

STATE OF ILLINOIS)
) SS.
COUNTY OF COLES)

22MX310

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

COMPLAINT FOR SEARCH WARRANT

FILED
SEP 26 2022

I. PLACE TO BE SEARCHED AND ITEMS TO BE SEIZED

Now appears **Sergeant Windy Westfall of the Illinois State Police (Special Investigations Unit)** "Complainant" or "Affiant") before the undersigned Judge of the Fifth Judicial Circuit Court, requesting the issuance of a Search Warrant to search the records of **AT&T (Attn: Global Legal Demands Center)**, located at **11760 U.S. Highway 1, Suite 300, North Palm Beach, FL 33408**, and therefrom to search, seize, and analyze the following instruments, articles, and things which were used in the commission of, or may constitute evidence of the offense(s) of **Official Misconduct**, in violation of 720 ILCS 5/33-3; and **Bribery**, in violation of 720 ILCS 5/44-1, to include records pertaining to the AT&T account(s) associated with the following individual:

Margaret H. Hurd
Circuit Clerk, Coles County, Illinois

Brady Lee Allen

Date of birth: 03/08/1989

Phone: 618-525-1044

Phone: 618-303-1088

Address: 1202 Lincoln Avenue, Apartment 35, Charleston, Illinois 61920

Email: brady_allen89@yahoo.com & BAllen@co.coles.il.us

The following information with respect to the above AT&T account(s) for the date period between October 1, 2018, and September 30, 2021, to wit:

1. Basic subscriber information, records, data or documents containing name, address, local and long distance telephone connection records or records of session time and duration, length of services (including start dates and types of services utilized), telephone or instrument number or other subscriber number or identity (including any temporarily assigned network address and any International Mobile Equipment Identity number), the means and source of payment for the service (including credit card or bank account number);
2. Location information, including any information, records, data or documents concerning the location of the electronic device that is in whole or in-part generated by or derived from the operation of the device utilizing the telephone number stated above, including all cell site activations and sectors for all incoming and outgoing calls, together with a complete listing (electronic/electronic mail provided if possible) of cell site identification number, physical address, latitude and longitude, sector identifiers, and true orientations/facings of all cell sites (including omni-directional and sectorized) in the market where the Target Device may be located; together with nationwide System Identify/Billing Identity (SID/BID) listing; and an engineering map identifying the same (if the provider possesses such an orientation(s). A list of any and all applicable cellular site(s)' number(s), locations(s), address(es), and/or latitude and longitude of any said site(s). Also, that cellular site(s)',

list(s), latitude(s) and longitude(s), be provided, via electronic mail, in an electronic format, if available and/or possible;

3. Non-content Short Message Service (SMS) data (e.g. the automated systems messages delivered to a device from the network) for messages sent to and received from any of the following phone numbers:

217-790-0681;
217-259-1872;
217-250-1192;
217-294-0246;
815-685-7566;
217-460-0049;
217-820-0694;
217-561-3309;
217-820-0313; and
217-343-1778;

4. Text message records, such as detailed information in reference to all known sent and received text messages, including but not limited to: dates and times text messages were sent and received, phone numbers to which messages were sent or received, and content sent or received (e.g. text, photographs and video) for messages sent to and received from any of the following phone numbers:

217-790-0681;
217-259-1872;
217-250-1192;
217-294-0246;
815-685-7566;
217-460-0049;
217-820-0694;
217-561-3309;
217-820-0313; and
217-343-1778;

5. Call detail records, including detailed information in reference to all known outgoing and incoming calls associated with the following phone numbers, dates and times the calls were made, and duration of the calls made or received:

217-790-0681;
217-259-1872;
217-250-1192;
217-294-0246;
815-685-7566;
217-460-0049;
217-820-0694;
217-561-3309;
217-820-0313; and
217-343-1778;

6. Data and information identifying any device associated with the above account(s) including but not

limited to the make, model, year and serial number associated with the device; the date the device became associated with the above account; personal cloud account information associated with the above account(s) including but not limited to account name, date of creation, account status, amount of storage and storage used, the type of content stored; any photos, videos, contacts saved to the personal cloud account; any and all payment information for the personal cloud account including credit card or debit card number or bank account number and associated payment information; date, time and IP address when data, information or content was saved to or uploaded to the personal cloud; date, time and IP address when data, information or content was deleted from the personal cloud; history of content being restored to devices from personal cloud account(s); and

7. Any data, information or content stored, uploaded to, edited in, or deleted from the account's personal cloud including but not limited to photos, videos, contacts, documents, voice memos, audio recordings, screenshots, files, or attachments that were created, uploaded, edited or deleted between October 1, 2018 through September 30, 2021.

Your Affiant believes that the foregoing instruments, articles and things are located within the records of AT&T, located at 11760 U.S. Highway 1, Suite 300, North Palm Beach, FL 33408.

All records to be provided in an electronic format and be disclosed to Sergeant Windy Westfall or Master Sergeant Matthew Barber or any other law enforcement personnel with the Illinois State Police.

In support of the foregoing, your Affiant states the following facts:

II. INVESTIGATOR BACKGROUND

I, Sergeant Windy Westfall, am an Investigator and sworn law enforcement officer in the State of Illinois and as such am authorized to execute search warrants. I have been employed with the Illinois State Police for 22 years. I have investigated criminal violations in the State of Illinois for 16 years, including but not limited to allegations of Official Misconduct and Bribery. Throughout my career I have attended trainings related to social media, including but not limited to trainings in the proper identification, preservation, and collection of digital devices and storage media. I have also attended trainings in the proper identification, preservation, and analysis of social media records. I have extensive knowledge of regular usage of several social media platforms. I have investigated over 50 cases involving computers or internet crimes that resulted in numerous arrests and convictions.

The facts set forth in this Complaint are based on Affiant's personal knowledge and investigation. The Complaint is also based on knowledge your Affiant obtained from other individuals, including other law enforcement officers, your Affiant's review of documents related to this investigation, communications with others who have personal knowledge of the events and circumstances described in this Complaint, and information gained through your Affiant's training and experience.

Your Affiant submits this Complaint for the limited purpose of showing there is sufficient probable cause to support issuing a warrant to search for, seize, and analyze the items identified herein. This Complaint does not purport to set forth all of your Affiant's knowledge of, or investigation into, this matter. Unless specifically indicated otherwise, all conversations and statements described in this Complaint are related in substance and in part only.

III. FACTS IN SUPPORT OF PROBABLE CAUSE

The Illinois State Police, Division of Criminal Investigation, Special Investigations Unit, was made aware of allegations of Official Misconduct and Bribery against then-Coles County Assistant State's Attorney Brady Allen ("Allen"), on August 12, 2020. On August 26, 2020, the Special Investigations Unit received an official request from Coles County State's Attorney Jesse Danley to conduct an investigation into Allen.

Throughout the course of my investigation, I identified several women who communicated with Allen in an unusual nature and through unusual channels, given his position as the Assistant State's Attorney assigned to each woman's criminal prosecution.

Through investigation and interviews, I learned Allen was born on March 8, 1989. He has two known phone numbers, both serviced by AT&T. Those numbers are: 618-525-1044 and 618-303-1088. Allen served as an Assistant State's Attorney in Coles County from December 2018 through August 2020. During his time at the Coles County State's Attorney's Office, Allen was assigned as the traffic prosecutor and misdemeanor prosecutor. Allen used his county-provided email address, BAllen@co.coles.il.us, to communicate interoffice, with defense counsel, victims, and *pro se* defendants. However, between December 2018 and August 2020, Allen also communicated with *pro se* defendants through his personal cell phone by way of text message, phone call, video chat, Snapchat, Facebook, and Tinder. These communications were with female defendants who were between 17 years old and 29 years old in 2018. All women were from the surrounding area. Allen did not communicate with all female defendants in this manner, but at this time, your Affiant is aware of Allen doing so with the following group of women:

Halie Michalski ("Michalski")

Through interviews and investigation, I learned that in April 2019, Michalski received a speeding ticket in Coles County. Allen was the prosecutor assigned to her case. Michalski recalls Allen sent her a "Friend Request" on Facebook, and a message through Facebook Messenger. Michalski said she did not accept his "Friend Request" or respond to his message, but she found it strange that he tried to contact her this way. In an email to Michalski (hmmichalski@eiu.edu) dated August 19, 2019, Allen said he ". . . [hasn't] forgotten [her].... And while [he's] of course disappointed [she] won't be joining [them] (in court), if [she is] sure [she's] good on having everything paid and [she's] really been good, [he'll] excuse [her] from court...". Allen also said that since she is no longer a defendant in this courtroom, she should "feel free to find [him] on Facebook and message [him] that way."

Based on investigation and interviews, I learned Michalski's known phone numbers include: 815-685-7566.

Carlee Wilson ("Wilson")

Through interviews and investigation, I learned that Wilson had both traffic and misdemeanor cases pending in Coles County between December 2018 and August 2020, including several matters where Allen was the assigned prosecutor. According to Wilson, she first exchanged cell phone numbers with Allen when she met him in his office to discuss her court cases. Throughout January 2020, Allen texted Wilson regarding her court cases. On January 17, 2020, Allen texted Wilson indicating there would be movement within the office, and he would only be handling traffic matters for a couple of more weeks. In a separate text message, Allen said he would "let it slide" that Wilson received a traffic ticket while she was already on Court Supervision. This ordinarily would be a violation of Wilson's sentence, and a basis for Allen to file a Petition to Revoke.

In July 2020, Carlee Wilson was arrested for unlawful possession of drug paraphernalia in Coles County. Allen was the assigned prosecutor. On July 16, 2020, Wilson emailed Allen to try to arrange a meeting to discuss the case. Wilson's email address at that time was carleewilson22@gmail.com. On July 30, 2020, Allen emailed Wilson saying he "had shot [her] a message over Facebook because it was after hours when

[he] was brainstorming on what to do with [her] situation . . .". After reviewing emails between Allen and Wilson, I believe the "situation" Allen refers to is the fact that Wilson 1) is already on a term of Court Supervision for another matter and/or 2) may not be eligible for Court Supervision given her driving and criminal history. On August 5, 2020, Allen emailed Wilson: "I think I can pull it off. Just keep that bit about the prior supervision on the down low, and I don't expect anyone to ask questions."

Based on my investigation, I learned Wilson spoke with Allen on his cell phone on more than one occasion. Wilson and Allen also communicated through Facebook Messenger. According to Wilson, they usually spoke about her court cases. Wilson's known phone numbers include: 217-460-0049.

Brianna Harshbarger ("Harshbarger")

Through investigation and interviews, I learned that Harshbarger was arrested in Coles County for Battery in July 2020. At the time, Harshbarger had a number of traffic and misdemeanor offenses pending in Coles County. Harshbarger emailed Allen regarding her case because he was the assigned prosecutor. Harshbarger's email address is amiyah62714@gmail.com.

On January 16, 2020, Allen emailed Harshbarger: "I don't normally like to do this, but you don't seem crazy to me, so I'm ok with doing it this way. I'm about to have to be in court for the rest of the afternoon, and won't be here tomorrow or Monday. So if you don't want to wait until I get back Tuesday, you can text me at 6185251044 (please keep that to yourself) and we can try to work out a time for a meeting to discuss your cases." Harshbarger told investigators Allen gave her his personal cell phone number, but she did not feel comfortable communicating with him in this manner.

On March 12, 2020, in an email exchange with Harshbarger, Allen wrote: "[o]n another note... [t]his might be none of my business, and this totally stays between you and me. Anything you say to me on this won't be relayed to Judge O'Brien. . . . [b]ut[,] I know you had been ordered in misdemeanor court to apply your entire tax return. You then asked if you could just pay \$1000 of it. And you sort of had a deer-in-the-headlights look. Had you by chance already spent the rest of it? You going to be able to make that payment? I was just a little concerned. This is coming from Brady Allen, the human being, not Brady Allen the prosecutor."

On May 6, 2020, in an email with the subject line "April 22 Incident", Allen wrote Harshbarger: "Normally, I just have to go off of the report, but since I'm familiar with you, I wanted to reach out and hear what happened from your perspective and what the situation is now."

On June 22, 2020, in an email with the subject line "Domestic", Allen emailed Harshbarger saying "[n]ot to be a pest—just wanting to make sure you're good since I never heard back from you last week." Harshbarger replied that she had been out of state on vacation.

Other emails between Allen and Harshbarger are informal, and contain swear words and slang. On one occasion, Harshbarger asks for additional time to make payments on post-sentence traffic matters, to which Allen told her he "can continue whatever [he] want[s]. Haha. But yeah, the judge does not seem to be [her] biggest fan."

According to Harshbarger, they met at Allen's office at least one time between December 2018 and August 2020.

Kara Chumbley ("Chumbley")

Based on interviews and investigation, I learned Chumbley and Allen met in August or September 2019 at the Coles County Courthouse when she attended a court date for her DUI. Sometime thereafter, in

December 2019 or January 2020, Chumbley and Allen “matched” on Tinder. Tinder is a dating application men and women use to establish romantic relationships, among other things. According to Chumbley, Allen messaged her first on Tinder, while he was the assigned prosecutor on her pending Coles County DUI. Chumbley knew of Allen through her long-time friend (and one time roommate, Brianna Lee), who told Chumbley about her interactions with Allen. In a Tinder message, Chumbley mentioned to Allen that he was the prosecutor on her case, and Allen told her it was ok as long as they were not dating. After that conversation, Allen asked Chumbley for her Snapchat name and they began communicating through Snapchat. According to Chumbley, most of the conversations between Chumbley and Allen were on Snapchat and were flirtatious and/or sexual in nature.

Chumbley identified Allen’s Snapchat name as “Brady Allen” with the account name: “wrath1989.” I confirmed Allen was born in 1989. On or about March 3 and March 4, 2020, Chumbley received the following messages from Allen over Snapchat:

Allen: 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 *purple devil emoji*

Allen: How’s that for a plan?

Allen: What time do you get off?

Allen: 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...

Allen: You’re killing me here.

Allen: Do you have any interest in getting together?

Allen: 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.

I have viewed screenshots (saved by Chumbley) of the above messages. According to Chumbley, when Allen referred to her “situation”, he was talking about the DUI prosecution. Chumbley understood these messages to mean Allen would talk to her about her DUI prosecution while she had sex with him and he would give her legal advice regarding her DUI case while she used her mouth to perform a sexual act on him.

My investigation and interviews revealed that Allen also asked Chumbley to send him nude photographs and videos of her multiple times over Snapchat; Chumbley indicated Allen was persistent in this regard. And therefore, she sent a nude photograph to him over Snapchat. Chumbley believes Allen saved the photograph to his cell phone’s camera roll because she received a notification to that effect on Snapchat.

Before the COVID-19 pandemic and the corresponding court closures, on or about February 18, 2020, Chumbley saw Allen in court. She was wearing her Apple watch, and she received a Snapchat message from Allen. The message said she looked pretty. Chumbley was unable to bring her phone into the courtroom, and did not reply until she left the courtroom. According to Chumbley, Allen sent this message when he was up before the Judge’s bench, and she was waiting for her case to get called.

Between September 2019 and August 2020, Allen and Chumbley also communicated on Facebook Messenger. At the time, Allen’s Facebook name was “Brady Allen”. On or about July 24, 2020, Allen messaged Chumbley asking if she did not trust him. At this time, Allen was no longer the assigned prosecutor on her DUI case. She told him that she was going to get her first DUI amended to Reckless

Driving, so she wanted to keep her distance. On or about July 28, 2020, Allen told Chumbley that he was not trying to hide that he's "been interested in getting with" Chumbley and/or Brianna Lee now that he "was no longer on [their] cases." Allen also said that Brianna Lee did not seem to "lose interest" like Chumbley did around April. Allen continued to compare Brianna Lee and Chumbley and said Chumbley was more "conservative in that area" than Brianna Lee was. Allen also wrote to Chumbley that he is "[. . .] just like a slut for someone [he] would date." Chumbley messaged Allen that she does not "put out for everyone," and Allen replied, in part, "you wouldn't want to date a guy who is into the stuff I'm into." The conversation ended with Allen asking to take Chumbley and Brianna Lee out for dinner. He also asked that they "act like friends," and that she not kick him off Snapchat. Through interviews, I learned that Chumbley understood this conversation to mean she was not as willing to fulfill Allen's sexual desires as Brianna Lee.

This Affiant has reviewed screenshots of these messages, which were provided to and reviewed by the Illinois State police, and can confirm that the account named "Brady Allen" had a profile photograph that matched Allen's physical appearance.

I also learned that Chumbley and Allen communicated through text messages. According to Chumbley, when she and Allen began to discuss court matters, Allen would text Chumbley asking for her to call him. However, on one occasion, around March 2020, Chumbley texted Allen asking him if she should accept a plea deal – he was the prosecutor on the case. Chumbley was represented at the time by attorney Todd M. Reardon. Chumbley told Illinois State Police that she did not feel comfortable telling her attorney about her conversations with Allen until their first court date after the COVID-19 shutdown. According to Chumbley, this is when she learned Allen was no longer the prosecutor on her case. On August 21, 2020, Attorney Reardon filed a Motion to Dismiss in Chumbley's criminal court cases pending in Coles County: 19DT76 and 19DT100. On January 25, 2021, Chumbley entered a plea to Driving Under the Influence of Alcohol (Case number 2019DT100) in exchange for Court Supervision. Pursuant to this plea, Chumbley's other Driving Under the Influence of Alcohol (Case number 2019DT76) was dismissed.

Based on investigation and interviews, I learned that Chumbley's known phone numbers include: 217-294-0246.

Brianna Lee ("Lee")

Coles County State's Attorney Jesse Danley ("SA Danley") requested that Lee be interviewed by the Mattoon Police Department ("MPD") after Chumbley's allegations came to light. After watching the interview, which occurred on August 24, 2020, SA Danley requested that the Appellate Prosecutor handle all cases with known or alleged victims of Allen. The same day of the interview, Allen texted Lee. According to Lee, they discussed news media covering the allegations, and Allen said if there is no proof, he is good.

Lee told the MPD she communicated with Allen on Tinder, Snapchat, by text message, and phone call. She said the messages were sexual in nature, and included her sending nude photographs on Snapchat. Lee believes Allen saved those photographs because Snapchat notified her they were saved to a camera roll. Lee told the MPD that Allen told her she "needs him." At the time, he was no longer the prosecutor on her DUI, but Lee had matters pending in other courtrooms, including the misdemeanor courtroom where Allen was reassigned. Allen also offered to "sway" the new traffic prosecutor, whom Allen identified as "Larry" to assist Lee in getting a favorable result in her DUI case. This Affiant is aware that the traffic prosecutor that replaced Allen was Assistant State's Attorney Lawrence Brandel. Lee also told the MPD that Allen asked her to get Chumbley not to testify against him. In exchange, Allen said he would pay Lee's remaining court costs, including restitution owed by Lee to Chumbley in an unrelated Criminal Damage to Property case.

Lee agreed to let the MPD dump her cell phone during the interview. In reviewing the content collected from the phone dump, Illinois State Police investigators learned that Lee and Chumbley had or have profiles on OnlyFans. OnlyFans is a website or application where individuals sell photographs or videos. It is often used for adult-only content. Lee and Chumbley were using OnlyFans as a means to make money.

Lee was re-interviewed on November 30, 2020, by the Illinois State Police. This time, she had an attorney present. During this interview, Lee said she and Allen matched on Tinder in October 2018. The day they matched on Tinder, Allen invited Lee to his office for a “nooner,” which Lee took to mean having sexual intercourse over his lunch hour. A search on Dictionary.com reveals the definition of “nooner” to be: “(1) an activity to be taken during lunch, and 2) a brief midday sexual encounter.” (cite: [Nooner Definition & Meaning | Dictionary.com](#), last visited 9/13/2022). Lee said she did not see him in person until her November 2018 court date. According to Lee, this is when she learned he was the prosecutor on her DUI. After court, they messaged each other on Tinder. After communicating on Tinder, Lee and Allen messaged on Snapchat. During my investigation and through interviews, I learned that in June or July 2019, Allen asked Lee to send him nude photographs of herself over Snapchat. Lee sent him several nude photographs between June 2019 and August 2020. Allen also gave Lee legal advice, and discussed Lee’s court cases with her on Snapchat. On one occasion Allen suggested Lee’s DUI could be amended to Reckless Driving. Lee asked Allen how, and Allen said if she gives him “a little nudge” or “motivation”. Lee understood this to mean she’d benefit from sending Allen nude photographs or by performing sexual acts with Allen. Lee told investigators she expressed concerns to Allen that this would be prostitution; however, Allen responded that it was not prostitution if it was recorded – then it would be pornography. During Lee’s interview, she admitted to selling nude photographs on OnlyFans.

Lee also told Illinois State Police that in April or May 2020, Allen messaged her on Snapchat telling her he was the type of person she would want on her side. Allen then offered to talk with the new traffic court prosecutor on Lee’s behalf. Allen also offered to write positive notes in Lee’s prosecution file, which would allow her to receive a better outcome on her case than if Allen did not write any notes. He said he would make it look like the new prosecutor wrote the notes.

Through investigation and interviews, I learned that between 2019 and 2020, Lee and Chumbley learned that they were both talking with Allen. Lee and Chumbley addressed this directly with Allen. Lee recalls that Allen sent her a Snapchat saying, it was “inappropriate but it wasn’t illegal.”

Lee told the Illinois State Police that between July and August 2020, after Chumbley made these allegations public, Allen offered to pay Lee’s court costs (including restitution for a case in which Chumbley was the complaining witness) if Lee could get Chumbley to not pursue a complaint against him. The estimated amount of restitution was \$365.00. Lee also owed approximately \$880.00 in fines and court costs. Allen also offered for Lee to live with him for a period of time. Allen asked Lee to talk to Chumbley multiple times. He would call, text, and Snapchat Lee for updates.

In late November 2020, Lee and Allen spoke through Facebook Messenger. I have reviewed those messages which include Allen initiating discussions with Lee about her interviews with law enforcement. Allen then referenced Lee’s financial situation and mental health. Allen says he assumes the worst, but hopes he will “find out that it’s all just a misunderstanding.” Allen also asked to meet with Lee to talk. He told Lee he cared for her a lot, that she’s always on his mind, and he “[. . .] will consider [her] a friend until [he’s] proven wrong.”

Allen also emailed Lee from his work email address. Lee’s personal email address at that time was b.lee98@hotmail.com. Lee first emailed Allen on May 23, 2019, where she provided her case number and asked to get a future court date so she can complete her drug & alcohol evaluation. Lee provided a phone number he can reach her at: 217-259-1872. Allen emailed Lee back on December 12, 2019, more than six

months later. At this time, I believe Lee and Allen communicated by other means between May 2019 and December 2019. In his December 12, 2019 email, Allen told Lee that they received a copy of her sworn report, which she needed to get her evaluation. Lee replied: “hahahaha oh lord. That’s actually good and really sad at the same time. I’ll come by and get it so I can schedule another evaluation. THANK YOU for the email, for real?”

Based on investigation and interviews, I learned Lee’s known phone numbers include: 217-790-0681, 217-259-1872, and 217-250-1192.

Ashley Daigle (“Daigle”)

On March 4, 2021, Ashley Daigle (“Daigle”) contacted SA Danley to report she also had concerning interactions with Allen. On March 10, 2021, Illinois State Police met with Daigle, who reported that she “matched” with Allen on Tinder in 2018. During an early conversation with Daigle, Allen mentioned he was an Assistant State’s Attorney, and Daigle indicated she was on the “other side of the law.” After matching on Tinder, Allen and Daigle communicated via text message. According to Daigle, it reached the point where Allen would “blow up” Daigle’s phone – on one occasion, Allen texted Daigle almost 30 messages in a row. Daigle recalls receiving one text message where Allen said he would have given her a better deal if she came in to talk with him privately or wore a mini skirt. On another occasion, when Daigle was not responding to Allen’s text messages, Allen said he pulled Daigle’s address from her case file and would send the police for a welfare check. At this point, Daigle felt uncomfortable and blocked his number.

About a year after matching on Tinder, Allen and Daigle matched on the Facebook dating application. In Facebook Messenger, Allen asked Daigle to go on a trip with him. At the time, Daigle’s DUI, which was pending in Coles County, had not yet concluded, and Allen was the assigned prosecutor. Daigle was represented by attorney Monroe McWard. Daigle told Illinois State Police that she did not tell her attorney about her conversations with Allen because she was afraid she would get in trouble.

In March or April 2020, Allen and Daigle matched again *via* the Facebook dating application. Daigle’s account name at this time was “Ash Jean”. Their conversations were sexual in nature. Allen sent her photographs of him shirtless. Daigle and Allen also spoke on the phone at least one time. Between the first and second time they matched on the Facebook dating application, Daigle saw Allen in court.

On or about September 26, 2021, Daigle messaged Allen on Facebook asking him if he should have removed himself from her DUI prosecution considering the “intentions that were said and implied” on Tinder. Daigle also mentions that she had to block him to get him to stop messaging her. Allen responded to Daigle that her DUI prosecution had already concluded when they spoke. He acknowledged sending her messages and said he never meant to seem “pushy”. Daigle then references Allen’s prior “short skirt” comment, which Allen claimed was a joke. Allen does not deny communicating with Daigle on Tinder or through Facebook dating. According to Daigle, between 2018 and 2020, Allen requested she send him photographs and videos of her having sex with other men and women. When Daigle confronted Allen regarding these requests in the September 2021 conversation, Allen said it “sounds like a joke I would crack.”

Based on investigation and interviews, I learned Daigle’s known phone numbers include: 217-820-0694, 217-561-3309, 217-820-0313, and 217-343-1778.

Stephanie Beltran (“Beltran”) & Mae Holec (“Holec”)

My investigation revealed additional women who Allen prosecuted that were subject to unusually informal communications.

One woman was Stephanie Beltran. On or about August 23, 2019, Allen and Beltran emailed back and forth regarding a traffic citation. Beltran uses the email Stephanie.beltran05@gmail.com. At one point, Allen emailed Beltran “by no means am I trying to blow you off”, to which Beltran replies “I d[o]n’t feel like you’re blowing me off, by any means :)” In reviewing their email communications, it appears Beltran had at least one in-person meeting with Allen. On October 3, 2019, Sam Gaines, a Deputy Chief with the Mattoon Police Department, copied Allen on an email to his staff. No other State’s Attorney employee was copied on the email. The email reflected: “The SAO has asked that any reports made by Stephanie Beltran pertaining to Shane Phelps stalking or harassing her be at least reported for SAO review.” Notably, Deputy Chief Gaines referenced vehicles that Shane Phelps may be driving and included Todd Reardon’s 2002 model Chevy Cavalier. Earlier that day, Allen emailed Gaines notifying him that Phelps had a suspended driver’s license. Allen also asked Gaines to “encourage [his] officers to entertain Ms. Beltran’s or any other reports of Phelps driving” because he “would VERY much like [to] catch Phelps driving, and any chance of catching him doing so---especially any incident when it might be caught on camera---would be of particular interest to [him].” In his email to Gaines, Allen communicated that Beltran had a pending Assault charge where Shane Phelps was the complaining witness, and she “isn’t the most reliable witness”. On November 13, 2019, Beltran gave Allen her cell phone number: 217-254-4266 *via* email.

