

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

PEOPLE OF THE STATE OF ILLINOIS,
Plaintiff,

vs.

Case No. 2018-DT-93

BRIANNA LEE,
Defendant.

AFFIDAVIT

**Affidavit of Brianna Lee
In Support of Motion to Suppress**

That my name is Brianna Lee and I am 21 years of age, I am under no legal disability and if called upon to testify would state the following:

1. I first had contact with Brady Allen via a dating app called "Tinder" on or about October, 2018. I was not aware at that time that Brady Allen was the Assistant State's Attorney in Coles County.

2. That immediately after making contact with me via Snap Chat, Brady Allen asked me to visit him at his office at the States Attorneys Office located at the Coles County Courthouse. That at some point early in our communications I questioned whether it was appropriate for and ASA to request to date and/or request pornographic material content from me. Brady Allen assured me that his inter-action was proper, that the conflict issue of "attempting to date defendants" had been previously discussed with his boss (Mr. Danley).

3. That Brady Allen stated to me that if our "relationship" became "serious", ASA Brady Allen would just report the change in our relationship "status" and request that Mr. Danley reassign her case to another ASA and until that time it was all proper. I believed him he was an attorney and a prosecutor. That immediately Brady Allen began to ask for topless photo's, but instructed me that it had to include my face. Brady also stated he would help me with my pending cases if I continued to comply with his request for nude photo's. After receiving the topless photo's Brady he then demanded picture's of my vaginal area, which I complied with.

4. That on 8/1/18, I began a pro se representation in Coles County, Illinois case 18CM247. ASA Guido was the prosecutor for the state in this case from initial charge. Kara Chumbley was the alleged victim. That on 7/29/20, ASA Brady Allen appeared on behalf of the State and excused my appearance until 10/14/20. My excused absence was arranged prior to the court date via SnapChat with ASA Brady Allen. That on or about 11/9/18, I was is charged in Coles County Case 18CL114, and ordered to pay or appear by 12/7/18. ASA Schiavone was the initial

prosecutor for the state in this case. ASA Brady Allen appeared on behalf of the state on 3/8/19 in 18CL114. I failed to appear (per his advice). ASA Brady Allen then sent \$156 to the collection agency.

5. That on or about 11/27/18, I began a pro se representation in Coles County, Illinois cases 18DT93; 18TR2833; 18TR2835. I saw ASA Brady Allen in the courtroom, during my DUI hearing, but we did not talk to each other, but we recognized each other from our previous interactions.

6. That on or about 1/9/19, ASA Brady Allen appeared as my prosecutor in 18DT93; 18TR2833; 18TR2835.

7. I was excused by Brady Allen and didn't go to a couple of court dates because I was told "we" were waiting on this one officers report. I was also told by Brady Allen that he had "spoken" to "Larry" at the CCSAO about resolving my DUI case. Later Brady Allen also told me he had spoken to Mrs. Mudge about resolving my DUI case and excusing my appearance. Brady Allen told me he had "taken" care of it.

8. I was told by Brady Allen that I would not have to appear in my DUI case. Brady Allen told me that he had spoken to Mrs. Mudge of the Illinois Appellate Prosecutors Office directly on my behalf. Brady Allen told me that Mrs. Mudge of the Illinois Appellate Prosecutors Office had excused my court appearance in my DUI.

9. That ASA Brady Allen communicated via my Snapchat for awhile, I didn't know he was on my Snapchat...up until I went to a court date and Brady Allen had been moved to misdemeanor court. Brady Allen asked me via Snapchat if I was ever going to actually take action in my DUI instead of just let it go on. This is when I first realized that Mr. Allen's offers to help my cases were unprofessional, unethical and perhaps criminal.

10. It was sometime between April and August of 2019, it was pointed out to me by my then boyfriend, Tristan Copsy, that Tristan didn't trust ASA Allen's motivations, and thought he was trying to "get with me". Tristan Copsy was extremely angry and posted a Facebook message online about the ASA's Allen sexually motivated behavior towards me.

11. That on or about June 2019, Tristan Allen and my mother warned me that ASA Brady Allen's behavior towards me was improper, unethical and probably criminal.

12. That I also showed two messages from Brady Allen to my mother. The first message was related to him asking me for nude photographs, and the second message was him offering to pay my fines if I could get Kara Chumbley to not testify against him. My mother advised me to have no further communications with Mr. Allen.

13. I met Chief Taylor on or about September of 2019. I was instructed to buy cocaine with monies provied by the MPD from a person I knew. When the sale was completed, the person was arrested and the cocaine I had purchased was returned to Officer Devon Patterson. Chief

Taylor took \$40 in cash from his pocket and paid me for helping them. I had multiple conversations with Brady Allen about all of it.

