases.

I have an emailed offer from DG that encompasses the first 4.

FYI - he lives in Chicago.

TM

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresematthews@gmail.com>  
**Sent:** Thursday, May 9, 2019 2:08 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Jacob Wakeland

Were there body camera videotapes for this case?

If so, could I see them?

Thanks.

TM



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**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresemathews@gmail.com>  
**Sent:** Thursday, May 23, 2019 10:19 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Todd Parker - in custody - court May 29

May 29 is not "my day" but I will be in the courthouse for other cases that morning.

If you make an offer that gets this guy out of jail, can we try to take care of him on May 29, when his case is set? My best guess is that I may be available around 10:00. But possibly not.

If your offer requires him to stay in jail for a bit, then let's just bump it to the next week.

Thanks.

TM



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**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresemathews@gmail.com>  
**Sent:** Thursday, May 30, 2019 10:19 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office

Do you have a phone number or email address for Steve Friedel?

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresematthews@gmail.com>  
**Sent:** Monday, June 3, 2019 5:57 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Andrew Hussong, 2018-CF-488

This is the case that failed to plead out before Tom left. It comes up in court next week, but I do not have the date in front of me.

Tom offered 2.5 years. My guy says he will take 2 years DOC.

I have learned that the Douglas County State's Attorney is seeking 4.5 years (at 85%) on a CF PTR. I am concerned that this may impact our ability to settle our case.

The case is set for speedy trial in early July. I would love to settle it.

Let me know if you find out which ASA will be handling it.

Thanks.

TM



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**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresemathews@gmail.com>  
**Sent:** Wednesday, June 5, 2019 4:32 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Leif Pesola - Court June 12

Maggie:

We believe that your victim, Soleil Norseworthy, has left the state of Illinois. Additionally, she is a heroin/meth user and has criminal history, including a drug CF in Coles County.

Leif does not believe she has any intention of assisting with the prosecution of this case, given her attempts to contact him. He has not allowed her to have contact with him.

At the time of this altercation, he was trying to retrieve his apartment keys from her. She resisted his attempts to end their relationship.

Do you have any interest in resolving this case with supervision on a charge of disorderly conduct (yelling)?

Leif does not use drugs or alcohol. He is presently engaged in weekly counseling and he sees a doctor for depression. He is taking medication. I believe he has no priors other than traffic.

Thank you for your consideration.

TM



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**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresemattthews@gmail.com>  
**Sent:** Monday, June 24, 2019 8:02 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** phone conference re: Wednesday

I'm available all day today if you want to discuss Wednesday's cases.

Unfortunately, I am in court all day tomorrow (Tuesday).

TM

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresemathews@gmail.com>  
**Sent:** Monday, June 24, 2019 8:44 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Re: phone conference re: Wednesday

Yep. Anytime that's good for you. I'm here all day.

On Mon, Jun 24, 2019 at 8:42 AM Maggie Crisman-Wilson - Coles Co State's Atty's Office <MWilson@co.coles.il.us> wrote:

Can we shoot for this afternoon? I can give you a better ETA later this morning.

Yours truly,

Maggie Crisman-Wilson

Assistant State's Attorney

Coles County State's Attorney's Office

217-348-0561

**From:** Terese Matthews [mailto:teresemathews@gmail.com]  
**Sent:** Monday, June 24, 2019 8:02 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** phone conference re: Wednesday

I'm available all day today if you want to discuss Wednesday's cases.

Unfortunately, I am in court all day tomorrow (Tuesday).

TM



**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <terese.matthews@gmail.com>  
**Sent:** Monday, June 24, 2019 9:02 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Jasmine Mims-Dantzler

This case comes up for final pretrial on July 10.

Jasmine calls me nearly every day to tell me about various things going on with her. This morning, she told me that she wants to return to Chicago because she is pregnant. The baby is in danger because she has a rare blood type. (You may recall that Jasmine frequently believes that she is pregnant.)

She also fears for the baby's safety because I told the whole courtroom about her baby at the last hearing. (???)

She wants to leave Mattoon and return to Chicago, where she may be able to live with her grandmother again.

Earlier, you mentioned that NP was a possibility in this case. If you have made a firm decision to do that, I will let Jasmine know that she is free to move back to Chicago.

Just let me know when you are able to look at the file and decide.

Thanks.

TM

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresemathews@gmail.com>  
**Sent:** Tuesday, July 2, 2019 8:48 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Nancy Barber

I think I mentioned this to you in court, but just to be sure - we definitely would like to see the videos.

Thanks,

TM



Virus-free: [www.avast.com](http://www.avast.com)

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

---

**From:** Terese Matthews <teresemattthews@gmail.com>  
**Sent:** Wednesday, July 3, 2019 2:34 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Greg Spiers. 7-10-19. He is in custody.

I believe that Judge Bovard set all of his pending cases to our courtroom for 7-10-19.

I met with Greg. He will accept the offer in our case. He will accept the offer in the TR case, where he should have enough credit to satisfy the 30 day offer.

There is also 18-CC-15 - a case that I know nothing about.

TM

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

**From:** Terese Matthews <terese.matthews@gmail.com>  
**Sent:** Wednesday, July 3, 2019 3:18 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Larry Pearson - in custody - jury trial 8-26-19

This guy is being held on a parole hold. He would like to get on his way to DOC, where he expects to serve the 10 months remaining on that case.

Upon his release from DOC, he plans to move to Wisconsin.

