

**ILLINOIS STATE POLICE  
INVESTIGATIVE REPORT**

File #: 20-1004-SP-SIU      Reporting /Incident Date(s): 8/18/2020      Reporting Agent(s): Sgt. Matthew Barber      ID #: 6249      Dictated/Lead #: TN-01

Title: Coles County State's Attorney Jesse Danley      Case Agent: ID# Sgt. M. Barber #6249      Office: DCI/SIU      Typed by: MKB      Date: 9/14/2020

**Purpose:**

Initial Case Documents

On August 18, 2020, the Illinois State Police, Division of Criminal Investigation, Special Investigations Unit, was made aware of an allegation of Official Misconduct against Coles County State's Attorney Jesse Danley and his Assistant Ronda Parker. According to the allegation and supporting documentation, Danley, through Parker, used Coles County equipment while on Coles County paid time to conduct personal business. The personal business involved a civil suit, [REDACTED], against [REDACTED]. Attached are the initial case documents, which contain the following:

- Criminal Complaint filed by [REDACTED] against Danley.
- Documentation of conversations between Parker and IDNR as well as Parker and [REDACTED]
- FOIA request sent to the Coles County State's Attorney's Office.
- Parker's pay stubs from the State's Attorney's Office.

**Attachment:**

1. Initial Case Documents, consisting of twenty-five pages, received on 8/18/2020.

**Identifier #1**

Name: Jesse Danley

DOB: [REDACTED]

Home Address: [REDACTED]

Work Address: 651 Jackson Avenue, Charleston, Illinois

**Dissemination:**

This document contains neither recommendations nor conclusions of the Illinois State Police.  
It and its contents are not to be disseminated outside your agency.

**ILLINOIS STATE POLICE**  
**INVESTIGATIVE REPORT**  
(continued)

Case No. 20-1004-SP-SIU  
Date: 09/14/2020  
Sgt. M. Barber #6249  
TN-01 - Page 2 of 2

**Identifier #2**

Name: Rhonda J. Parker

DOB: [REDACTED]

Home Address: [REDACTED]

Work Address: 651 Jackson Avenue, Charleston, Illinois

**Identifier #3**

Name: [REDACTED]

DOB: [REDACTED]

Home Address: [REDACTED]

**END OF REPORT**

Dissemination:

This document contains neither recommendations nor conclusions of the Illinois State Police.  
It and its contents are not to be disseminated outside your agency.

Charleston Police Department


614 6th Street

Charleston, IL 61920

Dear Sir:

I have attached my complaint to this cover letter. I have attached several exhibits to support what I am alleging. I realize there may be a conflict with your department in some manner because of Mr. Danley's status as appointed States Attorney. All of the allegations in my complaint took place in Charleston, Illinois. I would ask that your department review the attached documentation. I and many other concerned citizens have prepared and will be filing a Petition for the Appointment of a Special Prosecutor in conjunction with the attached complaint and exhibits. An examination of Ronda Parker's Emails to IDNR, Ronda Parker's Affidavit and Ronda Parker's voicemails leave no doubt of the validity of the allegations of Official Misconduct by Mr. Danley. The theft of public services is theft!

Sincerely,



## COMPLAINT OF CRIMINAL CONDUCT

I [REDACTED] am formally alleging criminal conduct by Coles County public employees Jesse Danley and Ronda Parker with specific series of acts of Official Misconduct which are Class 3 felonies under Illinois law. 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)

The Complainant 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.

### Official Misconduct

Section 33-3(c) of the Criminal Code of 1961 provides that a public employee commits misconduct when, in the public employee's official capacity, he seeks to obtain a personal advantage for himself or another by performing an act in excess of his lawful authority. 720 ILCS 5/33-3(c) (West 2014). The official misconduct statute was intended to prevent public officers and employees from using an official position in the commission of an offense. *Fellhauer v. City of Geneva*, 142 Ill. 2d 495, 506 (1991).

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

That 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 used 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 for himself at the county's expense. 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.

