

**ILLINOIS STATE POLICE
INVESTIGATIVE REPORT**

File #:	Reporting /Incident Date(s):	Reporting Agent(s):	ID #:	Dictated/Lead #:
20-1005-SP-SIU	09/22/22	Sgt. Windy Westfall	5210	TN: 16

Title:	Case Agent: ID#	Office:	Typed by:	Date:
Coles County ASA Brady Allen	Sgt. Windy Westfall #5210	DCI/SIU	WW	09/22/22

Purpose:

Search Warrant served- Brady Allen's personnel file

SYNOPSIS:

On August 12, 2020, the Illinois State Police, Division of Criminal Investigation, Special Investigations Unit, was made aware of an allegation of Official Misconduct, Indecent Solicitation of an Adult, Intimidation, and Bribery against Coles County Assistant State's Attorney Brady Allen. According to the allegation, Allen contacted defendant Kara Chumbley via text message while she was in court and he was prosecuting the case against her alleging Driving Under the Influence. Allen also allegedly sent text messages to Chumbley to the effect of "you can come over tonight and we can discuss while you're riding me," and "I can give you advice while I'm giving you a mouthful."

DETAILS:

The purpose of this investigative report is to document serving a search warrant. On September 20, 2022, at approximately 8:45 a.m., me, Sergeant Westfall, along Assistant Attorney General Mara Somlo and Attorney General Deputy Bureau Chief Jonas Harger, served a search warrant to the Coles County State's Attorney's office, located at 651 Jackson Avenue, 2nd Floor, Charleston, Illinois, for Brady Allen's personnel file. Paralegal Ronda Parker gave me Allen's personnel file.

Attachments:

1. Copy of Allen's personnel file, consisting of 31 pages.

END 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.

ILLINOIS STATE POLICE
INVESTIGATIVE REPORT
(continued)

Case No. 20-1005- SP-SIU
Date: 03/21/22
Sgt. W. Westfall #5210
TN: 10 - Page 2 of 2

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.

August 23, 2020

Jesse Danley
Coles County State's Attorney's Office
651 Jackson Ave, Room 330
Charleston, IL 61920

On this date, August 23, 2020, it is with great regret that I must tender my resignation as Assistant State's Attorney for Coles County, Illinois, effective immediately. While any claims of prosecutorial misconduct are untrue, I will not allow the name of this office, which I hold in such high regard, to be tainted by a purely political stunt.

It is true that I and Ms. Chumbley had a relationship outside of court based entirely over social media. At no point did we ever meet in person. The friendship originated back in the fall of 2019, which began when we were matched on the dating app, Tinder. Upon learning that Ms. Chumbley was a defendant in Coles County, I informed her that we could not pursue a dating relationship while I was the prosecutor assigned to her case. Several months later, I was promoted to misdemeanor attorney and Ms. Chumbley's case was assigned to the new traffic prosecutor. Only at that time did Ms. Chumbley and I entertain the idea of a dating relationship. However, I made it very clear that I still could not discuss her case in any fashion; nor would she receive any benefit or detriment from my position in the office. Ms. Chumbley became frustrated by my unwillingness to help her with her case. Ms. Chumbley provided a conversation in which she only tendered my comments and deleted her own to conceal the true context of the conversation. I recognize that those texts gave the appearance of impropriety.

I now recognize the ethical concerns of attempting to form any kind of a relationship with a defendant, even one that was originally based in what I believed to be friendship, and I regret my decision. I also regret the appearance of impropriety this has cast on the Office of the State's Attorney, and I hope you can forgive me for putting you in such an awkward position. I also want to thank you, Jesse, for placing your trust in me as a prosecutor and helping me to develop my skills as an attorney. I want to thank all of the honorable judges and attorneys who I've had the privilege to work with in my time with Coles County. I will miss you all.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brady Allen", with a long horizontal flourish extending to the right.

Brady Allen

Send Result Report

MFP



TASKalfa 3252ci

Firmware Version 2RL_2000.004.405 2020.02.06

W2R7705572
12/14/2020 14:50
[2RL_1000.005.201] [2ND_1100.001.007] [2ND_7000 E04.302]

Job No.: 064751

Total Time: 0°01'53"

Page: 004

Complete

Document: doc06475120201214144743

Fax:
217-557-4913
IDES

State's Attorney
Jesse Danley



First Assistant State's Attorney
Jenifer L. Schiavone

Victim Services
Shannon M. Hill
Jan Ashmore

COLES COUNTY STATE'S ATTORNEY
651 Jackson Ave., Room 330
Charleston, IL 61920-2074
Phone: (217) 348-0561
Fax: (217) 348-0576

Assistant State's Attorneys
Nathanael Harsy
Sarah D. Hocking
Lawrence D. Brandel
Benjamin N. Hoover

Investigators
Steve Kelly
Jeff Endsley

Paralegal
Ronda J. Parker

FAX TRANSMISSION

DATE: 12-14-20
TO: _____
DEPARTMENT: _____
FAX NUMBER: 217-557-4913
FROM: Jesse Danley
REFERENCE: Claimant Name: Brady L. Allen
COMMENTS: _____

PAGE 1 OF 4

No.	Date/Time	Destination	Times	Type	Result	Resolution/ECH
001	12/14/20 14:48	912175574913	0°01'53"	FAX	OK	200x100 Normal/Off

**State's
Attorney**

Jesse Danley

Victim Services

Shannon M. Hill
Jan Ashmore

Investigators

Steve Kelly
Jeff Endsley



**COLES COUNTY
STATE'S ATTORNEY**

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

FAX TRANSMISSION

**First Assistant
State's Attorney**

Jenifer L. Schiavone

**Assistant State's
Attorneys**

Nathanael Harsy
Sarah D. Hocking
Lawrence D. Brandel
Benjamin N. Hoover

Paralegal

Ronda J. Parker

DATE: 12-14-20

TO: _____

DEPARTMENT: _____

FAX NUMBER: 217-557-4913

FROM: Jesse Danley

REFERENCE: Claimant Name: Brady L. Allen

COMMENTS: _____



COUNTY OF COLES 12/03/2020
 Claimant Name: Brady L. Allen SSN:339-82-2417

This notice is being sent to you because you are the Chargeable Employer for whom the claimant worked for 30 days (not necessarily consecutively) from the beginning of the claimant's Base Period to the "Date of Claim." You will be charged for any benefits paid to him/her. There is no connection between the amount that you paid the claimant and the amount you will be charged. The claimant's benefits are based on his/her wages during the first four of the last five completed calendar quarters (Base Period) prior to the claimant's "Benefit Year Begin." You will be charged for the benefits paid even if the wages you paid the claimant are not used in calculating his/her benefits. If the claimant worked for you for less than 30 days, you can be charged because you were the single employer that paid the claimant enough wages to requalify the claimant after a disqualifying separation from a previous employer. Rules on charging can be found at 56 Ill. Adm. Code 2765.325 et seq. [See www.ides.illinois.gov under rules.]

