

Did Brady ever reach out

- While case pending
- When
- What was said

Did you ever talk to Kara about Brady + your relationship

~~What was~~ Did you recently talk to Brady

- What was said

Did you recently talk to Kara

- What was said

Have you had direct contact or indirect w/ Todd

Are statements 11 + 12 true

- Sent phone in where - thanks State Police
- When Brady offered to pay fine - a few days ago
- Who came up w/ idea to target Brady
- Who wrote Aff. - signed it
- Any specifics on call w/ Todd Kara Merwin
- Who told her to remember phrase
- All Political - Good timing
Good for both of us

Jordan Miller

Never met in person

Offered to talk to Larry - put in good word

Karas b/f MacKenzie Crable

8/24 555 PM

Brianna N. Lee 11/24/98

1316 Shelby Ave.

909 N. 20th

217-259-1872

Brady Allen has case

Kara ^{Chomley} called her + told

- Midnight last night sent her phone in + listed
-
- Matched on tinder
- Told her he saw her video
- living w/ her couple months ago
- he convicted
-
- Brady offered ^{Bris} to pay ~~back~~ fines if she got Kara to not testify
- If I save messages from Brady June 2020
1701 S. 17th
- Todd will file motion
- His hopes to be on news + file lawsuit
-
-

- Kara text him today call Wolfe
- "It takes care"
- Matched on Tinder Oct. 2 years ago
- On snap chat
- W/in last month sent nudes on snap
- Walking in Mattoon + talking to him
- No asks for sexual favors

2 1/2 weeks ago

**MATTOON POLICE DEPARTMENT
RECORD OF PROPERTY RECEIVED**

PAGE 1 OF 1 PAGES

CITY CHARGE	STATE CHARGE	FELONY	MISDEMEANOR
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

OFFENSE	OWNER OF PROPERTY	RMS CASE#	MATTOON CASE #
	MPD		

VICTIM: FIRST	MIDDLE	LAST	SUSPECT: FIRST	MIDDLE	LAST	ADDRESS OF RECOVERY
State	of	Ill	Brady		Allen	1710 Wabash

DATE	TIME	LOCATION RECOVERED: (i.e. BUSINESS, VEHICLE, ETC.)	REASON FOR RECOVERY
1/5/21	1015	MPD	Transfer

PROPERTY #	QUANTITY	DESCRIPTION OF PROPERTY (MODEL #, SERIAL #, MARKS, CONDITION, ETC.)
1	1	DVD Disc w/ Brianna Lee phone download
		CDR
		NOTHING FOLLOWS

SIGNATURE OF PERSON FROM WHOM PROPERTY IS RECEIVED	PRINTED NAME	ADDRESS
<i>Sgt Gregory Broughton</i>	Gregory Broughton #4150	ISP

OFFICER'S PRINTED NAME & BADGE NO.	OFFICER'S SIGNATURE
Alex Hesse 94	<i>Alex Hesse</i> 94

PROPERTY #	DATE	TIME	TRANSFERRED TO/FROM	TRANSFERRED TO	REASON

WHITE COPY TO FILE YELLOW COPY TO PERSON EVIDENCE WAS TAKEN FROM PINK COPY SAO CARD COPY WITH EVIDENCE

**ILLINOIS STATE POLICE
EVIDENCE INVENTORY
AND RECEIPT**

1. Date 01/05/2021 3. File/Field Report # 20-1005-SP-SIU
2. Time 10:15 AM 4. District/Office # SIU

5. Name or Place of Business Mattoon Police Department
6. Address 1710 Wabash Ave
City Mattoon State IL Zip 61938

ITEMIZED LIST OF EVIDENCE

LOCATION EVIDENCE FOUND

7. (List all items by name and serial no., if any, amount of currency, coins, etc.)

8. (Specify Location)

ITEMIZED LIST OF EVIDENCE	LOCATION EVIDENCE FOUND
1- CD-R Phone Dump - Brianna Lee.	Brianna Lee's Phone
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9. Received From (Signature) [Signature] 94
Time: 10:15 AM
Date: 01/05/21

10. Received By (Signature) [Signature] #4450
01/05/21 10:15 AM

11. Received From (Signature)

12. Received By (Signature)

13. Received From (Signature)

14. Received By (Signature)

15. Received From (Signature)

16. Received By (Signature)

White
Headquarters
IL 493-0007

Canary
Judge or Prosecutor

Pink
Person from whom evidence
was seized or property received

Goldenrod
Retained by Officer
ISP 1-10 (3/99)

276322 **MATTOON POLICE DEPARTMENT**
CONSENT TO SEARCH

I, Briann Lee hereby grant my consent to officers of the Mattoon Police Department and other law enforcement officers assisting them to search the following:

Vehicle, described as: _____ Color; _____ Year; _____
_____ Make; _____ Body Style; _____ Lic Number: _____
_____ Vehicle Identification Number

including any part, compartment, or trunk of the vehicle and the contents of any object or container found therein.