14. In addition, ASA Brady Allen requested that I act as a confidential source involving an investigation by the MPD and the Coles County States Attorney Office into Attorney Todd Reardon and cocaine use and distribution through the local Mattoon, Moose. I have had no personal contact with Jesse Danley. Over the course of our relationship with "Brady Allen talked many times about his relationship with Jesse Danley, who really "liked him a lot". Jesse Danley had just gave him a raise. That a few weeks prior to my 8/24/20 MPD interview Jesse Danley was told by Brady Allen about the sexually explicit snap chat posts sent by Brady Allen to Kara Chumbley.

15. That after the sexually explicit snapchat message(s) by Brady Allen to and from Kara Chumbley were given to attorney Todd Reardon. Brady Allen became aware and immediately communicated to Mr. Danley that "Todd Reardon" was in possession of the sexually explicit Snapchat communications.

16. That Brady Allen told me that they (Brady and Mr. Danley) had a "plan for dealing with it" as long as Kara Chumbley did not testify.

17. That I eventually blocked Brady Allen from contacting me because:

- A. He was pressuring me to find a way to keep Kara Chumbley from testifying against him.
- B. He was offering to pay my misdemeanor fines if I could get Kara to not testify.
- C. He was pressuring me to send him nude photographs.
- D. He was constantly calling me and increasingly more anxious for me to give him what he wanted.
- E. He offered for me to move in with him into his apartment.
- F. He offered to allow me to stay in his apartment while he was away in Montana avoiding prosecution.
- G. He told me he was thinking about "killing himself" and that he had Crohn's disease.
- H. He told me attorney Todd Reardon was going to "kill me".
- I. He told me attorney Todd Reardon was a violent criminal.
- J. He told me I did not need an attorney to represent me in my criminal cases

18. I was phoned by an unidentified male officer from the MPD on 8/24/20, requesting that I come into the station for an interview.

19. I was told that they needed to ask me questions. Initially the Officer told me it was about Brady Allen and later the police officer claimed it was about false statements being made against public official's, and that their department would not "tolerate it".

20. I told them I would come to the station at a certain time, but I did not.

21. The next thing I know is they (Mattoon PD) were knocking on the door where I was staying, asking me to come with them to the station.

22. I had been able to avoid them for two and a half hours, at this point, cause I didn't really want to talk to anybody.

23. Two unknown officers and Detective Hesse, drove me to the station for an interview on 8/24/20.

24. I found out later from family and friends that they had been looking for me all over, and had been to every previously known address before Detective Hess and the armed officers found me.

25. The taped interview at the MPD, a copy of which was given to the news, does not represent the entirety of the interview. There are multiple conversations with the MPD police officers and detective(s) that are not on the video which was supplied to my attorney.

26. That detective Hess requested and obtained consent to search and downloaded my phone as evidence in an investigation of "false statements against a public official".

27. The questions that Detective Hess asked me during my interview were in writing and typed.

28. That Officer Hess took written notes on a note pad while he interviewed me.

29. Detective Hess expressed his dislike of attorney Todd Reardon and that I should not cooperate or communicate with Todd Reardon or Mervin Wolfe on the communications and messages I had received from Brady Allen regarding Kara Chumbley.

30. Detective Hess told me it would not be a "good idea" to talk Mr. Wolfe and/or Mr. Reardon about Brady Allen and Kara Chumbley or myself case(s) because Mr. Wolfe and Mr. Reardon were doing illegal/unethical things and they were slimebag(s).

31. I have not received any of the documentation I was promised in my DUI case. No police reports no lab results were never given to me by Brady Allen. I was told I didn't need them "yet" by Brady Allen.

32. That Brady Allen would discuss the evidence in my case as well as the evidence in Kara Chumbley's case. Brady Allen would repeatedly point out her obvious mental and alcohol issues based upon what he observed.

33. That Brady Allen told me that Todd Reardon was going to kill me or have me killed.

34. That Brady Allen disclosed to me some the details of CCSAO investigation against Todd Reardon for witness tampering and/or intimidating a witness.

35. That the night before the last court date Brady Allen used Facebook to communicate his displeasure over my choice of attorney Mervin Wolfe stating he (Mr. Wolfe) was Todd 2.0, and that I had lied about his conduct to police.

Further the Affiant Sayeth Not:

VERIFICATION

I, Brianna Lee, being first duly sworn, states under oath that he has personal knowledge of the facts and statements alleged in the foregoing Affidavit and that they are true and correct, except for those stated to be *on* information and belief, and those he believes to be true and correct.



Brianna Lee