

**IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF ILLINOIS  
URBANA DIVISION**

KARA CHUMBLEY,  
Plaintiff,

vs.

2:23-cv-02086

BRADY ALLEN, in his individual capacity,  
JESSE DANLEY, in his individual capacity,  
ALEX HESSE, in his individual capacity,  
And RONDA PARKER, in her individual capacity,  
Defendants.

**DEMAND FOR JURY TRIAL**

**4TH AMENDED COMPLAINT AT LAW**

Now comes the Plaintiff, KARA CHUMBLEY, by and through her attorney, Todd M. Reardon, Jr., 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, 42 U.S.C. § 1985(2) and 42 U.S.C. §1988. The Court has jurisdiction of this matter pursuant to 28 U.S.C. § 1367, 28 U.S.C. § 1331 and 28 § 1343(a)(1)(2) and (3).
2. This judicial district is an appropriate venue under 28 U.S.C. § 1391(b) because the Defendants, JESSE DANLEY, RONDA PARKER and ALEX HESSE, all residents of Coles County, IL, reside 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 Defendant ALLEN), who was an Assistant State's Attorney for the Coles County State's Attorney's Office until August 23, 2020, and he is sued in his individual capacity.

5. Defendant, Jesse Danley (hereinafter Defendant DANLEY), who was at all times relevant, the Interim or Elected State's Attorney for the Coles County State's Attorney's Office, and he is sued in his individual capacity.

6. Defendant, Alex Hesse (hereinafter Defendant HESSE), who was at all times relevant, a detective for the Mattoon Police Department, and he is sued in his individual capacity.

7., Defendant, Ronda Parker (hereinafter Defendant PARKER) who throughout the relevant period served in multiple capacities, including as a paralegal for the Coles County State's Attorney's Office, as an agent for Jesse Danley in his personal legal matters, as well as a paralegal for the Illinois Office of the State's Attorney Appellate Prosecutor, and she is sued in her individual capacity.

## **STATEMENT OF FACTS**

### **Conspiratorial Agreement:**

8. Upon information and belief, the Plaintiff alleges that a secret arrangement or accord was in place between Defendant ALLEN, Defendant PARKER, a paralegal employed by the State's Attorney, then Coles County State Attorney, Defendant DANLEY, and Mattoon Police Officer, Defendant HESSE.

9. Upon information and belief, the agreement was aimed at circumventing the constitutional rights of certain individuals of a suspected class, women, including Plaintiff, and denying them equal protection under the law, by impeding their right to present witnesses, suppress evidence of Defendant ALLEN's misconduct, a right to a

fair trial without prosecutorial sexual misconduct, concealing Defendant ALLEN's prior misconduct, and slandering women who came forward through press releases.

10. That in 2019 through August of 2020 Defendant ALLEN engaged in a course of conduct towards women by denying them Equal Protection under the law in that he would use his position as a prosecutor with the Coles County State's Attorney's Office to exploit female criminal Defendants to provide him with sexually explicit content, ie. Sexually explicit communications, sexual photos and videos, as well as performing sexual favors and acts in exchange for leniency.

11. Plaintiff contends that Defendant ALLEN selectively targeted young women who were entangled in criminal proceedings where he served as a prosecuting attorney, and that by using his position in this manner, Defendant ALLEN wielded disproportionate influence over these individuals' cases, infringing upon their rights in the process.

12. Furthermore, the Plaintiff contends that Defendant ALLEN utilized personal communication channels and electronic devices to interact with these individuals as well as government owned phones, and emails.

13. By at least May of 2020, Defendant DANLEY became aware that Defendant ALLEN was engaging in misconduct through a prior instance of Defendant ALLEN's behavior, including documentation of Defendant ALLEN utilizing personal communication channels and devices as well as government owned phones and emails to tamper with witness testimony, notably, involving a female witness identified as Beth Houk.<sup>1</sup> (See, email communications between Defendant ALLEN and Thomas Bruno, hereinafter referred to as Exhibit A)

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<sup>1</sup> Exhibits A, B, C, D, G, J, O, Q, R, S, T and U only became known to Plaintiff as a result of a subpoena issued by Plaintiff to the Illinois State Police on December 12, 2023, and returned on or about January 3, 2024.

14. Upon learning of Defendant ALLEN's misconduct, Defendant PARKER provided Defendant ALLEN with Illinois Pattern Jury Instructions 3.10, revealing that Defendant ALLEN's predilection for targeting females utilizing personal communication channels and devices as well as government owned phones and emails was known and supported by Defendant DANLEY. (See, email communications between Defendant PARKER and Defendant ALLEN, hereinafter referred to as Exhibit B)

15. That the day after Defendant ALLEN was contacted by attorney Thomas Bruno regarding Beth Houk, Defendant ALLEN reached out to another female witness inquiring about her living arrangements, relationship status, and other alerting dialogue, likewise utilizing Defendant ALLEN's email provided by the Coles County State's Attorney's Office. (See, email communications between Defendant ALLEN and Brianna Harshbarger, hereinafter referred to as Exhibit C)

16. Despite the gravity of these transgressions, Defendant DANLEY failed to take any remedial action, allowing Defendant ALLEN's misconduct to continue. (See personnel file of Defendant ALLEN during his employment as an assistant State's Attorney containing no reference to any review or discipline of the events involving Beth Houk, Brianna Harshbarger, Brianna Lee, or Kara Chumbley, hereinafter referred to as Exhibit D)

17. The situation escalated when allegations of official misconduct, including accusations of sexual impropriety, surfaced against Defendant ALLEN in Coles County Case No. 2019DT76, Plaintiff's own DUI proceeding, in which Plaintiff Kara Chumbley filed a Motion to Dismiss for Prosecutorial Misconduct on August 21, 2020.

18. Upon information and belief, in light of the increasing public awareness to these

allegations, the aforementioned agreement was made involving Defendant DANLEY, Defendant PARKER, Defendant HESSE, and Defendant ALLEN; this agreement was purportedly designed to discredit the claims of sexual discrimination brought by the Plaintiff, and other witnesses, particularly regarding Defendant DANLEY's alleged enabling of Defendant ALLEN's exploitation of female criminal Defendants and female witnesses because of their belonging to a suspect class as women.