Apartment/House located at : _____

Including: _____

Place of business known as: _____

Including: _____

Biological standards: _____

Including: _____

Hair and fibers: _____

Including: _____

Photographic documentation: _____

Including: _____

Electronic media: Iphone 7 (white)

Including: Digital media

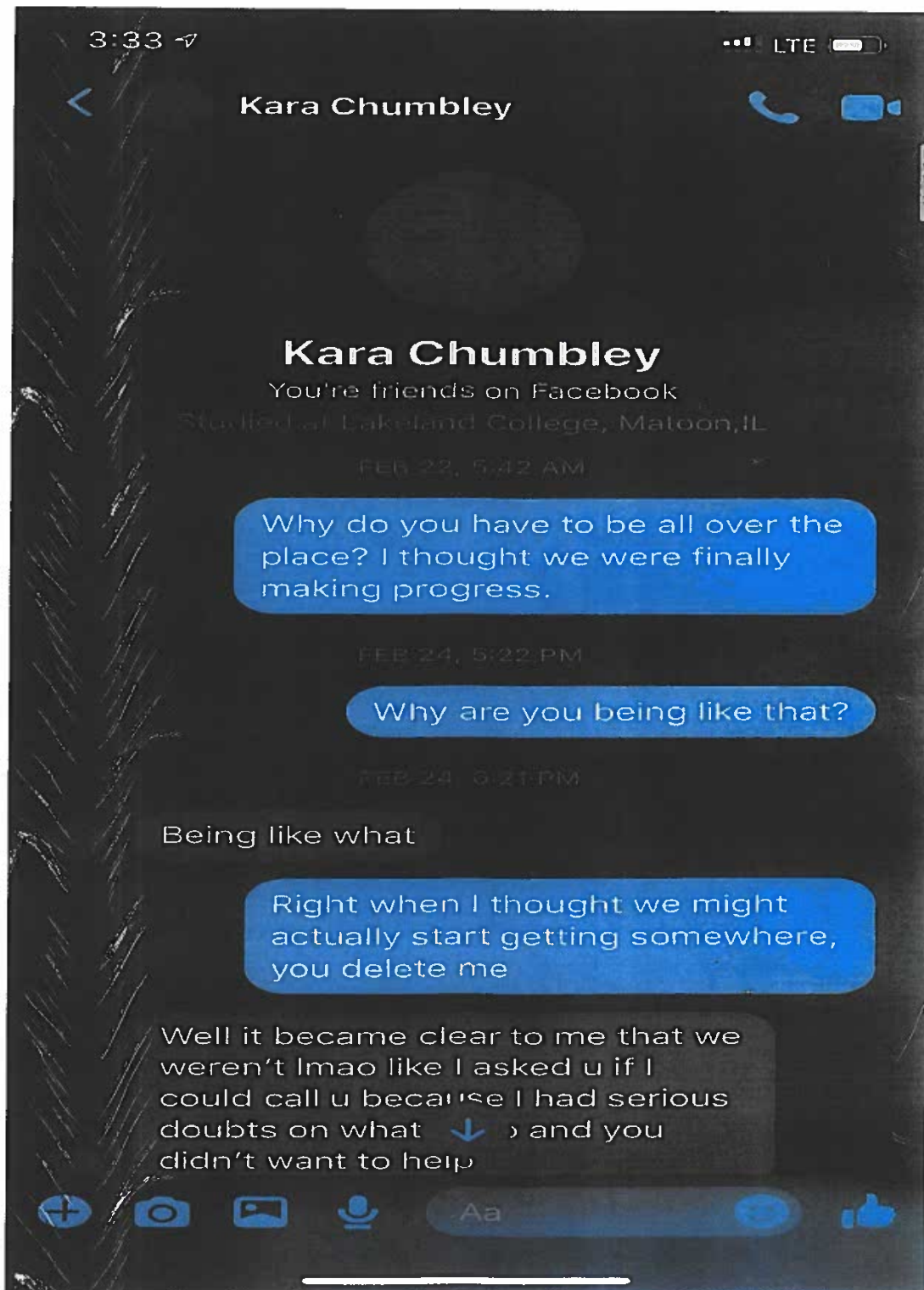
I understand that I have the right to refuse to consent to the search described above and to refuse to sign this form. I further state that no promises, threats, force, or physical or mental coercion of any kind whatsoever have been used to cause me to consent to the search described above or to sign this form.