FOR INFORMATION REGARDING YOUR RIGHTS UNDER ILLINOIS' UNEMPLOYMENT INSURANCE ACT, INCLUDING INFORMATION ON HOW TO OBTAIN FREE LEGAL SERVICES, AND THE EXACT LANGUAGE OF THE ACT AND IDES RULES, PLEASE VISIT THE AGENCY'S WEBSITE AT www.ides.illinois.gov/UIRights.

If you wish to protest the claimant's right to benefits because he/she received vacation pay in connection with his/her separation. In your response, you must indicate the period covered by the vacation pay and the amount of the pay. Your protest must be filed by the "Reply Due Date" or within 10 days of the date that the vacation pay is paid or becomes payable. If the payment was made for an announced period of vacation or inventory shutdown, it is not necessary to make this designation.

Appeal Rights

If your protest is not postmarked, faxed, or successfully submitted via SIDES by the "Reply Due Date", you will not have the right to appeal a determination that is not in your favor. However, you can protest at any time that the claimant was not able, available or actively seeking work, giving details. You can also protest anytime that the claimant was not unemployed or that the claimant is receiving a retirement pension. In those cases, you would have the right to appeal a determination for periods after the date that you filed your protest. Even if your protest is late, we will still consider any information that you provide. However, you will not be able to appeal our determination.

Keep your business information up to date.

To make a change of address for forms such as Notice of Claim (ADJ030F) and Statement of Benefit Charges (BEN 118), visit www.mytax.illinois.gov and make required changes or submit a Notice of Change (UI-50A) available at www.ides.illinois.gov. NOTE: All agents must have power of attorney on file to request a change of address.

Please complete, sign and return this form by 12/13/2020, to the Agency at the address listed above.

NOTE: If you choose to fax your protest, it is not necessary to mail as well.

IF YOU ARE RESPONDING TO THIS NOTICE, PLEASE PLACE ADDITIONAL DOCUMENTS BEHIND ANY BAR-CODED PAGE.

Please select one of the following and complete all other related information:			
<input checked="" type="checkbox"/> I did not employ the claimant for 30 days			
Start Date: ___/___/_____		End Date: ___/___/_____	
Total Number of Days Worked: _____			
<input type="checkbox"/> Leased employee (Please identify leasing Agency Name and Address)			
Agency Name Coles County State's Attorney's Office			
Address 1 651 Jackson Ave, Rm. 330		Address 2 (Apt., Floor, Suite, etc.)	
City Charleston		State IL	Zip Code 61920
<input type="checkbox"/> Claimant never worked for me <input type="checkbox"/> Claimant is not unemployed *NOTE: Claimant may still be eligible if working part-time			
I certify that the information contained herein is true and correct.			
Name (printed):	Jesse Dancy	Signature:	<i>Jesse Dancy</i>
Title:	State's Attorney	Contact Name (if different):	
Date:	12-8-20	Telephone Number:	217-348-0501

***State's
Attorney***
Jesse Danley

Victim Services
Shannon M. Hill
Jan Ashmore

Investigators
Steve Kelly
Jeff Endsley



**COLES COUNTY
STATE'S ATTORNEY**
651 Jackson Ave., Room 330
Charleston, IL 61920-2074
Phone: (217) 348-0561
Fax: (217) 348-0576

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

Jenifer L. Schiavone

***Assistant State's
Attorneys***

Nathanael Harsy
Sarah D. Hocking
Lawrence D. Brandel
Benjamin N. Hoover

Paralegal
Ronda J. Parker

To Whom It May Concern,

12/11/20

I, Jesse Danley, am the State's Attorney for Coles County. Brady Allen was employed with the Coles County State's Attorney office from December 19, 2018 through August 21, 2020. My office became aware of serious allegations of misconduct by Mr. Allen on Saturday August 22, 2020. Upon learning of these allegations, Mr. Allen was given the choice of resigning or being terminated. Mr. Allen chose to resign. He tendered his letter of resignation Sunday August 23, 2020, please see attachment. Due to Mr. Allen's resignation, it is our position that the Mr. Allen may not be eligible for unemployment benefits.

Sincerely,

Jesse Danley

A handwritten signature in blue ink, appearing to read "Jesse Danley", written over the printed name.

August 23, 2020

Jesse Danley
Coles County State's Attorney's Office
651 Jackson Ave, Room 330
Charleston, IL 61920

On this date, August 23, 2020, it is with great regret that I must tender my resignation as Assistant State's Attorney for Coles County, Illinois, effective immediately. While any claims of prosecutorial misconduct are untrue, I will not allow the name of this office, which I hold in such high regard, to be tainted by a purely political stunt.

It is true that I and Ms. Chumbley had a relationship outside of court based entirely over social media. At no point did we ever meet in person. The friendship originated back in the fall of 2019, which began when we were matched on the dating app, Tinder. Upon learning that Ms. Chumbley was a defendant in Coles County, I informed her that we could not pursue a dating relationship while I was the prosecutor assigned to her case. Several months later, I was promoted to misdemeanor attorney and Ms. Chumbley's case was assigned to the new traffic prosecutor. Only at that time did Ms. Chumbley and I entertain the idea of a dating relationship. However, I made it very clear that I still could not discuss her case in any fashion; nor would she receive any benefit or detriment from my position in the office. Ms. Chumbley became frustrated by my unwillingness to help her with her case. Ms. Chumbley provided a conversation in which she only tendered my comments and deleted her own to conceal the true context of the conversation. I recognize that those texts gave the appearance of impropriety.

I now recognize the ethical concerns of attempting to form any kind of a relationship with a defendant, even one that was originally based in what I believed to be friendship, and I regret my decision. I also regret the appearance of impropriety this has cast on the Office of the State's Attorney, and I hope you can forgive me for putting you in such an awkward position. I also want to thank you, Jesse, for placing your trust in me as a prosecutor and helping me to develop my skills as an attorney. I want to thank all of the honorable judges and attorneys who I've had the privilege to work with in my time with Coles County. I will miss you all.