1. The State's Attorney Jesse Danley has from September 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: [REDACTED] (See Attached Email, Voice Mail, power of attorney for IDNR), specifically:

- That from September 2019 until January 2020 Jesse Danley used Coles County State's Attorney's Office to prepare and file a Motion to Dismiss [REDACTED] [REDACTED] used the Coles County State's Attorney's Office address as his personal mailing address, used the Coles County email address to communicate in [REDACTED] and used staff employee Ronda Parker to file pleadings for him within the Odyssey system. Further, Ronda Parker notarized Jesse Danley's civil pleadings, a service not offered to the public.
- That on September 2019, Jesse Danley used the Coles County State's Attorney's Office to contact Illinois Department of Natural Resources' attorney for the purposes of consulting over a personal matter and seeking legal advice in his official capacity as Coles County State's Attorney over the contested personal issues of Jesse Danley's failure to complete a title transaction complained of within the small claims matter.
- That on September 2019, Jesse Danley used employee Ronda Parker and Coles County resources to prepare and execute a Power of Attorney to IDNR using the Coles County State's Attorney's Office address as the address of the boat's owner, Jesse Danley.
- That on September 2019, used the State's Attorney office staff and email to file pleadings into personal litigation with [REDACTED]
- That on September 2019, Jesse Danley used Ronda Parker to email the executed Power of Attorney to me in civil case [REDACTED]
- That on September 2019 used Ronda Parker to mail the executed Power of Attorney to me in civil case [REDACTED] via U.S. Mail, using Coles County postage.
- That on September 2019 used Ronda Parker as fact witness in communicating about Jesse Danley's not viewing my email regarding the boat.
- That Jesse Danley used Ronda Parker to contact Judge Bovard's office to get available dates for a hearing in civil case in [REDACTED]
- Used Ronda Parker to call my office, with Ronda identifying herself as "Ronda from the State's Attorney's Office" to set a hearing in civil case [REDACTED] (See attached Exhibit transcript of voicemail)



- The FOIA response and attached to this complaint details and admits the factual basis necessary to sustain a charge for Official misconduct.

The use of the information gained from the criminal case is being used by Jesse Danley in support for his personal benefit, which constitutes a Class 3 felony of official misconduct.

That all times relevant Jesse Danley was acting in his official capacity using state and county resources for personal gain. CCSA 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 [REDACTED] wherein Plaintiff is recorded on video grabbing an elderly woman and pushing her to the und, bruising her eye. Plaintiff filed his Entry of Appearance in his criminal case [REDACTED] the same date as filing his Complaint in this cause on July 30, 2019. CCSA Dan 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. CCSA Danley use and dissemination of the privileged information placed into paragraph 18 for personal gain and to cause harm.

I have attached various exhibits with documents as well as FOIA responses demonstrating irrefutable proof that Mr. Danley and Ronda Parker has committed official misconduct and theft of public services.

Respectfully Submitted

[REDACTED]  
Citizen Complainant

***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

Re: FOIA Request

Dear [REDACTED]

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 [REDACTED]. 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

10/15/2019

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		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	\$656.45		
			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		
Coles County		651 Jackson Ave		Room 124		Charleston, IL		61920			



10/31/2019

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	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	\$891.00
		0.00		\$1,937.50	\$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	\$2,290.62
						FWT	FEDERAL WITHHOLDIN	\$289.44	\$5,687.58
						MED	MEDICARE WITHHOLDI	\$27.42	\$535.66
						RG03	IMRF- RG03	\$67.19	\$1,704.46
						SWT	ILLINOIS STATE WITHH	\$84.60	\$1,650.68
								\$652.39	\$12,798.98

Coles County	651 Jackson Ave	Room 124	Charleston, IL	61920
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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	\$1,735.26		
								\$652.39	\$13,451.37		
Coles County                      651 Jackson Ave                      Room 124                      Charleston, IL                      61920											

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	11/29/2019	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	CAROP	BLUECROSS/BLUESHI	\$34.55	\$780.10
			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
								\$652.39	\$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**

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**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 [REDACTED], Mr. Danley will be required to provide [REDACTED] 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 [REDACTED] 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  
217-782-1889  
[ronda.brown@Illinois.gov](mailto:ronda.brown@Illinois.gov)

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**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 [REDACTED] [REDACTED]. Jesse signed the title over the same date as the boat being picked up. [REDACTED] never had the transferred title registered with DNR. Three weeks ago [REDACTED] 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 [REDACTED] stating he lost the title in 2018.