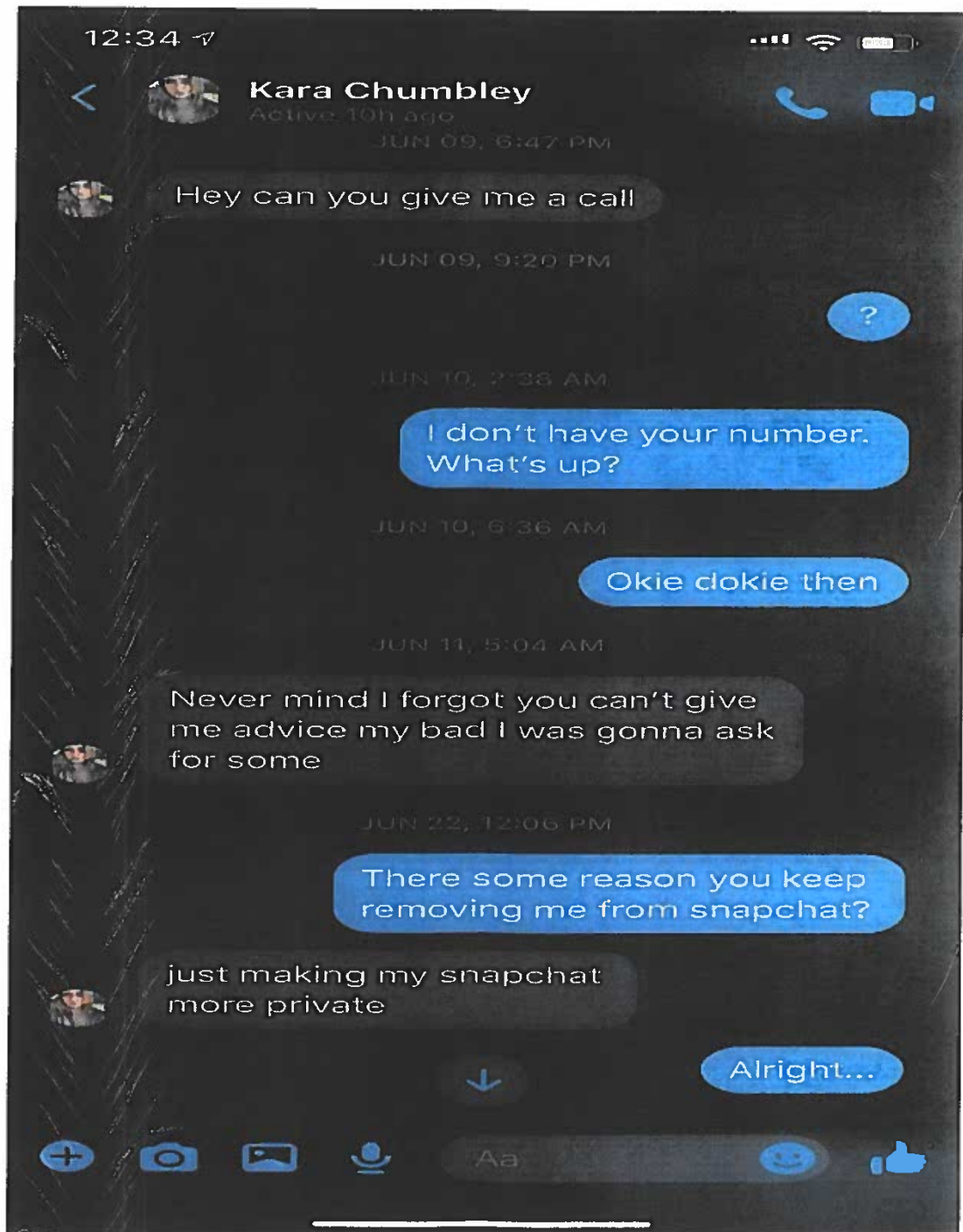
Witnesses: [Signature] 94

Date: 8/24/20

Time: 609 PM

Briann Lee
Signature





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

EFILED
8/21/2020 5:18 PM
Melissa Hurst
Circuit Clerk
Coles County, Illinois

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

**THE PEOPLE OF
THE STATE OF ILLINOIS
Plaintiff,**

vs.