Sincerely,



Brady Allen

Illinois Department of Employment Security
P.O. Box 19509
Springfield, IL 62794
Phone: 800-244-5631 • TTY: 866-322-8357
Fax: (217) 557-4913
www.ides.illinois.gov

Notice to Protest Benefit Charges

If you received a notice that you are the Chargeable Employer on an Unemployment Insurance claim it is because you are the last employer for whom the claimant worked for 30 days (not necessarily consecutively) from the beginning of the claimant's Base Period to the "Date of Claim." You will be charged for any benefits paid to him/her. Benefits paid to him/her will be assessed to your UI Account as the Chargeable Employer. The claimant's benefits are usually based on wages earned from all employers during the first four of the last five completed calendar quarters (Base Period) prior to the claimant's "Benefit Year Begin." You will be charged for the benefits paid even if the wages you paid the claimant are not used in calculating his/her benefits. If the claimant worked for you for less than 30 days, you could be charged because you were the single employer that paid the claimant enough in wages to requalify after a disqualifying separation from a previous employer. Rules on charging can be found at 56 Ill. Adm. Code 2765.325 et seq. [See www.ides.illinois.gov under rules.]

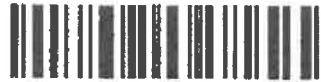
If you wish to protest a notice that you are chargeable on an Unemployment Insurance claim, you must do so in writing by completing this form or submitting a signed letter which gives a detailed and complete statement of facts supporting your allegation and returning it by the response due date listed on the Notice of Claim you received via SIDES. You may either mail this form to IDES at P.O. Box 19509 Springfield, IL 62794, fax to (217) 557-4913 or enter information into this fillable PDF form and once complete save this document and attach it to your SIDES response on the page titled "Attachments".

Unless you request reconsideration of your chargeability by the response due date listed on the "Notice of Claim" you received via SIDES, this decision will become final.

Employer Information					
Employer Name/DBA:			Phone Number:		
Employer Address:					
Employer Account Number:		FEIN:			
Claimant/Claim Information					
Notice of Claim Reply Due Date:			Claim ID Number:		
Claimant SSN:		Last Name:		First Name:	
Suffix:	Middle initial:	Other last Name:			
Please select one of the following and complete all other related information:					
<input type="checkbox"/> I did not employ the claimant for 30 days			Start Date: _____		End Date: _____
Total Number of Days Worked: _____					
<input type="checkbox"/> Leased employee (Please identify leasing Agency Name and Address)					
Agency Name					
Address 1				Address 2 (Apt., Floor, Suite, etc.)	
City				State	Zip Code
<input type="checkbox"/> Claimant never worked for me			<input type="checkbox"/> Claimant is not unemployed *NOTE: Claimant may still be eligible if working part-time		
I certify that the information contained herein is true and correct.					
Name (printed):			Signature:		
Title:		Contact Name (if different):			
Date:		Telephone Number:			

Illinois Department

P.O. Box 19509
 Springfield, IL 62794
 Phone: (800) 244-5631 TTY: (800) 244-5631
 Fax: (217) 557-4913
 www.ides.illinois.gov
 4230-2197



1085005611

MDG2020 00036743 01



COUNTY OF COLES
 651 JACKSON AVE RM 124
 CHARLESTON, IL 61920-2074

Date Mailed: 12/03/2020
 Employer Account Number: 801974
 FEIN: 376000640
 Claimant SSN: 339-82-2417
 Reply Due Date: 12/13/2020

Notice of Claim to Benefit Chargeable Employer



The claimant listed below has filed a claim for Unemployment Insurance. Please review the information carefully. If you wish to protest the claimant's right to benefits for any reason other than the claimant's involvement in a Labor Dispute, you must do so in writing by attaching a signed letter to this notice which includes the claimant's name and Social Security Number. Provide a detailed and complete statement of facts supporting your allegation and mail or fax the statement by 12/13/2020 to the Agency at the address listed above.

IF YOU ARE RESPONDING TO THIS NOTICE, PLEASE PLACE ADDITIONAL DOCUMENTS BEHIND ANY BAR-CODED PAGE.

If you are registered as a SIDES Employer, and you also received an E-mail notification regarding this notice, please respond using the SIDES E-Response process by logging into <https://ulsides.org/sew-s/views/login>.

If you would like to begin receiving or responding to Notices of Claims electronically, you may register with SIDES at <https://mytax.illinois.gov>. Once you have registered with SIDES E-Response you will start to receive E-mail notifications that you have requests pending. Only at this time will your SIDES account be activated and you can begin responding to Notice of Claims electronically. If at the time you receive this notice you are not registered for SIDES, you cannot respond electronically to this notice.

IMPORTANT INFORMATION: If you DO NOT wish to protest this claim, no response is necessary. HOWEVER: If you do respond to this notice please submit your response only once. If you respond electronically via SIDES then please DO NOT fax or mail your protest or response as well.

Last Name: Allen	Suffix:	Other Last Name:	
First Name: Brady	Middle Initial: L	Benefit Year Begin Date: 11/29/2020	
Date of Claim: 11/29/2020	Claim Type: New	Program: Regular	
First Day Worked: 12/18/2018	Last Day Worked: 08/14/2020	Reason for Separation: Discharged (Fired)	
Return to Work Date: Unknown	Claimant Resides In: IL	State Worked In: IL	Dependent: None

The wages shown represent earnings the claimant received from you during the base period. A worker's base period consists of the first four of the last five completed calendar quarters immediately preceding the month in which the benefit year begins. The alternate base period is the last four completed calendar quarters immediately preceding the benefit year.