Question: Jesse Danley wants [REDACTED] 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 [REDACTED] He did buy it and it was properly signed over to him.

Buyer: [REDACTED] [REDACTED] [REDACTED]

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 [REDACTED] 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

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**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:** [REDACTED]@yahoo.com  
**Subject:** RE: Hearing date

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

Safe travels!

Ronda

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**From:** [REDACTED]@yahoo.com <[REDACTED]@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 [REDACTED]

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 [REDACTED] vs. Danley [REDACTED]. 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:** [REDACTED]@yahoo.com  
**Cc:** Jesse Danley - State's Attorney  
**Subject:** Hearing date

Dear [REDACTED]

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 [REDACTED] vs. Danley [REDACTED]. 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:** [REDACTED]@yahoo.com'  
**Subject:** PO  
**Attachments:** [REDACTED] [REDACTED] ltr with Attached DNR POA.pdf

Dear [REDACTED]

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 [REDACTED] yahoo.com

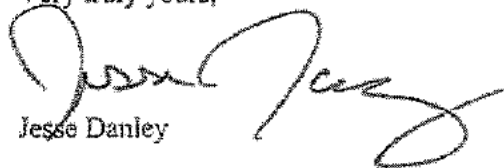
Mr. [REDACTED]  
[REDACTED]

Re: DNR POA- Sea Nymph

Dear [REDACTED]

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

ujp  
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

month/day/year

COMPLETE THE FOLLOWING: (if applicable)

Purchaser's Name

Purchaser's Address

(First)

(Middle initial)

(Number and Street)

(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 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.

STATE OF ILLINOIS

COUNTY OF COLES

)  
) SS:  
)

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

[REDACTED] )  
[REDACTED] )  
Plaintiff, )  
)  
)

vs. )

No. [REDACTED]

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, [REDACTED]. 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, [REDACTED] attempting to coordinate the hearing date. Plaintiff, [REDACTED] Wolf 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.

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, [REDACTED]

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.

[REDACTED]

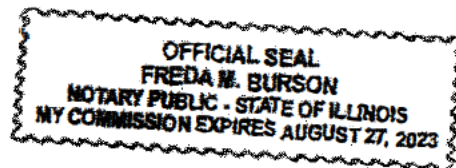
Ronda Parker

Subscribed and Sworn to before me this

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

[REDACTED]