My suggestion is that we do a straight conviction on our case with no probation and time served.

If you really want him to do the counseling after his release from DOC, would you consider changing probation to cd?

I'd very much like to take care of this one and get him moved along to DOC. Would you let me know if we could bring him back to court in the near future for a plea?

Thanks.

TM

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

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**From:** Terese Matthews <teresemathews@gmail.com>  
**Sent:** Friday, July 5, 2019 8:37 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Re: Larry Pearson - in custody - jury trial 8-26-19

Thanks. Would you pick a date in July when we can bring him over for the plea?

On Fri, Jul 5, 2019, 8:31 AM Maggie Crisman-Wilson - Coles Co State's Atty's Office <MWilson@co.coles.il.us> wrote:

I'll agree to the straight conviction. Sandy, would you please make a note in the file for me? Thank you!

Yours truly,

Maggie Crisman-Wilson

Assistant State's Attorney

Coles County State's Attorney's Office

217-348-0561

**From:** Terese Matthews [mailto:teresemathews@gmail.com]  
**Sent:** Wednesday, July 3, 2019 3:18 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Larry Pearson - in custody - jury trial 8-26-19

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Thanks.

TM

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

**From:** Terese Matthews <teresemathews@gmail.com>  
**Sent:** Wednesday, July 17, 2019 3:05 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Nancy Barber

Maggie:

I met with Nancy today, and I have watched the video of the altercation between Mervin Wolfe and her.

The video does show Nancy slapping or pushing his face, but then Mervin immediately pushed her hard - causing her to land on the ground. She has photos of her eye which became blackened from this injury.

Would you have any interest in pleading this out to disorderly??

Thanks..

TM



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**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

**From:** Terese Matthews <teresemathews@gmail.com>  
**Sent:** Tuesday, July 23, 2019 8:16 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Cody Endsley 2018-CF-574

This case comes up Thursday at 1:00. I am hoping for a probation offer.

TM



**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

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**From:** Terese Matthews <teresematthews@gmail.com>  
**Sent:** Wednesday, July 24, 2019 12:26 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Leif Pesola

Update offer??

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

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**From:** Terese Matthews <terese.matthews@gmail.com>  
**Sent:** Thursday, July 25, 2019 8:24 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Ditrell Jordan

Maggie:

Ditrell no longer resides in Coles County. He has moved back to Chicago where he has obtained employment.

He is aware that your offer expires on August 7, 2019.

I am wondering if you would consider letting him plead to the two VOBs and battery (instead of domestic battery) with cd instead of probation and a general mental health assessment and treatment instead of RAP. This would be much more manageable from Cook County.

He believes that Jada Morrow, your victim, no longer lives in this area, and that she will be an unwilling victim at trial.

Thank you for your consideration.

TM



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**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

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**From:** Terese Matthews <teresematthews@gmail.com>  
**Sent:** Thursday, July 25, 2019 8:30 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Kirklin England

Maggie:

I met with Kirklin England today, and we would like to make a counteroffer:

He would plead to one count of battery (instead of domestic battery) and resisting if you would drop the remaining counts.

He would do probation with a generic mental health evaluation and treatment instead of RAP. He would do the 2 days required in the resisting case with the remaining jail stayed.

You mentioned that you had two new reports for him, so I don't know how those may affect our negotiations.

Thank you.

TM



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**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

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**From:** Terese Matthews <teresemathews@gmail.com>  
**Sent:** Friday, August 2, 2019 3:18 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Ashley Larré

I met with Ashley today. We counteroffer with judicial supervision on battery. She would be glad to do one form of counseling - but not both.

I don't think her ex-boyfriend, Jordan Montz, wants to prosecute. He has beat her up many times in the past, including choking her, but she never pursued charges.

She entered his home because she could hear their son crying. Jordan was asleep/passed out next to the crying child when Ashley entered his house.

She requests the ability to have contact necessary for communication about the child and visitation drop-offs.

What do you think?

TM



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**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

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**From:** Terese Matthews <terese.matthews@gmail.com>  
**Sent:** Tuesday, August 13, 2019 11:31 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Grates Stacks - court 8-14-19

On August 14, Grates Stacks will accept your probation offer if you will reduce his actual jail time to 45 days. On August 14, he will have served 36 days by my calculation. Since this is a bodily harm case, he would still have 9 days to serve after his court date.

If your victim has indicated that she wants contact, he would be pleased to have the No Contact stricken as part of the plea. DCFS is involved with this family and is supervising their services.

Thanks for your consideration.

TM



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**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

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**From:** Terese Matthews <terese Matthews@gmail.com>  
**Sent:** Thursday, August 15, 2019 10:45 AM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Kirklin England - court September 11

I have received your comprehensive offer.

Kirklin would like to do a few additional days of jail in exchange for reducing the dom batt in 145 to simple battery. Also, he is enrolled in anger management and he wants that to take the place of RAP.

Let me know what you think.

Thanks.

TM

**Maggie Crisman-Wilson - Coles Co State's Atty's Office**

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**From:** Terese Matthews <teresemattews@gmail.com>  
**Sent:** Tuesday, August 20, 2019 2:23 PM  
**To:** Maggie Crisman-Wilson - Coles Co State's Atty's Office  
**Subject:** Ruby Burnett

Maggie:

I have read all the discovery provided to me - which is about the drug bust - but I don't find any mention of my client's resisting arrest. Is there another report?

Thanks.

TM