Benefit Year Begin Date: 11/29/2020		Total Base Period Wages: \$46,958.30
Base Period Qtr: 3	Base Period Year: 2019	Wages: \$11,125.00
Base Period Qtr: 4	Base Period Year: 2019	Wages: \$11,250.00
Base Period Qtr: 1	Base Period Year: 2020	Wages: \$12,083.32
Base Period Qtr: 2	Base Period Year: 2020	Wages: \$12,499.98





COUNTY OF COLES 12/03/2020
 Claimant Name: Brady L. Allen SSN:339-82-2417

This notice is being sent to you because you are the Chargeable Employer for whom the claimant worked for 30 days (not necessarily consecutively) from the beginning of the claimant's Base Period to the "Date of Claim." You will be charged for any benefits paid to him/her. There is no connection between the amount that you paid the claimant and the amount you will be charged. The claimant's benefits are based on his/her wages during the first four of the last five completed calendar quarters (Base Period) prior to the claimant's "Benefit Year Begin." You will be charged for the benefits paid even if the wages you paid the claimant are not used in calculating his/her benefits. If the claimant worked for you for less than 30 days, you can be charged because you were the single employer that paid the claimant enough wages to requalify the claimant after a disqualifying separation from a previous employer. Rules on charging can be found at 56 Ill. Adm. Code 2765.325 et seq. [See www.ides.illinois.gov under rules.]

FOR INFORMATION REGARDING YOUR RIGHTS UNDER ILLINOIS' UNEMPLOYMENT INSURANCE ACT, INCLUDING INFORMATION ON HOW TO OBTAIN FREE LEGAL SERVICES, AND THE EXACT LANGUAGE OF THE ACT AND IDES RULES, PLEASE VISIT THE AGENCY'S WEBSITE AT www.ides.illinois.gov/UIRights.

If you wish to protest the claimant's right to benefits because he/she received vacation pay in connection with his/her separation. In your response, you must indicate the period covered by the vacation pay and the amount of the pay. Your protest must be filed by the "Reply Due Date" or within 10 days of the date that the vacation pay is paid or becomes payable. If the payment was made for an announced period of vacation or inventory shutdown, it is not necessary to make this designation.

Appeal Rights

If your protest is not postmarked, faxed, or successfully submitted via SIDES by the "Reply Due Date", you will not have the right to appeal a determination that is not in your favor. However, you can protest at any time that the claimant was not able, available or actively seeking work, giving details. You can also protest anytime that the claimant was not unemployed or that the claimant is receiving a retirement pension. In those cases, you would have the right to appeal a determination for periods after the date that you filed your protest. Even if your protest is late, we will still consider any information that you provide. However, you will not be able to appeal our determination.

Keep your business information up to date.

To make a change of address for forms such as Notice of Claim (ADJ030F) and Statement of Benefit Charges (BEN 118), visit www.mytax.illinois.gov and make required changes or submit a Notice of Change (UI-50A) available at www.ides.illinois.gov. NOTE: All agents must have power of attorney on file to request a change of address.

Please complete, sign and return this form by 12/13/2020, to the Agency at the address listed above.

NOTE: If you choose to fax your protest, it is not necessary to mail as well.

IF YOU ARE RESPONDING TO THIS NOTICE, PLEASE PLACE ADDITIONAL DOCUMENTS BEHIND ANY BAR-CODED PAGE.

Please select one of the following and complete all other related information:			
<input checked="" type="checkbox"/> I did not employ the claimant for 30 days			
Start Date: ___ / ___ / _____		End Date: ___ / ___ / _____	
Total Number of Days Worked: _____			
<input type="checkbox"/> Leased employee (Please identify leasing Agency Name and Address)			
Agency Name			
Address 1		Address 2 (Apt, Floor, Suite, etc.)	
City		State	Zip Code
<input type="checkbox"/> Claimant never worked for me <input type="checkbox"/> Claimant is not unemployed *NOTE: Claimant may still be eligible if working part-time			
I certify that the information contained herein is true and correct.			
Name (printed):		Signature:	
Title:	Contact Name (if different):		
Date:	Telephone Number:		

BRADY ALLEN

Employment Dates: 12/19/18 – 08/21/20

Unused Vacation: 18 days

Unused Sick Days: 5 days

Breakdown of his last paycheck – Pay Period 08/16 – 08/31/20

- **Regular Pay: \$2,083.33 (Worked 08/16 – 08/21, Vacation days for 08/24 – 08/28/20 and 08/31/20) – 6 vacation days used this pay period**
- **Remainder of vacation days – 12 days @ \$192.31/day = \$2,307.72**
- **TOTAL of last paycheck: \$4,391.05**

***State's
Attorney***

Jesse Danley

Victim Services

Shannon M. Hill
Jan Ashmore

Investigators

Steve Kelly
Jeff Endsley



**COLES COUNTY
STATE'S ATTORNEY**

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

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

Jenifer L. Schiavone

***Assistant State's
Attorneys***

Nathanael Harsy
Sarah D. Hocking
Lawrence D. Brandel

Paralegal

Ronda J. Parker

MEMO VIA EMAIL

TO: Tina, Treasurer's Office
FROM: Shannon Hill
DATE: August 24, 2020
RE: Payroll Period August 16 – August 31, 2020

The attached payroll includes regular payroll amounts and includes the remainder of Brady Allen's vacation days. Mr. Allen's last day with our office was Friday, August 21, 2020.

If you have any questions, please direct those to Mr. Danley. Thank you.

<u>Brady L. Allen / Employee #</u>	<u>Date Used</u>	<u>Personal Days</u>	<u>Sick Days</u>	<u>Vacation Days</u>
Carried over from Fiscal 2019		0	1.5	10
Fiscal 2020		3	12	10
	12/26 - 12/27/19			-2
	1/17/2020		-1	
	1/31/2020		-1	
	3/6/2020		-1	
	3/20/2020		-1	
	5/13/2020		-0.5	
	5/22/2020		-1	
	6/12/2020		-1	
	7/30/2020		-1	
	8/6/2020		-1	
	8/10/2020	-1		
TOTAL DAYS LEFT AVAILABLE		2	5	18
As of 12/19/19 - 1 year of service				
Hire Date: 12/19/2018				

Brady L. Allen / Employee #	Date Used	Personal Days	Sick Days	Vacation Days
Carried over from Fiscal 2019		0	1.5	10
Fiscal 2020		3	12	10
	12/26 - 12/27/19			-2
	1/17/2020		-1	
	1/31/2020		-1	
	3/6/2020		-1	
	3/20/2020		-1	
	5/13/2020		-0.5	
	5/22/2020		-1	
	6/12/2020		-1	
	7/30/2020		-1	
	8/6/2020		-1	
	8/10/2020		-1	
		-1		