Notary Public





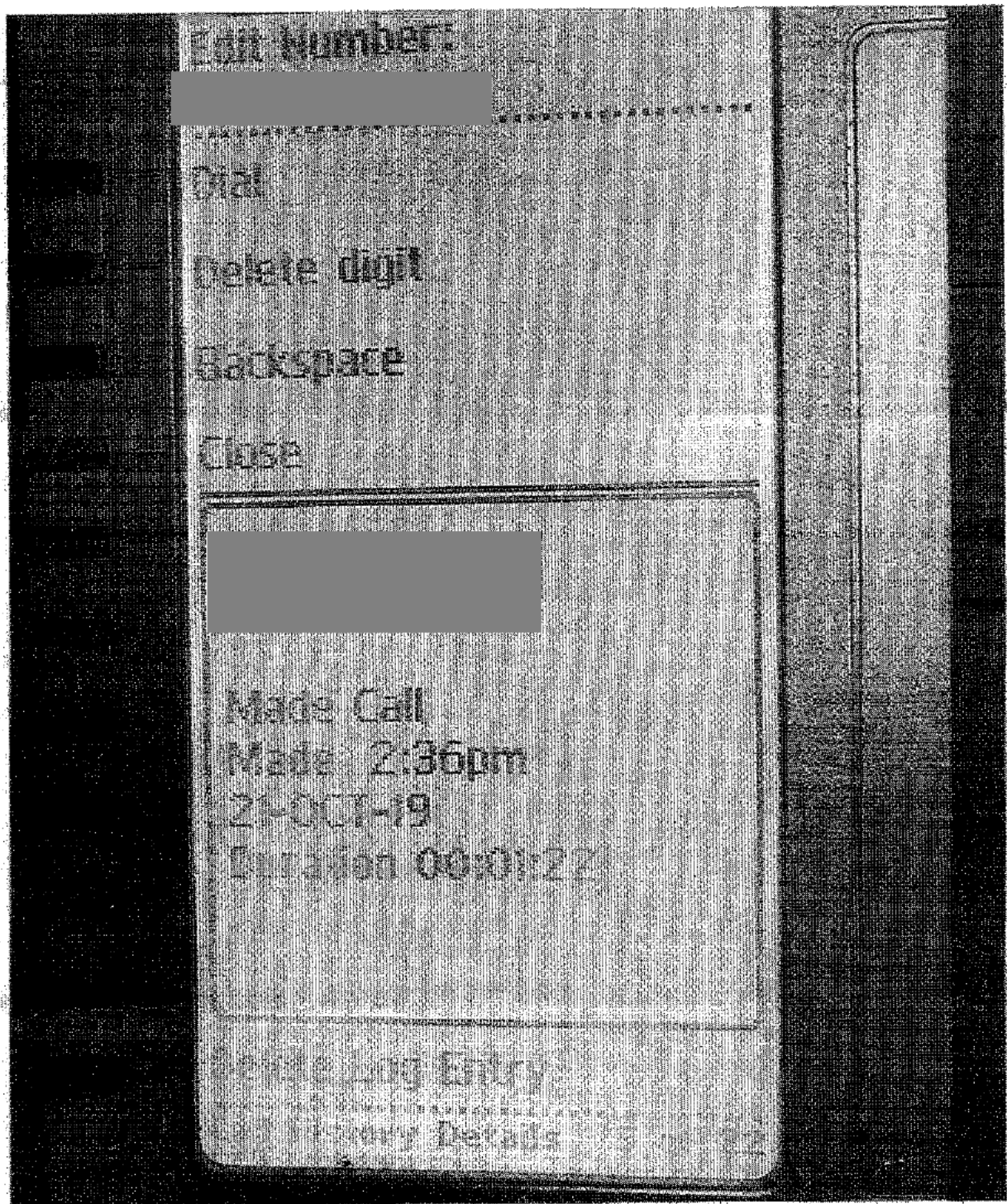


Exhibit B

**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:** [REDACTED] aho.com  
**Subject:** RE: Hearing date

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

Safe travels!

Ronda

---

**From:** [REDACTED]@yahoo.com <[REDACTED]@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:

[REDACTED]

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 [REDACTED] vs. Danley [REDACTED]. 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**

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**From:** [REDACTED] <[REDACTED]@yahoo.com>  
**Sent:** Thursday, October 24, 2019 10:50 AM  
**To:** Ronda Parker - Coles Co State's Atty's Office  
**Subject:** your involvement in [REDACTED] and [REDACTED]

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 [REDACTED] [REDACTED] also [REDACTED] vs Jesse Danley [REDACTED]. 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 [REDACTED] 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 [REDACTED] [REDACTED]

Ronda, the address on Answer to Small Claims Complaint filed by Mr. Danley in [REDACTED] 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 [REDACTED]. Did Jesse Danley personally approve of payroll for the time periods in which you were working on [REDACTED] 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 [REDACTED] 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 cases have you scheduled a hearing on behalf of Jesse Danley?
2. To your knowledge were county computers, email systems, paper, personnel and payroll used in this matter to mount a "defense" to Jesse Danley's conflict in the underlying civil matters??
3. Are you aware of the Petition for a Rule to Show cause now pending in [REDACTED]?
4. Are you aware of the Motion to Quash subpoena filed by Mr Danley still pending in [REDACTED]?
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 [REDACTED] 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 [REDACTED] for example county computers, paper, staff, emails, phone ect.
9. What personal knowledge do you have of Jesse Danley's 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 [REDACTED] 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,

