

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS  
E. ST. LOUIS DIVISION**

KARA CHUMBLEY,  
Plaintiff,

vs.

22-cv-1981  
DEMAND FOR JURY TRIAL

BRADY ALLEN, in his individual capacity,  
JESSE DANLEY, in his individual capacity,  
ALEX HESSE, in his individual capacity, and  
JASON TAYLOR, in his individual capacity.  
Defendants.

**1ST AMENDED COMPLAINT AT LAW**

Now comes the Plaintiff, KARA CHUMBLEY, by and through her attorney, Todd M. Reardon, Sr., and for her complaint against the Defendants states as follows:

1. This is a civil action arising under the Fifth and Fourteenth Amendments to the United States Constitution as well as 42 U.S.C. §§ 1983 and 1988, the Illinois Constitution, the Illinois Civil Rights Act of 2006-740 ILCS 24/5(b) and the Common Law of Illinois. The Court has jurisdiction of this matter pursuant to 28 U.S.C. §§ 1331 and 1343(a)(3).
2. This judicial district is an appropriate venue under 28 U.S.C. § 1391(b) because the Defendant, BRADY ALLEN, residing in Belleville, IL, resides in this judicial district.

**PARTIES**

3. Plaintiff, KARA CHUMBLEY, is a citizen of the City of Mattoon, Coles County, Illinois.

4. Defendant, Brady Allen (hereinafter ALLEN), was at all times relevant, an Assistant State's Attorney for the Coles County State's Attorney's Office, and he is sued in his individual capacity and at all times relevant hereto was acting under color of law.

5. Defendant, Jesse Danley (hereinafter DANLEY), was at all times relevant, the State's Attorney for the Coles County State's Attorney's Office, and he is sued in his individual capacity and at all times relevant hereto was acting under color of law.

6. Defendant, Jason Taylor (hereinafter TAYLOR), was at all times relevant, the Chief of Police for the Mattoon Police Department, and he is sued in his individual capacity and at all times relevant hereto was acting under color of law.

7. Defendant, Alex Hesse (hereinafter HESSE), was at all times relevant, a detective for the Mattoon Police Department, and he is sued in his individual capacity and at all times relevant hereto was acting under color of law.

#### **FACTS AS TO VIOLATION OF DUE PROCESS**

8. On June 13, 2019, the Plaintiff, KARA CHUMBLEY, was charged for DUI in Coles County Cause No. 2019DT76.

9. That throughout the litigation of 2019DT76, the Plaintiff was repeatedly contacted by the Defendant wherein the Defendant requested that the Plaintiff perform sexual favors in exchange for a more favorable outcome in the underlying proceeding. (See, Affidavit by Kara Chumbley, hereinafter referred to as Exhibit A; See, Affidavit by Mackenzie Crable, hereinafter referred to as Exhibit B; See, message(s) by ALLEN, hereinafter referred to as Group Exhibit C).

10. On August 21, 2020, counsel for KARA CHUMBLEY filed a Motion to Dismiss for Prosecutorial Misconduct into Cause No. 2019DT76.

11. On August 25, 2020, a statement was released by the Coles County State's Attorney's Office, claiming that the actions of ALLEN were not endorsed by the Coles County State's Attorney's Office.

12. That after August 25, 2020, Defendant ALLEN continued to work in tandem with the Coles County State's Attorney's Office, acting as a de facto "witness coordinator".

13. That after August 25, 2020, Defendant ALLEN continually harassed and intimidated any known witnesses claiming to have knowledge of Defendant ALLEN, acting as Coles County Assistant State's Attorney, coercing Defendants to perform sexual favors in exchange for favorable outcomes to the Defendant's proceedings.

14. At all times relevant, including after Defendant ALLEN's "resignation", ALLEN concealed the knowing violation of KARA CHUMBLEY's due process rights, including but not limited to the right to a fair trial process without regular threats and coercive demands for sexual favors from the prosecutor of KARA CHUMBLEY's criminal proceeding, by intimidating any and all corroborating witnesses and other victims, namely, BRIANNA LEE using agents of the Mattoon Police Department, namely Mattoon Police Chief JASON TAYLOR, acting under color of law.

15. At all times relevant, including after Defendant ALLEN's "resignation", ALLEN concealed the knowing violation of KARA CHUMBLEY's due process rights, including but not limited to the right to a fair trial process without regular threats and coercive demands for sexual favors from the prosecutor of KARA CHUMBLEY's criminal proceeding, by intimidating any and all corroborating witnesses and other victims,



namely, BRIANNA LEE using agents of the Mattoon Police Department, namely Detective ALEX HESSE, acting under color of law. (See, Affidavit of Brianna Lee, hereinafter referred to as Exhibit D).

16. At all times relevant, including after Defendant ALLEN's "resignation", ALLEN concealed the knowing violation of KARA CHUMBLEY's due process rights, including but not limited to the right to a fair trial process without regular threats and coercive demands for sexual favors from the prosecutor of KARA CHUMBLEY's criminal proceeding, by using agents of the Coles County State's Attorney's Office, namely Coles County State's Attorney, JESSE DANLEY, acting under color of law, to fabricate false pretenses for contacting the Mattoon Police Department for the purposes of intimidating any and all corroborating witnesses and other victims, namely, BRIANNA LEE.