My investigation revealed Mae Holec’s email is qholec@gmail.com. The email account reads “Quinn Holec”, but she signed her emails as Mae. Allen emailed Holec on September 30, 2019, stating “nice meeting with you today. I checked downstairs, and it looks like I need the judge to sign off on extending your time—which shouldn’t be a problem. I will just ask him about that in court tomorrow. I won’t need you to show up unless you just really want to. Lol”. Holec replies: “Nice meeting you as well! Thank you again for taking the time to meet with me today. As tempting as that sounds lol, I do however have class, but I can make it if you need me to. Please keep me updated :)”.

Brady Allen

According to emails sent and received by Allen, Allen was reassigned from the traffic courtroom to the misdemeanor courtroom on or about February 20, 2020 through June 2, 2020. It appears Allen worked on some traffic matters as he transitioned to his new position.

On August 23, 2020, Allen allegedly issued a written press release, which he signed. The press release reads in part: “It is true that I and Ms. Chumbley had a relationship outside of court based entirely over social media. . . . 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.”

Other ethics violations

During the course of Allen’s employment at the Coles County State’s Attorney’s Office, defense attorneys raised concerns on more than one occasion regarding Allen’s ethics. For example, a Partner at a criminal defense law firm emailed Allen on June 11, 2020, saying she found it inappropriate for a court date to be set without coordinating with the attorney of record. She also did not believe it was appropriate that Allen had “direct contact with [her client]”.

Similarly, on May 6, 2020, a private defense attorney contacted Allen over email indicating a witness contacted them saying she received a telephone call from someone identifying themselves as “Brady” with

the telephone number: 618-525-1044. Through my investigation, I learned this was Allen’s personal cell phone number. This witness said “Brady” told her about statements the defendant said. Defense counsel asked that any statements be disclosed. He also asked for copies of any text message conversations between Allen and the witness. Allen said that was his personal cell phone number, but he does not use it at work because of a “personal boundary [he’s] established for [him]self.” Allen denied calling the witness, but did say he texted her. Allen, who initiated the text conversation from his personal cell phone, told the attorney “it was not [his] intention for [the witness] to be given this number, but rather [his] office number.”

The same defense attorney emailed Allen again on May 14, 2020, after the witness provided him with screenshots of her text messages with Allen. At this point, the case was set for a final pre-trial conference. The defense counsel, in an email to Allen, said: “If you call witnesses, I will now be forced to cross-examine them with text messages that you sent suggesting what things you thought I would argue and what answers witnesses should give.” This defense counsel thought Allen should be disqualified as the prosecutor on the case because he was now a witness. In the text message to the witness, Allen says: “So basically here is the situation. If this goes to trial, his attorney is going to try to say he wasn’t the one who sent it—that someone else had his phone. So I need someone who was there to say, yes, he was in that class and that movie was playing that day. If you’re uncomfortable being that person who goes on the stand and says, ‘Yes, he was in class that day’ then I have to try to get hold of this instructor and have him testify that he was there. Would you be uncomfortable being the one to do that, even if we subpoenaed you so you could tell him you didn’t have a choice?” The witness said she was uncomfortable testifying.

Throughout his time as an Assistant State’s Attorney, Allen picked which defendants he chose to set boundaries with. For example, on April 8, 2019, Allen emailed a male defendant that he was not permitted to get lunch with him. I also learned that when a defendant called the office, they usually spoke to Allen’s secretary. In a January 3, 2020, email to a *pro se* defendant, Allen asserted that his secretary kept a call log for everyone who tried to reach him. Finally, when *pro se* defendants asked to speak with Allen on the phone, Allen referred back to the following language in his email replies: “I don’t discuss cases over the phone to avoid misunderstandings. We can either discuss it over email or I can set you up with an appointment to come in and discuss it with me.” He used this language often, which is inconsistent with other conversations this investigation has uncovered, which include Allen discussing cases with female criminal defendants through calls from his personal phone number, text message, Snapchat and Tinder.

Complainant alleges, upon information and belief as set forth herein, that AT&T possesses items of evidentiary value necessary to assist in the investigation of the aforementioned offense(s).

WHEREFORE, I respectfully request that the search warrant be issued as applied for herein.

Sgt. Windy Westfall #5210
Sergeant Windy Westfall
Illinois State Police (Special Investigations Unit)

Subscribed and sworn
before me on 9-22, 2022

[Signature]

Judge

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

SEARCH WARRANT

FILED
22MX310
SEP 20 2022
Melissa Hurst
Circuit Clerk COLES COUNTY, ILLINOIS

PLACE TO BE SEIZED AND ITEMS TO BE SEIZED:

On this day, **Sergeant Windy Westfall, of the Illinois State Police (Special Investigations Unit)**, has subscribed and sworn to a Complaint for a Search Warrant before me. Upon examination of the Complaint, I find that it states facts sufficient to show probable cause; I therefore command you to search:

AT&T (Attn: Global Legal Demands Center), located at 11760 U.S. Highway 1, Suite 300, North Palm Beach, FL 33408, and therefrom to seize the following instruments, articles, and things, including records pertaining to the AT&T account(s) associated with the following individual:

Brady Lee Allen

Date of birth: 03/08/1989

Phone: 618-525-1044

Phone: 618-303-1088

Address: 1202 Lincoln Avenue, Apartment 35, Charleston, Illinois 61920

Email: brady_allen89@yahoo.com & BALLen@co.coles.il.us

The following information with respect to the above AT&T account(s) for the date period between October 1, 2018, and September 30, 2021, to wit:

1. Basic subscriber information, records, data or documents containing name, address, local and long distance telephone connection records or records of session time and duration, length of services (including start dates and types of services utilized), telephone or instrument number or other subscriber number or identity (including any temporarily assigned network address and any International Mobile Equipment Identity number), the means and source of payment for the service (including credit card or bank account number);
2. Location information, including any information, records, data or documents concerning the location of the electronic device that is in whole or in-part generated by or derived from the operation of the device utilizing the telephone number stated above, including all cell site activations and sectors for all incoming and outgoing calls, together with a complete listing (electronic/electronic mail provided if possible) of cell site identification number, physical address, latitude and longitude, sector identifiers, and true orientations/facings of all cell sites (including omni-directional and sectorized) in the market where the Target Device may be located; together with nationwide System Identify/Billing Identity (SID/BID) listing; and an engineering map identifying the same (if the provider possesses such an orientation(s). A list of any and all applicable cellular site(s)' number(s), locations(s), address(es), and/or latitude and longitude of any said site(s). Also, that cellular site(s)', list(s), latitude(s) and longitude(s), be provided, via electronic mail, in an electronic format, if available and/or possible;
3. Non-content Short Message Service (SMS) data (e.g. the automated systems messages delivered to a device from the network) for messages sent to and received from any of the following phone numbers:

217-790-0681;

217-259-1872;

217-250-1192;
217-294-0246;
815-685-7566;
217-460-0049;
217-820-0694;
217-561-3309;
217-820-0313; and
217-343-1778;

4. Text message records, such as detailed information in reference to all known sent and received text messages, including but not limited to: dates and times text messages were sent and received, phone numbers to which messages were sent or received, and content sent or received (e.g. text, photographs and video) for messages sent to and received from any of the following phone numbers:

217-790-0681;
217-259-1872;
217-250-1192;
217-294-0246;
815-685-7566;
217-460-0049;
217-820-0694;
217-561-3309;
217-820-0313; and
217-343-1778;

5. Call detail records, including detailed information in reference to all known outgoing and incoming calls associated with the following phone numbers, dates and times the calls were made, and duration of the calls made or received:

217-790-0681;
217-259-1872;
217-250-1192;
217-294-0246;
815-685-7566;
217-460-0049;
217-820-0694;
217-561-3309;
217-820-0313; and
217-343-1778;

6. Data and information identifying any device associated with the above account(s) including but not limited to the make, model, year and serial number associated with the device; the date the device became associated with the above account; personal cloud account information associated with the above account(s) including but not limited to account name, date of creation, account status, amount of storage and storage used, the type of content stored; any photos, videos, contacts saved to the personal cloud account; any and all payment information for the personal cloud account including credit card or debit card number or bank account number and associated payment information; date, time and IP address when data, information or content was saved to or uploaded to the personal cloud; date, time and IP address when data, information or content was deleted from the personal cloud; history of content being restored to devices from personal cloud account(s); and

- 7. Any data, information or content stored, uploaded to, edited in, or deleted from the account's personal cloud including but not limited to photos, videos, contacts, documents, voice memos, audio recordings, screenshots, files, or attachments that were created, uploaded, edited or deleted between October 1, 2018 through September 30, 2021.

Which constitutes evidence of the offenses of: **Official Misconduct**, in violation of 720 ILCS 5/33-3; and **Bribery**, in violation of 720 ILCS 5/44-1.

YOU ARE NOT TO DISCLOSE THE EXISTENCE OF THIS SEARCH WARRANT UNTIL AFTER AT LEAST 90 DAYS OF THE DATE OF ISSUANCE. DOING SO MAY IMPEDE AN ONGOING INVESTIGATION.

All records to be provided in an electronic format and be disclosed to Sergeant Windy Westfall or Master Sergeant Matthew Barber or any other law enforcement with the Illinois State Police.

I further command that a return of anything so seized shall be made without unnecessary delay before me, or before any Court of competent jurisdiction.

Date of issuance: 9-20-22
 Time 8:30 (A.M.)/P.M.
MaOz

Judge

CERTIFIED TRUE COPY
 Date 9-20-22
Melissa Hurst
 CIRCUIT CLERK COLES CO

FILED
SEP 20 2022

**STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE 5TH JUDICIAL CIRCUIT
COUNTY OF COLES**

Melissa Hurst
Circuit Clerk COLES COUNTY, ILLINOIS

IN RE: *ILLINOIS STATE POLICE*
INVESTIGATION 20-1005-SP-SIU

NO. 2022-MX-310

MOTION TO SEAL SEARCH WARRANT

NOW COME the People of the State of Illinois by and through the Attorney General of the State of Illinois, Kwame Raoul, and his assistant, Mara Somlo, and respectfully request the Court to seal all documents filed in the above-entitled cause. In support of this motion, the People state as follows:

1. A Search Warrant is being sought to further an ongoing criminal investigation.
2. The Complaint for Search Warrant and Search Warrant contain confidential information regarding the details of the pending investigation, including, but not limited to, statements of witnesses and physical evidence.
3. A Seal Order is necessary to protect the integrity of the investigation, the public interest, including officer safety, and the safety of any cooperating witness.

WHEREFORE, the People of the State of Illinois respectfully request that for the compelling reasons stated above, that the Court seal the above Complaint, Search Warrant, and any additional documents and filings under the case number until further order of the Court consistent with the Supreme Court rules of discovery.

I, Mara Somlo, of the Office of the Illinois Attorney General, being duly sworn according to law, do on oath say that the matters and things set out in the within petition are true, to the best of my knowledge and information and belief.

THE PEOPLE OF THE STATE OF ILLINOIS
BY: KWAME RAOUL
ILLINOIS ATTORNEY GENERAL



Mara Somlo
Assistant Attorney General
Illinois Attorney General's Office
100 W. Randolph Street, 12th Floor
(773) 758-4623
Mara.somlo@ilag.gov

CERTIFIED TRUE COPY
Date 4/20/2022
Melissa Hurst
CIRCUIT CLERK COLES CO

FILED
SEP 20 2022

**STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE 5TH JUDICIAL CIRCUIT
COUNTY OF COLES**

Melissa Hurst
Circuit Clerk COLES COUNTY, ILLINOIS

IN RE: *Illinois state police
investigation 20-1005-SP-SIU*

NO. 2022-MX-310

ORDER

Pursuant to the Motion to Seal Search Warrant, having been duly advised of the premises,
the Court hereby grants the Motion to Seal the Search Warrant until further order of the Court.

ENTER: 9-20-22



Judge

CERTIFIED TRUE COPY
Date 9/20/22
Melissa Hurst
CIRCUIT CLERK COLES CO

STATE OF ILLINOIS)
) SS.
COUNTY OF COLES)

FILED
22MX313 SEP 20 2022

Melissa Hurst
Circuit Clerk COLES COUNTY, ILLINOIS

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

COMPLAINT FOR SEARCH WARRANT

I. PLACE TO BE SEARCHED AND ITEMS TO BE SEIZED

Now appears **Sergeant Windy Westfall**, of the Illinois State Police (Special Investigations Unit), Complainant, before the undersigned judge of the Fifth Judicial Circuit Court, requesting the issuance of a Search Warrant to search the premises of **Meta Platforms, Inc.**, located at **1601 Willow Road, Menlo Park, CA 94025** ("Facebook"), and to seize the following instruments, articles and things which have been used in the commission of, or which constitute evidence of, the offense(s) of **Official Misconduct**, in violation of **720 ILCS 5/33-3**; and **Bribery**, in violation of **720 ILCS 5/44-1**, to include records pertaining to the Facebook account(s) associated with the following individuals:

Brady Lee Allen ("Allen")

Date of birth: 03/08/1989

Known phone numbers: 618-525-1044 & 618-303-1088

Address: 1202 Lincoln Ave, Apartment 35, Charleston, Illinois 61920

Email: brady_allen89@yahoo.com & BAllen@co.coles.il.us

Brianna Lee

Date of birth: 11/24/1998

Known phone numbers: 217-790-0681, 217-259-1872 & 217-250-1192

Address: 1316 Shelby Avenue, Mattoon, Illinois 61938

Email: b.lee98@hotmail.com

Kara Chumbley

Date of birth: 11/15/1998

Known phone number: 217-294-0246

Address: 112 North 11th Street, Mattoon, Illinois 61938

Halie Michalski

Date of birth: 12/31/1997

Known phone number: 815-685-7566

Address: 13122 Blackstone Lane, Plainfield, Illinois 60585

Email: hmmichalski@eiu.edu

Carlie Wilson

Date of birth: 03/06/2001

Known phone number: 217-460-0049

Address: 2001 Laker Avenue, Apt. #3, Mattoon, Illinois 61938

Email: carleewilson22@gmail.com

Ashley Daigle

Date of birth: 02/09/1991

Known phone numbers: 217-820-0694, 217-561-3309, 217-820-0313, & 217-343-1778
Address: 1638 State Highway 16, Shelbyville, Illinois 62565

On the following dates/times: **October 1, 2018, through September 30, 2021**, to wit:

1. **Basic subscriber information:** including by way of example but not limitation, the user identification number; name; e-mail address; date and time stamp of account creation; most recent logins; any and all registered mobile telephone number(s) associated with the listed account;
2. **Expanded subscriber content:** including by way of example but not limitation, profile contact information; mini-feed; status update history; shares; notes; wall postings; friend listings; Facebook ID's; group listings to include Facebook group ID's; future and past events; video listing with file names;
3. **Stored active sessions:** including date, time, device, IP address, machine cookie and browser information;
4. **Current and past address(es) associated with this account:** including by way of example but not limitation, current city, hometown and other places lived;
5. **Alternate names the account holder has on the account:** including by way of example but not limitation, nicknames or aliases;
6. **Third-party applications (or "apps")** the account holder subscribes to;
7. A history of the conversations Brady Allen had on **Facebook Chat** with Brianna Lee, Kara Chumbley, Halie Michalski, Carlie Wilson, *and* Ashley Daigle;
8. **Credit card information**, including account name, account number and expiration date used in conjunction with this account;
9. **Email addresses** added by the account holder, including email addresses that may have subsequently been removed;
10. **Events** Brady Allen and Brianna Lee, Kara Chumbley, Halie Michalski, Carlie Wilson, *and* Ashley Daigle have been invited to or joined;
11. A list, including but not limited to user names and account information, detailing **whether any of the following individuals follow Brady Allen's account(s):** Brianna Lee, Kara Chumbley, Halie Michalski, Carlie Wilson, *and* Ashley Daigle;
12. A list, including but not limited to user names and account information, detailing **whether Brady Allen follows the account(s) for any of the following individuals:** Brianna Lee, Kara Chumbley, Halie Michalski, Carlie Wilson, *and* Ashley Daigle;
13. A list, including but not limited to user names and account information, of **pending, sent and received friend requests** between Brady Allen's account(s) and account(s) for any of the following individuals: Brianna Lee, Kara Chumbley, Halie Michalski, Carlie Wilson, *and* Ashley Daigle;
14. A list of **physical addresses** where Brady Allen has logged into his Facebook, Inc. account;
15. A list of the accounts this account holder has **linked to his Facebook, Inc. account;**
16. A list of **IP addresses**, dates and times associated with logins and logouts to Brady Allen's Facebook, Inc. account;
17. **Archives** of messages Brady Allen has sent and received on Facebook, Inc. including but not limited to messages through Facebook Messenger with Brianna Lee, Kara Chumbley, Halie Michalski, Carlie Wilson, *and* Ashley Daigle;
18. A list of **video chats or audio calls** through Facebook Messenger between and among Brady Allen and the following accounts: Brianna Lee, Kara Chumbley, Halie Michalski, Carlie Wilson, *and* Ashley Daigle, including but not limited to: the date of the video chat or audio call, who initiated the video chat or audio call, whether the video chat or audio call was received, and the duration of the video chat or audio call;
19. **Mobile phone numbers** the account holders have added to their accounts, including by way of example but not limited to verified mobile numbers he/she has added for security purposes;

20. **Photographs**, in their original format, connected to Brady Allen, Brianna Lee, Kara Chumbley, Halie Michalski, Carlie Wilson, *and* Ashley Daigle either by facial recognition or communications, that the account holders have uploaded to his/her account, including metadata information such as the date and time the photo was taken, GPS coordinates, make, model and possibly serial number of the device used;
21. **Videos**, in their original format, connected to Brady Allen involving, among, including or in any way connected to Brianna Lee, Kara Chumbley, Halie Michalski, Carlie Wilson, *and* Ashley Daigle either by facial recognition or communications, that the account holders have uploaded to his/her account, including metadata information, including by way of example but not limitation, the date and time the photo was taken, GPS coordinates, make, model and possibly serial number of the device used;
22. **Posts** by Brianna Lee, Kara Chumbley, Halie Michalski, Carlie Wilson, *and* Ashley Daigle to her own timeline, including by way of example but not limitation, photos, videos and status updates involving, among, including or in any way connected to Brady Allen;
23. **Posts** between and among the timeline or profile of any of the following account holders: Brady Allen, Brianna Lee, Kara Chumbley, Halie Michalski, Carlie Wilson, *and* Ashley Daigle, including by way of example but not limitation, photos, videos and status updates;
24. **Screen names** the account holder has added to his account, the service they are associated with, and whether these names are hidden or visible on the account; and
25. **Other accounts and all account information** that may be associated with this account after it has been identified.

Your Affiant believes that the foregoing instruments, articles and things are located within the records of Meta Platforms, Inc. ("Facebook"), located at 1601 Willow Road, Menlo Park, CA 94025.

All records to be provided in an electronic format and be disclosed to Sergeant Windy Westfall or Master Sergeant Matthew Barber or any other law enforcement personnel with the Illinois State Police.

In support of the foregoing, your Affiant states the following facts:

II. INVESTIGATOR BACKGROUND

I, Sergeant Windy Westfall, am an Investigator and sworn law enforcement officer in the State of Illinois and as such am authorized to execute search warrants. I have been employed with the Illinois State Police for 22 years. I have investigated criminal violations in the State of Illinois for 16 years, including but not limited to allegations of Official Misconduct and Bribery. Throughout my career, I have attended trainings related to social media, including but not limited to trainings in the proper identification, preservation, and collection of digital devices and storage media. I have also attended trainings in the proper identification, preservation, and analysis of social media records. I have extensive knowledge of regular usage of several social media platforms. I have investigated over 50 cases involving computers or internet crimes that resulted in numerous arrests and convictions.

Facebook is a social media network that connects people through an online platform. Users can share content like text status posts, images, videos, and external links like blog posts. They can also engage with the content other people share on Facebook by reacting to it with a like, a laugh, disapproval, and even a hug.

The Facebook profile consists of your name, photo, hometown, workplace, education history, among other information. You can make your profile as public or private as you want by disabling the information you

don't want publicly visible.

The newsfeed is where all of your friends' posts will appear. You'll also see updates from business pages that you've liked. Your posts will also appear in the newsfeed where your friends can see them.

The timeline is your personal record of all the posts you've shared and posts you've interacted with. While you won't usually see friend's status updates here, there is one exception — if they've tagged you in a post or a photo, it'll appear on your timeline. Your friends can see your timeline by default if they search your name unless you've set your privacy settings to do the contrary.

Status/Post are two terms that are often used interchangeably, but "post" is the term Facebook uses to describe something you share on the newsfeed. Text, images, videos, and location are just a few of the types of posts you can share to the newsfeed for your friends to see.

I also know through my own experiences and those of other Law Enforcement Officers that Facebook owns and operates a free-access social networking website of the same name that can be accessed at <http://www.facebook.com>. Facebook allows its users to establish accounts with Facebook, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook users, and sometimes with the general public.

Facebook asks users to provide basic contact information to Facebook, either during the registration process or thereafter. This information may include the user's full name, birth date, contact e-mail addresses, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers. Facebook also assigns a user identification number to each account.

Facebook users can select different levels of privacy for the communications and information associated with their Facebook accounts. By adjusting these privacy settings, a Facebook user can make information available only to himself or herself, to particular Facebook users, to all Facebook users, or to anyone with access to the Internet, including people who are not Facebook users. Facebook accounts also include other account settings that users can adjust to control, for example, the types of notifications they receive from Facebook.

Facebook users may join one or more groups or networks to connect and interact with other users who are members of the same group or network. A Facebook user can also connect directly with individual Facebook users by sending each user a "Friend Request." If the recipient of a "Friend Request" accepts the request, then the two users will become "Friends" for purposes of Facebook and can exchange communications or view information about each other. Each Facebook user's account includes a list of that user's "Friends" and a "Mini-Feed," which highlights information about the user's "Friends," such as profile changes, upcoming events, and birthdays.

Facebook users can create profiles that include photographs, lists of personal interests, and other information. Facebook users can also post "status" updates about their whereabouts and actions, as well as links to videos, photographs, articles, and other items available elsewhere on the Internet. Facebook users can also post information about upcoming "events," such as social occasions, by listing the event's time, location, host, and guest list. A particular user's profile page also includes a "Wall," which is a space where the user and his or her "Friends" can post messages, attachments, and links that will typically be visible to anyone who can view the user's profile.

Facebook has a Photos application, where users can upload an unlimited number of albums and photos. Another feature of the Photos application is the ability to "tag" (i.e., label) other Facebook users in a photo

or video. When a user is tagged in a photo or video, he or she receives a notification of the tag and a link to see the photo or video. For Facebook's purposes, a user's "Photoprint" includes all photos uploaded by that user that have not been deleted, as well as all photos uploaded by any user that have that user tagged in them.

Facebook users can exchange private messages on Facebook with other users. These messages, which are similar to e-mail messages, are sent to the recipient's "Inbox" on Facebook, which also stores copies of messages sent by the recipient, as well as other information. Facebook users can also post comments on the Facebook profiles of other users or on their own profiles; such comments are typically associated with a specific posting or item on the profile.

The Facebook Gifts feature allows users to send virtual "gifts" to their friends that appear as icons on the recipient's profile page. Gifts cost money to purchase, and a personalized message can be attached to each gift.

Facebook also has a Marketplace feature, which allows users to post free classified ads. Users can post items for sale, housing, jobs, and other items on the Marketplace.

In addition to the applications described above, Facebook also provides its users with access to thousands of other applications on the Facebook platform. When a Facebook user accesses or uses one of these applications, an update about that the user's access or use of that application may appear on the user's profile page.

Facebook uses the term "Neoprint" to describe an expanded view of a given user profile. The "Neoprint" for a given user can include the following information from the user's profile: profile contact information; Mini-Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the user's access and use of Facebook applications.

Facebook also retains Internet Protocol ("IP") logs for a given user ID or IP address. These logs may contain information about the actions taken by the user ID or IP address on Facebook, including information about the type of action, the date and time of the action, and the user ID and IP address associated with the action. For example, if a user views a Facebook profile, that user's IP log would reflect the fact that the user viewed the profile, and would show when and from what IP address the user did so.

Social networking providers like Facebook typically retain additional information about their users' accounts, such as information about the length of service (including start date), the types of service utilized, and the means and source of any payments associated with the service (including any credit card or bank account number). In some cases, Facebook users may communicate directly with Facebook about issues relating to their account, such as technical problems, billing inquiries, or complaints from other users. Social networking providers like Facebook typically retain records about such communications, including records of contacts between the user and the provider's support services, as well records of any actions taken by the provider or user as a result of the communications.

The facts set forth in this Complaint are based on your Affiant's personal knowledge and investigation. The Complaint is also based on knowledge your Affiant obtained from other individuals, including other law enforcement officers, your Affiant's review of documents related to this investigation, communications with others who have personal knowledge of the events and circumstances described in this Complaint, and

information gained through your Affiant's training and experience.

Your Affiant submits this Complaint for the limited purpose of showing there is sufficient probable cause to support issuing a warrant to search for, seize, and analyze the items identified herein. This Complaint does not purport to set forth all of your Affiant's knowledge of, or investigation into, this matter. Unless specifically indicated otherwise, all conversations and statements described in this Complaint are related in substance and in part only.

III. FACTS IN SUPPORT OF PROBABLE CAUSE

The Illinois State Police, Division of Criminal Investigation, Special Investigations Unit, was made aware of allegations of Official Misconduct and Bribery against then-Coles County Assistant State's Attorney Brady Allen ("Allen"), on August 12, 2020. On August 26, 2020, the Special Investigations Unit received an official request from Coles County State's Attorney Jesse Danley to conduct an investigation into Allen.

Throughout the course of my investigation, I identified several women who communicated with Allen in an unusual nature and through unusual channels, given his position as the Assistant State's Attorney assigned to each woman's criminal prosecution.