19. Upon information and belief, in furtherance of this purported agreement, Defendant DANLEY and Defendant PARKER, acting under color of law, collaborated on Sunday, August 23, 2020, and produced documents on behalf of Defendant ALLEN, namely a document entitled "press release" and a document entitled "response".<sup>2</sup> (See, Subpoena Return of Plaintiff's Subpoena issued to Coles County State's Attorney's Office for: all memorandum, attachments, or other tangible documentation sent from the email rparker@co.coles.il.us to ballen@co.coles.il.us, hereinafter referred to as Exhibit E)

20. That a subsequent document was produced on or around August 23, 2020, containing a nearly identical, truncated recitation of the body of the documents entitled "press release" and "response" which was provided to the Illinois State Police as part of Defendant ALLEN's personnel file. (See, Exhibit D, page 1)(See Also, Exhibit B).

21. Upon information and belief, in furtherance of this purported agreement, Defendant DANLEY and Defendant PARKER, acting under color of law, collaborated on or around August 23, 2020, and produced the aforementioned document in paragraph 20 above, placing the same into Defendant ALLEN's personnel file as a purported "resignation

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<sup>2</sup> Exhibit E likewise only became known to Plaintiff after the above-described subpoena was returned on or about January 24, 2024.

letter” for purposes of tendering this document to the Mattoon Police Department and the Illinois State Police.

22. That immediately prior to his resignation, Defendant ALLEN contacted BRIANNA LEE in an attempt to impede her from testifying, alleging, in part, that he and Defendant DANLEY “[we]re on the same page”. (See, Transcript of Defendant ALLEN and BRIANNA LEE, hereinafter referred to as Exhibit F)

23. Upon information and belief, the actions taken by Defendant DANLEY and Defendant PARKER were coordinated efforts aimed at minimizing and diverting focus from Defendant ALLEN's sexually discriminatory conduct, with Defendants' press release describing Defendant ALLEN's predations as "entertain[ing] the idea of a dating relationship"; this concerted effort effectively perpetuated an environment within the Coles County State's Attorney's office where such misconduct could thrive unchecked, fostering a culture of impunity. Notably, this same "press release" was also disseminated to Defendant HESSE. (See, Mattoon Police records of BRIANNA LEE interview, hereinafter referred to as Exhibit G)

24. On Sunday, August 23, 2020, Defendant DANLEY and Defendant ALLEN convened at the Coles County State's Attorney's Office when Defendant ALLEN pinpointed BRIANNA LEE as yet another victim of Defendant ALLEN's pattern of singling out female criminal defendants for discriminatory treatment; additionally, Defendant ALLEN also identified BRIANNA LEE as the next probable witness poised to publicly expose his misconduct. (See email communications between Defendant DANLEY and Kirk Allen, referred to hereinafter as Exhibit H).

25. Upon information and belief, continuing with the purported agreement, Defendant

DANLEY, Defendant ALLEN, and Defendant HESSE collaborated to intimidate BRIANNA LEE, orchestrating a police interview on August 24, 2020, where Defendant HESSE explicitly warned BRIANNA LEE against testifying on behalf of either the Plaintiff or herself concerning the allegations of Defendant ALLEN's sexually discriminatory behavior; this calculated action served to intensify an environment conducive to further instances of sexually discriminatory conduct. (See, Affidavit of BRIANNA LEE drafted in support of her own Motion to Suppress Evidence based upon the prosecutorial misconduct of Defendant ALLEN and Defendant HESSE in her criminal matter and later provided to Plaintiff KARA CHUMBLEY by BRIANNA LEE, hereinafter referred to as Exhibit I).

26. Upon information and belief, in continuation of the alleged agreement, Defendant HESSE altered or destroyed a recording made of the police interview in which there is no depiction of BRIANNA LEE ever leaving the interview room.

27. Upon information and belief, in continuation of the alleged agreement, Defendant HESSE also fabricated a police report, identifying statements made by BRIANNA LEE which was never said in the police interview recording, such as that the acts were "all political", and "good for both of us". (See, Exhibit G, page 2)

28. Upon information and belief, in continuation of the alleged agreement, Defendant ALLEN contacted BRIANNA LEE on August 27, 2020 and again, on November 26, 2020, to warn or entice BRIANNA LEE against testifying on behalf of either the Plaintiff or herself regarding the nature of Defendant ALLEN's sexually discriminatory conduct. (See, ISP Report of Defendant ALLEN's FaceBook Communications with BRIANNA LEE, hereinafter referred to as Exhibit J1)(See also, transcript of preliminary hearing of

BRADY ALLEN, hereinafter referred to as Exhibit J2)

29. Central to this agreement was the prevention of exposure to the systemic exploitation of women by Defendant ALLEN in his official capacity; however, the timing of this agreement is also noteworthy, occurring during a hotly contested election for the State's Attorney's office with Defendant DANLEY facing off against a defense attorney who had brought attention to Defendant ALLEN's unlawful behavior.

**Ongoing Involvement in Plaintiff's DUI Proceeding by Defendant PARKER:**

30. The Plaintiff alleges that after the Coles County State's Attorney's Office recusal from prosecution of Plaintiff in her pending DUI matter due to a conflict of interest and the appointment of a special prosecutor from the Illinois Office of the State's Attorney Appellate Prosecutor, that Defendant PARKER remained as support staff in the prosecution of Plaintiff's criminal matter.

31. That by resolution of the Coles County, Illinois Board, a Municipal Corporation, RONDA PARKER and other agents for the Coles County State's Attorney's Office were purportedly allowed to act as support staff during the entire duration of Plaintiff Kara Chumbley's ongoing DUI matter, as well as any other criminal Defendants that the Illinois Office of the State's Attorney Appellate Prosecutor was appointed to. (See, Resolution of Coles County, Illinois Board, paragraph 9, hereinafter referred to as Exhibit K).

32. Further revealing the continued involvement by Defendant PARKER, on September 9, 2020, Defendant PARKER sent two emails to Jenifer Mudge, a special prosecutor of the Illinois Office of the State's Attorney Appellate Prosecutor appointed to Plaintiff Kara

Chumbley's DUI matter, reflected as follows:

September 9, 2020 11:00 AM

Subject: Kara Chumbley

Dear Jennifer: I am attaching hereto a skeleton Response to the Motion to Dismiss that I tender for convenience. Please let me know if anything further is needed. . .

September 9, 2020 1:06 PM

Subject: RE: Kara Chumbley

Yes, I am just sending the Response as a springboard for you. . .

