

***State's
Attorney***

Jesse Danley

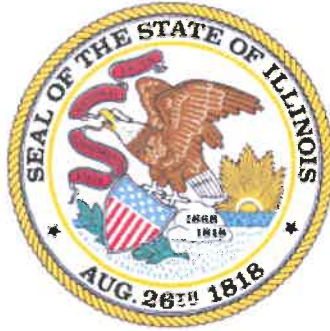
Victim Services

Lindsey Juszczak

Investigators

Jeff Endsley

Steve Kelly



**COLES COUNTY
STATE'S ATTORNEY**

651 Jackson Ave., Room 330

Charleston, IL 61920-2074

Phone: (217) 348-0561

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

Jenifer L. Schiavone

***Assistant State's
Attorneys***

Mark R. Karpus

Hunter D. Antonisse

Grant W. Manning

Chase A. Rich

Paralegal

Ronda J. Parker

January 24, 2024

Mr. Todd Reardon
518 6th Street
Charleston, IL 61920

Re: United States District Court-Central District of Illinois
23-cv-2086- Response to Subpoena to Produce Documents, Information, or
Objections

Dear Todd:

Attached please find the Response to the Subpoena to Produce Documents directed to my office.

Thank you.

Very truly yours,


JESSE DANLEY, State's Attorney

rjp

enclosure

cc: Brian Smith, Heyl, Royster, Voelker & Allen, P.C.

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

From: Ronda Parker - Coles Co State's Atty's Office
Sent: Sunday, August 23, 2020 3:56 PM
To: Brady Allen - Coles Co State's Atty's Office
Subject: Brady
Attachments: Response.docx

Ronda Parker, Paralegal
Coles County State's Attorney
Coles County Courthouse
651 Jackson Ave., Room 330
Charleston, IL 61920
(217) 348-0561 Phone
(217) 348-0576 Fax

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

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

From: Ronda Parker - Coles Co State's Atty's Office
Sent: Sunday, August 23, 2020 4:10 PM
To: Brady Allen - Coles Co State's Atty's Office
Subject: Brady
Attachments: Press Release.pdf

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Charleston, IL 61920
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Sincerely,


Brady Allen