Through investigation and interviews, I learned Allen was born on March 8, 1989. He has two known phone numbers, both serviced by AT&T. Those numbers are: 618-525-1044 and 618-303-1088. Allen served as an Assistant State's Attorney in Coles County from December 2018 through August 2020. During his time at the Coles County State's Attorney's Office, Allen was assigned as the traffic prosecutor and misdemeanor prosecutor. Allen used his county-provided email address, BAllen@co.coles.il.us, to communicate interoffice, with defense counsel, victims, and *pro se* defendants. However, between December 2018 and August 2020, Allen also communicated with *pro se* defendants through his personal cell phone by way of text message, phone call, video chat, Snapchat, Facebook, and Tinder. These communications were with female defendants who were between 17 years old and 29 years old in 2018. All women were from the surrounding area. Allen did not communicate with all female defendants in this manner, but at this time, your Affiant is aware of Allen doing so with the following group of women:

Halie Michalski ("Michalski")

Through interviews and investigation, I learned that in April 2019, Michalski received a speeding ticket in Coles County. Allen was the prosecutor assigned to her case. Michalski recalls Allen sent her a "Friend Request" on Facebook, and a message through Facebook Messenger. Michalski said she did not accept his "Friend Request" or respond to his message, but she found it strange that he tried to contact her this way. In an email to Michalski (hmmichalski@eiu.edu) dated August 19, 2019, Allen said he ". . . [hasn't] forgotten [her].... And while [he's] of course disappointed [she] won't be joining [them] (in court), if [she is] sure [she's] good on having everything paid and [she's] really been good, [he'll] excuse [her] from court...". Allen also said that since she is no longer a defendant in this courtroom, she should "feel free to find [him] on Facebook and message [him] that way."

Carlee Wilson ("Wilson")

Through interviews and investigation, I learned that Wilson had both traffic and misdemeanor cases pending in Coles County between December 2018 and August 2020, including several matters where Allen was the assigned prosecutor. According to Wilson, she first exchanged cell phone numbers with Allen when she met him in his office to discuss her court cases. Throughout January 2020, Allen texted Wilson regarding her court cases. On January 17, 2020, Allen texted Wilson indicating there would be movement within the office, and he would only be handling traffic matters for a couple of more weeks. In a separate text message, Allen said he would "let it slide" that Wilson received a traffic ticket while she was already

on Court Supervision. This ordinarily would be a violation of Wilson's sentence, and a basis for Allen to file a Petition to Revoke.

In July 2020, Carlee Wilson was arrested for unlawful possession of drug paraphernalia in Coles County. Allen was the assigned prosecutor. On July 16, 2020, Wilson emailed Allen to try to arrange a meeting to discuss the case. Wilson's email address at that time was carleewilson22@gmail.com. On July 30, 2020, Allen emailed Wilson saying he "had shot [her] a message over Facebook because it was after hours when [he] was brainstorming on what to do with [her] situation . . .". After reviewing emails between Allen and Wilson, I believe the "situation" Allen refers to is the fact that Wilson 1) is already on a term of Court Supervision for another matter and/or 2) may not be eligible for Court Supervision given her driving and criminal history. On August 5, 2020, Allen emailed Wilson: "I think I can pull it off. Just keep that bit about the prior supervision on the down low, and I don't expect anyone to ask questions."

Based on my investigation, I learned Wilson spoke with Allen on his cell phone on more than one occasion. Wilson and Allen also communicated through Facebook Messenger. According to Wilson, they usually spoke about her court cases. Wilson's known phone numbers include: 217-460-0049.

Brianna Harshbarger ("Harshbarger")

Through investigation and interviews, I learned that Harshbarger was arrested in Coles County for Battery in July 2020. At the time, Harshbarger had a number of traffic and misdemeanor offenses pending in Coles County. Harshbarger emailed Allen regarding her case because he was the assigned prosecutor. Harshbarger's email address is amiyah62714@gmail.com.

On January 16, 2020, Allen emailed Harshbarger: "I don't normally like to do this, but you don't seem crazy to me, so I'm ok with doing it this way. I'm about to have to be in court for the rest of the afternoon, and won't be here tomorrow or Monday. So if you don't want to wait until I get back Tuesday, you can text me at 6185251044 (please keep that to yourself) and we can try to work out a time for a meeting to discuss your cases." Harshbarger told investigators Allen gave her his personal cell phone number, but she did not feel comfortable communicating with him in this manner.

On March 12, 2020, in an email exchange with Harshbarger, Allen wrote: "[o]n another note... [t]his might be none of my business, and this totally stays between you and me. Anything you say to me on this won't be relayed to Judge O'Brien. . . . [b]ut[,] I know you had been ordered in misdemeanor court to apply your entire tax return. You then asked if you could just pay \$1000 of it. And you sort of had a deer-in-the-headlights look. Had you by chance already spent the rest of it? You going to be able to make that payment? I was just a little concerned. This is coming from Brady Allen, the human being, not Brady Allen the prosecutor."

On May 6, 2020, in an email with the subject line "April 22 Incident", Allen wrote to Harshbarger: "Normally, I just have to go off of the report, but since I'm familiar with you, I wanted to reach out and hear what happened from your perspective and what the situation is now."

On June 22, 2020, in an email with the subject line "Domestic", Allen emailed Harshbarger saying "[n]ot to be a pest—just wanting to make sure you're good since I never heard back from you last week." Harshbarger replied that she had been out of state on vacation.

Other emails between Allen and Harshbarger are informal, and contain swear words and slang. On one occasion, Harshbarger asks for additional time to make payments on post-sentence traffic matters, to which Allen told her he "can continue whatever [he] want[s]. Haha. But yeah, the judge does not seem to be [her] biggest fan."

According to Harshbarger, they met at Allen's office at least one time between December 2018 and August 2020.

Kara Chumbley ("Chumbley")

Based on interviews and investigation, I learned Chumbley and Allen met in August or September 2019 at the Coles County Courthouse when she attended a court date for her DUI. Sometime thereafter, in December 2019 or January 2020, Chumbley and Allen "matched" on Tinder. Tinder is a dating application men and women use to establish romantic relationships, among other things. According to Chumbley, Allen messaged her first on Tinder, while he was the assigned prosecutor on her pending Coles County DUI. Chumbley knew of Allen through her long-time friend (and one time roommate, Brianna Lee), who told Chumbley about her interactions with Allen. In a Tinder message, Chumbley mentioned to Allen that he was the prosecutor on her case, and Allen told her it was ok as long as they were not dating. After that conversation, Allen asked Chumbley for her Snapchat name and they began communicating through Snapchat. According to Chumbley, most of the conversations between Chumbley and Allen were on Snapchat and were flirtatious and/or sexual in nature.

Chumbley identified Allen's Snapchat name as "Brady Allen" with the account name: "wrath1989." I confirmed Allen was born in 1989. On or about March 3 and March 4, 2020, Chumbley received the following messages from Allen over Snapchat:

Allen: 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 *purple devil emoji*

Allen: How's that for a plan?

Allen: What time do you get off?

Allen: 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...

Allen: You're killing me here.

Allen: Do you have any interest in getting together?

Allen: 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.

I have viewed screenshots (saved by Chumbley) of the above messages. According to Chumbley, when Allen referred to her "situation", he was talking about the DUI prosecution. Chumbley understood these messages to mean Allen would talk to her about her DUI prosecution while she had sex with him and he would give her legal advice regarding her DUI case while she used her mouth to perform a sexual act on him.

My investigation and interviews revealed that Allen also asked Chumbley to send him nude photographs and videos of her multiple times over Snapchat; Chumbley indicated Allen was persistent in this regard. And therefore, she sent a nude photograph to him over Snapchat. Chumbley believes Allen saved the photograph to his cell phone's camera roll because she received a notification to that effect on Snapchat.

Before the COVID-19 pandemic and the corresponding court closures, on or about February 18, 2020, Chumbley saw Allen in court. She was wearing her Apple watch, and she received a Snapchat message from Allen. The message said she looked pretty. Chumbley was unable to bring her phone into the courtroom, and did not reply until she left the courtroom. According to Chumbley, Allen sent this message when he was up before the Judge's bench, and she was waiting for her case to get called.

Between September 2019 and August 2020, Allen and Chumbley also communicated on Facebook Messenger. At the time, Allen's Facebook name was "Brady Allen". On or about July 24, 2020, Allen messaged Chumbley asking if she did not trust him. At this time, Allen was no longer the assigned prosecutor on her DUI case. She told him that she was going to get her first DUI amended to Reckless Driving, so she wanted to keep her distance. On or about July 28, 2020, Allen told Chumbley that he was not trying to hide that he's "been interested in getting with" Chumbley and/or Brianna Lee now that he "was no longer on [their] cases." Allen also said that Brianna Lee did not seem to "lose interest" like Chumbley did around April. Allen continued to compare Brianna Lee and Chumbley and said Chumbley was more "conservative in that area" than Brianna Lee was. Allen also wrote to Chumbley that he is "[. . .] just like a slut for someone [he] would date." Chumbley messaged Allen that she does not "put out for everyone," and Allen replied, in part, "you wouldn't want to date a guy who is into the stuff I'm into." The conversation ended with Allen asking to take Chumbley and Brianna Lee out for dinner. He also asked that they "act like friends," and that she not kick him off Snapchat. Through interviews, I learned that Chumbley understood this conversation to mean she was not as willing to fulfill Allen's sexual desires as Brianna Lee.

This Affiant has reviewed screenshots of these messages, which were provided to and reviewed by the Illinois State police, and can confirm that the account named "Brady Allen" had a profile photograph that matched Allen's physical appearance.

I also learned that Chumbley and Allen communicated through text messages. According to Chumbley, when she and Allen began to discuss court matters, Allen would text Chumbley asking for her to call him. However, on one occasion, around March 2020, Chumbley texted Allen asking him if she should accept a plea deal – he was the prosecutor on the case. Chumbley was represented at the time by attorney Todd M. Reardon. Chumbley told Illinois State Police that she did not feel comfortable telling her attorney about her conversations with Allen until their first court date after the COVID-19 shutdown. According to Chumbley, this is when she learned Allen was no longer the prosecutor on her case. On August 21, 2020, Attorney Reardon filed a Motion to Dismiss in Chumbley's criminal court cases pending in Coles County: 19DT76 and 19DT100. On January 25, 2021, Chumbley entered a plea to Driving Under the Influence of Alcohol (Case number 2019DT100) in exchange for Court Supervision. Pursuant to this plea, Chumbley's other Driving Under the Influence of Alcohol (Case number 2019DT76) was dismissed.

Brianna Lee ("Lee")

Coles County State's Attorney Jesse Danley ("SA Danley") requested that Lee be interviewed by the Mattoon Police Department ("MPD") after Chumbley's allegations came to light. After watching the interview, which occurred on August 24, 2020, SA Danley requested that the Appellate Prosecutor handle all cases with known or alleged victims of Allen. The same day of the interview, Allen texted Lee. According to Lee, they discussed news media covering the allegations, and Allen said if there is no proof, he is good.

Lee told the MPD she communicated with Allen on Tinder, Snapchat, by text message, and phone call. She said the messages were sexual in nature, and included her sending nude photographs on Snapchat. Lee believes Allen saved those photographs because Snapchat notified her they were saved to a camera roll. Lee told the MPD that Allen told her she "needs him." At the time, he was no longer the prosecutor on her DUI, but Lee had matters pending in other courtrooms, including the misdemeanor courtroom where Allen was reassigned. Allen also offered to "sway" the new traffic prosecutor, whom Allen identified as "Larry" to assist Lee in getting a favorable result in her DUI case. This Affiant is aware that the traffic prosecutor that replaced Allen was Assistant State's Attorney Lawrence Brandel. Lee also told the MPD that Allen asked her to get Chumbley not to testify against him. In exchange, Allen said he would pay Lee's remaining court costs, including restitution owed by Lee to Chumbley in an unrelated Criminal Damage to Property case.

Lee agreed to let the MPD dump her cell phone during the interview. In reviewing the content collected from the phone dump, Illinois State Police investigators learned that Lee and Chumbley had or have profiles on OnlyFans. OnlyFans is a website or application where individuals sell photographs or videos. It is often used for adult-only content. Lee and Chumbley were using OnlyFans as a means to make money.

Lee was re-interviewed on November 30, 2020, by the Illinois State Police. This time, she had an attorney present. During this interview, Lee said she and Allen matched on Tinder in October 2018. The day they matched on Tinder, Allen invited Lee to his office for a “nooner,” which Lee took to mean having sexual intercourse over his lunch hour. A search on Dictionary.com reveals the definition of “nooner” to be: “1) an activity to be taken during lunch, and 2) a brief midday sexual encounter.” (cite: Nooner Definition & Meaning | Dictionary.com, last visited 9/13/2022). Lee said she did not see him in person until her November 2018 court date. According to Lee, this is when she learned he was the prosecutor on her DUI. After court, they messaged each other on Tinder. After communicating on Tinder, Lee and Allen messaged on Snapchat. During my investigation and through interviews, I learned that in June or July 2019, Allen asked Lee to send him nude photographs of herself over Snapchat. Lee sent him several nude photographs between June 2019 and August 2020. Allen also gave Lee legal advice, and discussed Lee’s court cases with her on Snapchat. On one occasion Allen suggested Lee’s DUI could be amended to Reckless Driving. Lee asked Allen how, and Allen said if she gives him “a little nudge” or “motivation”. Lee understood this to mean she’d benefit from sending Allen nude photographs or by performing sexual acts with Allen. Lee told investigators she expressed concerns to Allen that this would be prostitution; however, Allen responded that it was not prostitution if it was recorded – then it would be pornography. During Lee’s interview, she admitted to selling nude photographs on OnlyFans.

Lee also told Illinois State Police that in April or May 2020, Allen messaged her on Snapchat telling her he was the type of person she would want on her side. Allen then offered to talk with the new traffic court prosecutor on Lee’s behalf. Allen also offered to write positive notes in Lee’s prosecution file, which would allow her to receive a better outcome on her case than if Allen did not write any notes. He said he would make it look like the new prosecutor wrote the notes.

Through investigation and interviews, I learned that between 2019 and 2020, Lee and Chumbley learned that they were both talking with Allen. Lee and Chumbley addressed this directly with Allen. Lee recalls that Allen sent her a Snapchat saying, it was “inappropriate but it wasn’t illegal.”

Lee told the Illinois State Police that between July and August 2020, after Chumbley made these allegations public, Allen offered to pay Lee’s court costs (including restitution for a case in which Chumbley was the complaining witness) if Lee could get Chumbley to not pursue a complaint against him. The estimated amount of restitution was \$365.00. Lee also owed approximately \$880.00 in fines and court costs. Allen also offered for Lee to live with him for a period of time. Allen asked Lee to talk to Chumbley multiple times. He would call, text, and Snapchat Lee for updates.

In late November 2020, Lee and Allen spoke through Facebook Messenger. I have reviewed those messages which include Allen initiating discussions with Lee about her interviews with law enforcement. Allen then referenced Lee’s financial situation and mental health. Allen says he assumes the worst, but hopes he will “find out that it’s all just a misunderstanding.” Allen also asked to meet with Lee to talk. He told Lee he cared for her a lot, that she’s always on his mind, and he “[. . .] will consider [her] a friend until [he’s] proven wrong.”

Allen also emailed Lee from his work email address. Lee’s personal email address at that time was b.lee98@hotmail.com. Lee first emailed Allen on May 23, 2019, where she provided her case number and asked to get a future court date so she can complete her drug & alcohol evaluation. Lee provided a phone number he can reach her at: 217-259-1872. Allen emailed Lee back on December 12, 2019, more than six months later. At this time, I believe Lee and Allen communicated by other means between May 2019 and

December 2019. In his December 12, 2019 email, Allen told Lee that they received a copy of her sworn report, which she needed to get her evaluation. Lee replied: “hahahaha oh lord. That’s actually good and really sad at the same time. I’ll come by and get it so I can schedule another evaluation. THANK YOU for the email, for real?”

Ashley Daigle (“Daigle”)

On March 4, 2021, Ashley Daigle (“Daigle”) contacted SA Danley to report she also had concerning interactions with Allen. On March 10, 2021, Illinois State Police met with Daigle, who reported that she “matched” with Allen on Tinder in 2018. During an early conversation with Daigle, Allen mentioned he was an Assistant State’s Attorney, and Daigle indicated she was on the “other side of the law.” After matching on Tinder, Allen and Daigle communicated via text message. According to Daigle, it reached the point where Allen would “blow up” Daigle’s phone – on one occasion, Allen texted Daigle almost 30 messages in a row. Daigle recalls receiving one text message where Allen said he would have given her a better deal if she came in to talk with him privately or wore a mini skirt. On another occasion, when Daigle was not responding to Allen’s text messages, Allen said he pulled Daigle’s address from her case file and would send the police for a welfare check. At this point, Daigle felt uncomfortable and blocked his number.

About a year after matching on Tinder, Allen and Daigle matched on the Facebook dating application. In Facebook Messenger, Allen asked Daigle to go on a trip with him. At the time, Daigle’s DUI, which was pending in Coles County, had not yet concluded, and Allen was the assigned prosecutor. Daigle was represented by attorney Monroe McWard. Daigle told Illinois State Police that she did not tell her attorney about her conversations with Allen because she was afraid she would get in trouble.

In March or April 2020, Allen and Daigle matched again *via* the Facebook dating application. Daigle’s account name at this time was “Ash Jean”. Their conversations were sexual in nature. Allen sent her photographs of him shirtless. Daigle and Allen also spoke on the phone at least one time. Between the first and second time they matched on the Facebook dating application, Daigle saw Allen in court.

On or about September 26, 2021, Daigle messaged Allen on Facebook asking him if he should have removed himself from her DUI prosecution considering the “intentions that were said and implied” on Tinder. Daigle also mentions that she had to block him to get him to stop messaging her. Allen responded to Daigle that her DUI prosecution had already concluded when they spoke. He acknowledged sending her messages and said he never meant to seem “pushy”. Daigle then references Allen’s prior “short skirt” comment, which Allen claimed was a joke. Allen does not deny communicating with Daigle on Tinder or through Facebook dating. According to Daigle, between 2018 and 2020, Allen requested she send him photographs and videos of her having sex with other men and women. When Daigle confronted Allen regarding these requests in the September 2021 conversation, Allen said it “sounds like a joke I would crack.”

Stephanie Beltran (“Beltran”) & Mae Holec (“Holec”)

My investigation revealed additional women who Allen prosecuted that were subject to unusually informal communications.

One woman was Stephanie Beltran. On or about August 23, 2019, Allen and Beltran emailed back and forth regarding a traffic citation. Beltran uses the email Stephanie.beltran05@gmail.com. At one point, Allen emailed Beltran “by no means am I trying to blow you off”, to which Beltran replies “I d[o]n’t feel like you’re blowing me off, by any means :).” In reviewing their email communications, it appears Beltran had at least one in-person meeting with Allen. On October 3, 2019, Sam Gaines, a Deputy Chief with the Mattoon Police Department, copied Allen on an email to his staff. No other State’s Attorney employee was copied on the email. The email reflected: “The SAO has asked that any reports made by Stephanie Beltran pertaining to Shane Phelps stalking or harassing her be at least reported for SAO review.” Notably, Deputy

Chief Gaines referenced vehicles that Shane Phelps may be driving and included Todd Reardon's 2002 model Chevy Cavalier. Earlier that day, Allen emailed Gaines notifying him that Phelps had a suspended driver's license. Allen also asked Gaines to "encourage [his] officers to entertain Ms. Beltran's or any other reports of Phelps driving" because he "would VERY much like [to] catch Phelps driving, and any chance of catching him doing so---especially any incident when it might be caught on camera---would be of particular interest to [him]." In his email to Gaines, Allen communicated that Beltran had a pending Assault charge where Shane Phelps was the complaining witness, and she "isn't the most reliable witness". On November 13, 2019, Beltran gave Allen her cell phone number: 217-254-4266 *via* email.

My investigation revealed Mae Holec's email is gholec@gmail.com. The email account reads "Quinn Holec", but she signed her emails as Mae. Allen emailed Holec on September 30, 2019, stating "nice meeting with you today. I checked downstairs, and it looks like I need the judge to sign off on extending your time—which shouldn't be a problem. I will just ask him about that in court tomorrow. I won't need you to show up unless you just really want to. Lol". Holec replies: "Nice meeting you as well! Thank you again for taking the time to meet with me today. As tempting as that sounds lol, I do however have class, but I can make it if you need me to. Please keep me updated :)".

Brady Allen

According to emails sent and received by Allen, Allen was reassigned from the traffic courtroom to the misdemeanor courtroom on or about February 20, 2020 through June 2, 2020. It appears Allen worked on some traffic matters as he transitioned to his new position.

On August 23, 2020, Allen allegedly issued a written press release, which he signed. The press release reads in part: "It is true that I and Ms. Chumbley had a relationship outside of court based entirely over social media. . . . 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."

Other ethics violations

During the course of Allen's employment at the Coles County State's Attorney's Office, defense attorneys raised concerns on more than one occasion regarding Allen's ethics. For example, a Partner at a criminal defense law firm emailed Allen on June 11, 2020, saying she found it inappropriate for a court date to be set without coordinating with the attorney of record. She also did not believe it was appropriate that Allen had "direct contact with [her client]".

Similarly, on May 6, 2020, a private defense attorney contacted Allen over email indicating a witness contacted them saying she received a telephone call from someone identifying themselves as "Brady" with the telephone number: 618-525-1044. Through my investigation, I learned this was Allen's personal cell phone number. This witness said "Brady" told her about statements the defendant said. Defense counsel asked that any statements be disclosed. He also asked for copies of any text message conversations between Allen and the witness. Allen said that was his personal cell phone number, but he does not use it at work because of a "personal boundary [he's] established for [him]self." Allen denied calling the witness, but did say he texted her. Allen, who initiated the text conversation from his personal cell phone, told the attorney "it was not [his] intention for [the witness] to be given this number, but rather [his] office number."

The same defense attorney emailed Allen again on May 14, 2020, after the witness provided him with screenshots of her text messages with Allen. At this point, the case was set for a final pre-trial conference.

The defense counsel, in an email to Allen, said: "If you call witnesses, I will now be forced to cross-examine them with text messages that you sent suggesting what things you thought I would argue and what answers witnesses should give." This defense counsel thought Allen should be disqualified as the prosecutor on the case because he was now a witness. In the text message to the witness, Allen says: "So basically here is the situation. If this goes to trial, his attorney is going to try to say he wasn't the one who sent it—that someone else had his phone. So I need someone who was there to say, yes, he was in that class and that movie was playing that day. If you're uncomfortable being that person who goes on the stand and says, 'Yes, he was in class that day' then I have to try to get hold of this instructor and have him testify that he was there. Would you be uncomfortable being the one to do that, even if we subpoenaed you so you could tell him you didn't have a choice?" The witness said she was uncomfortable testifying.

Throughout his time as an Assistant State's Attorney, Allen picked which defendants he chose to set boundaries with. For example, on April 8, 2019, Allen emailed a male defendant that he was not permitted to get lunch with him. I also learned that when a defendant called the office, they usually spoke to Allen's secretary. In a January 3, 2020, email to a *pro se* defendant, Allen asserted that his secretary kept a call log for everyone who tried to reach him. Finally, when *pro se* defendants asked to speak with Allen on the phone, Allen referred back to the following language in his email replies: "I don't discuss cases over the phone to avoid misunderstandings. We can either discuss it over email or I can set you up with an appointment to come in and discuss it with me." He used this language often, which is inconsistent with other conversations this investigation has uncovered, which include Allen discussing cases with female criminal defendants through calls from his personal phone number, text message, Snapchat and Tinder.

Complainant alleges, upon information and belief as set forth herein, there is probable cause to believe that Meta Platforms, Inc. ("Facebook") possesses items of evidentiary value necessary to assist in the investigation of the aforementioned offense(s).

WHEREFORE, I respectfully request that the search warrant be issued as applied for herein.