(See, email communications between Defendant PARKER and Jenifer Mudge, hereinafter referred to as Exhibit L)

33. That on or around his resignation, Defendant ALLEN again contacted BRIANNA LEE in an attempt to convince her to not testify, alleging that he had committed no misconduct, and that his actions were an "ethical violation". (See, Exhibit F)

34. That on December 12, 2020, Jenifer Mudge pleaded that she had received a Motion from RONDA PARKER that was used as a drafting template in the ongoing prosecution of Plaintiff, KARA CHUMBLEY. (See, Response to Motion to Dismiss signed and certified by Jenifer Mudge, paragraph 21, hereinafter referred to as Exhibit M).

35. That within the same pleading, Jenifer Mudge claimed that Defendant ALLEN "at best. . . had violated the Illinois Rules of Professional Conduct", mirroring the inaccurate conclusion alleged by Defendant ALLEN to BRIANNA LEE and highly suggestive of ongoing undue influence exerted by Defendant ALLEN into Plaintiff Kara Chumbley's DUI matter.

**Ongoing Communications with Defendant ALLEN:**

36. Upon information and belief, Defendant PARKER owned or operated an

account which employed the following phone number: (217) 273-4536. (See, Mediator List of Fifth Judicial Circuit of Illinois, identifying a Parker, Ronda J. with included phone number, hereinafter referred to as Exhibit N)

37. That concurrent to Defendant PARKER's involvement in Plaintiff's ongoing DUI matter, Defendant PARKER had direct, regular phone communications with Defendant ALLEN, at the following times:

August 21, 2020 (Fri)

11:29 PM: Defendant PARKER reached out to Defendant ALLEN, engaging in a lengthy conversation for 25 minutes and 8 seconds.

August 22, 2020 (Sat)

16:43 PM: Defendant PARKER again contacted Defendant ALLEN, this time for 2 minutes and 11 seconds.

6:19 PM: Defendant PARKER initiated a 17-minute call with Defendant ALLEN.

August 23, 2020 (Sun)

16:56 PM: A series of calls between Defendant PARKER and Defendant ALLEN occurred, lasting 3 minutes and 30 seconds, and 34 seconds, respectively.

8:41 PM: Defendant PARKER initiated an 11-minute call with Defendant ALLEN.

August 24, 2020 (Mon)

10:22 AM: Defendant PARKER made a second call to Defendant ALLEN for 12 minutes.

August 25, 2020 (Tues)

17:40 PM: Defendant PARKER initiated a 9-minute call with Defendant ALLEN.

September 2, 2020 (Wed)

10:05 AM: Defendant ALLEN responded with a call to Defendant PARKER, engaging for about 1 minute and 15 seconds.

10:32 AM: Defendant PARKER initiated a call to Defendant ALLEN, lasting approximately 1 minute and 8 seconds.

11:13 AM: A subsequent call from Defendant PARKER to Defendant ALLEN, lasting 52 seconds.

1:24 PM: Defendant PARKER again reached out to Defendant ALLEN, with this call extending for nearly 57 minutes.

September 8, 2020 (Tues)

9:55 AM: Defendant PARKER made two back-to-back calls to Defendant ALLEN; the first lasted for 2 minutes and 20 seconds, and the second for 2 minutes and 30 seconds.

11:06 AM: Defendant ALLEN returned a call to Defendant PARKER, lasting 3 minutes and 20 seconds, followed by another at 5:06 PM for 2 minutes and 41 seconds.

1:06 PM: Defendant PARKER again contacted Defendant ALLEN, this time engaging for an extensive period of 2 hours and 41 minutes and 52 seconds.

7:15 PM: A late-night call from Defendant PARKER to Defendant ALLEN lasted 1 minute and 18 seconds.

September 14, 2020 (Mon)

10:32 AM: Defendant PARKER contacted Defendant ALLEN for a discussion lasting over 10 minutes.

February 17, 2021 (Wed)

5:47 PM: Defendant PARKER initiated a 17-minute call with Defendant ALLEN, the last known conversation by this medium.

(See, Phone Records of Defendant ALLEN, hereinafter referred to as Exhibit O)(converted from UTC)

38. Upon information and belief, these discussions were in furtherance of the agreement purportedly designed to directly discredit the claims of sexual discrimination brought by any potential witnesses against Defendant ALLEN as well as Defendant DANLEY, particularly regarding the alleged enabling of Defendant ALLEN's exploitation of female criminal Defendants.

39. Upon information and belief, these discussions were about affecting the ongoing criminal investigation into Defendant Allen and disposition of Plaintiff's own ongoing criminal matter, specifically relating to impeding BRIANNA LEE from testifying about Defendant ALLEN's misconduct.

40. Upon information and belief, these discussions involving Defendant ALLEN and Defendant PARKER were part of Defendants' ongoing scheme to perpetuate sexual discrimination against other unidentified female criminal defendants, known only to Defendant ALLEN; their aim was to coordinate efforts to discourage these individuals

from stepping forward, mirroring the tactics used to intimidate and coerce BRIANNA LEE.

41. Upon information and belief, the ongoing discussions between Defendant PARKER and Defendant ALLEN were known and encouraged by Defendant DANLEY; as noted by Defendant ALLEN to BRIANNA LEE, allegations against Defendant ALLEN's sexual misconduct were becoming public during a contested election for the State's Attorney's office and that both Defendant DANLEY and Defendant PARKER were at risk of losing employment. (See, Exhibit F)

42. That Defendant PARKER had previously sworn under oath to acting as Defendant DANLEY's personal assistant outside the scope of her employment, using telephonic and email communications owned by Coles County State's Attorney's Office, further revealing a likelihood that Defendant PARKER was acting as Defendant DANLEY's agent. (See, Affidavit of Ronda Parker, hereinafter referred to as Exhibit P)

43. On September 6, 2021, a phone number under an account owned by Defendant DANLEY contacted Defendant ALLEN, further revealing ongoing communications between Defendant DANLEY and Defendant ALLEN. (See, Phone Records of Defendant ALLEN (landline), hereinafter referred to as Exhibit Q)

#### **Ongoing Involvement in Prosecution of Defendant ALLEN by Defendant DANLEY**

44. Upon information and belief, the Plaintiff alleges that following Defendant ALLEN's resignation, Defendant DANLEY persistently assumed the role of both prosecutor and investigator in relation to Defendant ALLEN's alleged criminal activities for nearly two years to obstruct any repercussions for Defendant ALLEN's purported sexual

misconduct, along with Defendant DANLEY's failure to take corrective measures, as well as Defendants' mutual collaboration to impede witnesses and undermine any allegations of sexual discrimination.