TOTAL DAYS LEFT AVAILABLE

As of 12/19/19 - 1 year of service

Hire Date: 12/19/2018

August 16-31 Pay Period

18 vacation left
 - 5 this week
 - 1 8/31
 12 Additional Days need paid

Daily Pay Rate: \$192.³¹

x 12

Vacation left 2,307.⁷²

Regular Pay + 2,083.³³

4,391.⁰⁵

***State's
Attorney***

Jesse Danley

Victim Services

Shannon M. Hill
Jan Ashmore

Investigators

Steve Kelly
Jeff Endsley



**COLES COUNTY
STATE'S ATTORNEY**

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

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

Jenifer L. Schiavone

***Assistant State's
Attorneys***

Nathanael Harsy
Sarah D. Hocking
Lawrence D. Brandel

Paralegal

Ronda J. Parker

August 26, 2020

TO: Lt. Samuel Thomas, Illinois State Police

FROM: Jesse Danley, Coles County State's Attorney

RE: Request for Investigation

Dear Lt. Thomas,

Consistent with our phone conversation, I am requesting that the Illinois State Police investigate allegations of prosecutorial misconduct relating to former Coles County Assistant State's Attorney, Brady Allen. I have attached the complaint filed in Coles County cause 19-DT-76. I thank you in advance. My office will cooperate fully with every part of this investigation. Please advise if you require any anything.

Respectfully,

A handwritten signature in black ink that reads "Jesse Danley". The signature is written in a cursive style with a large loop for the letter 'D'.

Jesse Danley
Coles County State's Attorney

August 23, 2020

In response to the allegations filed by Todd Reardon, on behalf of defendant, Kara Chumbley, I deny all allegations of prosecutorial misconduct. It is true that I and Ms. Chumbley had a relationship outside of court based entirely over social media. At no point did we ever meet in person. The friendship originated back in the fall of 2019, which began when we were matched on the dating app, Tinder. Upon learning that Ms. Chumbley was a defendant in Coles County, I informed her that we could not pursue a dating relationship while I was the prosecutor assigned to her case. Several months later, I was promoted to misdemeanor attorney and Ms. Chumbley's case was assigned to the new traffic prosecutor. Only at that time did Ms. Chumbley and I entertain the idea of a dating relationship. However, I made it very clear that I still could not discuss her case in any fashion; nor would she receive any benefit or detriment from my position in the office. Ms. Chumbley became frustrated by my unwillingness to help her with her case. Ms. Chumbley provided a conversation in which she only tendered my comments and deleted her own to conceal the true context of the conversation. Those texts gave the appearance of impropriety.

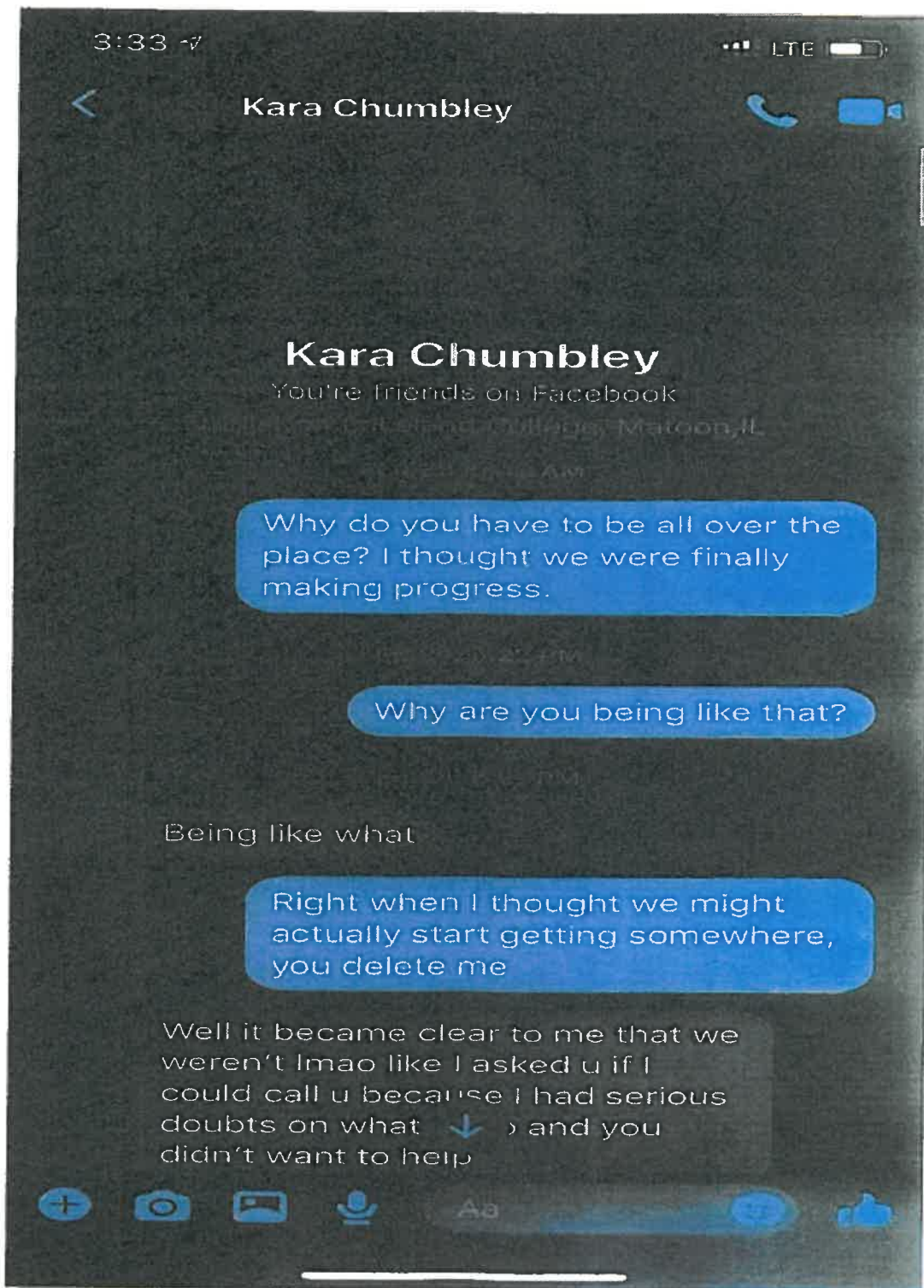
I was contacted by Brianna Lee, a mutual friend. Brianna Lee informed me that Ms. Chumbley did this at the direction of her counsel, Todd Reardon. Brianna Lee further informed me that Todd Reardon promised Ms. Chumbley her DUI cases would be dismissed and she would receive a substantial sum of money from Coles County if she agreed to say these specific things and to sign an affidavit that had been prepared for her by Todd Reardon. Brianna Lee also informed me that Todd Reardon instructed Ms. Chumbley to extend a similar offer to her (Ms. Lee) if she was willing to publicly misrepresent our relationship.