Sgt. Windy Westfall #5210
Sergeant Windy Westfall

Illinois State Police (Special Investigations Unit)

Subscribed and sworn
before me on 9-20, 2022



Judge

CERTIFIED TRUE COPY
Date 9/20/22
Melissa Hurst
CIRCUIT CLERK COLES CO

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

SEARCH WARRANT

FILED
SEP 30 2022
22MX3130
Melissa Hurst
Circuit Clerk COLES COUNTY, ILLINOIS

PLACE TO BE SEIZED AND ITEMS TO BE SEIZED;

On this day, Sergeant Windy Westfall, of the Illinois State Police (Special Investigations Unit), has subscribed and sworn to a Complaint for a Search Warrant before me. Upon examination of the Complaint, I find that it states facts sufficient to show probable cause; I therefore command you to search:

Meta Platforms, Inc. ("Facebook"), located at 1601 Willow Road, Menlo Park, CA 94025, to seize the following instruments, articles and things, to include records pertaining to the Facebook account(s) associated with the following individuals:

Brady Lee Allen ("Allen")

Date of birth: 03/08/1989

Known phone numbers: 618-525-1044 & 618-303-1088

Address: 1202 Lincoln Ave, Apartment 35, Charleston, Illinois 61920

Email: brady_allen89@yahoo.com & BALLen@co.coles.il.us

Brianna Lee

Date of birth: 11/24/1998

Known phone numbers: 217-790-0681, 217-259-1872 & 217-250-1192

Address: 1316 Shelby Avenue, Mattoon, Illinois 61938

Email: b.lee98@hotmail.com

Kara Chumbley

Date of birth: 11/15/1998

Known phone number: 217-294-0246

Address: 112 North 11th Street, Mattoon, Illinois 61938

Halie Michalski

Date of birth: 12/31/1997

Known phone number: 815-685-7566

Address: 13122 Blackstone Lane, Plainfield, Illinois 60585

Email: hmmichalski@eiu.edu

Carlie Wilson

Date of birth: 03/06/2001

Known phone number: 217-460-0049

Address: 2001 Laker Avenue, Apt. #3, Mattoon, Illinois 61938

Email: carleewilson22@gmail.com

Ashley Daigle

Date of birth: 02/09/1991

Known phone numbers: 217-820-0694, 217-561-3309, 217-820-0313, & 217-343-1778

Address: 1638 State Highway 16, Shelbyville, Illinois 62565

On the following dates/times: October 1, 2018, through September 30, 2021, to wit:

1. **Basic subscriber information:** including by way of example but not limitation, the user identification number; name; e-mail address; date and time stamp of account creation; most recent

- logins; any and all registered mobile telephone number(s) associated with the listed account;
2. **Expanded subscriber content:** including by way of example but not limitation, profile contact information; mini-feed; status update history; shares; notes; wall postings; friend listings; Facebook ID's; group listings to include Facebook group ID's; future and past events; video listing with file names;
 3. **Stored active sessions:** including date, time, device, IP address, machine cookie and browser information;
 4. **Current and past address(es) associated with this account:** including by way of example but not limitation, current city, hometown and other places lived;
 5. **Alternate names the account holder has on the account:** including by way of example but not limitation, nicknames or aliases;
 6. **Third-party applications** (or "apps") the account holder subscribes to;
 7. A history of the conversations Brady Allen had on **Facebook Chat** with Brianna Lee, Kara Chumbley, Halie Michalski, Carlie Wilson, *and* Ashley Daigle;
 8. **Credit card information**, including account name, account number and expiration date used in conjunction with this account;
 9. **Email addresses** added by the account holder, including email addresses that may have subsequently been removed;
 10. **Events** Brady Allen and Brianna Lee, Kara Chumbley, Halie Michalski, Carlie Wilson, *and* Ashley Daigle have been invited to or joined;
 11. A list, including but not limited to user names and account information, detailing **whether any of the following individuals follow Brady Allen's account(s):** Brianna Lee, Kara Chumbley, Halie Michalski, Carlie Wilson, *and* Ashley Daigle;
 12. A list, including but not limited to user names and account information, detailing **whether Brady Allen follows the account(s) for any of the following individuals:** Brianna Lee, Kara Chumbley, Halie Michalski, Carlie Wilson, *and* Ashley Daigle;
 13. A list, including but not limited to user names and account information, of **pending, sent and received friend requests** between Brady Allen's account(s) and account(s) for any of the following individuals: Brianna Lee, Kara Chumbley, Halie Michalski, Carlie Wilson, *and* Ashley Daigle;
 14. A list of **physical addresses** where Brady Allen has logged into his Facebook, Inc. account;
 15. A list of the accounts this account holder has **linked to his Facebook, Inc. account;**
 16. A list of **IP addresses**, dates and times associated with logins and logouts to Brady Allen's Facebook, Inc. account;
 17. **Archives** of messages Brady Allen has sent and received on Facebook, Inc. including but not limited to messages through Facebook Messenger with Brianna Lee, Kara Chumbley, Halie Michalski, Carlie Wilson, *and* Ashley Daigle;
 18. A list of **video chats or audio calls** through Facebook Messenger between and among Brady Allen and the following accounts: Brianna Lee, Kara Chumbley, Halie Michalski, Carlie Wilson, *and* Ashley Daigle, including but not limited to: the date of the video chat or audio call, who initiated the video chat or audio call, whether the video chat or audio call was received, and the duration of the video chat or audio call;
 19. **Mobile phone numbers** the account holders have added to their accounts, including by way of example but not limited to verified mobile numbers he/she has added for security purposes;
 20. **Photographs**, in their original format, connected to Brady Allen, Brianna Lee, Kara Chumbley, Halie Michalski, Carlie Wilson, *and* Ashley Daigle either by facial recognition or communications, that the account holders have uploaded to his/her account, including metadata information such as the date and time the photo was taken, GPS coordinates, make, model and possibly serial number of the device used;
 21. **Videos**, in their original format, connected to Brady Allen involving, among, including or in any way connected to Brianna Lee, Kara Chumbley, Halie Michalski, Carlie Wilson, *and* Ashley Daigle

either by facial recognition or communications, that the account holders have uploaded to his/her account, including metadata information, including by way of example but not limitation, the date and time the photo was taken, GPS coordinates, make, model and possibly serial number of the device used;

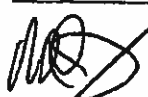
- 22. Posts by Brianna Lee, Kara Chumbley, Halie Michalski, Carlie Wilson, and Ashley Daigle to her own timeline, including by way of example but not limitation, photos, videos and status updates involving, among, including or in any way connected to Brady Allen;
- 23. Posts between and among the timeline or profile of any of the following account holders: Brady Allen, Brianna Lee, Kara Chumbley, Halie Michalski, Carlie Wilson, and Ashley Daigle, including by way of example but not limitation, photos, videos and status updates;
- 24. Screen names the account holder has added to his account, the service they are associated with, and whether these names are hidden or visible on the account; and
- 25. Other accounts and all account information that may be associated with this account after it has been identified.

Which constitutes evidence of the offenses of: **Official Misconduct**, in violation of 720 ILCS 5/33-3; and **Bribery**, in violation of 720 ILCS 5/44-1.

YOU ARE NOT TO DISCLOSE THE EXISTENCE OF THIS SEARCH WARRANT UNTIL AFTER AT LEAST 90 DAYS OF THE DATE OF ISSUANCE. DOING SO MAY IMPEDE AN ONGOING INVESTIGATION.

All records to be provided in an electronic format and be disclosed to Sergeant Windy Westfall or Master Sergeant Matthew Barber or any other law enforcement within the Illinois State Police.

I further command that a return of anything so seized shall be made without unnecessary delay before me, or before any Court of competent jurisdiction.

Date of issuance: 9-20-22
 Time 8:31 (A.M.)/P.M.


Judge

CERTIFIED TRUE COPY
 Date 9/20/22
Melissa Hurst
 CIRCUIT CLERK COLES CO

FILED
SEP 20 2022

Melissa Hurst
Circuit Clerk COLES COUNTY, ILLINOIS

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE 5TH JUDICIAL CIRCUIT
COUNTY OF COLES

IN RE: Illinois state police)
investigation 20-1005-SP-SIU)
)
)
)
)
)

NO. 2022-MX-313

MOTION TO SEAL SEARCH WARRANT

NOW COME the People of the State of Illinois by and through the Attorney General of the State of Illinois, Kwame Raoul, and his assistant, Mara Somlo, and respectfully request the Court to seal all documents filed in the above-entitled cause. In support of this motion, the People state as follows:

1. A Search Warrant is being sought to further an ongoing criminal investigation.
2. The Complaint for Search Warrant and Search Warrant contain confidential information regarding the details of the pending investigation, including, but not limited to, statements of witnesses and physical evidence.
3. A Seal Order is necessary to protect the integrity of the investigation, the public interest, including officer safety, and the safety of any cooperating witness.

WHEREFORE, the People of the State of Illinois respectfully request that for the compelling reasons stated above, that the Court seal the above Complaint, Search Warrant, and any additional documents and filings under the case number until further order of the Court consistent with the Supreme Court rules of discovery.

I, Mara Somlo, of the Office of the Illinois Attorney General, being duly sworn according to law, do on oath say that the matters and things set out in the within petition are true, to the best of my knowledge and information and belief.

THE PEOPLE OF THE STATE OF ILLINOIS
BY: KWAME RAOUL
ILLINOIS ATTORNEY GENERAL

Mara Somlo

Mara Somlo
Assistant Attorney General
Illinois Attorney General's Office
100 W. Randolph Street, 12th Floor
(773) 758-4623
Mara.somlo@ilag.gov

CERTIFIED TRUE COPY
Date 9/20/2022
Melissa Hurst
CIRCUIT CLERK COLES CO

FILED
SEP 20 2022

**STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE 5TH JUDICIAL CIRCUIT
COUNTY OF COLES**

Melissa Hurst
Circuit Clerk COLES COUNTY, ILLINOIS


IN RE: *ILLINOIS STATE POLICE
INVESTIGATION 20-1005-SP-SIU*

NO. 2022-MX-313

ORDER

Pursuant to the Motion to Seal Search Warrant, having been duly advised of the premises,
the Court hereby grants the Motion to Seal the Search Warrant until further order of the Court.

ENTER: 9-20-22



Judge

CERTIFIED TRUE COPY
Date 9/20/2022
Melissa Hurst
CIRCUIT CLERK COLES CO

STATE OF ILLINOIS)
) SS.
COUNTY OF COLES)

FILED
2017312
SEP 20 2022

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

Clara A. Hurst
Clerk of Court
COLES COUNTY, ILLINOIS

COMPLAINT FOR SEARCH WARRANT

I. PLACE TO BE SEARCHED AND ITEMS TO BE SEIZED

Now appears **Sergeant Windy Westfall, of the Illinois State Police (Special Investigations Unit)**, Complainant, before the undersigned judge of the Fifth Judicial Circuit Court, requesting the issuance of a Search Warrant to search the premises of **Coles County State’s Attorney’s Office, located at 651 Jackson Avenue, Room 330, Charleston, IL 61920**, and to seize the following instruments, articles and things which have been used in the commission of, or which constitute evidence of, the offenses of **Official Misconduct**, in violation of 720 ILCS 5/33-3; and **Bribery**, in violation of 720 ILCS 5/44-1, to wit:

- 1. For such instruments, articles, or things, which are more particularly described as follows: any digital or hard copies of personnel and/or human resources files, including but not limited to: applications for employment, dates of hire, performance reviews, grievances, notices of corrective action/performance improvement, information regarding accommodations or promotions, approved time-off or leave of absence, notices of suspension, termination or resignation, end dates of employment, for Brady Lee Allen (D.O.B. 03/08/1989) that were created or filed between October 1, 2018 and September 30, 2021.

Your Affiant believes that the foregoing instruments, articles and things are located within the records of the Coles County State’s Attorney’s Office, located at 651 Jackson Avenue, Room 330, Charleston, IL 61920. Coles County State’s Attorney Jesse Danley agrees to comply with this legal process.

In support of the foregoing, your Affiant states the following facts:

II. INVESTIGATOR BACKGROUND

I, Sergeant Windy Westfall, am an Investigator and sworn law enforcement officer in the State of Illinois and as such am authorized to execute search warrants. I have been employed with the Illinois State Police for 22 years. I have investigated criminal violations in the State of Illinois for 16 years, including but not limited to allegations of Official Misconduct and Bribery. Throughout my career, I have attended trainings related to social media, including but not limited to trainings in the proper identification, preservation, and collection of digital devices and storage media. I have also attended trainings in the proper identification, preservation, and analysis of social media records. I have extensive knowledge of regular usage of several social media platforms. I have investigated over 50 cases involving computers or internet crimes that resulted in numerous arrests and convictions.

Tinder is an online dating app that matches couples based on their physical attraction to one another. It alerts you to other Tinder users who fall within a specified age range and gender and are within a certain distance of your location, and it lets you know whether you have any mutual friends.

Users decide whether or not you like the look of a person. If you're both interested, then Tinder's messaging function offers you a private chat thread in which to talk and get to know each other better.

You'll also have to fill out your own profile. Tinder pulls some information from your Facebook profile, such as your job and education, but you can choose what to display and write out a short bio of yourself. You also need to pick a few photos to include – you can pull these either from your phone's image library or your Facebook account.

Tinder's primary companion site has been Facebook. Using Facebook, Tinder is able to build a user profile with photos that have already been uploaded. Basic information is gathered, and the user's social graph is analyzed. Candidates who are most likely to be compatible based on geographical location, number of mutual friends, and common interests are streamed into a list of matches. Based on the results of potential candidates, the app allows the user to anonymously like another user by swiping right or pass by swiping left on them. If two users like each other, it results in a "match" and they are able to chat within the app. Chatting on Tinder is only available between two users that have swiped right on one another's photos. The selections a user makes are not known to other users, unless two individuals swipe right on each other's profiles. However, once the user matches on the app, they are able to send personal photos called "Tinder Moments" to all matches at once, allowing each match to like or not like the photos.

Tinder offers a variety of features within their services. The Swipe is central to Tinder's design, as it is how users choose whether or not they are interested in matching with another user. Messaging is also a heavily utilized feature. Once a user matches with another user, they are able to exchange text messages on the app. Instagram integration enables users to access other users' Instagram profiles. Common Connections allows users to see whether they share a mutual Facebook friend with a match or when a user and their match have two separate friends who happen to be friends with each other. Tinder Gold, which was introduced worldwide in August 2017, is a premium subscription feature that allows the user to see those who have already liked them before swiping. Panic Button was introduced in the US in January 2020 and includes emergency assistance, location tracking, and photo verification. In March 2015, Tinder released its paid service, Tinder Plus, a feature allowing unlimited matches, whereas the free Tinder app limits the number of right swipes in a 12-hour period.

Tinder collects information that the users give them and information that is collected from others. Tinder also collects information generated as users access their services, for example, access logs, as well as information from third parties, like when users access Tinder services through a social media account.

The facts set forth in this Complaint are based on your Affiant's personal knowledge and investigation. The Complaint is also based on knowledge your Affiant obtained from other individuals, including other law enforcement officers, your Affiant's review of documents related to this investigation, communications with others who have personal knowledge of the events and circumstances described in this Complaint, and information gained through your Affiant's training and experience.

Your Affiant submits this Complaint for the limited purpose of showing there is sufficient probable cause to support issuing a warrant to search for, seize, and analyze the items identified here. This Complaint does not purport to set forth all of your Affiant's knowledge of, or investigation into, this matter. Unless specifically indicated otherwise, all conversations and statements described in this Complaint are related in substance and in part only.

III. FACTS IN SUPPORT OF PROBABLE CAUSE

The Illinois State Police, Division of Criminal Investigation, Special Investigations Unit, was made aware of allegations of Official Misconduct and Bribery against then-Coles County Assistant State's Attorney

Brady Allen (“Allen”), on August 12, 2020. On August 26, 2020, the Special Investigations Unit received an official request from Coles County State’s Attorney Jesse Danley to conduct an investigation into Allen.

Throughout the course of my investigation, I identified several women who communicated with Allen in an unusual nature and through unusual channels, given his position as the Assistant State’s Attorney assigned to each woman’s criminal prosecution.

Through investigation and interviews, I learned Allen was born on March 8, 1989. He has two known phone numbers, both serviced by AT&T. Those numbers are: 618-525-1044 and 618-303-1088. Allen served as an Assistant State’s Attorney in Coles County from December 2018 through August 2020. During his time at the Coles County State’s Attorney’s Office, Allen was assigned as the traffic prosecutor and misdemeanor prosecutor. Allen used his county-provided email address, BAllen@co.coles.il.us, to communicate interoffice, with defense counsel, victims, and *pro se* defendants. However, between December 2018 and August 2020, Allen also communicated with *pro se* defendants through his personal cell phone by way of text message, phone call, video chat, Snapchat, Facebook, and Tinder. These communications were with female defendants who were between 17 years old and 29 years old in 2018. All women were from the surrounding area. Allen did not communicate with all female defendants in this manner, but at this time, your Affiant is aware of Allen doing so with the following group of women:

Halie Michalski (“Michalski”)

Through interviews and investigation, I learned that in April 2019, Michalski received a speeding ticket in Coles County. Allen was the prosecutor assigned to her case. Michalski recalls Allen sent her a “Friend Request” on Facebook, and a message through Facebook Messenger. Michalski said she did not accept his “Friend Request” or respond to his message, but she found it strange that he tried to contact her this way. In an email to Michalski (hmmichalski@eiu.edu) dated August 19, 2019, Allen said he “. . . [hasn’t] forgotten [her]... And while [he’s] of course disappointed [she] won’t be joining [them] (in court), if [she is] sure [she’s] good on having everything paid and [she’s] really been good, [he’ll] excuse [her] from court...”. Allen also said that since she is no longer a defendant in this courtroom, she should “feel free to find [him] on Facebook and message [him] that way.”

Carlee Wilson (“Wilson”)

Through interviews and investigation, I learned that Wilson had both traffic and misdemeanor cases pending in Coles County between December 2018 and August 2020, including several matters where Allen was the assigned prosecutor. According to Wilson, she first exchanged cell phone numbers with Allen when she met him in his office to discuss her court cases. Throughout January 2020, Allen texted Wilson regarding her court cases. On January 17, 2020, Allen texted Wilson indicating there would be movement within the office, and he would only be handling traffic matters for a couple of more weeks. In a separate text message, Allen said he would “let it slide” that Wilson received a traffic ticket while she was already on Court Supervision. This ordinarily would be a violation of Wilson’s sentence, and a basis for Allen to file a Petition to Revoke.

In July 2020, Carlee Wilson was arrested for unlawful possession of drug paraphernalia in Coles County. Allen was the assigned prosecutor. On July 16, 2020, Wilson emailed Allen to try to arrange a meeting to discuss the case. Wilson’s email address at that time was carleewilson22@gmail.com. On July 30, 2020, Allen emailed Wilson saying he “had shot [her] a message over Facebook because it was after hours when [he] was brainstorming on what to do with [her] situation . . .”. After reviewing emails between Allen and Wilson, I believe the “situation” Allen refers to is the fact that Wilson 1) is already on a term of Court Supervision for another matter and/or 2) may not be eligible for Court Supervision given her driving and criminal history. On August 5, 2020, Allen emailed Wilson: “I think I can pull it off. Just keep that bit about the prior supervision on the down low, and I don’t expect anyone to ask questions.”

Based on my investigation, I learned Wilson spoke with Allen on his cell phone on more than one occasion.

Wilson and Allen also communicated through Facebook Messenger. According to Wilson, they usually spoke about her court cases. Wilson's known phone numbers include: 217-460-0049.

Brianna Harshbarger ("Harshbarger")

Through investigation and interviews, I learned that Harshbarger was arrested in Coles County for Battery in July 2020. At the time, Harshbarger had a number of traffic and misdemeanor offenses pending in Coles County. Harshbarger emailed Allen regarding her case because he was the assigned prosecutor. Harshbarger's email address is amiyah62714@gmail.com.

On January 16, 2020, Allen emailed Harshbarger: "I don't normally like to do this, but you don't seem crazy to me, so I'm ok with doing it this way. I'm about to have to be in court for the rest of the afternoon, and won't be here tomorrow or Monday. So if you don't want to wait until I get back Tuesday, you can text me at 6185251044 (please keep that to yourself) and we can try to work out a time for a meeting to discuss your cases." Harshbarger told investigators Allen gave her his personal cell phone number, but she did not feel comfortable communicating with him in this manner.

On March 12, 2020, in an email exchange with Harshbarger, Allen wrote: "[o]n another note... [t]his might be none of my business, and this totally stays between you and me. Anything you say to me on this won't be relayed to Judge O'Brien. . . . [b]ut[,] I know you had been ordered in misdemeanor court to apply your entire tax return. You then asked if you could just pay \$1000 of it. And you sort of had a deer-in-the-headlights look. Had you by chance already spent the rest of it? You going to be able to make that payment? I was just a little concerned. This is coming from Brady Allen, the human being, not Brady Allen the prosecutor."

On May 6, 2020, in an email with the subject line "April 22 Incident", Allen wrote Harshbarger: "Normally, I just have to go off of the report, but since I'm familiar with you, I wanted to reach out and hear what happened from your perspective and what the situation is now."

On June 22, 2020, in an email with the subject line "Domestic", Allen emailed Harshbarger saying "[n]ot to be a pest—just wanting to make sure you're good since I never heard back from you last week." Harshbarger replied that she had been out of state on vacation.

Other emails between Allen and Harshbarger are informal, and contain swear words and slang. On one occasion, Harshbarger asks for additional time to make payments on post-sentence traffic matters, to which Allen told her he "can continue whatever [he] want[s]. Haha. But yeah, the judge does not seem to be [her] biggest fan."

According to Harshbarger, they met at Allen's office at least one time between December 2018 and August 2020.

Kara Chumbley ("Chumbley")

Based on interviews and investigation, I learned Chumbley and Allen met in August or September 2019 at the Coles County Courthouse when she attended a court date for her DUI. Sometime thereafter, in December 2019 or January 2020, Chumbley and Allen "matched" on Tinder. Tinder is a dating application men and women use to establish romantic relationships, among other things. According to Chumbley, Allen messaged her first on Tinder, while he was the assigned prosecutor on her pending Coles County DUI. Chumbley knew of Allen through her long-time friend (and one time roommate, Brianna Lee), who told Chumbley about her interactions with Allen. In a Tinder message, Chumbley mentioned to Allen that he was the prosecutor on her case, and Allen told her it was ok as long as they were not dating. After that conversation, Allen asked Chumbley for her Snapchat name and they began communicating through Snapchat. According to Chumbley, most of the conversations between Chumbley and Allen were on Snapchat and were flirtatious and/or sexual in nature.

Chumbley identified Allen's Snapchat name as "Brady Allen" with the account name: "wrath1989." I confirmed Allen was born in 1989. On or about March 3 and March 4, 2020, Chumbley received the following messages from Allen over Snapchat:

Allen: 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 *purple devil emoji*

Allen: How's that for a plan?

Allen: What time do you get off?

Allen: 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...

Allen: You're killing me here.

Allen: Do you have any interest in getting together?

Allen: 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.

I have viewed screenshots (saved by Chumbley) of the above messages. According to Chumbley, when Allen referred to her "situation", he was talking about the DUI prosecution. Chumbley understood these messages to mean Allen would talk to her about her DUI prosecution while she had sex with him and he would give her legal advice regarding her DUI case while she used her mouth to perform a sexual act on him.

My investigation and interviews revealed that Allen also asked Chumbley to send him nude photographs and videos of her multiple times over Snapchat; Chumbley indicated Allen was persistent in this regard. And therefore, she sent a nude photograph to him over Snapchat. Chumbley believes Allen saved the photograph to his cell phone's camera roll because she received a notification to that effect on Snapchat.

Before the COVID-19 pandemic and the corresponding court closures, on or about February 18, 2020, Chumbley saw Allen in court. She was wearing her Apple watch, and she received a Snapchat message from Allen. The message said she looked pretty. Chumbley was unable to bring her phone into the courtroom, and did not reply until she left the courtroom. According to Chumbley, Allen sent this message when he was up before the Judge's bench, and she was waiting for her case to get called.

Between September 2019 and August 2020, Allen and Chumbley also communicated on Facebook Messenger. At the time, Allen's Facebook name was "Brady Allen". On or about July 24, 2020, Allen messaged Chumbley asking if she did not trust him. At this time, Allen was no longer the assigned prosecutor on her DUI case. She told him that she was going to get her first DUI amended to Reckless Driving, so she wanted to keep her distance. On or about July 28, 2020, Allen told Chumbley that he was not trying to hide that he's "been interested in getting with" Chumbley and/or Brianna Lee now that he "was no longer on [their] cases." Allen also said that Brianna Lee did not seem to "lose interest" like Chumbley did around April. Allen continued to compare Brianna Lee and Chumbley and said Chumbley was more "conservative in that area" than Brianna Lee was. Allen also wrote to Chumbley that he is "[. . .] just like a slut for someone [he] would date." Chumbley messaged Allen that she does not "put out for everyone," and Allen replied, in part, "you wouldn't want to date a guy who is into the stuff I'm into." The conversation ended with Allen asking to take Chumbley and Brianna Lee out for dinner. He also asked that they "act like friends," and that she not kick him off Snapchat. Through interviews, I learned that Chumbley understood this conversation to mean she was not as willing to fulfill Allen's sexual desires as Brianna Lee.

This Affiant has reviewed screenshots of these messages, which were provided to and reviewed by the Illinois State police, and can confirm that the account named “Brady Allen” had a profile photograph that matched Allen’s physical appearance.

I also learned that Chumbley and Allen communicated through text messages. According to Chumbley, when she and Allen began to discuss court matters, Allen would text Chumbley asking for her to call him. However, on one occasion, around March 2020, Chumbley texted Allen asking him if she should accept a plea deal – he was the prosecutor on the case. Chumbley was represented at the time by attorney Todd M. Reardon. Chumbley told Illinois State Police that she did not feel comfortable telling her attorney about her conversations with Allen until their first court date after the COVID-19 shutdown. According to Chumbley, this is when she learned Allen was no longer the prosecutor on her case. On August 21, 2020, Attorney Reardon filed a Motion to Dismiss in Chumbley’s criminal court cases pending in Coles County: 19DT76 and 19DT100. On January 25, 2021, Chumbley entered a plea to Driving Under the Influence of Alcohol (Case number 2019DT100) in exchange for Court Supervision. Pursuant to this plea, Chumbley’s other Driving Under the Influence of Alcohol (Case number 2019DT76) was dismissed.

Brianna Lee (“Lee”)

Coles County State’s Attorney Jesse Danley (“SA Danley”) requested that Lee be interviewed by the Mattoon Police Department (“MPD”) after Chumbley’s allegations came to light. After watching the interview, which occurred on August 24, 2020, SA Danley requested that the Appellate Prosecutor handle all cases with known or alleged victims of Allen. The same day of the interview, Allen texted Lee. According to Lee, they discussed news media covering the allegations, and Allen said if there is no proof, he is good.

Lee told the MPD she communicated with Allen on Tinder, Snapchat, by text message, and phone call. She said the messages were sexual in nature, and included her sending nude photographs on Snapchat. Lee believes Allen saved those photographs because Snapchat notified her they were saved to a camera roll. Lee told the MPD that Allen told her she “needs him.” At the time, he was no longer the prosecutor on her DUI, but Lee had matters pending in other courtrooms, including the misdemeanor courtroom where Allen was reassigned. Allen also offered to “sway” the new traffic prosecutor, whom Allen identified as “Larry” to assist Lee in getting a favorable result in her DUI case. This Affiant is aware that the traffic prosecutor that replaced Allen was Assistant State’s Attorney Lawrence Brandel. Lee also told the MPD that Allen asked her to get Chumbley not to testify against him. In exchange, Allen said he would pay Lee’s remaining court costs, including restitution owed by Lee to Chumbley in an unrelated Criminal Damage to Property case.

Lee agreed to let the MPD dump her cell phone during the interview. In reviewing the content collected from the phone dump, Illinois State Police investigators learned that Lee and Chumbley had or have profiles on OnlyFans. OnlyFans is a website or application where individuals sell photographs or videos. It is often used for adult-only content. Lee and Chumbley were using OnlyFans as a means to make money.

Lee was re-interviewed on November 30, 2020, by the Illinois State Police. This time, she had an attorney present. During this interview, Lee said she and Allen matched on Tinder in October 2018. The day they matched on Tinder, Allen invited Lee to his office for a “nooner,” which Lee took to mean having sexual intercourse over his lunch hour. A search on Dictionary.com reveals the definition of “nooner” to be: “1) an activity to be taken during lunch, and 2) a brief midday sexual encounter.” (cite: Nooner Definition & Meaning | Dictionary.com, last visited 9/13/2022). Lee said she did not see him in person until her November 2018 court date. According to Lee, this is when she learned he was the prosecutor on her DUI. After court, they messaged each other on Tinder. After communicating on Tinder, Lee and Allen messaged on Snapchat. During my investigation and through interviews, I learned that in June or July 2019, Allen asked Lee to send him nude photographs of herself over Snapchat. Lee sent him several nude photographs between June 2019 and August 2020. Allen also gave Lee legal advice, and discussed Lee’s court cases

with her on Snapchat. On one occasion Allen suggested Lee's DUI could be amended to Reckless Driving. Lee asked Allen how, and Allen said if she gives him "a little nudge" or "motivation". Lee understood this to mean she'd benefit from sending Allen nude photographs or by performing sexual acts with Allen. Lee told investigators she expressed concerns to Allen that this would be prostitution; however, Allen responded that it was not prostitution if it was recorded – then it would be pornography. During Lee's interview, she admitted to selling nude photographs on OnlyFans.