45. On September 10, 2020, Defendant DANLEY was interviewed by Illinois State Police agents when Defendant DANLEY expressed a willingness to prosecute Defendant ALLEN, but cited the complexity of the case as a reason for needing further investigation to determine if there were conflicts of interest; despite this assertion, the Plaintiff alleges, upon information and belief, that Defendant DANLEY did not conduct any such research, and instead made these statements to delay the appointment of a special prosecutor. (See, Illinois State Police Report No. 6, hereinafter referred to as Exhibit R)

46. That Defendant DANLEY had purportedly requested that the Illinois Office of the State Attorney's Appellate Prosecutor handle the prosecution of Defendant ALLEN on or before December 18, 2020, but that said office refused to participate in the prosecution of Defendant ALLEN. (See, Exhibit M, para 17)

47. On June 15, 2022, after being informed by the Illinois State Police that their investigation into Defendant ALLEN had been completed, Defendant DANLEY asked the Illinois Attorney General's Office to take on the role of prosecutor for the case. He claimed to be unaware of the investigation's outcomes; however, the Plaintiff alleges that Defendant DANLEY was, in fact, deeply involved in the investigation into Defendant ALLEN. According to the Plaintiff, Defendant DANLEY had ordered Defendant HESSE to intimidate BRIANNA LEE during a police interview. Furthermore, Defendant DANLEY had

kept the recording of this interview and had regularly communicated with Defendant ALLEN through Defendant PARKER. There is also evidence of direct contact between Defendant ALLEN and Defendant DANLEY as recently as September 6, 2021.

48. Within the same June 15, 2022 request, Defendant DANLEY also claimed that the Illinois Attorney General's Office had previously already advised Defendant DANLEY to formally request appointment of a special prosecutor.

49. Upon information and belief, Defendant DANLEY's continued involvement as the purported prosecutor of Defendant ALLEN until June 15, 2022, may also explain the delay in investigating and prosecuting Defendant ALLEN given the ambiguity of Defendant DANLEY's position.

50. Within the same June 15, 2022, request, Defendant DANLEY also purported to be still receiving information relating to the investigation, claiming that investigators for the Illinois State Police had reported their investigation as complete directly to Defendant DANLEY; however, upon information and belief, the criminal investigation of Defendant ALLEN was not completed as no search warrants relating to Defendant ALLEN's criminal activity were issued until after Defendant DANLEY's recusal, approximately 659 days after Defendant DANLEY first claimed to have discovered Defendant ALLEN's criminal conduct. (See, all search warrants provided by the Illinois State Police relating to the criminal investigation of Defendant ALLEN, issued on September 20, 2022, October 18, 2022, and November 16, 2022, hereinafter referred to as Exhibit S).

51. Upon information and belief, Defendant DANLEY's continued involvement as the purported prosecutor and the associated inactivity of Defendant ALLEN's criminal

investigation was in furtherance of concealing Defendant ALLEN's sexually discriminatory conduct, as the delay permanently impeded the prosecution of Defendant ALLEN due to at least one known victim, namely, ASHLEY DAIGLE, committing suicide on June 5, 2022, as well as another potential victim and witness, KAYLEE CARRUTHERS who had been physically present in the Coles County, Illinois Courthouse as late as January 11, 2023, but whose whereabouts then became unknown by February 1, 2023. (See, ISP report of suicide of ASHLEY DAIGLE, hereinafter referred to as Exhibit T)(See also, ISP report of inability to locate KAYLEE CARRUTHERS, hereinafter referred to as Exhibit U)(See also, Judici record of KAYLEE CARRUTHERS in Coles County Case No. 2019CM98, hereinafter referred to as Exhibit V)

52. Upon information and belief, the reason for Defendant DANLEY's delay in recusing himself and his office from Defendant ALLEN's criminal prosecution, especially one involving allegations of sexual exploitation of female criminal defendants within their office, was motivated by an intent to protect Defendants' personal reputation, the reputation of the Coles County State's Attorney's Office, as well as to manipulate the outcome of Defendant ALLEN's criminal case to prevent damaging revelations about misconduct occurring within the State's Attorney's Office.

## **COUNT I**

### **42 USC 1985 (Defendant ALLEN)**

53. Upon information and belief, the Plaintiff alleges that the previously aforementioned clandestine agreement between Defendant ALLEN, Defendant PARKER, a paralegal under the employ of the State's Attorney, then Coles County State Attorney, Defendant

DANLEY, and Mattoon Police Officer, Defendant HESSE was a conspiracy to deprive the Plaintiff KARA CHUMBLEY of equal protection.

54. That the conspiracy was motivated by an intent to sexually discriminate against Plaintiff KARA CHUMBLEY for her belonging to a suspect class, women.

55. That Defendant ALLEN committed the following acts in furtherance of this conspiracy:

- A. exploiting female criminal Defendants to provide him with sexual favors for leniency while still acting as an assistant State's Attorney;
- B. intimidating and bribing female criminal Defendants to remove potential witnesses and suppress evidence, further reinforcing the atmosphere of sexually discriminatory conduct to occur, both as an assistant State's Attorney and a private citizen;
- C. Issuing a press release to undermine and discredit the Plaintiff's allegations of sexual discrimination, further perpetuating a hostile environment for female criminal Defendants within the legal system;
- D. using documents drafted by Defendant PARKER and Defendant DANLEY to mitigate Defendant ALLEN's sexual misconduct as nothing beyond "entertain[ing] the idea of a dating relationship";
- E. identifying BRIANNA LEE as a potential witness to Defendant DANLEY, upon information and belief, for purposes of informing Defendant HESSE to intimidate BRIANNA LEE with a mock police interview cautioning BRIANNA LEE against testifying on behalf of either the Plaintiff or herself regarding the allegations of Defendant ALLEN's sexually discriminatory conduct;

- F. upon information and belief, maintaining direct, regular phone communications with Defendant PARKER in furtherance of the agreement purportedly designed to directly discredit the claims of sexual discrimination brought by any potential witnesses against Defendant ALLEN as well as Defendant DANLEY, particularly regarding the alleged enabling of Defendant ALLEN's exploitation of female criminal Defendants;
- G. upon information and belief, maintaining direct, regular phone communications with Defendant PARKER about affecting the litigation and disposition of Plaintiff's own ongoing criminal matter, specifically relating to impeding BRIANNA LEE from testifying about Defendant ALLEN's misconduct; and
- H. upon information and belief, maintaining direct, regular phone communications with Defendant ALLEN in furtherance of Defendants' ongoing scheme to perpetuate sexual discrimination against any unidentified female criminal defendants, known only to Defendant ALLEN. Their aim was to coordinate efforts to discourage these individuals from stepping forward, mirroring the tactics used to intimidate and coerce BRIANNA LEE.