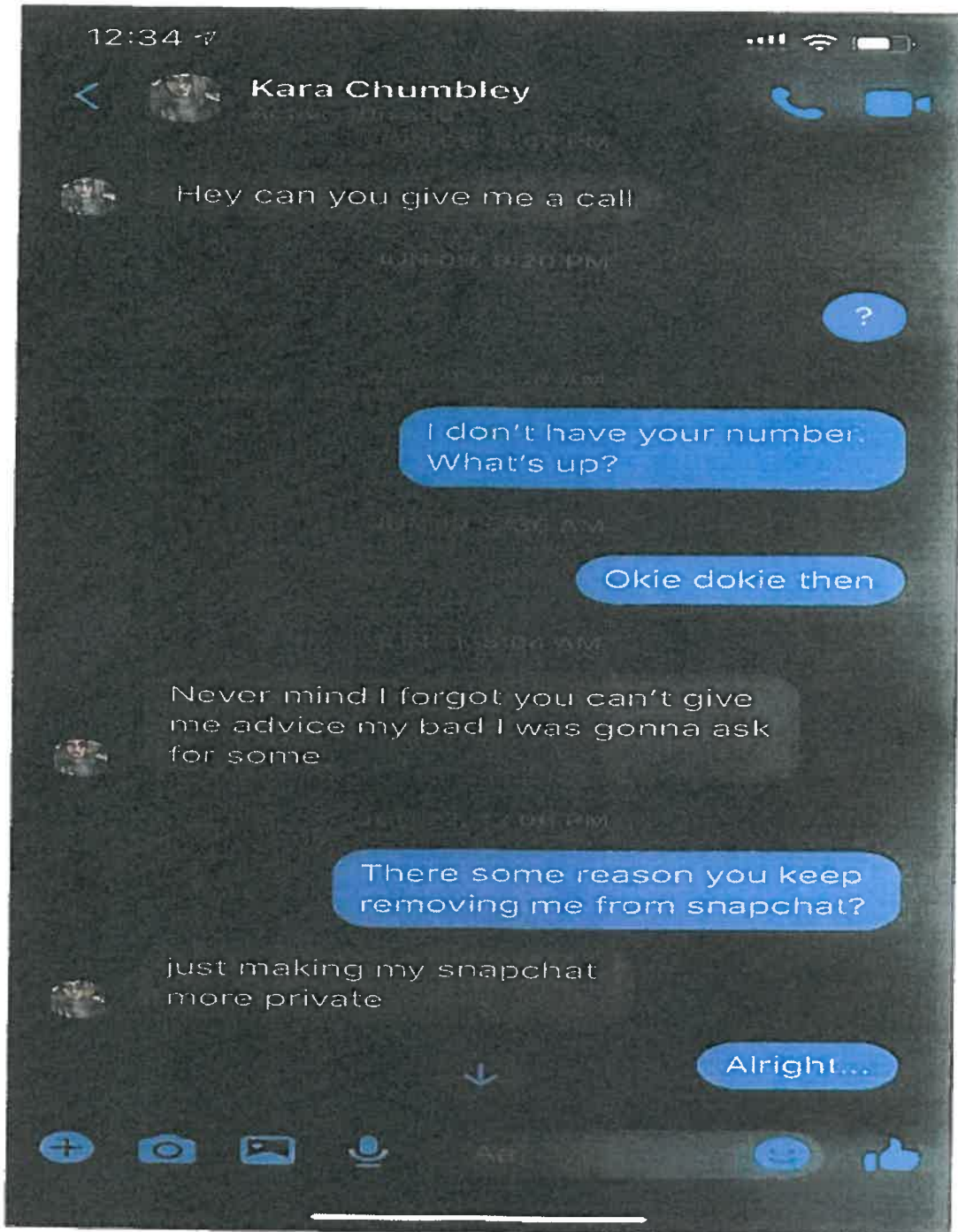
While the allegations against me remain untrue and appear to me to be nothing more than a political stunt deliberately timed just before the election, I acknowledge the appearance of impropriety. Therefore, I have tendered my resignation to State's Attorney, Jesse Danley.

I now recognize the ethical concerns of attempting to form any kind of a relationship with a defendant, even one that was originally based in what I believed to be friendship, and I regret my decision. I also regret the appearance of impropriety this has cast on the Office of the State's Attorney. Perhaps, most importantly, I want to stress that Mr. Danley had no knowledge of this error in judgment and remains one of the most upstanding and law-abiding attorneys I've ever had the good fortune to know. I want to thank former State's Attorney, Brian Bower, for placing trust in me and hiring me as a prosecutor. I want to thank all of the honorable judges and attorneys who I've had the privilege to work with in my time with Coles County and regret that I must part ways, but I will not allow the name of this office that I hold in such high regard to be tainted by this purely political stunt.

Sincerely,


Brady Allen







State of Illinois)
)
County of Coles)

OATH OF OFFICE

I, *Brady L Allen*, having been appointed to the office of
Assistant State's Attorney

in and for the County of Coles and State of Illinois, do solemnly swear, or affirm, that I will support the Constitution of the United States and the Constitution of the State of Illinois, and that I will faithfully discharge the duties of said office to the best of my ability.

Brady L Allen

Signature of Appointee

Signed and sworn to or affirmed before me
this 19th day of DECEMBER, 2018.