**[REDACTED]
Defendant.**

**Case No. 19-DT-76
19-DT-100**

MOTION TO DISMISS BASED ON PROSECUTORIAL MISCONDUCT

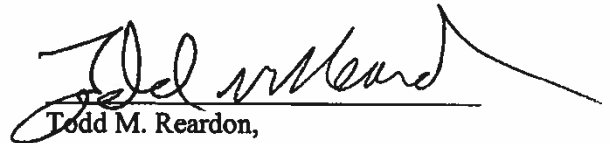
NOW COMES, The Defendant, [REDACTED], by and through her attorney, Todd M. Reardon, and moves this Honorable Court to Dismiss the Charge in this case and in support of said motion the Defendant states as follows:

1. The Defendant is Charged with Driving Under the Influence of Alcohol.
2. That the Defendant was represented in these causes by counsel.
3. That for a period of time thereafter Counsel for the State’s Attorney’s Office was having communication with the Defendant all the while knowing she was represented in violation of Illinois Rules of Professional Conduct, **RULE 4.2: COMMUNICATION WITH PERSON REPRESENTED BY COUNSEL** “ In representing a client, a lawyer shall not communicate about the subject of the representation with a liaison the lawyer knows to be represented by another lawyer in the matter, unless the lawyer has the consent of the other lawyer or is authorized to do so by law or a court order.”
4. That the original prosecutor in this case sought to advance his own sexual desires with the Defendant and began communications with the Defendant about her case her defenses her strategies and her desired outcome.
5. That the Defendant asserts her Constitutional Rights were being violated by the State’s Attorney office specifically the Right to Counsel by having unannounced communications with her behind her Attorney’s back. (See Attached Affidavits of the Defendant [Exhibit A] and Witness [Exhibit B], and corresponding sex request [Exhibit C] attached hereto .
6. As a result of the State’s action by Brady Allen, the Defendant’s Defense case has been irreparably harmed in that no prophylactic measure can be put in place to undo the illegal communications obtained by ASA Allen against the Defendant in his quest to have sexual liaison with the Defendant while pretending to take an interest in the Defendant’s case outcome. See, *People v. Lawson* 67 Ill.2d 449 (1977). “ We are aware of appellate

court cases holding that the trial court may not dismiss an indictment for any reason other than the reasons given in section 114-1 of the Code of Criminal Procedure of 1963. . . . We are also aware of conflicting appellate court decisions. However, we believe that on the basis of the reasoning of our past decisions and that of the appellate courts and on the basis of the reasoning of the United States Supreme Court, we must conclude that a trial court does have an inherent authority to dismiss an indictment in a criminal case where there has been a clear denial of due process even though that is not a stated ground in section 114-1." *Id.*

WHEREFORE, The Defendant, Moves this honorable court to dismiss this case for violations of Due Process based on Prosecutorial Misconduct.

Respectively Submitted,



Todd M. Reardon,

Todd M. Reardon #6238998
518 6th Street
Charleston, IL 61920
217-345-5291

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

THE PEOPLE OF
THE STATE OF ILLINOIS
Plaintiff,

vs.

[REDACTED]
Defendant.

Case No. 19-DT-76
19-DT-100

AFFIDAVIT

I, [REDACTED] being sworn under oath do hereby state as follows:

1. I am over the age of 18, and I make this affidavit based upon my own personal knowledge.
2. That I am a current client of Todd Reardon and a Defendant in the above captioned cases.
3. That I have had many electronic communications via Snap Chat, texts messages, Facebook, Tinder, as well as cell phone contact with ASA Brady Allen during the pendency of my criminal cases.
4. That on February 18, 2020 while I was attending court in my criminal cases, I received text message from ASA Brady Allen on my Apple watch.
5. That during the pendency of this case ASA Brady Allen sent me the following messages attached hereto as Exhibit A to I.
6. That ASA Brady Allen has on multiple occasions requested sexual favors and pornographic material from me in exchange for favorable treatment on my criminal cases.
7. That during the pendency of my case ASA Brady Allen kept asking for pornographic photos from me. I eventually provided him said photo.
8. That ASA Brady Allen stated he would give me advice on my DUI cases while he was having sex with me.
9. That ASA Brady Allen repeatedly told me that I had a alcohol problem and I needed help.
10. That during the pendency of my criminal cases ASA Brady Allen told me to ignore my attorneys advice and take the plea deal being offered by Coles County States Attorneys Office.
11. That I am a personal friend of [REDACTED] and have had multiple conversations about ASA Brady Allen both in person and via social media about her relationship with ASA Brady Allen.
12. That [REDACTED] has made statements to myself and others that ASA Brady Allen has for many months engaged in electronic communications with [REDACTED] during the pendency of her criminal matters also requesting sexual favors and/or



pornographic material.