17. At all times relevant, including after Defendant ALLEN's "resignation", ALLEN concealed the knowing violation of KARA CHUMBLEY's due process rights, including but not limited to the right to a fair trial process without regular threats and coercive demands for sexual favors from the prosecutor of KARA CHUMBLEY's criminal proceeding, by bribing any and all corroborating witnesses and other victims, namely, BRIANNA LEE. (See, Exhibit D).

18 At all times relevant, ALLEN concealed the knowing violation of KARA CHUMBLEY's due process rights, including but not limited to the right to a fair trial process without regular threats and coercive demands for sexual favors from the prosecutors over KARA CHUMBLEY's criminal proceeding, by publishing Defendant's opinions that the allegations of prosecutorial misconduct by ALLEN were political stunts

not deserving of redressal or proper investigation. (See, Publication by ALLEN, hereinafter referred to as Exhibit E).

19. That on or about October 27, 2020, DANLEY concealed the knowing violation of KARA CHUMBLEY's due process rights, including but not limited to the right to a fair trial process without regular threats and coercive demands for sexual favors from the prosecutors over KARA CHUMBLEY's criminal proceeding, by falsely claiming to have initiated a "proactive investigation" of allegations against Defendant ALLEN, and for the actual purposes of intimidating any and all corroborating witnesses and other victims, namely, BRIANNA LEE.

20. At all times relevant, TAYLOR concealed the knowing violation of KARA CHUMBLEY's due process rights, including but not limited to the right to a fair trial process without regular threats and coercive demands for sexual favors from the prosecutor of KARA CHUMBLEY's criminal proceeding, by using agents of the Mattoon Police Department, namely ALEX HESSE, acting under color of law, to fabricate false pretenses for a "proactive investigation" of allegations against Defendant ALLEN, and for the actual purposes of intimidating any and all corroborating witnesses and other victims, namely, BRIANNA LEE.

21. That on or about October 26, 2020, TAYLOR concealed the knowing violation of KARA CHUMBLEY's due process rights, including but not limited to the right to a fair trial process without regular threats and coercive demands for sexual favors from the prosecutor of KARA CHUMBLEY's criminal proceeding, by falsely claiming to have initiated a "proactive investigation" of allegations against a Todd M. Reardon, and for the actual purposes of intimidating any and all corroborating witnesses and other victims,

namely, BRIANNA LEE. (See, email from Jesse Danley to a Kirk Allen, hereinafter referred to as Group Exhibit F)

22. At all times relevant, HESSE concealed the knowing violation of KARA CHUMBLEY's due process rights, including but not limited to the right to a fair trial process without regular threats and coercive demands for sexual favors from the prosecutor of KARA CHUMBLEY's criminal proceeding, namely, by HESSE, acting under color of law, fabricating false pretenses for a "proactive investigation" of allegations against Defendant ALLEN, and for the actual purposes of intimidating any and all corroborating witnesses and other victims, namely, BRIANNA LEE.

23. That on August 24, 2020, Defendant HESSE interviewed BRIANNA LEE, acting under color of law, fabricating false pretenses for a "proactive investigation" of allegations against Defendant ALLEN, and for the actual purposes of intimidating BRIANNA LEE.

24. That after August 25, 2020, Defendant HESSE continually harassed and intimidated BRIANNA LEE, acting under color of law at all relevant times.

**Count I - 42 U.S.C. § 1983, Due Process by ALLEN**

1-24. Each of the Paragraphs in this Complaint is incorporated as if restated fully herein.

25. As described in the preceding paragraphs, the Defendant ALLEN violated Plaintiff's Fourteenth Amendment right to due process under the law.



26. The conduct described in this Count was objectively unreasonable and was undertaken intentionally and/or with malice, willfulness, and/or reckless indifference to Plaintiff's rights.

27. As described more fully above, Defendant ALLEN denied Plaintiff due process of law in that he engaged in arbitrary government action that deprived her of her liberty and was so malfeasant as to shock the conscience.

28. As a result of conduct described in this Count, Plaintiff has suffered injuries, including but not limited to emotional distress, and anguish.

**Count II - 42 U.S.C. § 1983, Equal Protection by ALLEN**

1-28. Each Paragraph of this Complaint is incorporated as if fully stated herein.

29. As described more fully above, Defendant ALLEN denied Plaintiff equal protection of the law in violation of her constitutional rights.

30. As described in the preceding paragraphs, the Defendant ALLEN violated Plaintiff's Fourteenth Amendment right to equal protection under the law.

31. The conduct described in this count was motivated by gender animus and constituted purposeful discrimination.

32. The conduct described in this Count was undertaken intentionally, and/or with malice, willfulness, and/or reckless indifference to Plaintiff's rights.

33. As a result of the conduct described in this Count, Plaintiff has suffered damages, including but not limited to emotional distress, and anguish.