Lee also told Illinois State Police that in April or May 2020, Allen messaged her on Snapchat telling her he was the type of person she would want on her side. Allen then offered to talk with the new traffic court prosecutor on Lee's behalf. Allen also offered to write positive notes in Lee's prosecution file, which would allow her to receive a better outcome on her case than if Allen did not write any notes. He said he would make it look like the new prosecutor wrote the notes.

Through investigation and interviews, I learned that between 2019 and 2020, Lee and Chumbley learned that they were both talking with Allen. Lee and Chumbley addressed this directly with Allen. Lee recalls that Allen sent her a Snapchat saying, it was "inappropriate but it wasn't illegal."

Lee told the Illinois State Police that between July and August 2020, after Chumbley made these allegations public, Allen offered to pay Lee's court costs (including restitution for a case in which Chumbley was the complaining witness) if Lee could get Chumbley to not pursue a complaint against him. The estimated amount of restitution was \$365.00. Lee also owed approximately \$880.00 in fines and court costs. Allen also offered for Lee to live with him for a period of time. Allen asked Lee to talk to Chumbley multiple times. He would call, text, and Snapchat Lee for updates.

In late November 2020, Lee and Allen spoke through Facebook Messenger. I have reviewed those messages which include Allen initiating discussions with Lee about her interviews with law enforcement. Allen then referenced Lee's financial situation and mental health. Allen says he assumes the worst, but hopes he will "find out that it's all just a misunderstanding." Allen also asked to meet with Lee to talk. He told Lee he cared for her a lot, that she's always on his mind, and he "[. . .] will consider [her] a friend until [he's] proven wrong."

Allen also emailed Lee from his work email address. Lee's personal email address at that time was b.lee98@hotmail.com. Lee first emailed Allen on May 23, 2019, where she provided her case number and asked to get a future court date so she can complete her drug & alcohol evaluation. Lee provided a phone number he can reach her at: 217-259-1872. Allen emailed Lee back on December 12, 2019, more than six months later. At this time, I believe Lee and Allen communicated by other means between May 2019 and December 2019. In his December 12, 2019 email, Allen told Lee that they received a copy of her sworn report, which she needed to get her evaluation. Lee replied: "hahahaha oh lord. That's actually good and really sad at the same time. I'll come by and get it so I can schedule another evaluation. THANK YOU for the email, for real?"

Ashley Daigle ("Daigle")

On March 4, 2021, Ashley Daigle ("Daigle") contacted SA Danley to report she also had concerning interactions with Allen. On March 10, 2021, Illinois State Police met with Daigle, who reported that she "matched" with Allen on Tinder in 2018. During an early conversation with Daigle, Allen mentioned he was an Assistant State's Attorney, and Daigle indicated she was on the "other side of the law." After matching on Tinder, Allen and Daigle communicated via text message. According to Daigle, it reached the point where Allen would "blow up" Daigle's phone – on one occasion, Allen texted Daigle almost 30 messages in a row. Daigle recalls receiving one text message where Allen said he would have given her a better deal if she came in to talk with him privately or wore a mini skirt. On another occasion, when Daigle was not responding to Allen's text messages, Allen said he pulled Daigle's address from her case file and would send the police for a welfare check. At this point, Daigle felt uncomfortable and blocked his number.

About a year after matching on Tinder, Allen and Daigle matched on the Facebook dating application. In Facebook Messenger, Allen asked Daigle to go on a trip with him. At the time, Daigle's DUI, which was pending in Coles County, had not yet concluded, and Allen was the assigned prosecutor. Daigle was represented by attorney Monroe McWard. Daigle told Illinois State Police that she did not tell her attorney about her conversations with Allen because she was afraid she would get in trouble.

In March or April 2020, Allen and Daigle matched again *via* the Facebook dating application. Daigle's account name at this time was "Ash Jean". Their conversations were sexual in nature. Allen sent her photographs of him shirtless. Daigle and Allen also spoke on the phone at least one time. Between the first and second time they matched on the Facebook dating application, Daigle saw Allen in court.

On or about September 26, 2021, Daigle messaged Allen on Facebook asking him if he should have removed himself from her DUI prosecution considering the "intentions that were said and implied" on Tinder. Daigle also mentions that she had to block him to get him to stop messaging her. Allen responded to Daigle that her DUI prosecution had already concluded when they spoke. He acknowledged sending her messages and said he never meant to seem "pushy". Daigle then references Allen's prior "short skirt" comment, which Allen claimed was a joke. Allen does not deny communicating with Daigle on Tinder or through Facebook dating. According to Daigle, between 2018 and 2020, Allen requested she send him photographs and videos of her having sex with other men and women. When Daigle confronted Allen regarding these requests in the September 2021 conversation, Allen said it "sounds like a joke I would crack."

Stephanie Beltran ("Beltran") & Mae Holec ("Holec")

My investigation revealed additional women who Allen prosecuted that were subject to unusually informal communications.

One woman was Stephanie Beltran. On or about August 23, 2019, Allen and Beltran emailed back and forth regarding a traffic citation. Beltran uses the email Stephanie.beltran05@gmail.com. At one point, Allen emailed Beltran "by no means am I trying to blow you off", to which Beltran replies "I d[o]n't feel like you're blowing me off, by any means :)." In reviewing their email communications, it appears Beltran had at least one in-person meeting with Allen. On October 3, 2019, Sam Gaines, a Deputy Chief with the Mattoon Police Department, copied Allen on an email to his staff. No other State's Attorney employee was copied on the email. The email reflected: "The SAO has asked that any reports made by Stephanie Beltran pertaining to Shane Phelps stalking or harassing her be at least reported for SAO review." Notably, Deputy Chief Gaines referenced vehicles that Shane Phelps may be driving and included Todd Reardon's 2002 model Chevy Cavalier. Earlier that day, Allen emailed Gaines notifying him that Phelps had a suspended driver's license. Allen also asked Gaines to "encourage [his] officers to entertain Ms. Beltran's or any other reports of Phelps driving" because he "would VERY much like [to] catch Phelps driving, and any chance of catching him doing so---especially any incident when it might be caught on camera---would be of particular interest to [him]." In his email to Gaines, Allen communicated that Beltran had a pending Assault charge where Shane Phelps was the complaining witness, and she "isn't the most reliable witness". On November 13, 2019, Beltran gave Allen her cell phone number: 217-254-4266 *via* email.

My investigation revealed Mae Holec's email is qholec@gmail.com. The email account reads "Quinn Holec", but she signed her emails as Mae. Allen emailed Holec on September 30, 2019, stating "nice meeting with you today. I checked downstairs, and it looks like I need the judge to sign off on extending your time—which shouldn't be a problem. I will just ask him about that in court tomorrow. I won't need you to show up unless you just really want to. Lol". Holec replies: "Nice meeting you as well! Thank you again for taking the time to meet with me today. As tempting as that sounds lol, I do however have class, but I can make it if you need me to. Please keep me updated :)".

Brady Allen

According to emails sent and received by Allen, Allen was reassigned from the traffic courtroom to the misdemeanor courtroom on or about February 20, 2020 through June 2, 2020. It appears Allen worked on some traffic matters as he transitioned to his new position.

On August 23, 2020, Allen allegedly issued a written press release, which he signed. The press release reads in part: "It is true that I and Ms. Chumbley had a relationship outside of court based entirely over social media. . . . 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."

Other ethics violations

During the course of Allen's employment at the Coles County State's Attorney's Office, defense attorneys raised concerns on more than one occasion regarding Allen's ethics. For example, a Partner at a criminal defense law firm emailed Allen on June 11, 2020, saying she found it inappropriate for a court date to be set without coordinating with the attorney of record. She also did not believe it was appropriate that Allen had "direct contact with [her client]".

Similarly, on May 6, 2020, a private defense attorney contacted Allen over email indicating a witness contacted them saying she received a telephone call from someone identifying themselves as "Brady" with the telephone number: 618-525-1044. Through my investigation, I learned this was Allen's personal cell phone number. This witness said "Brady" told her about statements the defendant said. Defense counsel asked that any statements be disclosed. He also asked for copies of any text message conversations between Allen and the witness. Allen said that was his personal cell phone number, but he does not use it at work because of a "personal boundary [he's] established for [him]self." Allen denied calling the witness, but did say he texted her. Allen, who initiated the text conversation from his personal cell phone, told the attorney "it was not [his] intention for [the witness] to be given this number, but rather [his] office number."

The same defense attorney emailed Allen again on May 14, 2020, after the witness provided him with screenshots of her text messages with Allen. At this point, the case was set for a final pre-trial conference. The defense counsel, in an email to Allen, said: "If you call witnesses, I will now be forced to cross-examine them with text messages that you sent suggesting what things you thought I would argue and what answers witnesses should give." This defense counsel thought Allen should be disqualified as the prosecutor on the case because he was now a witness. In the text message to the witness, Allen says: "So basically here is the situation. If this goes to trial, his attorney is going to try to say he wasn't the one who sent it—that someone else had his phone. So I need someone who was there to say, yes, he was in that class and that movie was playing that day. If you're uncomfortable being that person who goes on the stand and says, 'Yes, he was in class that day' then I have to try to get hold of this instructor and have him testify that he was there. Would you be uncomfortable being the one to do that, even if we subpoenaed you so you could tell him you didn't have a choice?" The witness said she was uncomfortable testifying.

Throughout his time as an Assistant State's Attorney, Allen picked which defendants he chose to set boundaries with. For example, on April 8, 2019, Allen emailed a male defendant that he was not permitted to get lunch with him. I also learned that when a defendant called the office, they usually spoke to Allen's secretary. In a January 3, 2020, email to a *pro se* defendant, Allen asserted that his secretary kept a call log for everyone who tried to reach him. Finally, when *pro se* defendants asked to speak with Allen on the phone, Allen referred back to the following language in his email replies: "I don't discuss cases over the phone to avoid misunderstandings. We can either discuss it over email or I can set you up with an

appointment to come in and discuss it with me.” He used this language often, which is inconsistent with other conversations this investigation has uncovered, which include Allen discussing cases with female criminal defendants through calls from his personal phone number, text message, Snapchat and Tinder.

Complainant alleges, upon information and belief as set forth herein, there is probable cause to believe that the Coles County State’s Attorney’s Office possesses items of evidentiary value necessary to assist in the investigation of the aforementioned offense(s).

WHEREFORE, I respectfully request that the search warrant be issued as applied for herein.

Sgt. Windy Westfall #5210
Sergeant Windy Westfall

Illinois State Police (Special Investigations Unit)

Subscribed and sworn
before me on 9-20, 2022



Judge

IDENTIFIED TRUE COPY
9-20-22
Melissa Hurst
CIRCUIT CLERK COLES CO

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

SEARCH WARRANT

FILED
22MXB12
SEP 20 2022

Melissa Hurst
Circuit Clerk COLES COUNTY ILLINOIS

PLACE TO BE SEARCHED AND ITEMS TO BE SEIZED:

On this day, **Sergeant Windy Westfall, of the Illinois State Police (Special Investigations Unit)**, has subscribed and sworn to a Complaint for a Search Warrant before me. Upon examination of the Complaint, I find that it states facts sufficient to show probable cause; I therefore command you to search:

Coles County State's Attorney's Office, located at 651 Jackson Avenue, Room 330, Charleston, IL 61920, and to seize the following instruments, articles and things, to wit:

2. For such instruments, articles, or things, which are more particularly described as follows: any digital or hard copies of personnel and/or human resources files, including but not limited to: applications for employment, dates of hire, performance reviews, grievances, notices of corrective action/performance improvement, information regarding accommodations or promotions, approved time-off or leave of absence, notices of suspension, termination or resignation, end dates of employment, for Brady Lee Allen (D.O.B. 03/08/1989) that were created or filed between October 1, 2018 and September 30, 2021.

Which constitutes evidence of the offenses of: **Official Misconduct**, in violation of 720 ILCS 5/33-3; and **Bribery**, in violation of 720 ILCS 5/44-1.

I further command that a return of anything so seized shall be made without unnecessary delay before me, or before any Court of competent jurisdiction.

Date of issuance: 9-20-22

Time 9:35 (A.M./P.M.)



Judge

CERTIFIED TRUE COPY
Date _____
Melissa Hurst
CIRCUIT CLERK COLES CO

FILED
SEP 28 2022

**STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE 5TH JUDICIAL CIRCUIT
COUNTY OF COLES**

Meissa Hurst
Circuit Clerk COLES COUNTY, ILLINOIS

IN RE: *Illinois state police
investigation 20-1005-SP-SIU*

NO. 2022-MX-312

MOTION TO SEAL SEARCH WARRANT

NOW COME the People of the State of Illinois by and through the Attorney General of the State of Illinois, Kwame Raoul, and his assistant, Mara Somlo, and respectfully request the Court to seal all documents filed in the above-entitled cause. In support of this motion, the People state as follows:

1. A Search Warrant is being sought to further an ongoing criminal investigation.
2. The Complaint for Search Warrant and Search Warrant contain confidential information regarding the details of the pending investigation, including, but not limited to, statements of witnesses and physical evidence.
3. A Seal Order is necessary to protect the integrity of the investigation, the public interest, including officer safety, and the safety of any cooperating witness.

WHEREFORE, the People of the State of Illinois respectfully request that for the compelling reasons stated above, that the Court seal the above Complaint, Search Warrant, and any additional documents and filings under the case number until further order of the Court consistent with the Supreme Court rules of discovery.

I, Mara Somlo, of the Office of the Illinois Attorney General, being duly sworn according to law, do on oath say that the matters and things set out in the within petition are true, to the best of my knowledge and information and belief.

THE PEOPLE OF THE STATE OF ILLINOIS
BY: KWAME RAOUL
ILLINOIS ATTORNEY GENERAL



Mara Somlo
Assistant Attorney General
Illinois Attorney General's Office
100 W. Randolph Street, 12th Floor
(773) 758-4623
Mara.somlo@ilag.gov

CERTIFIED TRUE COPY
Date 9/10/2022
Melissa Hurst
CIRCUIT CLERK COLES CO

FILED
SEP 20 2022

**STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE 5TH JUDICIAL CIRCUIT
COUNTY OF COLES**

Melissa Hurst
Circuit Clerk COLES COUNTY, ILLINOIS

IN RE: *ILLINOIS STATE POLICE
INVESTIGATION 20-1005-SP-SIU*

NO. 2022-MX-312

ORDER

Pursuant to the Motion to Seal Search Warrant, having been duly advised of the premises,
the Court hereby grants the Motion to Seal the Search Warrant until further order of the Court.

ENTER: 9-20-22



Judge

CERTIFIED TRUE COPY
Date 09/20/2022
Melissa Hurst
CIRCUIT CLERK COLES CO

FILED
SEP 26 2022

STATE OF ILLINOIS)
) SS.
COUNTY OF COLES)

22HX311
Melissa Hurst
Circuit Clerk COLES COUNTY, ILLINOIS

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

COMPLAINT FOR SEARCH WARRANT

I. PLACE TO BE SEARCHED AND ITEMS TO BE SEIZED

Now appears **Sergeant Windy Westfall, of the Illinois State Police (Special Investigations Unit)**, Complainant, before the undersigned judge of the Fifth Judicial Circuit Court, requesting the issuance of a Search Warrant to search the premises of **Snap Inc. ("Snapchat")**, located at **2772 Donald Douglas Loop North, Santa Monica, CA 90405 (ATTN: Custodian of Records)** and to seize the following instruments, articles and things which have been used in the commission of, or which constitute evidence of, the offenses of **Official Misconduct**, in violation of 720 ILCS 5/33-3; and **Bribery**, in violation of 720 ILCS 5/44-1, to include records pertaining to the Snapchat account(s) associated with the following individuals ("Users"):

Brady Lee Allen

Date of birth: 03/08/1989

Known phone numbers: 618-525-1044 & 618-303-1088

Address: 1202 Lincoln Avenue, Apartment 35, Charleston, Illinois 61920

Email: brady_allen89@yahoo.com & BAllen@co.coles.il.us

Snapchat username: **wrath1989**

Brianna Lee

Date of birth: 11/24/1998

Known phone numbers: 217-790-0681, 217-259-1872 & 217-250-1192

Address: 1316 Shelby Avenue, Mattoon, Illinois 61938

Email: b.lee98@hotmail.com

Kara Chumbley

Date of birth: 11/15/1998

Known phone Number: 217-294-0246

Address: 112 North 11th Street, Mattoon, Illinois 61938

On the following dates/times: October 1, 2018, through September 30, 2021, to wit:

1. **Information Provided by the Snapchat User to include:** name; username; vanity name; password; email address; phone number; date of birth; profile picture; Bitmoji avatar; debit and/or credit card number and its associated account information; content of "Snaps" (sent and received) between Brady Allen and the following individuals: Brianna Lee *and* Kara Chumbley; content of "Chats" (sent and received) between Brady Allen and the following individuals: Brianna Lee *and* Kara Chumbley; content uploaded to "Snapchat Story"; content of "Memories";
2. **Information Snapchat collects when the Snapchat User uses Snapchat's services to include:** usage information regarding how the user interacted with Snapchat's services including search queries submitted by the user; the names of other "Snapchatters" the user has communicated with; the time and date of communication with other "Snapchatters"; the number of messages exchanged

between Brady Allen and the following individuals: Brianna Lee *and* Kara Chumbley; Brady Allen's interactions with messages sent to and received from Brianna Lee *and* Kara Chumbley (such as when a message is opened or screenshotted); user created content information such as custom stickers; information regarding if the recipient has viewed the content sent by user and any metadata provided with the content for communications between Brady Allen and the following individuals: Brianna Lee *and* Kara Chumbley;

3. **Device information to include:** hardware and software information such as the hardware model, operating system version, device memory, advertising identifiers, unique application identifiers, apps installed, unique device identifiers to include International Mobile Equipment Identified (IMEI), Mobile Equipment Identifier (MEID) Unique Device Identification (UDID), browser type, keyboards installed, language, and time zone; information from device sensors such as accelerometers, gyroscopes, compasses, microphones; information about the users' wireless and mobile network connections, such as mobile phone number, service provider, IP address, and signal strength; device phonebook information; images, videos, and other information from the users' camera roll and photos;
4. **Location information to include:** location information derived from GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors such as gyroscopes, accelerometers, and compasses;
5. **Information Collected by cookies and other technologies to include:** web beacons, web storage, and unique advertising identifiers;
6. **Log information when a person uses Snapchat's website:** details about how a person has used Snapchat's services; device information such as web browser type and language; access time; pages viewed; IP address; identifiers associated with cookies or other technologies that may uniquely identify a person's device or browser; pages visited before or after navigating to Snapchat's website; Snapchat account creation date and IP address; timestamp and IP address of account logins and logouts; logs of previous "Snaps", "Stories", and "Chats"; and
7. **Information Snapchat collected from third parties:** information about how the users used another service linked to their Snapchat account; information shared by advertisers, app developers, or other third parties.

Your Affiant believes that the foregoing instruments, articles and things are located within the records of Snap Inc. ("Snapchat"), located at 2772 Donald Douglas Loop North, Santa Monica, CA 90405.

All records to be provided in an electronic format and be disclosed to Sergeant Windy Westfall or Sergeant Matthew Barber or any other law enforcement personnel with the Illinois State Police.

In support of the foregoing, your Affiant states the following facts:

II. INVESTIGATOR BACKGROUND

I, Sergeant Windy Westfall, am an Investigator and sworn law enforcement officer in the State of Illinois and as such am authorized to execute search warrants. I have been employed with the Illinois State Police for 22 years. I have investigated criminal violations in the State of Illinois for 16 years, including but not limited to allegations of Official Misconduct and Bribery. Throughout my career, I have attended trainings related to social media, including but not limited to trainings in the proper identification, preservation, and collection of digital devices and storage media. I have also attended trainings in the proper identification, preservation, and analysis of social media records. I have extensive knowledge of regular usage of several social media platforms. I have investigated over 50 cases involving computers or internet crimes that resulted in numerous arrests and convictions.

Snapchat is a mobile messaging application used to share photos, videos, text, and drawings. There is one feature that makes Snapchat different from other forms of texting and photo sharing: the messages disappear

from the recipient's phone after a few seconds. You take a picture using your camera phone, select recipients from your contacts, decide how long you want the message to be visible for (up to 10 seconds), and click send. For the recipient, the process is very like getting a text message, simply tap to view a snap. Also, the message disappears from their phone once the time limit has expired, although the details of the sender and the time stamp remain. Users can add friends from their phone/device contact lists. In addition, users can now add friends who are nearby them, so if users are hanging out in a group – it is now easier for them to connect and become friends.

It also has a drawing tool. Users can easily draw pictures, draw on top of photos, and add text to photos before sending them.

Snapchat is now being used for its multiple communication features. Not only can you voice or video call, you can send edited pictures while on a call, and leave audio or video 'notes' while using the messenger feature. The 'notes' are 10-second video clips that you can send. These are generally sent as 'reactions' and are played with audio when clicked.

In the last several years Snapchat has expanded its functionality to include a host of other communication techniques, both software and hardware related. The software updates include Snap videos, Snap Geofilters, Snap group messages, Snap Group Video, Snap Filters, Snap stories, Snap lenses, Snap Memories, SnapMaps, and Bitmoji. Snapchat has also created Snap Spectacles, glasses which contain a camera that allows a user to take a photograph or movie which can then be sent out as a Snap to other individual users or groups.

Other Snap updates include Snap Infinity and Snap Camera Roll. Infinity allowed a user to create a snap chat, either photo or video, and instead of setting a timer limiting the period the snap would appear on the recipient's phone, by selecting infinity, the snap would remain, until the user deleted it. Snap Camera Roll enabled a recipient of a Snap to choose to save it to his or her own camera roll. The sender of the Snap would be notified of the camera roll saving, but the sender no longer controlled the Snap. The recipient could do anything he or she wanted with the saved Snap.

Snap also introduced Snap Memory, which allowed a Snapchatter to save their own Snaps or entire Stories to their Snap Memories. Once a Snap or a Snap Stories is saved into a Memory, the data is stored on Snap's servers, and a user may have repeated long-term access to that data. Once a Snap or Story is added to Memories, the data is automatically saved in the Snap cloud.

Additionally, Snap released SnapMaps, a service that shares a Snap's user location, based on geolocation data, with other people in the user's contact list. Snapchat informs users that once they have signed up for SnapMaps, users cannot turn the functionality off. The user's location is always being provided to Snapchat, even in "Ghost" mode.

Your Affiant is further aware that the Privacy Policy published by Snapchat and effective 11/17/2021, lists what information Snapchat collects and retains from Snapchat. According to this Privacy Policy, there are three basic categories of information collected by Snapchat: information provided by users, information Snapchat gets when a Snapchatter uses Snapchat's services, and information Snapchat receives from third parties.

Snapchat keeps some metadata on the Snaps and Chats a Snapchatter sends and receives. When a Snapchatter sends or receives Snaps and Chats, Snap records metadata, such as the date, time, sender, and receiver. Most Snapchat metadata is deleted after 30 days. If Snapchat needs to keep metadata longer, they remove personal identifiers before processing the data for analytical purposes.

If a user has device-level location services turned on and has opted into location services on Snapchat, Snap will collect location data at various points during the user's use of Snapchat, and retention periods for location

data vary depending on the purpose of the collection. Users have some control over the deletion of their location data in the app settings.

Snapchat uses a Snapchatter's device's GPS to offer location-based features. Snapchat says that it will store users' GPS locations "for a while," and may also store location information of the Snaps a Snapchatter saves in Memories or submits to My Story, Our Story, Spotlight, or Snap Map.

There are different types of Profiles on Snapchat, including My Profile, Friendship Profiles, Group Profiles, and Public Profiles. My Profile features a Snapchatter's info, like their Bitmoji (a type of personalized icon), location on the Map, friend info, and more. Friendship Profile is where a Snapchatter can manage their friendship, and report, block, or remove the friend. Group Profiles showcase a Snapchatter's saved Snaps and Chats within a Group Chat and a Snapchatter's friends' Snapchat info. Public Profiles enable Snapchatters to be discovered in the app and must be created by the user.

The facts set forth in this Complaint are based on your Affiant's personal knowledge and investigation. The Complaint is also based on knowledge your Affiant obtained from other individuals, including other law enforcement officers, your Affiant's review of documents related to this investigation, communications with others who have personal knowledge of the events and circumstances described in this Complaint, and information gained through your Affiant's training and experience.

Your Affiant submits this Complaint for the limited purpose of showing there is sufficient probable cause to support issuing a warrant to search for, seize, and analyze the items identified here. This Complaint does not purport to set forth all of your Affiant's knowledge of, or investigation into, this matter. Unless specifically indicated otherwise, all conversations and statements described in this Complaint are related in substance and in part only.

III. FACTS IN SUPPORT OF PROBABLE CAUSE

The Illinois State Police, Division of Criminal Investigation, Special Investigations Unit, was made aware of allegations of Official Misconduct and Bribery against then-Coles County Assistant State's Attorney Brady Allen ("Allen"), on August 12, 2020. On August 26, 2020, the Special Investigations Unit received an official request from Coles County State's Attorney Jesse Danley to conduct an investigation into Allen.

Throughout the course of my investigation, I identified several women who communicated with Allen in an unusual nature and through unusual channels, given his position as the Assistant State's Attorney assigned to each woman's criminal prosecution.