[Signature]

Circuit Judge

EMPLOYEE NAME: Brady L. Allen

START DATE: 12/19/18

- **Office Code for Doors: 1983**

- **Meeting with Tina in Treasurer's Office: Wednesday, December 26, 2018 at 8:30 a.m.**

- **Fingerprinting at the jail: Thursday, December 20, 2018 at 9:00 a.m.**

- **County Email Address: ballen@co.coles.il.us**

Username: bradya Password: temp1234

- **Office Logic: Username: BRADY Password: ballen**

- **Clerk's Computer (JIMS): Username: BLA Password: ballen**

- **You will receive an email from Lori Pearson on your county email to set up your Westlaw**

- **Your business cards and nameplate have been ordered.**

CHECKLIST FOR NEW EMPLOYEES

Employee Name: Brady L. Allen

Start Date: 12/19/18

- ~~Office Card~~ Office Card: 1983
- Swipe card for courthouse entry Requested from Ron 12/13/18 ~~7:50~~
- Photo Identification Card (done by IT Dept.) anytime after Xmas
- Meeting with Treasurer's Office w/ Tina Dec. 26 8:30a.m. (bring photo ID)
- County Email emailed Mark Harris 12/10/18
- Add to Office Logic Username: BRADY Password: ballen
- Clerk's Computer Username and Password Emailed Melissa 12/11/18 Username: BLA Password: ballen
- Fingerprints (done at the jail) Thursday, Dec. 20 9:00
- County Policy Manual
- West Law (Attorneys/Paralegals only) call once his email is set up - called Cori w/ email 12/14/18
- Badge (Attorneys/Investigator only) Paul has
- Business Cards and Nameplate (Attorneys) waiting for email to be set up
- Employee Worksheet (Vacation/Personal/Sick Days)

~~4/23~~

Shannon Hill - Coles Co State's Atty's Office

From: Mark Harris - Coles Co Sheriff's Office
Sent: Friday, December 14, 2018 12:21 PM
To: Shannon Hill - Coles Co State's Atty's Office
Cc: Noah Spence - Coles Co Regional Planning; James Beech - Coles Co Regional Planning
Subject: RE: New employee

Shannon,

I have added an email account with the following credentials:

Username: bradya with initial password temp1234
His email address is ballen@co.coles.il.us

Thanks,
Mark

Ofc. Mark Harris #150
IT Director / LAC
Coles County Sheriff's Office
701 7th St, Charleston, IL 61920
Phone: (217)348-0557 Fax(217)348-7345
E-mail: mharris@co.coles.il.us
CDC: S9U ORI: IL01500S1

From: Shannon Hill - Coles Co State's Atty's Office
Sent: Wednesday, December 12, 2018 15:05
To: Mark Harris - Coles Co Sheriff's Office <MHarris@co.coles.il.us>
Subject: New employee
Importance: High

Hello. We have a new attorney that will be starting next week on Wednesday, December 19. Will you please set up a county email for him? His name is Brady L. Allen.

Please let me know if you need any other information from me. Thank you so much!

Shannon M. Hill
Victim/Witness Coordinator
Coles County State's Attorney's Office
651 Jackson Ave., Rm. 330
Charleston, IL 61920
Ph. (217) 348-0561
Fax. (217) 348-0576

Shannon Hill - Coles Co State's Atty's Office

From: Shannon Hill - Coles Co State's Atty's Office
Sent: Wednesday, December 12, 2018 3:05 PM
To: Mark Harris - Coles Co Sheriff's Office
Subject: New employee

Importance: High

Hello. We have a new attorney that will be starting next week on Wednesday, December 19. Will you please set up a county email for him? His name is Brady L. Allen.

Please let me know if you need any other information from me. Thank you so much!

Shannon M. Hill
Victim/Witness Coordinator
Coles County State's Attorney's Office
651 Jackson Ave., Rm. 330
Charleston, IL 61920
Ph. (217) 348-0561
Fax. (217) 348-0576

Shannon Hill - Coles Co State's Atty's Office

From: Shannon Hill - Coles Co State's Atty's Office
Sent: Wednesday, December 12, 2018 3:25 PM
To: Melissa Hurst - Coles Co Circuit Clerk's Office
Subject: New employee

Importance: High

Hi, Melissa. Daniel Guido left us. We have a new attorney starting on Wednesday, December 19. Would you be able to set him up as a user on the clerk's computer? His name is Brady Allen and his initials are BLA. You can use password ballen.

Please let me know if you need any other information. Thank you!

Shannon M. Hill
Victim/Witness Coordinator
Coles County State's Attorney's Office
651 Jackson Ave., Rm. 330
Charleston, IL 61920
Ph. (217) 348-0561
Fax. (217) 348-0576

Received: Wednesday, December 12, 2018 2:41 PM

Date: Wed, 12 Dec 2018 14:41:17 -0600

From: RONDA (Ronda Parker)

To:

**BRIAN,FREDA,JADE,JAN,JENIFER,JOY,JULIE,LISA,MICHELLE,PAUL,ROBERT,SANDY,
SHANNON,TOM**

Subject: Traffic Attorney

Notice to All:

Brady Allen has been hired as our new traffic attorney. He will begin working on Wednesday, December 19, 2018.

Thank you.

Ronda

Shannon Hill - Coles Co State's Atty's Office

From: Melissa Hurst - Coles Co Circuit Clerk's Office
Sent: Wednesday, December 12, 2018 9:00 PM
To: Shannon Hill - Coles Co State's Atty's Office
Subject: RE: New employee

Sorry Shannon just now saw this. Kurt & Kayte Goodin are off the rest of this week for Christmas with the family. They'll be back next week sometime and I'll leave him an email to do this as soon as he gets back.

Melissa

From: Shannon Hill - Coles Co State's Atty's Office
Sent: Wednesday, December 12, 2018 3:25 PM
To: Melissa Hurst - Coles Co Circuit Clerk's Office <MHurst@co.coles.il.us>
Subject: New employee
Importance: High

Hi, Melissa. Daniel Guido left us. We have a new attorney starting on Wednesday, December 19. Would you be able to set him up as a user on the clerk's computer? His name is Brady Allen and his initials are BLA. You can use password ballen.

Please let me know if you need any other information. Thank you!

Shannon M. Hill
Victim/Witness Coordinator
Coles County State's Attorney's Office
651 Jackson Ave., Rm. 330
Charleston, IL 61920
Ph. (217) 348-0561
Fax. (217) 348-0576

Send Result Report



MFP

TASKalfa 3252ci

Firmware Version 2RL_2000.002.326 2017.05.10

W2R7705572
12/14/2018 13:48
[2RL_1000.002.019] [2ND_1100.001.007] [2ND_7000.002.323]

Job No.: 025714

Total Time: 0°00'28"

Page: 002

Complete

Document: doc02571420181214134755

State's Attorney
Brian L. Bower

Victim Services
Shannon M. Hill
Jan Ashmore

Investigator
Paul Cottingham

Paralegal
Ronda J. Parker



**COLES COUNTY
STATE'S ATTORNEY**
651 Jackson Ave., Room 330
Charleston, IL 61920-2074
Phone: (217) 348-0561
Fax: (217) 348-0576

*First Assistant
State's Attorney*
Robert A. Scales

*Assistant State's
Attorneys*
Thomas E. Bacher
Joy R. Wolf
Jennifer Schiavone

FAX TRANSMISSION

DATE: 12/14/18

TO: COUNTY OFFICE PRODUCTS

FAX NUMBER: 345-1448

FROM: SHANNON HILL

REFERENCE: New Assistant State's Attorney

COMMENTS: Attached please find a copy of one of our business cards. The new attorney's name is Brady L. Allen. His email address will be ballen@coles.il.us. We would also like to order a nameplate with his name and then underneath Assistant State's Attorney. If you need further information, please let me know. Thank you!