[REDACTED]

[REDACTED]

Fax: [REDACTED]

communications regarding defense with all  
 those in Danley's letter does not identify any  
 one would be submitted by various  
 line. There is no other identification any  
 having any of the issue. As such, on that  
 these "animosity, hostility, ill will, ex

6. Judge O'Brien has previously indicated. Affidavit relative to defendant's motion for summary judgment in the affidavit, Judge O'Brien acknowledged receiving defendant's August 18, 2019, ARDC complaint letter against the jury which had been placed in the court file. Judge O'Brien indicated that he did not make any ruling on the allegation that defendant would be subjected to the federal inquiry posed by the threat against him. Judge O'Brien indicated that the letter had no impact upon a summary in a trial or would provide any findings in this case. Judge O'Brien also stated that he was aware of the relationship between Maggie Graham Wilson and Thomas Matthews, that he inquired as to any potential contact with Dinkley and, separately, with Matthews, and that he did not believe there was a contact or interest. Judge O'Brien stated he did not have any conversation with the other judges of Cook County regarding the firing of Graham Wilson or of any potential conflict of interest. Judge O'Brien stated that, based on the contents of the affidavit, there does not appear to be any basis for the allegations that the judges in Cook County have conspired to deny defendant's motion. This court should deny defendant's motion.

... Court deny defendant's request for a  
... (b)(7)(C) ... (b)(7)(D) ...

respectfully submitted,

Date: May 14, 2020

/s/ Brian Toomey

**ILLINOIS STATE POLICE  
INVESTIGATIVE REPORT**

File #:	Reporting /Incident Date(s):	Reporting Agent(s):	ID #:	Dictated/Lead #:
20-1004-SP-SIU	9/10/2020	Sgt. Matthew Barber	6249	TN-02

Title:	Case Agent: ID#	Office:	Typed by:	Date:
Coles County State's Attorney Jesse Danley	Sgt. M. Barber #6249	DCI/SIU	MKB	9/14/2020

Purpose:

Interview of State's Attorney Jesse Danley

The purpose of this report is to document the interview of Coles County State's Attorney Jesse Danley. Danley was interviewed pursuant to an allegation of Official Misconduct where it was alleged Danley had used his office and staff for personal gain during a civil suit with [REDACTED]. The interview occurred on September 10, 2020, at the Coles County State's Attorney's Office located at 651 Jackson Avenue in Charleston. The interview was conducted by Illinois State Police (ISP) Special Investigations Unit (SIU) Special Agent Denis Janis #4709 and I, Sergeant Matthew Barber #6249. Danley was notified that we were investigating him for Official Misconduct and that he was not under arrest or detention and that we would leave if he did not want to continue with questioning. Danley consented to answer questions and provided us with the following information:

- Danley had been appointed as Coles County State's Attorney sometime in December 2019 when the office became vacant.
- Danley had known of [REDACTED] for several years and had sold him a boat in 2013 following Danley's advertisement on Craig's List.
- [REDACTED] had lost the title and sale information and had contacted Danley via email and mail to the State's Attorney's Office.
- Coles County State's Attorney Paralegal Rhonda Parker had heard Danley talking about the request by [REDACTED] to provide the information and she volunteered to help Danley (See TN-03 for her interview).
- Danley did not require Parker to do this, she had volunteered, and to his understanding had done this during her breaks (twice a day for 15 minutes) or during her lunch break (once a day for one hour).
- Danley had rarely dealt with [REDACTED] with as few as 1 case during which they were litigating against each other from 2013-18. During that time [REDACTED] had never mentioned anything about the boat in person and all communication had went to county email accounts or to county offices (when Danley was a public defender or as his position as S.A.).
- [REDACTED] and attorney Todd Reardon (currently running for State's Attorney against Danley) had previously had a friendly relationship; however, it was Danley's understanding that they had a falling out and did not speak until [REDACTED] was charged with battery. According to www.Judici.com (a search engine for court cases for participating counties in Illinois), [REDACTED] was charged with a misdemeanor on [REDACTED].