Through investigation and interviews, I learned Allen was born on March 8, 1989. He has two known phone numbers, both serviced by AT&T. Those numbers are: 618-525-1044 and 618-303-1088. Allen served as an Assistant State's Attorney in Coles County from December 2018 through August 2020. During his time at the Coles County State's Attorney's Office, Allen was assigned as the traffic prosecutor and misdemeanor prosecutor. Allen used his county-provided email address, BAllen@co.coles.il.us, to communicate interoffice, with defense counsel, victims, and *pro se* defendants. However, between December 2018 and August 2020, Allen also communicated with *pro se* defendants through his personal cell phone by way of text message, phone call, video chat, Snapchat, Facebook, and Tinder. These communications were with female defendants who were between 17 years old and 29 years old in 2018. All women were from the surrounding area. Allen did not communicate with all female defendants in this manner, but at this time, your Affiant is aware of Allen doing so with the following group of women:

Halie Michalski ("Michalski")

Through interviews and investigation, I learned that in April 2019, Michalski received a speeding ticket in Coles County. Allen was the prosecutor assigned to her case. Michalski recalls Allen sent her a “Friend Request” on Facebook, and a message through Facebook Messenger. Michalski said she did not accept his “Friend Request” or respond to his message, but she found it strange that he tried to contact her this way. In an email to Michalski (hmmichalski@eiu.edu) dated August 19, 2019, Allen said he “. . . [hasn’t] forgotten [her].... And while [he’s] of course disappointed [she] won’t be joining [them] (in court), if [she is] sure [she’s] good on having everything paid and [she’s] really been good, [he’ll] excuse [her] from court...”. Allen also said that since she is no longer a defendant in this courtroom, she should “feel free to find [him] on Facebook and message [him] that way.”

Carlee Wilson (“Wilson”)

Through interviews and investigation, I learned that Wilson had both traffic and misdemeanor cases pending in Coles County between December 2018 and August 2020, including several matters where Allen was the assigned prosecutor. According to Wilson, she first exchanged cell phone numbers with Allen when she met him in his office to discuss her court cases. Throughout January 2020, Allen texted Wilson regarding her court cases. On January 17, 2020, Allen texted Wilson indicating there would be movement within the office, and he would only be handling traffic matters for a couple of more weeks. In a separate text message, Allen said he would “let it slide” that Wilson received a traffic ticket while she was already on Court Supervision. This ordinarily would be a violation of Wilson’s sentence, and a basis for Allen to file a Petition to Revoke.

In July 2020, Carlee Wilson was arrested for unlawful possession of drug paraphernalia in Coles County. Allen was the assigned prosecutor. On July 16, 2020, Wilson emailed Allen to try to arrange a meeting to discuss the case. Wilson’s email address at that time was carleewilson22@gmail.com. On July 30, 2020, Allen emailed Wilson saying he “had shot [her] a message over Facebook because it was after hours when [he] was brainstorming on what to do with [her] situation . . .”. After reviewing emails between Allen and Wilson, I believe the “situation” Allen refers to is the fact that Wilson 1) is already on a term of Court Supervision for another matter and/or 2) may not be eligible for Court Supervision given her driving and criminal history. On August 5, 2020, Allen emailed Wilson: “I think I can pull it off. Just keep that bit about the prior supervision on the down low, and I don’t expect anyone to ask questions.”

Based on my investigation, I learned Wilson spoke with Allen on his cell phone on more than one occasion. Wilson and Allen also communicated through Facebook Messenger. According to Wilson, they usually spoke about her court cases. Wilson’s known phone numbers include: 217-460-0049.

Brianna Harshbarger (“Harshbarger”)

Through investigation and interviews, I learned that Harshbarger was arrested in Coles County for Battery in July 2020. At the time, Harshbarger had a number of traffic and misdemeanor offenses pending in Coles County. Harshbarger emailed Allen regarding her case because he was the assigned prosecutor. Harshbarger’s email address is amiyah62714@gmail.com.

On January 16, 2020, Allen emailed Harshbarger: “I don’t normally like to do this, but you don’t seem crazy to me, so I’m ok with doing it this way. I’m about to have to be in court for the rest of the afternoon, and won’t be here tomorrow or Monday. So if you don’t want to wait until I get back Tuesday, you can text me at 6185251044 (please keep that to yourself) and we can try to work out a time for a meeting to discuss your cases.” Harshbarger told investigators Allen gave her his personal cell phone number, but she did not feel comfortable communicating with him in this manner.

On March 12, 2020, in an email exchange with Harshbarger, Allen wrote: “[o]n another note... [t]his might be none of my business, and this totally stays between you and me. Anything you say to me on this won’t be relayed to Judge O’Brien. . . . [b]ut[,] I know you had been ordered in misdemeanor court to apply your

entire tax return. You then asked if you could just pay \$1000 of it. And you sort of had a deer-in-the-headlights look. Had you by chance already spent the rest of it? You going to be able to make that payment? I was just a little concerned. This is coming from Brady Allen, the human being, not Brady Allen the prosecutor.”

On May 6, 2020, in an email with the subject line “April 22 Incident”, Allen wrote Harshbarger: “Normally, I just have to go off of the report, but since I’m familiar with you, I wanted to reach out and hear what happened from your perspective and what the situation is now.”

On June 22, 2020, in an email with the subject line “Domestic”, Allen emailed Harshbarger saying “[n]ot to be a pest—just wanting to make sure you’re good since I never heard back from you last week.” Harshbarger replied that she had been out of state on vacation.

Other emails between Allen and Harshbarger are informal, and contain swear words and slang. On one occasion, Harshbarger asks for additional time to make payments on post-sentence traffic matters, to which Allen told her he “can continue whatever [he] want[s]. Haha. But yeah, the judge does not seem to be [her] biggest fan.”

According to Harshbarger, they met at Allen’s office at least one time between December 2018 and August 2020.

Kara Chumbley (“Chumbley”)

Based on interviews and investigation, I learned Chumbley and Allen met in August or September 2019 at the Coles County Courthouse when she attended a court date for her DUI. Sometime thereafter, in December 2019 or January 2020, Chumbley and Allen “matched” on Tinder. Tinder is a dating application men and women use to establish romantic relationships, among other things. According to Chumbley, Allen messaged her first on Tinder, while he was the assigned prosecutor on her pending Coles County DUI. Chumbley knew of Allen through her long-time friend (and one time roommate, Brianna Lee), who told Chumbley about her interactions with Allen. In a Tinder message, Chumbley mentioned to Allen that he was the prosecutor on her case, and Allen told her it was ok as long as they were not dating. After that conversation, Allen asked Chumbley for her Snapchat name and they began communicating through Snapchat. According to Chumbley, most of the conversations between Chumbley and Allen were on Snapchat and were flirtatious and/or sexual in nature.

Chumbley identified Allen’s Snapchat name as “Brady Allen” with the account name: “wrath1989.” I confirmed Allen was born in 1989. On or about March 3 and March 4, 2020, Chumbley received the following messages from Allen over Snapchat:

Allen: 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 *purple devil emoji*

Allen: How’s that for a plan?

Allen: What time do you get off?

Allen: 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...

Allen: You’re killing me here.

Allen: Do you have any interest in getting together?

Allen: 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.

I have viewed screenshots (saved by Chumbley) of the above messages. According to Chumbley, when Allen referred to her "situation", he was talking about the DUI prosecution. Chumbley understood these messages to mean Allen would talk to her about her DUI prosecution while she had sex with him and he would give her legal advice regarding her DUI case while she used her mouth to perform a sexual act on him.

My investigation and interviews revealed that Allen also asked Chumbley to send him nude photographs and videos of her multiple times over Snapchat; Chumbley indicated Allen was persistent in this regard. And therefore, she sent a nude photograph to him over Snapchat. Chumbley believes Allen saved the photograph to his cell phone's camera roll because she received a notification to that effect on Snapchat.

Before the COVID-19 pandemic and the corresponding court closures, on or about February 18, 2020, Chumbley saw Allen in court. She was wearing her Apple watch, and she received a Snapchat message from Allen. The message said she looked pretty. Chumbley was unable to bring her phone into the courtroom, and did not reply until she left the courtroom. According to Chumbley, Allen sent this message when he was up before the Judge's bench, and she was waiting for her case to get called.

Between September 2019 and August 2020, Allen and Chumbley also communicated on Facebook Messenger. At the time, Allen's Facebook name was "Brady Allen". On or about July 24, 2020, Allen messaged Chumbley asking if she did not trust him. At this time, Allen was no longer the assigned prosecutor on her DUI case. She told him that she was going to get her first DUI amended to Reckless Driving, so she wanted to keep her distance. On or about July 28, 2020, Allen told Chumbley that he was not trying to hide that he's "been interested in getting with" Chumbley and/or Brianna Lee now that he "was no longer on [their] cases." Allen also said that Brianna Lee did not seem to "lose interest" like Chumbley did around April. Allen continued to compare Brianna Lee and Chumbley and said Chumbley was more "conservative in that area" than Brianna Lee was. Allen also wrote to Chumbley that he is "[. . .] just like a slut for someone [he] would date." Chumbley messaged Allen that she does not "put out for everyone," and Allen replied, in part, "you wouldn't want to date a guy who is into the stuff I'm into." The conversation ended with Allen asking to take Chumbley and Brianna Lee out for dinner. He also asked that they "act like friends," and that she not kick him off Snapchat. Through interviews, I learned that Chumbley understood this conversation to mean she was not as willing to fulfill Allen's sexual desires as Brianna Lee.

This Affiant has reviewed screenshots of these messages, which were provided to and reviewed by the Illinois State police, and can confirm that the account named "Brady Allen" had a profile photograph that matched Allen's physical appearance.

I also learned that Chumbley and Allen communicated through text messages. According to Chumbley, when she and Allen began to discuss court matters, Allen would text Chumbley asking for her to call him. However, on one occasion, around March 2020, Chumbley texted Allen asking him if she should accept a plea deal – he was the prosecutor on the case. Chumbley was represented at the time by attorney Todd M. Reardon. Chumbley told Illinois State Police that she did not feel comfortable telling her attorney about her conversations with Allen until their first court date after the COVID-19 shutdown. According to Chumbley, this is when she learned Allen was no longer the prosecutor on her case. On August 21, 2020, Attorney Reardon filed a Motion to Dismiss in Chumbley's criminal court cases pending in Coles County: 19DT76 and 19DT100. On January 25, 2021, Chumbley entered a plea to Driving Under the Influence of Alcohol (Case number 2019DT100) in exchange for Court Supervision. Pursuant to this plea, Chumbley's other Driving Under the Influence of Alcohol (Case number 2019DT76) was dismissed.

Brianna Lee ("Lee")

Coles County State's Attorney Jesse Danley ("SA Danley") requested that Lee be interviewed by the Mattoon Police Department ("MPD") after Chumbley's allegations came to light. After watching the interview, which occurred on August 24, 2020, SA Danley requested that the Appellate Prosecutor handle

all cases with known or alleged victims of Allen. The same day of the interview, Allen texted Lee. According to Lee, they discussed news media covering the allegations, and Allen said if there is no proof, he is good.

Lee told the MPD she communicated with Allen on Tinder, Snapchat, by text message, and phone call. She said the messages were sexual in nature, and included her sending nude photographs on Snapchat. Lee believes Allen saved those photographs because Snapchat notified her they were saved to a camera roll. Lee told the MPD that Allen told her she “needs him.” At the time, he was no longer the prosecutor on her DUI, but Lee had matters pending in other courtrooms, including the misdemeanor courtroom where Allen was reassigned. Allen also offered to “sway” the new traffic prosecutor, whom Allen identified as “Larry” to assist Lee in getting a favorable result in her DUI case. This Affiant is aware that the traffic prosecutor that replaced Allen was Assistant State’s Attorney Lawrence Brandel. Lee also told the MPD that Allen asked her to get Chumbley not to testify against him. In exchange, Allen said he would pay Lee’s remaining court costs, including restitution owed by Lee to Chumbley in an unrelated Criminal Damage to Property case.

Lee agreed to let the MPD dump her cell phone during the interview. In reviewing the content collected from the phone dump, Illinois State Police investigators learned that Lee and Chumbley had or have profiles on OnlyFans. OnlyFans is a website or application where individuals sell photographs or videos. It is often used for adult-only content. Lee and Chumbley were using OnlyFans as a means to make money.

Lee was re-interviewed on November 30, 2020, by the Illinois State Police. This time, she had an attorney present. During this interview, Lee said she and Allen matched on Tinder in October 2018. The day they matched on Tinder, Allen invited Lee to his office for a “nooner,” which Lee took to mean having sexual intercourse over his lunch hour. A search on Dictionary.com reveals the definition of “nooner” to be: “(1) an activity to be taken during lunch, and 2) a brief midday sexual encounter.” (cite: [Nooner Definition & Meaning | Dictionary.com](#), last visited 9/13/2022). Lee said she did not see him in person until her November 2018 court date. According to Lee, this is when she learned he was the prosecutor on her DUI. After court, they messaged each other on Tinder. After communicating on Tinder, Lee and Allen messaged on Snapchat. During my investigation and through interviews, I learned that in June or July 2019, Allen asked Lee to send him nude photographs of herself over Snapchat. Lee sent him several nude photographs between June 2019 and August 2020. Allen also gave Lee legal advice, and discussed Lee’s court cases with her on Snapchat. On one occasion Allen suggested Lee’s DUI could be amended to Reckless Driving. Lee asked Allen how, and Allen said if she gives him “a little nudge” or “motivation”. Lee understood this to mean she’d benefit from sending Allen nude photographs or by performing sexual acts with Allen. Lee told investigators she expressed concerns to Allen that this would be prostitution; however, Allen responded that it was not prostitution if it was recorded – then it would be pornography. During Lee’s interview, she admitted to selling nude photographs on OnlyFans.

Lee also told Illinois State Police that in April or May 2020, Allen messaged her on Snapchat telling her he was the type of person she would want on her side. Allen then offered to talk with the new traffic court prosecutor on Lee’s behalf. Allen also offered to write positive notes in Lee’s prosecution file, which would allow her to receive a better outcome on her case than if Allen did not write any notes. He said he would make it look like the new prosecutor wrote the notes.

Through investigation and interviews, I learned that between 2019 and 2020, Lee and Chumbley learned that they were both talking with Allen. Lee and Chumbley addressed this directly with Allen. Lee recalls that Allen sent her a Snapchat saying, it was “inappropriate but it wasn’t illegal.”

Lee told the Illinois State Police that between July and August 2020, after Chumbley made these allegations public, Allen offered to pay Lee’s court costs (including restitution for a case in which Chumbley was the complaining witness) if Lee could get Chumbley to not pursue a complaint against him. The estimated amount of restitution was \$365.00. Lee also owed approximately \$880.00 in fines and court costs. Allen

also offered for Lee to live with him for a period of time. Allen asked Lee to talk to Chumbley multiple times. He would call, text, and Snapchat Lee for updates.

In late November 2020, Lee and Allen spoke through Facebook Messenger. I have reviewed those messages which include Allen initiating discussions with Lee about her interviews with law enforcement. Allen then referenced Lee's financial situation and mental health. Allen says he assumes the worst, but hopes he will "find out that it's all just a misunderstanding." Allen also asked to meet with Lee to talk. He told Lee he cared for her a lot, that she's always on his mind, and he "[. . .] will consider [her] a friend until [he's] proven wrong."

Allen also emailed Lee from his work email address. Lee's personal email address at that time was b.lee98@hotmail.com. Lee first emailed Allen on May 23, 2019, where she provided her case number and asked to get a future court date so she can complete her drug & alcohol evaluation. Lee provided a phone number he can reach her at: 217-259-1872. Allen emailed Lee back on December 12, 2019, more than six months later. At this time, I believe Lee and Allen communicated by other means between May 2019 and December 2019. In his December 12, 2019 email, Allen told Lee that they received a copy of her sworn report, which she needed to get her evaluation. Lee replied: "hahahaha oh lord. That's actually good and really sad at the same time. I'll come by and get it so I can schedule another evaluation. THANK YOU for the email, for real?"

Ashley Daigle ("Daigle")

On March 4, 2021, Ashley Daigle ("Daigle") contacted SA Danley to report she also had concerning interactions with Allen. On March 10, 2021, Illinois State Police met with Daigle, who reported that she "matched" with Allen on Tinder in 2018. During an early conversation with Daigle, Allen mentioned he was an Assistant State's Attorney, and Daigle indicated she was on the "other side of the law." After matching on Tinder, Allen and Daigle communicated via text message. According to Daigle, it reached the point where Allen would "blow up" Daigle's phone – on one occasion, Allen texted Daigle almost 30 messages in a row. Daigle recalls receiving one text message where Allen said he would have given her a better deal if she came in to talk with him privately or wore a mini skirt. On another occasion, when Daigle was not responding to Allen's text messages, Allen said he pulled Daigle's address from her case file and would send the police for a welfare check. At this point, Daigle felt uncomfortable and blocked his number.

About a year after matching on Tinder, Allen and Daigle matched on the Facebook dating application. In Facebook Messenger, Allen asked Daigle to go on a trip with him. At the time, Daigle's DUI, which was pending in Coles County, had not yet concluded, and Allen was the assigned prosecutor. Daigle was represented by attorney Monroe McWard. Daigle told Illinois State Police that she did not tell her attorney about her conversations with Allen because she was afraid she would get in trouble.

In March or April 2020, Allen and Daigle matched again *via* the Facebook dating application. Daigle's account name at this time was "Ash Jean". Their conversations were sexual in nature. Allen sent her photographs of him shirtless. Daigle and Allen also spoke on the phone at least one time. Between the first and second time they matched on the Facebook dating application, Daigle saw Allen in court.

On or about September 26, 2021, Daigle messaged Allen on Facebook asking him if he should have removed himself from her DUI prosecution considering the "intentions that were said and implied" on Tinder. Daigle also mentions that she had to block him to get him to stop messaging her. Allen responded to Daigle that her DUI prosecution had already concluded when they spoke. He acknowledged sending her messages and said he never meant to seem "pushy". Daigle then references Allen's prior "short skirt" comment, which Allen claimed was a joke. Allen does not deny communicating with Daigle on Tinder or through Facebook dating. According to Daigle, between 2018 and 2020, Allen requested she send him photographs and videos of her having sex with other men and women. When Daigle confronted Allen

regarding these requests in the September 2021 conversation, Allen said it “sounds like a joke I would crack.”

Stephanie Beltran (“Beltran”) & Mae Holec (“Holec”)

My investigation revealed additional women who Allen prosecuted that were subject to unusually informal communications.

One woman was Stephanie Beltran. On or about August 23, 2019, Allen and Beltran emailed back and forth regarding a traffic citation. Beltran uses the email Stephanie.beltran05@gmail.com. At one point, Allen emailed Beltran “by no means am I trying to blow you off”, to which Beltran replies “I d[o]n’t feel like you’re blowing me off, by any means :)” In reviewing their email communications, it appears Beltran had at least one in-person meeting with Allen. On October 3, 2019, Sam Gaines, a Deputy Chief with the Mattoon Police Department, copied Allen on an email to his staff. No other State’s Attorney employee was copied on the email. The email reflected: “The SAO has asked that any reports made by Stephanie Beltran pertaining to Shane Phelps stalking or harassing her be at least reported for SAO review.” Notably, Deputy Chief Gaines referenced vehicles that Shane Phelps may be driving and included Todd Reardon’s 2002 model Chevy Cavalier. Earlier that day, Allen emailed Gaines notifying him that Phelps had a suspended driver’s license. Allen also asked Gaines to “encourage [his] officers to entertain Ms. Beltran’s or any other reports of Phelps driving” because he “would VERY much like [to] catch Phelps driving, and any chance of catching him doing so---especially any incident when it might be caught on camera---would be of particular interest to [him].” In his email to Gaines, Allen communicated that Beltran had a pending Assault charge where Shane Phelps was the complaining witness, and she “isn’t the most reliable witness”. On November 13, 2019, Beltran gave Allen her cell phone number: 217-254-4266 *via* email.

My investigation revealed Mae Holec’s email is qholec@gmail.com. The email account reads “Quinn Holec”, but she signed her emails as Mae. Allen emailed Holec on September 30, 2019, stating “nice meeting with you today. I checked downstairs, and it looks like I need the judge to sign off on extending your time—which shouldn’t be a problem. I will just ask him about that in court tomorrow. I won’t need you to show up unless you just really want to. Lol”. Holec replies: “Nice meeting you as well! Thank you again for taking the time to meet with me today. As tempting as that sounds lol, I do however have class, but I can make it if you need me to. Please keep me updated :)”.

Brady Allen

According to emails sent and received by Allen, Allen was reassigned from the traffic courtroom to the misdemeanor courtroom on or about February 20, 2020 through June 2, 2020. It appears Allen worked on some traffic matters as he transitioned to his new position.

On August 23, 2020, Allen allegedly issued a written press release, which he signed. The press release reads in part: “It is true that I and Ms. Chumbley had a relationship outside of court based entirely over social media. . . . 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.”

Other ethics violations

During the course of Allen’s employment at the Coles County State’s Attorney’s Office, defense attorneys raised concerns on more than one occasion regarding Allen’s ethics. For example, a Partner at a criminal defense law firm emailed Allen on June 11, 2020, saying she found it inappropriate for a court date to be

set without coordinating with the attorney of record. She also did not believe it was appropriate that Allen had “direct contact with [her client]”.

Similarly, on May 6, 2020, a private defense attorney contacted Allen over email indicating a witness contacted them saying she received a telephone call from someone identifying themselves as “Brady” with the telephone number: 618-525-1044. Through my investigation, I learned this was Allen’s personal cell phone number. This witness said “Brady” told her about statements the defendant said. Defense counsel asked that any statements be disclosed. He also asked for copies of any text message conversations between Allen and the witness. Allen said that was his personal cell phone number, but he does not use it at work because of a “personal boundary [he’s] established for [him]self.” Allen denied calling the witness, but did say he texted her. Allen, who initiated the text conversation from his personal cell phone, told the attorney “it was not [his] intention for [the witness] to be given this number, but rather [his] office number.”

The same defense attorney emailed Allen again on May 14, 2020, after the witness provided him with screenshots of her text messages with Allen. At this point, the case was set for a final pre-trial conference. The defense counsel, in an email to Allen, said: “If you call witnesses, I will now be forced to cross-examine them with text messages that you sent suggesting what things you thought I would argue and what answers witnesses should give.” This defense counsel thought Allen should be disqualified as the prosecutor on the case because he was now a witness. In the text message to the witness, Allen says: “So basically here is the situation. If this goes to trial, his attorney is going to try to say he wasn’t the one who sent it—that someone else had his phone. So I need someone who was there to say, yes, he was in that class and that movie was playing that day. If you’re uncomfortable being that person who goes on the stand and says, ‘Yes, he was in class that day’ then I have to try to get hold of this instructor and have him testify that he was there. Would you be uncomfortable being the one to do that, even if we subpoenaed you so you could tell him you didn’t have a choice?” The witness said she was uncomfortable testifying.

Throughout his time as an Assistant State’s Attorney, Allen picked which defendants he chose to set boundaries with. For example, on April 8, 2019, Allen emailed a male defendant that he was not permitted to get lunch with him. I also learned that when a defendant called the office, they usually spoke to Allen’s secretary. In a January 3, 2020, email to a *pro se* defendant, Allen asserted that his secretary kept a call log for everyone who tried to reach him. Finally, when *pro se* defendants asked to speak with Allen on the phone, Allen referred back to the following language in his email replies: “I don’t discuss cases over the phone to avoid misunderstandings. We can either discuss it over email or I can set you up with an appointment to come in and discuss it with me.” He used this language often, which is inconsistent with other conversations this investigation has uncovered, which include Allen discussing cases with female criminal defendants through calls from his personal phone number, text message, Snapchat and Tinder.

Complainant alleges, upon information and belief as set forth herein, there is probable cause to believe that Snap Inc. ("Snapchat") possesses items of evidentiary value necessary to assist in the investigation of the aforementioned offenses.

WHEREFORE, I respectfully request that the search warrant be issued as applied for herein.

Sgt. Windy Westfall #5210
Sergeant Windy Westfall

Illinois State Police (Special Investigations Unit)

Subscribed and sworn

before me on 9-20, 2022

[Signature]

Judge

CERTIFIED TRUE COPY
Date 9-20-22
Melissa Hurst
CIRCUIT CLERK COLES CO

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

FILED
SEP 26 2022

22MY311
Circuit Clerk COLES COUNTY, ILLINOIS

SEARCH WARRANT

PLACE TO BE SEARCHED AND ITEMS TO BE SEIZED:

On this day, **Sergeant Windy Westfall**, of the **Illinois State Police (Special Investigations Unit)**, has subscribed and sworn to a Complaint for a Search Warrant before me. Upon examination of the Complaint, I find that it states facts sufficient to show probable cause; I therefore command you to search:

Snap Inc. ("Snapchat"), located at **2772 Donald Douglas Loop North, Santa Monica, CA 90405 (ATTN: Custodian of Records)** and to seize the following instruments, articles and things, including records pertaining to the Snapchat account(s) associated with the following individuals:

Brady Lee Allen

Date of birth: 03/08/1989
Known phone numbers: 618-525-1044 & 618-303-1088
Address: 1202 Lincoln Avenue, Apartment 35, Charleston, Illinois 61920
Email: brady_allen89@yahoo.com & BAllen@co.coles.il.us
Snapchat username: **wrath1989**

Brianna Lee

Date of birth: 11/24/1998
Known phone numbers: 217-790-0681, 217-259-1872 & 217-250-1192
Address: 1316 Shelby Avenue, Mattoon, Illinois 61938
Email: b.lee98@hotmail.com

Kara Chumbley

Date of birth: 11/15/1998
Known phone Number: 217-294-0246
Address: 112 North 11th Street, Mattoon, Illinois 61938

On the following dates/times: October 1, 2018, through September 30, 2021, to wit:

1. **Information Provided by the Snapchat User to include:** name; username; vanity name; password; email address; phone number; date of birth; profile picture; Bitmoji avatar; debit and/or credit card number and its associated account information; content of "Snaps" (sent and received) between Brady Allen and the following individuals: Brianna Lee *and* Kara Chumbley; content of "Chats" (sent and received) between Brady Allen and the following individuals: Brianna Lee *and* Kara Chumbley; content uploaded to "Snapchat Story"; content of "Memories";
2. **Information Snapchat collects when the Snapchat User uses Snapchat's services to include:** usage information regarding how the user interacted with Snapchat's services including search queries submitted by the user; the names of other "Snapchatters" the user has communicated with; the time and date of communication with other "Snapchatters"; the number of messages exchanged between Brady Allen and the following individuals: Brianna Lee *and* Kara Chumbley; Brady Allen's interactions with messages sent to and received from Brianna Lee *and* Kara Chumbley (such as when a message is opened or screenshotted); user created content information such as custom stickers; information regarding if the recipient has viewed the content sent by user and any metadata provided with the content for communications between Brady Allen and the following individuals: Brianna Lee *and* Kara Chumbley;

3. **Device information to include:** hardware and software information such as the hardware model, operating system version, device memory, advertising identifiers, unique application identifiers, apps installed, unique device identifiers to include International Mobile Equipment Identified (IMEI), Mobile Equipment Identifier (MEID) Unique Device Identification (UDID), browser type, keyboards installed, language, and time zone; information from device sensors such as accelerometers, gyroscopes, compasses, microphones; information about the users' wireless and mobile network connections, such as mobile phone number, service provider, IP address, and signal strength; device phonebook information; images, videos, and other information from the users' camera roll and photos;
4. **Location information to include:** location information derived from GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors such as gyroscopes, accelerometers, and compasses;
5. **Information Collected by cookies and other technologies to include:** web beacons, web storage, and unique advertising identifiers;
6. **Log information when a person uses Snapchat's website:** details about how a person has used Snapchat's services; device information such as web browser type and language; access time; pages viewed; IP address; identifiers associated with cookies or other technologies that may uniquely identify a person's device or browser; pages visited before or after navigating to Snapchat's website; Snapchat account creation date and IP address; timestamp and IP address of account logins and logouts; logs of previous "Snaps", "Stories", and "Chats"; and
7. **Information Snapchat collected from third parties:** information about how the users used another service linked to their Snapchat account; information shared by advertisers, app developers, or other third parties.