PAGE 1 OF 2

No.	Date/Time	Destination	Times	Type	Result	Resolution/ECH
001	12/14/18 13:48	93451448	0°00'28"	FAX	OK	200x100 Normal/On

State's Attorney
Brian L. Bower

Victim Services
Shannon M. Hill
Jan Ashmore

Investigator
Paul Cottingham

Paralegal
Ronda J. Parker



***First Assistant
State's Attorney***
Robert A. Scales

***Assistant State's
Attorneys***
Thomas E. Bucher
Joy R. Wolf
Jenifer Schiavone

**COLES COUNTY
STATE'S ATTORNEY**

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

FAX TRANSMISSION

DATE: 12/14/18

TO: COUNTY OFFICE PRODUCTS

FAX NUMBER: 348-1448

FROM: SHANNON HILL

REFERENCE: New Assistant State's Attorney

COMMENTS: Attached please find a copy of one of our business cards. The new attorney's name is Brady L. Allen. His email address will be ballen@co.coles.il.us. We would also like to order a nameplate with his name and then underneath Assistant State's Attorney. If you need further information, please let me know. Thank you!

PAGE 1 OF 2



BRADY L. ALLEN

~~DENNIS J. CHERRY~~
Assistant State's Attorney
Coles County

Char: (217) 348-0561
Fax: (217) 348-0576
Email: ~~dcherry@co-cnty.il.us~~
~~baller@co-cnty.il.us~~

Coles County Courthouse
651 Jackson Ave., Room 330
Charleston, IL 61920

111 South Douglas, McLeansboro, Illinois (618) 525-1044 • brady_allen89@yahoo.com

Brady L. Allen

Objective

To find a challenging career in an esteemed organization so that I may grow professionally, while utilizing my skills in such a way that I am able achieve a great level of personal fulfillment.

Bar Admissions

Illinois - Admitted 2017

Education

Juris Doctorate - December 2016

Southern Illinois University School of Law - Carbondale, IL

Bachelor of Arts, Majoring in Criminal Justice with a Minor in Psychology - May 2011

Southern Illinois University - Carbondale, IL

Associate of Arts - May 2009

Rend Lake College - Ina, IL

Legal Experience

August '18-Present

Drew Law Group

Benton, IL

Associate Attorney

- Representing clients in court, in both civil and criminal matters.
- Meeting with clients; conducting research; building their cases; and negotiating on their behalf.
- Opening criminal, federal, and civil case files, including but not limited to preparing the proper documentation, maintaining and updating the file as needed, sending out and preparing all required legal pleadings, setting court dates through the circuit clerk, and obtaining and preparing all required discovery documentation, and constant oral and written communication with clients.
- Maintaining Personal Injury files, including but not limited to contacting insurance companies and medical providers in order to maintain updated discovery material, preparing all necessary pleadings as directed, and organizing all medical liens accordingly.
- Preparing and electronically filing all necessary documentation.

January '18-Aug. '18

Franklin County State's Attorney

Benton, IL

Assistant State's Attorney

- Representing the State's interests in Court in bench trials; hearings; pre-trial and review settings.
- Conducting legal research.
- Meeting with opposing counsel.

Summer 2016 Appellate Prosecutor's Office (5th District) Mount Vernon, IL

Research Assistant

- Conducting legal research and preparing appellate court briefs

May '15-December '15 Union County State's Attorney Jonesboro, IL

Intern

- Assisting attorneys in court.
- Conducting legal research.
- Drafting court documents.

Summer 2015 SIU Domestic Violence Clinic Carbondale, IL

Intern

- Conducting client interviews
- Conducting legal research.
- Drafting court documents.

Additional Work Experience

Xanterra Parks and Resorts, Yellowstone Nat'l Park, WY (May '17-October '17)
Reservations Supervisor

Securitas, Marion, IL (May '13-August'14)
Security Officer

Toys 'R Us, Springfield, IL (September '12-April '13)
Sales Associate

US Army Illinois National Guard (July '11-December '12)
Specialist *Medically Discharged

Next Energy, Ltd., McLeansboro, IL (January '12-June '12)
Title Abstractor

McLeansboro City Pool, McLeansboro, IL (May '05-August '11) *Seasonal, Yearly
Asst. Manager, Lifeguard

West Frankfort Aquatic Center, West Frankfort, IL (August '07-August '11)
Lifeguard, Sales Associate

Toys 'R Us, Marion, IL (October '10 -January '11)
Sales Associate, Cashier *Holiday Help

SIUC Child Development Labs, Carbondale, IL - August 2009 to January 2010
Childcare Worker

References

Name	Address	Phone
Justin Hood State's Attorney, Hamilton County, IL	McLeansboro, IL 62859	(618) 643-3021
Evan Owens State's Attorney, Franklin County, IL	Benton, IL 62812	(618) 439-4316
Shannon Appleton Asst. State's Attorney, Franklin County, IL	Benton, IL 62812	(618) 439-4316
David Robinson Deputy Director, 4th and 5th District Appellate Prosecutor's Office	Springfield, IL 62701	(217) 299-8512
Tyler Edmonds State's Attorney, Union County, IL	Anna, IL 62906	(618) 833-7216
Bryan Drew Managing Partner, Drew Law Group	Benton, IL 62812	(618) 439-9406

Academic References

Name	Address	Phone
Mark Brittingham Clinical Assistant Professor, Public Interest Advisor	Carbondale, IL 62901	(618) 453-8744
Andrew Pardieck Associate Professor at Law	Carbondale, IL 62901	(618) 536-8325
Christopher Behan Dean for Academic Affairs and Professor of Law	Carbondale, IL 62901	(618) 453-8722