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**ILLINOIS STATE POLICE**  
**INVESTIGATIVE REPORT**  
(continued)

Case No. 20-1004-SP-SIU  
Date: 09/14/2020  
Sgt. M. Barber #6249  
TN-02 - Page 2 of 2

- Once [REDACTED] had been charged, he retained Reardon as his attorney and they began to file multiple lawsuits against Danley as well as the Coles County State's Attorney's Office. According to Judici, [REDACTED] filed a small claims suit against Danley on [REDACTED]
- According to Danley, at that time the water had been "muddied," as to who or what entity [REDACTED] and Reardon were suing so responses with State's Attorney letterhead (once that Danley could recall) and during work hours were warranted and more frequent.
- Danley stated that he believed [REDACTED] and Reardon were making filings for political reasons and that they had begun suing the office of the State's Attorney along with Danley personally. Once they had begun suing the office, then they should understand the responses would come from the office.

**Identifier #1**

Name: Jesse Danley

DOB: [REDACTED]

Home Address: [REDACTED]

Work Address: 651 Jackson Avenue, Charleston, Illinois

Driver's License: [REDACTED]

**END OF REPORT**

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**ILLINOIS STATE POLICE  
INVESTIGATIVE REPORT**

File #:	Reporting /Incident Date(s):	Reporting Agent(s):	ID #:	Dictated/Lead #:
20-1004-SP-SIU	9/10/2020	Sgt. Matthew Barber	6249	TN-03

Title:	Case Agent: ID#	Office:	Typed by:	Date:
Coles County State's Attorney Jesse Danley	Sgt. M. Barber #6249	DCI/SIU	MKB	9/14/2020

Purpose:

Interview of Ronda J. Parker

The purpose of this report is to document the interview of Coles County State's Attorney (CCSA) Paralegal Ronda Parker. Parker was interviewed pursuant to an allegation of Official Misconduct against Coles County State's Attorney Jesse Danley, where it was alleged Danley had used his office and staff for personal gain during a civil suit with [REDACTED]. The interview occurred on September 10, 2020, at the Coles County State's Attorney's Office located at 651 Jackson Avenue in Charleston. The interview was conducted by Illinois State Police (ISP) Special Investigations Unit (SIU) Special Agent Denis Janis #4709 and I, Sergeant Matthew Barber #6249. Parker provided us with the following information:

- Parker could not recall when she learned about the civil suit between [REDACTED] and Danley.
- Parker overheard Danley speaking about the suit with [REDACTED] and offered to assist him because she is "good at civil law."
- Parker never recalled Danley asking her to help in his suit against [REDACTED] she would just simply respond to any correspondence sent to the CCSA's Office.
- Parker stated she was "salary exempt," with no set hours of work or Overtime available. Parker is allowed an hour lunch break and two 15-minute breaks each work day.
- Parker also stated she used her personal computer, which she uses for work at home. Parker did all work on her breaks and stated that the first few correspondences she used stamps and letters from her house without being compensated. None of the responses to [REDACTED] took much time and were completely quickly without interfering with her regular work or work day.
- Danley had not paid her to do the work, but did it as a courtesy to him and she was never compensated by him or his office.
- Parker stated [REDACTED] had "blurred the lines," between suing Danley personally and the CCSA as all correspondences from [REDACTED] were sent to the CCSA Office.
- Parker believed [REDACTED] had been "made whole," as IDNR had issued a new title for the boat in question.
- Parker believed [REDACTED] filed this complaint against Danley due to the CCSA Office filing charges against [REDACTED] for a battery against his neighbor.
- Parker stated because [REDACTED] sent all correspondences to Danley through the CCSA Office that he had blurred all lines between Danley personally and his official capacity.