56. As a result of the conspiracy, Plaintiff KARA CHUMBLEY was deprived of her civil rights to equal protection under the law in the course of prosecuting her in an underlying DUI matter, in that Plaintiff KARA CHUMBLEY was denied her right to bodily integrity and due process by acts of Defendant ALLEN in conspiracy with Defendant DANLEY, Defendant PARKER, and Defendant HESSE.

WHEREFORE, the Plaintiff KARA CHUMBLEY respectfully prays that this Honorable Court enter judgment in her favor and against Defendant ALLEN, 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.

## **COUNT II**

### **42 USC 1985 (Defendant DANLEY)**

57. The Plaintiff alleges that the previously aforementioned clandestine agreement between Defendant ALLEN, Defendant PARKER, a paralegal under the employ of the Coles County State's Attorney's Office, then Coles County State Attorney, Defendant DANLEY, and Mattoon Police Officer, Defendant HESSE was a conspiracy to deprive the Plaintiff KARA CHUMBLEY of equal protection.

58. That the conspiracy was motivated by an intent to sexually discriminate against Plaintiff KARA CHUMBLEY for her belonging to a suspect class, women.

59. That Defendant DANLEY committed the following acts in furtherance of this conspiracy:

- A. ignoring potential red flags and turning a blind eye to the inappropriate actions of Defendant ALLEN by failing to acknowledge the severity of his sexually discriminatory conduct towards female criminal Defendants and female witnesses;
- B. upon information and belief, directing Defendant PARKER to provide Defendant ALLEN with jury instructions to downplay his inappropriate actions, allowing the sexually discriminatory conduct to persist unchecked;
- C. upon information and belief, crafting a "press release" with Defendant PARKER on behalf of Defendant ALLEN to minimize and divert focus from Defendant

ALLEN's sexually discriminatory conduct, with Defendants' press release describing Defendant ALLEN's predations as "considering the notion of a romantic relationship" and discrediting Plaintiff's allegations of sexual discrimination;

- D. upon information and belief, crafting a "resignation letter" with Defendant PARKER on behalf of Defendant ALLEN to minimize and divert focus from Defendant ALLEN's sexually discriminatory conduct to subsequent Illinois State Police investigative review;
- E. upon information and belief, at Defendant ALLEN's request, informing Defendant HESSE to intimidate BRIANNA LEE where Defendant HESSE explicitly warned BRIANNA LEE against testifying on behalf of either the Plaintiff or herself concerning the allegations of Defendant ALLEN's sexually discriminatory behavior;
- F. upon information and belief, directing Defendant PARKER to maintain direct, regular phone communications with Defendant ALLEN in furtherance of the agreement purportedly designed to directly discredit the claims of sexual discrimination brought by any potential witnesses against Defendant ALLEN as well as Defendant DANLEY, particularly regarding the alleged enabling of Defendant ALLEN's exploitation of female criminal Defendants;
- G. upon information and belief, directing Defendant PARKER to maintain direct, regular phone communications with Defendant ALLEN about affecting the litigation and disposition of Plaintiff's own ongoing criminal matter, specifically

relating to impeding BRIANNA LEE from testifying about Defendant ALLEN's misconduct;

- H. upon information and belief, directing Defendant PARKER to maintain direct, regular phone communications with Defendant ALLEN in furtherance of Defendants' ongoing scheme to perpetuate sexual discrimination against any unidentified female criminal defendants, known only to Defendant ALLEN. Their aim was to coordinate efforts to discourage these individuals from stepping forward, mirroring the tactics used to intimidate and coerce BRIANNA LEE; and
- I. upon information and belief, delaying investigation and prosecution of Defendant ALLEN by continuing to act as the purported prosecutor of Defendant ALLEN's criminal conduct for approximately two (2) years thereafter.

60. As a result of the conspiracy, Plaintiff KARA CHUMBLEY was deprived of her civil rights to equal protection under the law in the course of prosecuting her in an underlying DUI matter, in that Plaintiff KARA CHUMBLEY was denied her right to bodily integrity and due process by acts of Defendant ALLEN in conspiracy with Defendant DANLEY, Defendant PARKER, and Defendant HESSE.

WHEREFORE, the Plaintiff KARA CHUMBLEY respectfully prays that this Honorable Court enter judgment in her favor and against Defendant DANLEY, 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.

### **COUNT III**

#### **42 USC 1985 (Defendant HESSE)**

61. Upon information and belief, the Plaintiff alleges that the previously aforementioned clandestine agreement between Defendant ALLEN, Defendant PARKER, a paralegal under the employ of the State's Attorney, then Coles County State Attorney, Defendant DANLEY, and Mattoon Police Officer, Defendant HESSE was a conspiracy to deprive the Plaintiff KARA CHUMBLEY of equal protection.

62. That the conspiracy was motivated by an intent to sexually discriminate against Plaintiff KARA CHUMBLEY for her belonging to a suspect class, women.

63. That Defendant HESSE committed the following acts in furtherance of this conspiracy:

- A. upon information and belief, at Defendant DANLEY's request, intimidating BRIANNA LEE with a simulated police interview where Defendant HESSE explicitly warned BRIANNA LEE against testifying on behalf of either the Plaintiff or herself concerning the allegations of Defendant ALLEN's sexually discriminatory behavior;
- B. upon information and belief, altering or destroying a recording made of the same mock police interview of BRIANNA LEE; and
- C. upon information and belief, fabricating a police report which included statements purported to be made by BRIANNA LEE in the same mock police interview which are never depicted in the recording of said interview.

64. As a result of the conspiracy, Plaintiff KARA CHUMBLEY was deprived of her civil rights to equal protection under the law in the course of prosecuting her in an underlying DUI matter, in that Plaintiff KARA CHUMBLEY was denied her right to bodily integrity

and due process by acts of Defendant ALLEN in conspiracy with Defendant DANLEY, Defendant PARKER, and Defendant HESSE.

WHEREFORE, the Plaintiff KARA CHUMBLEY respectfully prays that this Honorable Court enter judgment in her favor and against Defendant 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.

#### **COUNT IV**

##### **42 USC 1985 (Defendant PARKER)**

65. Upon information and belief, the Plaintiff alleges that the previously aforementioned clandestine agreement between Defendant ALLEN, Defendant PARKER, a paralegal under the employ of the Coles County State's Attorney's Office, then Coles County State Attorney, Defendant DANLEY, and Mattoon Police Officer, Defendant HESSE was a conspiracy to deprive the Plaintiff KARA CHUMBLEY of equal protection.