Which constitutes evidence of the offenses of: **Official Misconduct**, in violation of 720 ILCS 5/33-3; and **Bribery**, in violation of 720 ILCS 5/44-1.

YOU ARE NOT TO DISCLOSE THE EXISTENCE OF THIS SEARCH WARRANT UNTIL AFTER AT LEAST 90 DAYS OF THE DATE OF ISSUANCE. DOING SO MAY IMPEDE AN ONGOING INVESTIGATION.

All records to be provided in an electronic format and be disclosed to Sergeant Windy Westfall or Master Sergeant Matthew Barber or any other law enforcement with the Illinois State Police.

I further command that a return of anything so seized shall be made without unnecessary delay before me, or before any Court of competent jurisdiction.

Date of issuance: 9-20-22
 Time 8:34 (A.M.)/P.M.

 [Signature]

Judge

CERTIFIED TRUE COPY
 Date 9-20-22
 Melissa Hurst
 CIRCUIT CLERK COLES CO

FILED
SEP 20 2022

Melissa Hurst
Circuit Clerk COLES COUNTY, ILLINOIS

**STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE 5TH JUDICIAL CIRCUIT,
COUNTY OF COLES**

IN RE: *Illinois State Police
investigation 20-1005-SP-SIU*

NO. 2022-MX-311

MOTION TO SEAL SEARCH WARRANT

NOW COME the People of the State of Illinois by and through the Attorney General of the State of Illinois, Kwame Raoul, and his assistant, Mara Somlo, and respectfully request the Court to seal all documents filed in the above-entitled cause. In support of this motion, the People state as follows:

1. A Search Warrant is being sought to further an ongoing criminal investigation.
2. The Complaint for Search Warrant and Search Warrant contain confidential information regarding the details of the pending investigation, including, but not limited to, statements of witnesses and physical evidence.
3. A Seal Order is necessary to protect the integrity of the investigation, the public interest, including officer safety, and the safety of any cooperating witness.

WHEREFORE, the People of the State of Illinois respectfully request that for the compelling reasons stated above, that the Court seal the above Complaint, Search Warrant, and any additional documents and filings under the case number until further order of the Court consistent with the Supreme Court rules of discovery.

I, Mara Somlo, of the Office of the Illinois Attorney General, being duly sworn according to law, do on oath say that the matters and things set out in the within petition are true, to the best of my knowledge and information and belief.

THE PEOPLE OF THE STATE OF ILLINOIS
BY: KWAME RAOUL
ILLINOIS ATTORNEY GENERAL



Mara Somlo
Assistant Attorney General
Illinois Attorney General's Office
100 W. Randolph Street, 12th Floor
(773) 758-4623
Mara.somlo@ilag.gov

CERTIFIED TRUE COPY
Date 9/22/2022
Mollasa Hurst
CIRCUIT CLERK COLES CO

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE 5TH JUDICIAL CIRCUIT
COUNTY OF COLES

FILED
SEP 20 2022

Melissa Hurst
Circuit Clerk COLES COUNTY, ILLINOIS

IN RE: *Illinois state police
investigation 20-1005-SP-514*

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NO. 2022-MX-311

ORDER

Pursuant to the Motion to Seal Search Warrant, having been duly advised of the premises,
the Court hereby grants the Motion to Seal the Search Warrant until further order of the Court.

ENTER: 9-20-22



Judge

CERTIFIED TRUE COPY
Date 9/20/22
Melissa Hurst
CIRCUIT CLERK COLES CO

FILED
22MX3184P 20 2022
Melissa Hurst
Circuit Clerk COLES COUNTY, ILLINOIS

STATE OF ILLINOIS)
) SS.
COUNTY OF COLES)

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

COMPLAINT FOR SEARCH WARRANT

I. PLACE TO BE SEARCHED AND ITEMS TO BE SEIZED

Now appears **Sergeant Windy Westfall, of the Illinois State Police (Special Investigations Unit)**, Complainant, before the undersigned judge of the Fifth Judicial Circuit Court, requesting the issuance of a Search Warrant to search the premises of **Match Group LLC ("Tinder")**, located at **8750 N. Central Expressway, Suite 1400, Dallas, TX 75231 (ATTN: Tinder)**, and to seize the following instruments, articles and things which have been used in the commission of, or which constitute evidence of, the offenses of **Official Misconduct**, in violation of 720 ILCS 5/33-3; and **Bribery**, in violation of 720 ILCS 5/44-1, to include records pertaining to the Tinder account(s) associated with the following individuals ("Users"):

Brady Lee Allen

Date of birth: 03/08/1989
Known phone numbers: 618-525-1044 & 618-303-1088
Address: 1202 Lincoln Avenue, Apartment 35, Charleston, Illinois 61920
Email: brady_allen89@yahoo.com & BAllen@co.coles.il.us

Brianna Lee

Date of birth: 11/24/1998
Known phone numbers: 217-790-0681, 217-259-1872 & 217-250-1192
Address: 1316 Shelby Avenue, Mattoon, Illinois 61938
Email: b.lee98@hotmail.com

Kara Chumbley

Date of birth: 11/15/1998
Known phone Number: 217-294-0246
Address: 112 North 11th Street, Mattoon, Illinois 61938

Ashley Daigle

Date of birth: 02/09/1991
Known phone numbers: 217-820-0694, 217-561-3309, 217-820-0313 & 217-343-1778
Address: 1638 State Highway 16, Shelbyville, Illinois 62565

On the following dates/times: October 1, 2018, through September 30, 2021, to wit:

1. **Information Collected Directly From Users:** Any information associated with the above users, including but not limited to the user's full name; log in credentials; gender; date of birth; personality details; lifestyle; interests; content (such as photos and videos); content accessed through the user's camera or photo album; sensitive information (such as racial or ethnic origins, sexual orientation, and religious belief); financial information (such as the user's credit or debit card); survey or focus group participation (such as insights into products and services as well as responses to Tinder's questions and testimonials); information gathered from participation in promotions or events or

contests; information given during communications with Tinder's customer care team; information collected about others that is given by the user; and any chats between Brady Allen and the following individuals: Brianna Lee, Kara Chumbley, and Ashley Daigle; and content any of the above users publish;

2. **Information Received From Others:** Any information collected about the user from others, including from other users, through any and all social media accounts linked to the user's Tinder account(s), and from Tinder's partners;
3. **Usage Information:** Any information collected regarding how the user's activity on Tinder services, such as date and time the user logged in; features the user has been using; searches and search parameters; clicks and pages which have been shown to the user; referring webpage addresses; and advertisements the user clicks on;
4. **Interactions Between the User and Others:** Any information regarding how Brady Allen interacts with Brianna Lee, Kara Chumbley, and Ashley Daigle, such as: which of these users Brady Allen connects and interacts with; time and date of the users' exchanges; the number of messages the users send and receive; and the content of the interactions;
5. **Device Information:** Any information collected about the device(s) Brady Allen uses to access Tinder services, including hardware and software information such as IP address; device ID and type; device-specific and apps settings and characteristics; app crashes; advertising IDs such as Google's AAID and Apple's IDFA; browser type, version and language; operating system; time zones; identifiers associated with cookies or other technologies that may identify the user's device or browser; information on the user's wireless and mobile network connection; and information on device sensors such as accelerometers, gyroscopes, and compasses; and
6. **Location Data.** Any precise or approximate location information obtained by Tinder for Brady Allen's account GPS location data and IP addresses.

Your Affiant believes that the foregoing instruments, articles and things are located within the records of Match Group LLC ("Tinder"), located at 8750 N. Central Expressway, Suite 1400, Dallas, TX 75231.

All records to be provided in an electronic format and be disclosed to Sergeant Windy Westfall or Master Sergeant Matthew Barber or any other law enforcement personnel with the Illinois State Police.

In support of the foregoing, your Affiant states the following facts:

II. INVESTIGATOR BACKGROUND

I, Sergeant Windy Westfall, am an Investigator and sworn law enforcement officer in the State of Illinois and as such am authorized to execute search warrants. I have been employed with the Illinois State Police for 22 years. I have investigated criminal violations in the State of Illinois for 16 years, including but not limited to allegations of Official Misconduct and Bribery. Throughout my career, I have attended trainings related to social media, including but not limited to trainings in the proper identification, preservation, and collection of digital devices and storage media. I have also attended trainings in the proper identification, preservation, and analysis of social media records. I have extensive knowledge of regular usage of several social media platforms. I have investigated over 50 cases involving computers or internet crimes that resulted in numerous arrests and convictions.

Tinder is an online dating app that matches couples based on their physical attraction to one another. It alerts you to other Tinder users who fall within a specified age range and gender and are within a certain distance of your location, and it lets you know whether you have any mutual friends.

Users decide whether or not you like the look of a person. If you're both interested, then Tinder's messaging function offers you a private chat thread in which to talk and get to know each other better.

You'll also have to fill out your own profile. Tinder pulls some information from your Facebook profile, such as your job and education, but you can choose what to display and write out a short bio of yourself. You also need to pick a few photos to include – you can pull these either from your phone's image library or your Facebook account.

Tinder's primary companion site has been Facebook. Using Facebook, Tinder is able to build a user profile with photos that have already been uploaded. Basic information is gathered, and the user's social graph is analyzed. Candidates who are most likely to be compatible based on geographical location, number of mutual friends, and common interests are streamed into a list of matches. Based on the results of potential candidates, the app allows the user to anonymously like another user by swiping right or pass by swiping left on them. If two users like each other, it results in a "match" and they are able to chat within the app. Chatting on Tinder is only available between two users that have swiped right on one another's photos. The selections a user makes are not known to other users, unless two individuals swipe right on each other's profiles. However, once the user matches on the app, they are able to send personal photos called "Tinder Moments" to all matches at once, allowing each match to like or not like the photos.

Tinder offers a variety of features within their services. The Swipe is central to Tinder's design, as it is how users choose whether or not they are interested in matching with another user. Messaging is also a heavily utilized feature. Once a user matches with another user, they are able to exchange text messages on the app. Instagram integration enables users to access other users' Instagram profiles. Common Connections allows users to see whether they share a mutual Facebook friend with a match or when a user and their match have two separate friends who happen to be friends with each other. Tinder Gold, which was introduced worldwide in August 2017, is a premium subscription feature that allows the user to see those who have already liked them before swiping. Panic Button was introduced in the US in January 2020 and includes emergency assistance, location tracking, and photo verification. In March 2015, Tinder released its paid service, Tinder Plus, a feature allowing unlimited matches, whereas the free Tinder app limits the number of right swipes in a 12-hour period.

Tinder collects information that the users give them and information that is collected from others. Tinder also collects information generated as users access their services, for example, access logs, as well as information from third parties, like when users access Tinder services through a social media account.

The facts set forth in this Complaint are based on your Affiant's personal knowledge and investigation. The Complaint is also based on knowledge your Affiant obtained from other individuals, including other law enforcement officers, your Affiant's review of documents related to this investigation, communications with others who have personal knowledge of the events and circumstances described in this Complaint, and information gained through your Affiant's training and experience.

Your Affiant submits this Complaint for the limited purpose of showing there is sufficient probable cause to support issuing a warrant to search for, seize, and analyze the items identified here. This Complaint does not purport to set forth all of your Affiant's knowledge of, or investigation into, this matter. Unless specifically indicated otherwise, all conversations and statements described in this Complaint are related in substance and in part only.

III. FACTS IN SUPPORT OF PROBABLE CAUSE

The Illinois State Police, Division of Criminal Investigation, Special Investigations Unit, was made aware of allegations of Official Misconduct and Bribery against then-Coles County Assistant State's Attorney

Brady Allen (“Allen”), on August 12, 2020. On August 26, 2020, the Special Investigations Unit received an official request from Coles County State’s Attorney Jesse Danley to conduct an investigation into Allen.

Throughout the course of my investigation, I identified several women who communicated with Allen in an unusual nature and through unusual channels, given his position as the Assistant State’s Attorney assigned to each woman’s criminal prosecution.

Through investigation and interviews, I learned Allen was born on March 8, 1989. He has two known phone numbers, both serviced by AT&T. Those numbers are: 618-525-1044 and 618-303-1088. Allen served as an Assistant State’s Attorney in Coles County from December 2018 through August 2020. During his time at the Coles County State’s Attorney’s Office, Allen was assigned as the traffic prosecutor and misdemeanor prosecutor. Allen used his county-provided email address, BAllen@co.coles.il.us, to communicate interoffice, with defense counsel, victims, and *pro se* defendants. However, between December 2018 and August 2020, Allen also communicated with *pro se* defendants through his personal cell phone by way of text message, phone call, video chat, Snapchat, Facebook, and Tinder. These communications were with female defendants who were between 17 years old and 29 years old in 2018. All women were from the surrounding area. Allen did not communicate with all female defendants in this manner, but at this time, your Affiant is aware of Allen doing so with the following group of women:

Halie Michalski (“Michalski”)

Through interviews and investigation, I learned that in April 2019, Michalski received a speeding ticket in Coles County. Allen was the prosecutor assigned to her case. Michalski recalls Allen sent her a “Friend Request” on Facebook, and a message through Facebook Messenger. Michalski said she did not accept his “Friend Request” or respond to his message, but she found it strange that he tried to contact her this way. In an email to Michalski (hmmichalski@eiu.edu) dated August 19, 2019, Allen said he “. . . [hasn’t] forgotten [her].... And while [he’s] of course disappointed [she] won’t be joining [them] (in court), if [she is] sure [she’s] good on having everything paid and [she’s] really been good, [he’ll] excuse [her] from court...”. Allen also said that since she is no longer a defendant in this courtroom, she should “feel free to find [him] on Facebook and message [him] that way.”

Carlee Wilson (“Wilson”)

Through interviews and investigation, I learned that Wilson had both traffic and misdemeanor cases pending in Coles County between December 2018 and August 2020, including several matters where Allen was the assigned prosecutor. According to Wilson, she first exchanged cell phone numbers with Allen when she met him in his office to discuss her court cases. Throughout January 2020, Allen texted Wilson regarding her court cases. On January 17, 2020, Allen texted Wilson indicating there would be movement within the office, and he would only be handling traffic matters for a couple of more weeks. In a separate text message, Allen said he would “let it slide” that Wilson received a traffic ticket while she was already on Court Supervision. This ordinarily would be a violation of Wilson’s sentence, and a basis for Allen to file a Petition to Revoke.

In July 2020, Carlee Wilson was arrested for unlawful possession of drug paraphernalia in Coles County. Allen was the assigned prosecutor. On July 16, 2020, Wilson emailed Allen to try to arrange a meeting to discuss the case. Wilson’s email address at that time was carleewilson22@gmail.com. On July 30, 2020, Allen emailed Wilson saying he “had shot [her] a message over Facebook because it was after hours when [he] was brainstorming on what to do with [her] situation . . .”. After reviewing emails between Allen and Wilson, I believe the “situation” Allen refers to is the fact that Wilson 1) is already on a term of Court Supervision for another matter and/or 2) may not be eligible for Court Supervision given her driving and criminal history. On August 5, 2020, Allen emailed Wilson: “I think I can pull it off. Just keep that bit about the prior supervision on the down low, and I don’t expect anyone to ask questions.”

Based on my investigation, I learned Wilson spoke with Allen on his cell phone on more than one occasion.

Wilson and Allen also communicated through Facebook Messenger. According to Wilson, they usually spoke about her court cases. Wilson's known phone numbers include: 217-460-0049.

Brianna Harshbarger ("Harshbarger")

Through investigation and interviews, I learned that Harshbarger was arrested in Coles County for Battery in July 2020. At the time, Harshbarger had a number of traffic and misdemeanor offenses pending in Coles County. Harshbarger emailed Allen regarding her case because he was the assigned prosecutor. Harshbarger's email address is amivah62714@gmail.com.

On January 16, 2020, Allen emailed Harshbarger: "I don't normally like to do this, but you don't seem crazy to me, so I'm ok with doing it this way. I'm about to have to be in court for the rest of the afternoon, and won't be here tomorrow or Monday. So if you don't want to wait until I get back Tuesday, you can text me at 6185251044 (please keep that to yourself) and we can try to work out a time for a meeting to discuss your cases." Harshbarger told investigators Allen gave her his personal cell phone number, but she did not feel comfortable communicating with him in this manner.

On March 12, 2020, in an email exchange with Harshbarger, Allen wrote: "[o]n another note... [t]his might be none of my business, and this totally stays between you and me. Anything you say to me on this won't be relayed to Judge O'Brien. . . . [b]ut[,] I know you had been ordered in misdemeanor court to apply your entire tax return. You then asked if you could just pay \$1000 of it. And you sort of had a deer-in-the-headlights look. Had you by chance already spent the rest of it? You going to be able to make that payment? I was just a little concerned. This is coming from Brady Allen, the human being, not Brady Allen the prosecutor."

On May 6, 2020, in an email with the subject line "April 22 Incident", Allen wrote Harshbarger: "Normally, I just have to go off of the report, but since I'm familiar with you, I wanted to reach out and hear what happened from your perspective and what the situation is now."

On June 22, 2020, in an email with the subject line "Domestic", Allen emailed Harshbarger saying "[n]ot to be a pest—just wanting to make sure you're good since I never heard back from you last week." Harshbarger replied that she had been out of state on vacation.

Other emails between Allen and Harshbarger are informal, and contain swear words and slang. On one occasion, Harshbarger asks for additional time to make payments on post-sentence traffic matters, to which Allen told her he "can continue whatever [he] want[s]. Haha. But yeah, the judge does not seem to be [her] biggest fan."

According to Harshbarger, they met at Allen's office at least one time between December 2018 and August 2020.

Kara Chumbley ("Chumbley")

Based on interviews and investigation, I learned Chumbley and Allen met in August or September 2019 at the Coles County Courthouse when she attended a court date for her DUI. Sometime thereafter, in December 2019 or January 2020, Chumbley and Allen "matched" on Tinder. Tinder is a dating application men and women use to establish romantic relationships, among other things. According to Chumbley, Allen messaged her first on Tinder, while he was the assigned prosecutor on her pending Coles County DUI. Chumbley knew of Allen through her long-time friend (and one time roommate, Brianna Lee), who told Chumbley about her interactions with Allen. In a Tinder message, Chumbley mentioned to Allen that he was the prosecutor on her case, and Allen told her it was ok as long as they were not dating. After that conversation, Allen asked Chumbley for her Snapchat name and they began communicating through Snapchat. According to Chumbley, most of the conversations between Chumbley and Allen were on Snapchat and were flirtatious and/or sexual in nature.

Chumbley identified Allen's Snapchat name as "Brady Allen" with the account name: "wrath1989." I confirmed Allen was born in 1989. On or about March 3 and March 4, 2020, Chumbley received the following messages from Allen over Snapchat:

Allen: 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 *purple devil emoji*

Allen: How's that for a plan?

Allen: What time do you get off?

Allen: 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...

Allen: You're killing me here.

Allen: Do you have any interest in getting together?

Allen: 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.

I have viewed screenshots (saved by Chumbley) of the above messages. According to Chumbley, when Allen referred to her "situation", he was talking about the DUI prosecution. Chumbley understood these messages to mean Allen would talk to her about her DUI prosecution while she had sex with him and he would give her legal advice regarding her DUI case while she used her mouth to perform a sexual act on him.

My investigation and interviews revealed that Allen also asked Chumbley to send him nude photographs and videos of her multiple times over Snapchat; Chumbley indicated Allen was persistent in this regard. And therefore, she sent a nude photograph to him over Snapchat. Chumbley believes Allen saved the photograph to his cell phone's camera roll because she received a notification to that effect on Snapchat.

Before the COVID-19 pandemic and the corresponding court closures, on or about February 18, 2020, Chumbley saw Allen in court. She was wearing her Apple watch, and she received a Snapchat message from Allen. The message said she looked pretty. Chumbley was unable to bring her phone into the courtroom, and did not reply until she left the courtroom. According to Chumbley, Allen sent this message when he was up before the Judge's bench, and she was waiting for her case to get called.

Between September 2019 and August 2020, Allen and Chumbley also communicated on Facebook Messenger. At the time, Allen's Facebook name was "Brady Allen". On or about July 24, 2020, Allen messaged Chumbley asking if she did not trust him. At this time, Allen was no longer the assigned prosecutor on her DUI case. She told him that she was going to get her first DUI amended to Reckless Driving, so she wanted to keep her distance. On or about July 28, 2020, Allen told Chumbley that he was not trying to hide that he's "been interested in getting with" Chumbley and/or Brianna Lee now that he "was no longer on [their] cases." Allen also said that Brianna Lee did not seem to "lose interest" like Chumbley did around April. Allen continued to compare Brianna Lee and Chumbley and said Chumbley was more "conservative in that area" than Brianna Lee was. Allen also wrote to Chumbley that he is "[. . .] just like a slut for someone [he] would date." Chumbley messaged Allen that she does not "put out for everyone," and Allen replied, in part, "you wouldn't want to date a guy who is into the stuff I'm into." The conversation ended with Allen asking to take Chumbley and Brianna Lee out for dinner. He also asked that they "act like friends," and that she not kick him off Snapchat. Through interviews, I learned that Chumbley understood this conversation to mean she was not as willing to fulfill Allen's sexual desires as Brianna Lee.

This Affiant has reviewed screenshots of these messages, which were provided to and reviewed by the Illinois State police, and can confirm that the account named "Brady Allen" had a profile photograph that matched Allen's physical appearance.

I also learned that Chumbley and Allen communicated through text messages. According to Chumbley, when she and Allen began to discuss court matters, Allen would text Chumbley asking for her to call him. However, on one occasion, around March 2020, Chumbley texted Allen asking him if she should accept a plea deal – he was the prosecutor on the case. Chumbley was represented at the time by attorney Todd M. Reardon. Chumbley told Illinois State Police that she did not feel comfortable telling her attorney about her conversations with Allen until their first court date after the COVID-19 shutdown. According to Chumbley, this is when she learned Allen was no longer the prosecutor on her case. On August 21, 2020, Attorney Reardon filed a Motion to Dismiss in Chumbley's criminal court cases pending in Coles County: 19DT76 and 19DT100. On January 25, 2021, Chumbley entered a plea to Driving Under the Influence of Alcohol (Case number 2019DT100) in exchange for Court Supervision. Pursuant to this plea, Chumbley's other Driving Under the Influence of Alcohol (Case number 2019DT76) was dismissed.

Brianna Lee ("Lee")

Coles County State's Attorney Jesse Danley ("SA Danley") requested that Lee be interviewed by the Mattoon Police Department ("MPD") after Chumbley's allegations came to light. After watching the interview, which occurred on August 24, 2020, SA Danley requested that the Appellate Prosecutor handle all cases with known or alleged victims of Allen. The same day of the interview, Allen texted Lee. According to Lee, they discussed news media covering the allegations, and Allen said if there is no proof, he is good.

Lee told the MPD she communicated with Allen on Tinder, Snapchat, by text message, and phone call. She said the messages were sexual in nature, and included her sending nude photographs on Snapchat. Lee believes Allen saved those photographs because Snapchat notified her they were saved to a camera roll. Lee told the MPD that Allen told her she "needs him." At the time, he was no longer the prosecutor on her DUI, but Lee had matters pending in other courtrooms, including the misdemeanor courtroom where Allen was reassigned. Allen also offered to "sway" the new traffic prosecutor, whom Allen identified as "Larry" to assist Lee in getting a favorable result in her DUI case. This Affiant is aware that the traffic prosecutor that replaced Allen was Assistant State's Attorney Lawrence Brandel. Lee also told the MPD that Allen asked her to get Chumbley not to testify against him. In exchange, Allen said he would pay Lee's remaining court costs, including restitution owed by Lee to Chumbley in an unrelated Criminal Damage to Property case.

Lee agreed to let the MPD dump her cell phone during the interview. In reviewing the content collected from the phone dump, Illinois State Police investigators learned that Lee and Chumbley had or have profiles on OnlyFans. OnlyFans is a website or application where individuals sell photographs or videos. It is often used for adult-only content. Lee and Chumbley were using OnlyFans as a means to make money.

Lee was re-interviewed on November 30, 2020, by the Illinois State Police. This time, she had an attorney present. During this interview, Lee said she and Allen matched on Tinder in October 2018. The day they matched on Tinder, Allen invited Lee to his office for a "nooner," which Lee took to mean having sexual intercourse over his lunch hour. A search on Dictionary.com reveals the definition of "nooner" to be: "1) an activity to be taken during lunch, and 2) a brief midday sexual encounter." (cite: [Nooner Definition & Meaning | Dictionary.com](https://www.dictionary.com/browse/nooner), last visited 9/13/2022). Lee said she did not see him in person until her November 2018 court date. According to Lee, this is when she learned he was the prosecutor on her DUI. After court, they messaged each other on Tinder. After communicating on Tinder, Lee and Allen messaged on Snapchat. During my investigation and through interviews, I learned that in June or July 2019, Allen asked Lee to send him nude photographs of herself over Snapchat. Lee sent him several nude photographs between June 2019 and August 2020. Allen also gave Lee legal advice, and discussed Lee's court cases

with her on Snapchat. On one occasion Allen suggested Lee's DUI could be amended to Reckless Driving. Lee asked Allen how, and Allen said if she gives him "a little nudge" or "motivation". Lee understood this to mean she'd benefit from sending Allen nude photographs or by performing sexual acts with Allen. Lee told investigators she expressed concerns to Allen that this would be prostitution; however, Allen responded that it was not prostitution if it was recorded – then it would be pornography. During Lee's interview, she admitted to selling nude photographs on OnlyFans.