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**ILLINOIS STATE POLICE**  
**INVESTIGATIVE REPORT**  
(continued)

Case No. 20-1004-SP-SIU  
Date: 09/14/2020  
Sgt. M. Barber #6249  
TN:03 - Page 2 of 2

**Identifier #1**

Name: Rhonda J. Parker

DOB: [REDACTED]

Home Address: [REDACTED]

Work Address: 651 Jackson Avenue, Charleston, Illinois

Driver's License: [REDACTED]

**END OF REPORT**

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**ILLINOIS STATE POLICE  
INVESTIGATIVE REPORT**

File #:	Reporting /Incident Date(s):	Reporting Agent(s):	ID #:	Dictated/Lead #:
20-1004-SP-SIU	9/23/2020	Sgt. Matthew Barber	6249	TN-04

Title:	Case Agent: ID#	Office:	Typed by:	Date:
Coles County State's Attorney Jesse Danley	Sgt. M. Barber #6249	DCI/SIU	MKB	10/13/2020

**Purpose:**

Interview of [REDACTED]

The purpose of this report is to document the interview of complainant [REDACTED] was interviewed pursuant to his allegation of Official Misconduct against Coles County State's Attorney (CCSA) Jesse Danley, where it was alleged Danley had used his office and staff for personal gain during a civil suit with [REDACTED]. The interview occurred on September 23, 2020, at his attorney Todd Reardon's office with Reardon present, located at 518 South 6<sup>th</sup> Street, in Charleston, Illinois. The interview was conducted by Illinois State Police (ISP) Special Investigations Unit (SIU) Special Agent Denis Janis #4709 and I, Sergeant Matthew Barber #6249. The interview was audio recorded with [REDACTED] permission and will be downloaded to a CD at a later date and placed in the case file. For a full account of the interview the audio recording should be referenced. In summary, [REDACTED] provided us with the following information:

- Sometime in 2013 [REDACTED] purchased a boat off of Danley via a Craig's List posting for approximately \$1,500.00. [REDACTED] had little knowledge of Danley at this point. The boat was purchased by [REDACTED] for his grandson and Danley had provided the title for the boat and the trailer at the time of sale. [REDACTED] later said that Danley had done "everything he was supposed to," but that the difficulties occurred with IDNR while he was trying to get the title.
- [REDACTED] believed he first contacted Danley via a phone number listed on the ad for the boat.
- The boat title had difficulties being processed at IDNR and required documentation from the original owner, Danley.
- At the time of the difficulties, Danley had left his position as a Public Defender and went to work as an Assistant State's Attorney at Cole's County. [REDACTED] sent an email to Danley's Cole's County's email account with attachments that contained the required documentation to get the title corrected.
- [REDACTED] and Danley began to get into arguments over a case where they were against each other involving Mark Karr.
- While representing Karr, [REDACTED] would tease Danley about the title in court by saying "when are we gonna go fishing Jesse." They would get into verbal arguments in court over the boat title. [REDACTED] stated all Danley had to do was sign the paperwork he had sent Danley and the issue would have been resolved.
- [REDACTED] related an incident that occurred between him and his neighbor, Nancy Barber, on April 21, 2019 (Easter), during which they got into a physical altercation. [REDACTED] did not believe he should have been

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**ILLINOIS STATE POLICE**  
**INVESTIGATIVE REPORT**  
(continued)

Case No. 20-1004-SP-SIU  
Date: 09/23/2020  
Sgt. M. Barber #6249  
TN:04 - Page 2 of 2

charged and stated that Barber should have been charged; however, Danley and the State's Attorney's Office got involved and charges against Barber were dropped and then filed against him.

- [REDACTED] had attempted to hand the forms to Danley several times in court; however, Danley would not take them or sign them. [REDACTED] sent the forms and requests to the CCSA Office and email system.
- [REDACTED] believed Ronda Parker's use of county time and resources created Official Misconduct and should be prosecuted because he has defended people who had stolen less.
- [REDACTED] brought and showed us previously received documentation that is located in TN-01 of this case.
- [REDACTED] believed Danley should have asked the Attorney General's Office to represent the state in the case between them; however, Danley represented the state.

**Identifier #1**

Name: [REDACTED]

DOB: [REDACTED]

Home and Work Address: [REDACTED]

**END OF REPORT**

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