13. That [REDACTED] has made statements to me that ASA Brady Allen was going to reduce her pending criminal DUI charge to reckless driving in exchange for sexual favors and/or pornographic material.

14. That I questioned ASA Brady Allen about the conflict of interest and his involvement in my cases.

15. That ASA Brady stated that the CCSAO had a policy that the contact with between ASA Brady Allen and the Defendants was permissible as long as the relationship did not get serious.

16. That ASA Brady Allen stated to me that if the relationship became serious he would inform States Attorney Danley who would then get someone else to prosecute her.

AFFIANT FURTHER SAYETH NAUGHT

Respectfully Submitted,

Date: 8-21-20

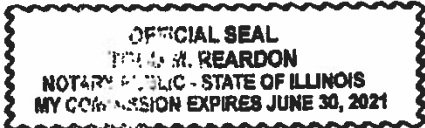
[REDACTED]

STATE OF ILLINOIS)
) SS
COUNTY OF COLES)

I, the undersigned, a Notary Public in and for said County, in the State aforementioned do hereby certify that [REDACTED], becoming personally known to me to be the same person whose name is subscribed to the foregoing instrument, appeared before me this day in person and acknowledged that she signed, sealed, and delivered the said instrument as her free and voluntary act, for the uses and purposes therein set forth.

Given under my hand this 21st day of August, 2020.

[Signature]
Notary Public



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

THE PEOPLE OF
THE STATE OF ILLINOIS
Plaintiff,

vs.

[REDACTED]

Defendant.

Case No. 19-DT-76
19-DT-100

AFFIDAVIT

I, [REDACTED], being sworn under oath do hereby state as follows:

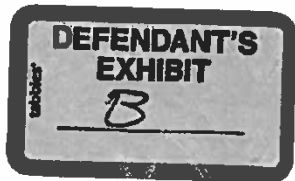
1. I am over the age of 22, and I make this affidavit based upon my own personal knowledge.
2. That I have no cases in pending in Coles County.
3. That in 2019 a friend of mine, [REDACTED], advised she was being approached by an Assistant State's Attorney who was wanting to trade sexual favors for her on a case.
4. That on February 18, 2020, I was in court with [REDACTED] and saw her receive a text messages while in Court from Brady Allen on her apple watch.
5. That [REDACTED] shared with me some of the sexually explicit messages she had received from Mr. Allen.
6. That Brady Allen was the same person who I learned was pressuring [REDACTED].

AFFIANT FURTHER SAYETH NAUGHT

Date: 8/21/2020

Respectfully Submitted,

[REDACTED]



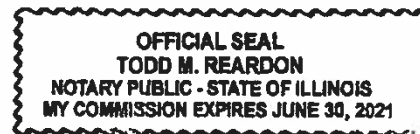
STATE OF ILLINOIS)
)
COUNTY OF COLES) SS

I, the undersigned, a Notary Public in and for said County, in the State
aforementioned do hereby certify that [REDACTED], becoming personally known to
me to be the same person whose name is subscribed to the foregoing instrument,
appeared before me this day in person and acknowledged that she signed, sealed, and
delivered the said instrument as her free and voluntary act, for the uses and purposes
therein set forth.

Given under my hand this 21st day of August, 2020.



Notary Public



2:36 LTE



Brady Allen



MARCH 3RD

BRADY

Then you need to visit me and we can discuss your situation while you ride my cock ;) Or I can give advice while your mouth is full 🐱

BRADY

How's that for a plan?

BRADY

What time do you get off?

MARCH 4TH

BRADY

Well I don't think I'm going to hear back from you tonight. And I was trying to be playful there but if you don't like that suggestion, I'd at least like to get dinner or something and talk things out. I hope you won't take forever to get back to me...

You're killing me here.

Do you have any interest in getting together?

Damn. I'm out of town Saturday. Let me know what your schedule looks like the next week, or just whenever you think you're going to have a few hours free.

TODAY



Send a char