66. That the conspiracy was motivated by an intent to sexually discriminate against Plaintiff KARA CHUMBLEY for her belonging to a suspect class, women.

67. That Defendant PARKER committed the following acts in furtherance of this conspiracy:

- A. providing Defendant ALLEN with jury instructions to downplay his inappropriate actions, allowing the sexually discriminatory conduct to persist unchecked;
- B. crafting a "press release" on behalf of Defendant ALLEN to minimize and divert focus from Defendant ALLEN's sexually discriminatory conduct, with Defendant's press release describing Defendant ALLEN's predations as "entertain[ing] the

idea of a dating relationship" and discrediting Plaintiff's allegations of sexual discrimination;

- C. upon information and belief, crafting a "resignation letter" on behalf of Defendant ALLEN to minimize and divert focus from Defendant ALLEN's sexually discriminatory conduct to subsequent Illinois State Police investigative review;
- D. upon information and belief, maintaining direct, regular phone communications with Defendant ALLEN in furtherance of the agreement purportedly designed to directly discredit the claims of sexual discrimination brought by any potential witnesses against Defendant ALLEN as well as Defendant DANLEY, particularly regarding the alleged enabling of Defendant ALLEN's exploitation of female criminal Defendants;
- E. upon information and belief, maintaining direct, regular phone communications with Defendant ALLEN about affecting the litigation and disposition of Plaintiff's own ongoing criminal matter, specifically relating to impeding BRIANNA LEE from testifying about Defendant ALLEN's misconduct; and
- F. upon information and belief, maintaining direct, regular phone communications with Defendant ALLEN in furtherance of Defendants' ongoing scheme to perpetuate sexual discrimination against any unidentified female criminal defendants, known only to Defendant ALLEN, aiming to coordinate their efforts to discourage these individuals from stepping forward, mirroring the tactics used to intimidate and coerce BRIANNA LEE.

68. As a result of the conspiracy, Plaintiff KARA CHUMBLEY was deprived of her civil rights to equal protection under the law in the course of prosecuting her in an underlying

DUI matter, in that Plaintiff KARA CHUMBLEY was denied her right to bodily integrity and due process by acts of Defendant ALLEN in conspiracy with Defendant DANLEY, Defendant PARKER, and Defendant HESSE.

WHEREFORE, the Plaintiff KARA CHUMBLEY respectfully prays that this Honorable Court enter judgment in her favor and against Defendant PARKER, 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.

## **COUNT V**

### **42 USC 1983 (Defendant PARKER)**

69. Upon information and belief, the Plaintiff alleges that Defendant PARKER continued to exert undue influence over the Plaintiff's DUI proceeding while serving as a paralegal for both the Coles County State's Attorney's Office and the Illinois Office of the State's Attorney Appellate Prosecutor, as well as an agent for both Defendant DANLEY and Defendant ALLEN.

70. The Plaintiff contends that on August 25, 2020, when a special prosecutor was appointed to the Plaintiff Kara Chumbley's ongoing DUI proceeding, Defendant PARKER knew that the Plaintiff had a clearly established right to a fair trial and an impartial prosecutor.

71. Furthermore, the Plaintiff alleges that Defendant PARKER knew of a potential conflict of interest and appearance of impropriety stemming from Defendant PARKER's knowledge of a prior recusal of prosecution made by Defendant DANLEY on behalf of the entire Coles County State's Attorney's Office.

72. In light of, the Plaintiff alleges that Defendant PARKER violated Plaintiff's clearly established right to a fair trial and impartial prosecutor when, upon information and belief, Defendant PARKER continued to exert undue influence in Plaintiff's DUI proceedings by maintaining direct, regular phone communications with Defendant ALLEN in furtherance of:

- A. upon information and belief, impeding any potential witnesses from testifying about Defendant ALLEN's sexual misconduct while directing Defendant PARKER to simultaneously remain as support staff in Plaintiff KARA CHUMBLEY's underlying DUI proceeding;
- B. upon information and belief, affecting the litigation and disposition of Plaintiff's own ongoing criminal matter, specifically relating to impeding BRIANNA LEE from testifying about Defendant ALLEN's misconduct; and
- C. upon information and belief, advance Defendants' ongoing scheme to perpetuate sexual discrimination against any unidentified female criminal defendants, known only to Defendant ALLEN, aiming to coordinate their efforts to discourage these individuals from stepping forward, mirroring the tactics used to intimidate and coerce BRIANNA LEE.

73. The Plaintiff alleges that Defendant PARKER's actions, made under color of law, were knowingly in furtherance of violating Plaintiff's clearly established right to a fair trial and impartial prosecutor, denying Defendant PARKER any claim for qualified immunity.

WHEREFORE, the Plaintiff KARA CHUMBLEY respectfully prays that this

Honorable Court enter judgment in her favor and against Defendant PARKER, 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.

## **COUNT V**

### **42 USC 1983 (Defendant DANLEY)**

74. Upon information and belief, the Plaintiff alleges that Defendant DANLEY continued to exert undue influence over the Plaintiff's DUI proceeding while acting as Coles County State's Attorney by directing Defendant PARKER, including during office time hours, to maintain direct, regular phone communications with Defendant ALLEN in furtherance of:

- A. upon information and belief, impeding any potential witnesses from testifying about Defendant ALLEN's sexual misconduct while directing Defendant PARKER to simultaneously remain as support staff in Plaintiff KARA CHUMBLEY's underlying DUI proceeding;
- B. upon information and belief, affecting the litigation and disposition of Plaintiff's own ongoing criminal matter, specifically relating to impeding BRIANNA LEE from testifying about Defendant ALLEN's misconduct; and
- C. upon information and belief, advance Defendants' ongoing scheme to perpetuate sexual discrimination against any unidentified female criminal defendants, known only to Defendant ALLEN, aiming to coordinate their efforts to discourage these individuals from stepping forward, mirroring the tactics used to intimidate and coerce BRIANNA LEE.

75. The Plaintiff contends that on August 25, 2020, when a special prosecutor was

appointed to the Plaintiff Kara Chumbley's DUI proceeding, Defendant DANLEY knew that the Plaintiff had a clearly established right to a fair trial and an impartial prosecutor, stemming from Defendant DANLEY's own recusal from prosecution on behalf of the entire Coles County State's Attorney's Office.