**Count III - 42 U.S.C. § 1983, Due Process by DANLEY**

1-33. Each of the Paragraphs in this Complaint is incorporated as if restated fully herein.

34. As described in the preceding paragraphs, the Defendant DANLEY violated Plaintiff's Fourteenth Amendment right to due process under the law.

35. The conduct described in this Count was objectively unreasonable and was undertaken intentionally and/or with malice, willfulness, and/or reckless indifference to Plaintiff's rights.

36. As described more fully above, Defendant DANLEY denied Plaintiff due process of law in that he engaged in arbitrary government action that deprived her of her liberty and was so malfeasant as to shock the conscience.

37. As a result of conduct described in this Count, Plaintiff has suffered injuries, including but not limited to emotional distress, and anguish.

#### **Count IV - 42 U.S.C. § 1983, Equal Protection by DANLEY**

1-37. Each Paragraph of this Complaint is incorporated as if fully stated herein.

38. As described more fully above, Defendant DANLEY denied Plaintiff equal protection of the law in violation of her constitutional rights.

39. As described in the preceding paragraphs, the Defendant DANLEY violated Plaintiff's Fourteenth Amendment right to equal protection under the law.

40. The conduct described in this count was motivated by gender animus and constituted purposeful discrimination.

41. The conduct described in this Count was undertaken intentionally, and/or with malice, willfulness, and/or reckless indifference to Plaintiff's rights.



42. As a result of the conduct described in this Count, Plaintiff has suffered damages, including but not limited to emotional distress, and anguish.

**Count V - 42 U.S.C. § 1983, Due Process by TAYLOR**

1-42. Each of the Paragraphs in this Complaint is incorporated as if restated fully herein.

43. As described in the preceding paragraphs, the Defendant TAYLOR violated Plaintiff's Fourteenth Amendment right to due process under the law.

44. The conduct described in this Count was objectively unreasonable and was undertaken intentionally and/or with malice, willfulness, and/or reckless indifference to Plaintiff's rights.

45. As described more fully above, Defendant TAYLOR denied Plaintiff due process of law in that he engaged in arbitrary government action that deprived her of her liberty and was so malfeasant as to shock the conscience.

46. As a result of conduct described in this Count, Plaintiff has suffered injuries, including but not limited to emotional distress, and anguish.

**Count VI - 42 U.S.C. § 1983, Equal Protection by TAYLOR**

1-46. Each Paragraph of this Complaint is incorporated as if fully stated herein.

47. As described more fully above, Defendant TAYLOR denied Plaintiff equal protection of the law in violation of her constitutional rights.

48. As described in the preceding paragraphs, the Defendant TAYLOR violated Plaintiff's Fourteenth Amendment right to equal protection under the law.

49. The conduct described in this count was motivated by gender animus and constituted purposeful discrimination.

50. The conduct described in this Count was undertaken intentionally, and/or with malice, willfulness, and/or reckless indifference to Plaintiff's rights.

51. As a result of the conduct described in this Count, Plaintiff has suffered damages, including but not limited to emotional distress, and anguish.

**Count V - 42 U.S.C. § 1983, Due Process by HESSE**

1-51. Each of the Paragraphs in this Complaint is incorporated as if restated fully herein.

52. As described in the preceding paragraphs, the Defendant HESSE violated Plaintiff's Fourteenth Amendment right to due process under the law.

53. The conduct described in this Count was objectively unreasonable and was undertaken intentionally and/or with malice, willfulness, and/or reckless indifference to Plaintiff's rights.

54. As described more fully above, Defendant HESSE denied Plaintiff due process of law in that he engaged in arbitrary government action that deprived her of her liberty and was so malfeasant as to shock the conscience.

55. As a result of conduct described in this Count, Plaintiff has suffered injuries, including but not limited to emotional distress, and anguish.

**Count VI - 42 U.S.C. § 1983, Equal Protection by HESSE**

1-55. Each Paragraph of this Complaint is incorporated as if fully stated herein.

56. As described more fully above, Defendant HESSE denied Plaintiff equal protection of the law in violation of her constitutional rights.

57. As described in the preceding paragraphs, the Defendant HESSE violated Plaintiff's Fourteenth Amendment right to equal protection under the law.

58. The conduct described in this count was motivated by gender animus and constituted purposeful discrimination.

59. The conduct described in this Count was undertaken intentionally, and/or with malice, willfulness, and/or reckless indifference to Plaintiff's rights.

60. As a result of the conduct described in this Count, Plaintiff has suffered damages, including but not limited to emotional distress, and anguish.

WHEREFORE, Plaintiff, KARA CHUMBLEY, respectfully requests that this Court enter judgment in her favor and against the Defendants, BRADY ALLEN, JESSE DANLEY, JASON TAYLOR and ALEX HESSE, awarding compensatory damages and attorneys' fees, costs of the suit herein incurred, as well as punitive damages, and any other relief this Court deems just and appropriate.

Respectfully submitted,

/s/Todd M. Reardon, Sr.

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