76. The Plaintiff alleges that Defendant DANLEY violated Plaintiff's clearly established right to a fair trial and impartial prosecutor when, upon information and belief, Defendant DANLEY continued to exert undue influence in Plaintiff's ongoing DUI proceedings whilst simultaneously coordinating with Defendant PARKER and Defendant ALLEN as described above.

77. The Plaintiff alleges that Defendant DANLEY's actions, made under color of law, were knowingly in furtherance of violating Plaintiff's clearly established right to a fair trial and impartial prosecutor, as well as outside the scope of Defendant DANLEY's position as a prosecutor in light of the recusal of the Coles County State's Attorney's Office, denying Defendant DANLEY any claim for absolute immunity or qualified immunity.

WHEREFORE, the Plaintiff KARA CHUMBLEY respectfully prays that this Honorable Court enter judgment in her favor and against Defendant DANLEY, 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.

## **COUNT VI**

### **CIVIL CONSPIRACY (Defendant DANLEY)**

78. Upon information and belief, the Plaintiff alleges that the previously aforementioned clandestine agreement between Defendant ALLEN, Defendant PARKER, under the

employ of the State's Attorney, the then Coles County State Attorney, Defendant DANLEY, and Mattoon Police Officer, Defendant HESSE was a conspiracy to commit tortious and unlawful acts.

79. That Defendant DANLEY committed the following acts in furtherance of this conspiracy:

- A. ignoring potential red flags and turning a blind eye to the inappropriate actions of Defendant ALLEN by failing to acknowledge the severity of his sexually discriminatory conduct towards female criminal Defendants and female witnesses;
- B. upon information and belief, crafting a "press release" with Defendant PARKER on behalf of Defendant ALLEN to minimize and divert focus from Defendant ALLEN's sexually discriminatory conduct, with Defendants' press release describing Defendant ALLEN's predations as "entertain[ing] the idea of a dating relationship" and discrediting Plaintiff's allegations of sexual discrimination;
- C. upon information and belief, crafting a "resignation letter" with Defendant PARKER on behalf of Defendant ALLEN to minimize and divert focus from Defendant ALLEN's sexually discriminatory conduct to subsequent Illinois State Police investigative review;
- D. upon information and belief, at Defendant ALLEN's request, informing Defendant HESSE to intimidate BRIANNA LEE with a mock police interview cautioning BRIANNA LEE against testifying on behalf of either the Plaintiff or herself regarding the allegations of Defendant ALLEN's sexually discriminatory conduct;

- E. upon information and belief, directing Defendant PARKER to maintain direct, regular phone communications with Defendant ALLEN in furtherance of the agreement purportedly designed to directly discredit the claims of sexual discrimination brought by any potential witnesses against Defendant ALLEN as well as Defendant DANLEY, particularly regarding the alleged enabling of Defendant ALLEN's exploitation of female criminal Defendants;
  - F. upon information and belief, directing Defendant PARKER to maintain direct, regular phone communications with Defendant ALLEN about affecting the litigation and disposition of Plaintiff's own ongoing criminal matter, specifically relating to impeding BRIANNA LEE from testifying about Defendant ALLEN's misconduct;
  - G. upon information and belief, directing Defendant PARKER to maintain direct, regular phone communications with Defendant ALLEN in furtherance of Defendants' ongoing scheme to perpetuate sexual discrimination against any unidentified female criminal defendants, known only to Defendant ALLEN. Their aim was to coordinate efforts to discourage these individuals from stepping forward, mirroring the tactics used to intimidate and coerce BRIANNA LEE; and
  - H. upon information and belief, delaying investigation and prosecution of Defendant ALLEN by continuing to act as the purported prosecutor of Defendant ALLEN's criminal conduct for approximately two (2) years thereafter.
80. That the conspiracy was in furtherance of the unlawful purpose to:
- A. upon information and belief, sexually discriminate against Plaintiff for her belonging to a suspect class, women;

- B. upon information and belief, batter the Plaintiff;
- C. upon information and belief, inflict intentional emotional distress upon the Plaintiff;
- D. upon information and belief, intimidate witnesses Plaintiff intended to have testify to prove prosecutorial misconduct by Defendant ALLEN;
- E. upon information and belief, fabricate false police reports to impede efforts by Plaintiff to prove prosecutorial misconduct of Defendant ALLEN;
- F. upon information and belief, defame the Plaintiff by publishing a press release claiming she was lying about Defendant ALLEN's prosecutorial misconduct; and,
- G. upon information and belief, place the Plaintiff under a false light,

WHEREFORE, the Plaintiff KARA CHUMBLEY respectfully prays that this Honorable Court enter judgment in her favor and against Defendant DANLEY, 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.

## **COUNT VII**

### **CIVIL CONSPIRACY (Defendant ALLEN)**

81. Upon information and belief, the Plaintiff alleges that the previously aforementioned clandestine agreement between Defendant ALLEN, Defendant PARKER, a paralegal under the employ of the Coles County State's Attorney's Office, then Coles County State Attorney, Defendant DANLEY, and Mattoon Police Officer, Defendant HESSE was a conspiracy to commit tortious and unlawful acts.

82. That Defendant ALLEN committed the following acts in furtherance of this conspiracy:

- A. exploiting female criminal Defendants to provide him with sexual favors for leniency while still acting as an assistant State's Attorney;
- B. intimidating and bribing female criminal Defendants to remove potential witnesses and suppress evidence, further reinforcing the atmosphere of sexually discriminatory conduct to occur, both as an assistant State's Attorney and a private citizen thereafter;
- C. issuing a press release to undermine and discredit the Plaintiff's allegations of sexual discrimination, further perpetuating a hostile environment for female criminal Defendants within the legal system;
- D. upon information and belief, using documents drafted by Defendant PARKER and Defendant DANLEY, to minimize and divert focus from Defendant ALLEN's sexually discriminatory conduct, with Defendants' press release describing Defendant ALLEN's predations as "entertain[ing] the idea of a dating relationship" and discrediting Plaintiff's allegations of sexual discrimination;
- E. identifying BRIANNA LEE as a potential witness to Defendant DANLEY for purposes of informing Defendant HESSE to obstruct justice by intimidating BRIANNA LEE with a mock police interview cautioning BRIANNA LEE against testifying on behalf of either the Plaintiff or herself regarding the allegations of Defendant ALLEN's sexually discriminatory conduct;
- F. upon information and belief, maintaining direct, regular phone communications with Defendant PARKER about the agreement purportedly designed to directly

discredit the claims of sexual discrimination brought by any potential witnesses against Defendant ALLEN as well as Defendant DANLEY, particularly regarding the alleged enabling of Defendant ALLEN's exploitation of female criminal Defendants.

G. upon information and belief, maintaining direct, regular phone communications with Defendant PARKER about affecting the litigation and disposition of Plaintiff's own ongoing criminal matter, specifically relating to impeding BRIANNA LEE from testifying about Defendant ALLEN's misconduct; and

H. upon information and belief, maintaining direct, regular phone communications with Defendant PARKER in furtherance of Defendants' continued intent to sexually discriminate against any other female criminal Defendants whose presence had not yet become otherwise known beyond Defendant ALLEN's personal knowledge and to coordinate to impede those individuals from coming forward in the same fashion Defendants had intimidated and bribed BRIANNA LEE.

83. That the conspiracy was in furtherance of the unlawful purpose to:

- A. sexually discriminate against Plaintiff for her belonging to a suspect class, women;
- B. batter the Plaintiff;
- C. inflict intentional emotional distress upon the Plaintiff;
- D. intimidate witnesses Plaintiff intended to have testify to prove prosecutorial misconduct by Defendant ALLEN;

- E. upon information and belief, fabricate false police reports to impede efforts by Plaintiff to prove prosecutorial misconduct of Defendant ALLEN;
- F. defame the Plaintiff by publishing a press release claiming she was lying about Defendant ALLEN's prosecutorial misconduct; and,
- G. place the Plaintiff under a false light,

WHEREFORE, the Plaintiff KARA CHUMBLEY respectfully prays that this Honorable Court enter judgment in her favor and against Defendant ALLEN, 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.

### **COUNT VIII**

#### **CIVIL CONSPIRACY (Defendant HESSE)**

84. Upon information and belief, the Plaintiff alleges that the previously aforementioned clandestine agreement between Defendant ALLEN, Defendant PARKER, a paralegal under the employ of the Coles County State's Attorney's Office, then Coles County State Attorney, Defendant DANLEY, and Mattoon Police Officer, Defendant HESSE was a conspiracy to commit tortious and unlawful acts.

85. That Defendant HESSE committed the following acts in furtherance of this conspiracy:

- A. upon information and belief, at Defendant DANLEY's request, intimidating BRIANNA LEE with a simulated police interview cautioning BRIANNA LEE against testifying on behalf of either the Plaintiff or herself regarding the allegations of Defendant ALLEN's sexually discriminatory conduct.

- B. upon information and belief, altering or destroying a recording made of the same mock police interview of BRIANNA LEE; and
- C. upon information and belief, fabricating a police report which included statements purported to be made by BRIANNA LEE in the same mock police interview which are never depicted in the recording of said interview.

86. That the conspiracy was in furtherance of the unlawful purpose to:

- A. upon information and belief, sexually discriminate against Plaintiff for her belonging to a suspect class, women;
- B. upon information and belief, batter the Plaintiff;
- C. upon information and belief, inflict intentional emotional distress upon the Plaintiff;
- D. intimidate witnesses Plaintiff intended to have testify to prove prosecutorial misconduct by Defendant ALLEN;
- E. upon information and belief, fabricate false police reports to impede efforts by Plaintiff to prove prosecutorial misconduct of Defendant ALLEN;

WHEREFORE, the Plaintiff KARA CHUMBLEY respectfully prays that this Honorable Court enter judgment in her favor and against Defendant 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.

## **COUNT IX**

### **CIVIL CONSPIRACY (Defendant PARKER)**

87. Upon information and belief, the Plaintiff alleges that the previously aforementioned

clandestine agreement between Defendant ALLEN, Defendant PARKER under the employ of the State's Attorney, the then Coles County State Attorney, Defendant DANLEY, and Mattoon Police Officer, Defendant HESSE was a conspiracy to commit tortious and unlawful acts.

88. That paralegal RONDA PARKER committed the following acts in furtherance of this conspiracy:

- A. crafting a "press release" on behalf of Defendant ALLEN to minimize and divert focus from Defendant ALLEN's sexually discriminatory conduct, with Defendant's press release describing Defendant ALLEN's predations as "entertain[ing] the idea of a dating relationship" and discrediting Plaintiff's allegations of sexual discrimination;
- B. crafting a "resignation letter" on behalf of Defendant ALLEN to minimize and divert focus from Defendant ALLEN's sexually discriminatory conduct to subsequent Illinois State Police investigative review;
- C. upon information and belief, maintaining direct, regular phone communications with Defendant ALLEN about the agreement purportedly designed to directly discredit the claims of sexual discrimination brought by any potential witnesses against Defendant ALLEN as well as Defendant DANLEY, particularly regarding the alleged enabling of Defendant ALLEN's exploitation of female criminal Defendants;
- D. upon information and belief, maintaining direct, regular phone communications with Defendant ALLEN about affecting the litigation and disposition of Plaintiff's

own ongoing criminal matter, specifically relating to impeding BRIANNA LEE from testifying about Defendant ALLEN's misconduct; and

- E. upon information and belief, maintaining direct, regular phone communications with Defendant ALLEN in furtherance of Defendants' continued intent to sexually discriminate against any other female criminal Defendants whose presence had not yet become otherwise known beyond Defendant ALLEN's personal knowledge and to coordinate to impede those individuals from coming forward in the same fashion Defendants had intimidated and bribed BRIANNA LEE.

89. That the conspiracy was in furtherance of the unlawful purpose to:

- A. upon information and belief, sexually discriminate against Plaintiff for her belonging to a suspect class, women;
- B. upon information and belief, batter the Plaintiff;
- C. upon information and belief, inflict intentional emotional distress upon the Plaintiff;
- D. upon information and belief, intimidate witnesses Plaintiff intended to have testify to prove prosecutorial misconduct by Defendant ALLEN;
- E. upon information and belief, fabricate false police reports to impede efforts by Plaintiff to prove prosecutorial misconduct of Defendant ALLEN;
- F. defame the Plaintiff by publishing a press release claiming she was lying about Defendant ALLEN's prosecutorial misconduct; and,
- G. place the Plaintiff under a false light,

WHEREFORE, the Plaintiff KARA CHUMBLEY respectfully prays that this

Honorable Court enter judgment in her favor and against Defendant PARKER, 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.

KARA CHUMBLEY

Respectfully submitted,

/s/Todd M. Reardon

Todd M. Reardon #6330701

518 6th Street

Charleston, IL 61920

217-345-5291

todd.reardon@outlook.com