Lee also told Illinois State Police that in April or May 2020, Allen messaged her on Snapchat telling her he was the type of person she would want on her side. Allen then offered to talk with the new traffic court prosecutor on Lee's behalf. Allen also offered to write positive notes in Lee's prosecution file, which would allow her to receive a better outcome on her case than if Allen did not write any notes. He said he would make it look like the new prosecutor wrote the notes.

Through investigation and interviews, I learned that between 2019 and 2020, Lee and Chumbley learned that they were both talking with Allen. Lee and Chumbley addressed this directly with Allen. Lee recalls that Allen sent her a Snapchat saying, it was "inappropriate but it wasn't illegal."

Lee told the Illinois State Police that between July and August 2020, after Chumbley made these allegations public, Allen offered to pay Lee's court costs (including restitution for a case in which Chumbley was the complaining witness) if Lee could get Chumbley to not pursue a complaint against him. The estimated amount of restitution was \$365.00. Lee also owed approximately \$880.00 in fines and court costs. Allen also offered for Lee to live with him for a period of time. Allen asked Lee to talk to Chumbley multiple times. He would call, text, and Snapchat Lee for updates.

In late November 2020, Lee and Allen spoke through Facebook Messenger. I have reviewed those messages which include Allen initiating discussions with Lee about her interviews with law enforcement. Allen then referenced Lee's financial situation and mental health. Allen says he assumes the worst, but hopes he will "find out that it's all just a misunderstanding." Allen also asked to meet with Lee to talk. He told Lee he cared for her a lot, that she's always on his mind, and he "[. . .] will consider [her] a friend until [he's] proven wrong."

Allen also emailed Lee from his work email address. Lee's personal email address at that time was b.lee98@hotmail.com. Lee first emailed Allen on May 23, 2019, where she provided her case number and asked to get a future court date so she can complete her drug & alcohol evaluation. Lee provided a phone number he can reach her at: 217-259-1872. Allen emailed Lee back on December 12, 2019, more than six months later. At this time, I believe Lee and Allen communicated by other means between May 2019 and December 2019. In his December 12, 2019 email, Allen told Lee that they received a copy of her sworn report, which she needed to get her evaluation. Lee replied: "hahahaha oh lord. That's actually good and really sad at the same time. I'll come by and get it so I can schedule another evaluation. THANK YOU for the email, for real?"

Ashley Daigle ("Daigle")

On March 4, 2021, Ashley Daigle ("Daigle") contacted SA Danley to report she also had concerning interactions with Allen. On March 10, 2021, Illinois State Police met with Daigle, who reported that she "matched" with Allen on Tinder in 2018. During an early conversation with Daigle, Allen mentioned he was an Assistant State's Attorney, and Daigle indicated she was on the "other side of the law." After matching on Tinder, Allen and Daigle communicated via text message. According to Daigle, it reached the point where Allen would "blow up" Daigle's phone – on one occasion, Allen texted Daigle almost 30 messages in a row. Daigle recalls receiving one text message where Allen said he would have given her a better deal if she came in to talk with him privately or wore a mini skirt. On another occasion, when Daigle was not responding to Allen's text messages, Allen said he pulled Daigle's address from her case file and would send the police for a welfare check. At this point, Daigle felt uncomfortable and blocked his number.

About a year after matching on Tinder, Allen and Daigle matched on the Facebook dating application. In Facebook Messenger, Allen asked Daigle to go on a trip with him. At the time, Daigle's DUI, which was pending in Coles County, had not yet concluded, and Allen was the assigned prosecutor. Daigle was represented by attorney Monroe McWard. Daigle told Illinois State Police that she did not tell her attorney about her conversations with Allen because she was afraid she would get in trouble.

In March or April 2020, Allen and Daigle matched again *via* the Facebook dating application. Daigle's account name at this time was "Ash Jean". Their conversations were sexual in nature. Allen sent her photographs of him shirtless. Daigle and Allen also spoke on the phone at least one time. Between the first and second time they matched on the Facebook dating application, Daigle saw Allen in court.

On or about September 26, 2021, Daigle messaged Allen on Facebook asking him if he should have removed himself from her DUI prosecution considering the "intentions that were said and implied" on Tinder. Daigle also mentions that she had to block him to get him to stop messaging her. Allen responded to Daigle that her DUI prosecution had already concluded when they spoke. He acknowledged sending her messages and said he never meant to seem "pushy". Daigle then references Allen's prior "short skirt" comment, which Allen claimed was a joke. Allen does not deny communicating with Daigle on Tinder or through Facebook dating. According to Daigle, between 2018 and 2020, Allen requested she send him photographs and videos of her having sex with other men and women. When Daigle confronted Allen regarding these requests in the September 2021 conversation, Allen said it "sounds like a joke I would crack."

Stephanie Beltran ("Beltran") & Mae Holec ("Holec")

My investigation revealed additional women who Allen prosecuted that were subject to unusually informal communications.

One woman was Stephanie Beltran. On or about August 23, 2019, Allen and Beltran emailed back and forth regarding a traffic citation. Beltran uses the email Stephanie.beltran05@gmail.com. At one point, Allen emailed Beltran "by no means am I trying to blow you off", to which Beltran replies "I d[o]n't feel like you're blowing me off, by any means :)." In reviewing their email communications, it appears Beltran had at least one in-person meeting with Allen. On October 3, 2019, Sam Gaines, a Deputy Chief with the Mattoon Police Department, copied Allen on an email to his staff. No other State's Attorney employee was copied on the email. The email reflected: "The SAO has asked that any reports made by Stephanie Beltran pertaining to Shane Phelps stalking or harassing her be at least reported for SAO review." Notably, Deputy Chief Gaines referenced vehicles that Shane Phelps may be driving and included Todd Reardon's 2002 model Chevy Cavalier. Earlier that day, Allen emailed Gaines notifying him that Phelps had a suspended driver's license. Allen also asked Gaines to "encourage [his] officers to entertain Ms. Beltran's or any other reports of Phelps driving" because he "would VERY much like [to] catch Phelps driving, and any chance of catching him doing so---especially any incident when it might be caught on camera---would be of particular interest to [him]." In his email to Gaines, Allen communicated that Beltran had a pending Assault charge where Shane Phelps was the complaining witness, and she "isn't the most reliable witness". On November 13, 2019, Beltran gave Allen her cell phone number: 217-254-4266 *via* email.

My investigation revealed Mae Holec's email is qholec@gmail.com. The email account reads "Quinn Holec", but she signed her emails as Mae. Allen emailed Holec on September 30, 2019, stating "nice meeting with you today. I checked downstairs, and it looks like I need the judge to sign off on extending your time—which shouldn't be a problem. I will just ask him about that in court tomorrow. I won't need you to show up unless you just really want to. Lol". Holec replies: "Nice meeting you as well! Thank you again for taking the time to meet with me today. As tempting as that sounds lol, I do however have class, but I can make it if you need me to. Please keep me updated :)"

Brady Allen

According to emails sent and received by Allen, Allen was reassigned from the traffic courtroom to the misdemeanor courtroom on or about February 20, 2020 through June 2, 2020. It appears Allen worked on some traffic matters as he transitioned to his new position.

On August 23, 2020, Allen allegedly issued a written press release, which he signed. The press release reads in part: "It is true that I and Ms. Chumbley had a relationship outside of court based entirely over social media. . . . 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."

Other ethics violations

During the course of Allen's employment at the Coles County State's Attorney's Office, defense attorneys raised concerns on more than one occasion regarding Allen's ethics. For example, a Partner at a criminal defense law firm emailed Allen on June 11, 2020, saying she found it inappropriate for a court date to be set without coordinating with the attorney of record. She also did not believe it was appropriate that Allen had "direct contact with [her client]".

Similarly, on May 6, 2020, a private defense attorney contacted Allen over email indicating a witness contacted them saying she received a telephone call from someone identifying themselves as "Brady" with the telephone number: 618-525-1044. Through my investigation, I learned this was Allen's personal cell phone number. This witness said "Brady" told her about statements the defendant said. Defense counsel asked that any statements be disclosed. He also asked for copies of any text message conversations between Allen and the witness. Allen said that was his personal cell phone number, but he does not use it at work because of a "personal boundary [he's] established for [him]self." Allen denied calling the witness, but did say he texted her. Allen, who initiated the text conversation from his personal cell phone, told the attorney "it was not [his] intention for [the witness] to be given this number, but rather [his] office number."

The same defense attorney emailed Allen again on May 14, 2020, after the witness provided him with screenshots of her text messages with Allen. At this point, the case was set for a final pre-trial conference. The defense counsel, in an email to Allen, said: "If you call witnesses, I will now be forced to cross-examine them with text messages that you sent suggesting what things you thought I would argue and what answers witnesses should give." This defense counsel thought Allen should be disqualified as the prosecutor on the case because he was now a witness. In the text message to the witness, Allen says: "So basically here is the situation. If this goes to trial, his attorney is going to try to say he wasn't the one who sent it—that someone else had his phone. So I need someone who was there to say, yes, he was in that class and that movie was playing that day. If you're uncomfortable being that person who goes on the stand and says, 'Yes, he was in class that day' then I have to try to get hold of this instructor and have him testify that he was there. Would you be uncomfortable being the one to do that, even if we subpoenaed you so you could tell him you didn't have a choice?" The witness said she was uncomfortable testifying.

Throughout his time as an Assistant State's Attorney, Allen picked which defendants he chose to set boundaries with. For example, on April 8, 2019, Allen emailed a male defendant that he was not permitted to get lunch with him. I also learned that when a defendant called the office, they usually spoke to Allen's secretary. In a January 3, 2020, email to a *pro se* defendant, Allen asserted that his secretary kept a call log for everyone who tried to reach him. Finally, when *pro se* defendants asked to speak with Allen on the phone, Allen referred back to the following language in his email replies: "I don't discuss cases over the phone to avoid misunderstandings. We can either discuss it over email or I can set you up with an

appointment to come in and discuss it with me.” He used this language often, which is inconsistent with other conversations this investigation has uncovered, which include Allen discussing cases with female criminal defendants through calls from his personal phone number, text message, Snapchat and Tinder.

Complainant alleges, upon information and belief as set forth herein, there is probable cause to believe that Match Group LLC (“Tinder”) possesses items of evidentiary value necessary to assist in the investigation of the aforementioned offense(s).

WHEREFORE, I respectfully request that the search warrant be issued as applied for herein.

Sgt. Windy Westfall #5210
Sergeant Windy Westfall
Illinois State Police (Special Investigations Unit)

Subscribed and sworn
before me on 9-20, 2022



Judge

CERTIFIED TRUE COPY
Date 9/20/22
Melissa Hurst
CIRCUIT CLERK COLES CO

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

FILED
SEP 23 2022
22MX314
Melissa Hurst
Circuit Clerk COLES COUNTY, ILLINOIS

SEARCH WARRANT

PLACE TO BE SEARCHED AND ITEMS TO BE SEIZED:

On this day, **Sergeant Windy Westfall, of the Illinois State Police (Special Investigations Unit)**, has subscribed and sworn to a Complaint for a Search Warrant before me. Upon examination of the Complaint, I find that it states facts sufficient to show probable cause; I therefore command you to search:

Match Group LLC, located at 8750 N. Central Expressway, Suite 1400, Dallas, TX 75231 (ATTN: Tinder) and to seize the following instruments, articles and things, including records pertaining to the Tinder account(s) associated with the following individuals:

Brady Lee Allen

Date of birth: 03/08/1989

Known phone numbers: 618-525-1044 & 618-303-1088

Address: 1202 Lincoln Avenue, Apartment 35, Charleston, Illinois 61920

Email: brady_allen89@yahoo.com & BAllen@co.coles.il.us

Brianna Lee

Date of birth: 11/24/1998

Known phone numbers: 217-790-0681, 217-259-1872 & 217-250-1192

Address: 1316 Shelby Avenue, Mattoon, Illinois 61938

Email: b.lee98@hotmail.com

Kara Chumbley

Date of birth: 11/15/1998

Known phone Number: 217-294-0246

Address: 112 North 11th Street, Mattoon, Illinois 61938

Ashley Daigle

Date of birth: 02/09/1991

Known phone numbers: 217-820-0694, 217-561-3309, 217-820-0313 & 217-343-1778

Address: 1638 State Highway 16, Shelbyville, Illinois 62565

On the following dates/times: October 1, 2018, through September 30, 2021, to wit:

1. **Information Collected Directly From Users:** Any information associated with the above users, including but not limited to the user's full name; log in credentials; gender; date of birth; personality details; lifestyle; interests; content (such as photos and videos); content accessed through the user's camera or photo album; sensitive information (such as racial or ethnic origins, sexual orientation, and religious belief); financial information (such as the user's credit or debit card); survey or focus group participation (such as insights into products and services as well as responses to Tinder's questions and testimonials); information gathered from participation in promotions or events or contests; information given during communications with Tinder's customer care team; information collected about others that is given by the user; and any chats between Brady Allen and the following individuals: Brianna Lee, Kara Chumbley, and Ashley Daigle; and content any of the above users publish;

2. **Information Received From Others:** Any information collected about the user from others, including from other users, through any and all social media accounts linked to the user's Tinder account(s), and from Tinder's partners;
3. **Usage Information:** Any information collected regarding how the user's activity on Tinder services, such as date and time the user logged in; features the user has been using; searches and search parameters; clicks and pages which have been shown to the user; referring webpage addresses; and advertisements the user clicks on;
4. **Interactions Between the User and Others:** Any information regarding how Brady Allen interacts with Brianna Lee, Kara Chumbley, and Ashley Daigle, such as: which of these users Brady Allen connects and interacts with; time and date of the users' exchanges; the number of messages the users send and receive; and the content of the interactions;
5. **Device Information:** Any information collected about the device(s) Brady Allen uses to access Tinder services, including hardware and software information such as IP address; device ID and type; device-specific and apps settings and characteristics; app crashes; advertising IDs such as Google's AAID and Apple's IDFA; browser type, version and language; operating system; time zones; identifiers associated with cookies or other technologies that may identify the user's device or browser; information on the user's wireless and mobile network connection; and information on device sensors such as accelerometers, gyroscopes, and compasses; and
6. **Location Data.** Any precise or approximate location information obtained by Tinder for Brady Allen's account GPS location data and IP addresses.

Which constitutes evidence of the offenses of: **Official Misconduct**, in violation of 720 ILCS 5/33-3; and **Bribery**, in violation of 720 ILCS 5/44-1.


YOU ARE NOT TO DISCLOSE THE EXISTENCE OF THIS SEARCH WARRANT UNTIL AFTER AT LEAST 90 DAYS OF THE DATE OF ISSUANCE. DOING SO MAY IMPEDE AN ONGOING INVESTIGATION.

All records to be provided in an electronic format and be disclosed to Sergeant Windy Westfall or Sergeant Matthew Barber or any other law enforcement with the Illinois State Police.

I further command that a return of anything so seized shall be made without unnecessary delay before me, or before any Court of competent jurisdiction.

Date of issuance: 9-20-22

Time 8:32 (A.M.) P.M.



Judge

CERTIFIED TRUE COPY
 Date 9-20-22
 Melissa Hurst
 CIRCUIT CLERK COLES CO

FILED
SEP 28 2022

Melissa Hurst
Circuit Clerk COLES COUNTY, ILLINOIS

**STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE 5TH JUDICIAL CIRCUIT
COUNTY OF COLES**

IN RE: Illinois state police)
investigation 20-1005-SP-SIM)
)
)
)
)
)

NO. 2022-MX-314

MOTION TO SEAL SEARCH WARRANT

NOW COME the People of the State of Illinois by and through the Attorney General of the State of Illinois, Kwame Raoul, and his assistant, Mara Somlo, and respectfully request the Court to seal all documents filed in the above-entitled cause. In support of this motion, the People state as follows:

1. A Search Warrant is being sought to further an ongoing criminal investigation.
2. The Complaint for Search Warrant and Search Warrant contain confidential information regarding the details of the pending investigation, including, but not limited to, statements of witnesses and physical evidence.
3. A Seal Order is necessary to protect the integrity of the investigation, the public interest, including officer safety, and the safety of any cooperating witness.

WHEREFORE, the People of the State of Illinois respectfully request that for the compelling reasons stated above, that the Court seal the above Complaint, Search Warrant, and any additional documents and filings under the case number until further order of the Court consistent with the Supreme Court rules of discovery.

I, Mara Somlo, of the Office of the Illinois Attorney General, being duly sworn according to law, do on oath say that the matters and things set out in the within petition are true, to the best of my knowledge and information and belief.

THE PEOPLE OF THE STATE OF ILLINOIS
BY: KWAME RAOUL
ILLINOIS ATTORNEY GENERAL

Mara Somlo

Mara Somlo
Assistant Attorney General
Illinois Attorney General's Office
100 W. Randolph Street, 12th Floor
(773) 758-4623
Mara.somlo@ilag.gov

CERTIFIED TRUE COPY
Date 03/19/24
Melissa Hurst
CIRCUIT CLERK COLES CO

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE 5TH JUDICIAL CIRCUIT
COUNTY OF COLES

FILED
SEP 20 2022

Melissa Hurst
Circuit Clerk COLES COUNTY, ILLINOIS

IN RE: *Illinois state police*
investigation 20-1015-SP-SIU

NO. 2022-MX-314

ORDER

Pursuant to the Motion to Seal Search Warrant, having been duly advised of the premises,
the Court hereby grants the Motion to Seal the Search Warrant until further order of the Court.

ENTER:

9-20-22



Judge

CERTIFIED TRUE COPY
Date 9/20/22
Melissa Hurst
CIRCUIT CLERK COLES CO

STATE OF ILLINOIS)
) SS.
COUNTY OF COLES)

FILED
OCT 18 2022

2022MX312

IN THE CIRCUIT COURT OF THE FIFTH JUDICIAL CIRCUIT
COLES COUNTY, ILLINOIS *Michael Hurst*
Circuit Clerk COLES COUNTY, ILLINOIS

NOW COME the People of the State of Illinois, through **Sergeant Windy Westfall, of the Illinois State Police (Special Investigations Unit)**, the Court being fully advised that on September 20, 2022, at approximately 8:35 A.M., Presiding Judge Mark E. Bovard of the Circuit Court of Coles County, Illinois, signed an Order authorizing the search of:

Coles County State's Attorney's Office, located at 651 Jackson Avenue, Room 330, Charleston, IL 61920

And search for, seize, and analyze the following instruments articles and things, to Wit:

1. For such instruments, articles, or things, which are more particularly described as follows: any digital or hard copies of personnel and/or human resources files, including but not limited to: applications for employment, dates of hire, performance reviews, grievances, notices of corrective action/performance improvement, information regarding accommodations or promotions, approved time-off or leave of absence, notices of suspension, termination or resignation, end dates of employment, for Brady Lee Allen (D.O.B. 03/08/1989) that were created or filed between October 1, 2018 and September 30, 2021.

Which have been used in the commission of, which constitute evidence of, or which constitute the fruits of the offenses of **Official Misconduct**, in violation of 720 ILCS 5/33-3; and **Bribery**, in violation of 720 ILCS 5/44-1;

And further, that the said search warrant was executed on September 20, 2022, at approximately 8:45 a.m. and that **Sergeant Windy Westfall of the Illinois State Police (Special Investigations Unit)** provided a copy of the search warrant to the Coles County State's Attorney's Office;

And **Sergeant Windy Westfall** prepared a written inventory and said written inventory was signed by **Sergeant Windy Westfall** on this day, and the Court being fully advised in the premise;

IT IS HEREBY ORDERED that the written inventory signed by **Sergeant Windy Westfall** be, and hereby is, received by the Court and filed;

IT IS FURTHER ORDERED that said inventory be attached to this Order and made part hereof;

IT IS FURTHER ORDERED that the documents, instruments, articles and things listed in the said inventory shall remain in the custody and control of the **Illinois State Police** until further Order.

In executing said warrant I seized the following from the location described above and have returned the same before Presiding Judge Mark E. Bovard on October 18, 2022.

1. One (1) manila folder containing hard copies of new hire documentation (such as resume, payroll, and benefits), and the resignation letter for Brady Lee Allen (D.O.B. 03/08/1989).

Sgt. Windy Westfall #5010
Officer

Signed and sworn to before me on 10-18, 2022.



Presiding Judge

FILED
OCT 18 2022
2022MX311

STATE OF ILLINOIS)
) SS.
COUNTY OF COLES)

Melissa Hurst
Circuit Clerk COLES COUNTY, ILLINOIS
**IN THE CIRCUIT COURT OF THE FIFTH JUDICIAL CIRCUIT
COLES COUNTY, ILLINOIS**

NOW COME the People of the State of Illinois, through **Sergeant Windy Westfall, of the Illinois State Police (Special Investigations Unit)**, the Court being fully advised that on September 20, 2022, at approximately 8:34 A.M., Presiding Judge Mark E. Bovard of the Circuit Court of Coles County, Illinois, signed an Order authorizing the search of:

Snap Inc. ("Snapchat"), located at 2772 Donald Douglas Loop North, Santa Monica, CA 90405

And search for, seize, and analyze the following instruments articles and things, for the following dates/times: **October 1, 2018, through September 30, 2021**, to Wit:

1. **Information Provided by the Snapchat User to include:** name; username; vanity name; password; email address; phone number; date of birth; profile picture; Bitmoji avatar; debit and/or credit card number and its associated account information; content of "Snaps" (sent and received) between Brady Allen and the following individuals: Brianna Lee and Kara Chumbley; content of "Chats" (sent and received) between Brady Allen and the following individuals: Brianna Lee and Kara Chumbley; content uploaded to "Snapchat Story"; content of "Memories";
2. **Information Snapchat collects when the Snapchat User uses Snapchat's services to include:** usage information regarding how the user interacted with Snapchat's services including search queries submitted by the user; the names of other "Snapchatters" the user has communicated with; the time and date of communication with other "Snapchatters"; the number of messages exchanged between Brady Allen and the following individuals: Brianna Lee and Kara Chumbley; Brady Allen's interactions with messages sent to and received from Brianna Lee and Kara Chumbley (such as when a message is opened or screenshotted); user created content information such as custom stickers; information regarding if the recipient has viewed the content sent by user and any metadata provided with the content for communications between Brady Allen and the following individuals: Brianna Lee and Kara Chumbley;
3. **Device information to include:** hardware and software information such as the hardware model, operating system version, device memory, advertising identifiers, unique application identifiers, apps installed, unique device identifiers to include International Mobile Equipment Identified (IMEI), Mobile Equipment Identifier (MEID) Unique Device Identification (UDID), browser type, keyboards installed, language, and time zone; information from device sensors such as accelerometers, gyroscopes, compasses, microphones; information about the users' wireless and mobile network connections, such as mobile phone number, service provider, IP address, and signal strength; device phonebook information; images, videos, and other information from the users' camera roll and photos;
4. **Location information to include:** location information derived from GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors such as gyroscopes, accelerometers, and compasses;
5. **Information Collected by cookies and other technologies to include:** web beacons, web storage, and unique advertising identifiers;
6. **Log information when a person uses Snapchat's website:** details about how a person has used Snapchat's services; device information such as web browser type and language; access time; pages viewed; IP address; identifiers associated with cookies or other technologies that may uniquely identify a person's device or browser; pages visited before or after navigating to Snapchat's website; Snapchat account creation date and IP address; timestamp and IP address of account logins and logouts; logs of previous "Snaps", "Stories", and "Chats"; and
7. **Information Snapchat collected from third parties:** information about how the users used another service linked to their Snapchat account; information shared by advertisers, app developers, or other third parties.

Which have been used in the commission of, which constitute evidence of, or which constitute the fruits of the offenses of **Official Misconduct**, in violation of 720 ILCS 5/33-3; and **Bribery**, in violation of 720 ILCS 5/44-1;

And further, that the said search warrant was executed on September 21, 2022, at approximately 3:36 p.m., by **Sergeant Windy Westfall of the Illinois State Police (Special Investigations Unit)** by way of Snap Inc.'s online Law Enforcement Portal;

And on or about September 26, 2022, at approximately 3:13 p.m., **Sergeant Windy Westfall** received electronic files from Snap Inc. by way of the Law Enforcement Portal;

And **Sergeant Windy Westfall** prepared a written inventory and said written inventory was signed by **Sergeant Windy Westfall** on this day, and the Court being fully advised in the premise;

IT IS HEREBY ORDERED that the written inventory signed by **Sergeant Windy Westfall** be, and hereby is, received by the Court and filed;

IT IS FURTHER ORDERED that said inventory be attached to this Order and made part hereof;

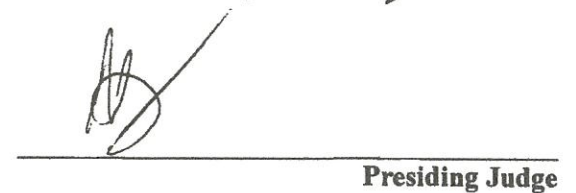
IT IS FURTHER ORDERED that the documents, instruments, articles and things listed in the said inventory shall remain in the custody and control of the **Illinois State Police** until further Order.

In executing said warrant I seized the following from the location described above and have returned the same before **Presiding Judge Mark E. Bovard** on October 18, 2022.

1. User account information for Brady Allen, Brianna Lee, and Kara Chumbley;
2. Photos from accounts associated with Brady Allen, Brianna Lee, and Kara Chumbley; and
3. Videos from accounts associated with Brady Allen, Brianna Lee, and Kara Chumbley.

Signed and sworn to before me on 10-18, 2022.


Officer


Presiding Judge

STATE OF ILLINOIS)
) SS.
COUNTY OF COLES)

2022MX310
FILED
NOV 16 2022

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

Melissa Hurst
Circuit Clerk COLES COUNTY, ILLINOIS

NOW COME the People of the State of Illinois, through **Sergeant Windy Westfall, of the Illinois State Police (Special Investigations Unit)**, the Court being fully advised that on September 20, 2022, at approximately 8:34 A.M., Presiding Judge Mark E. Bovard of the Circuit Court of Coles County, Illinois, signed an Order authorizing the search of:

AT&T, located at 11760 U.S. Highway 1, Suite 300, North Palm Beach, FL 33408

And search for, seize, and analyze the following instruments articles and things, for the following dates/times: **October 1, 2018, through September 30, 2021**, to Wit:

1. Basic subscriber information, records, data or documents containing name, address, local and long distance telephone connection records or records of session time and duration, length of services (including start dates and types of services utilized), telephone or instrument number or other subscriber number or identity (including any temporarily assigned network address and any Internal Mobile Equipment Identity number), the means and source of payment for the service (including credit card or bank account number).
2. Location information, including any information, records, data or documents concerning the location of the electronic device that is in whole or in-part generated by or derived from the operation of the device utilizing the telephone number stated above, including all cell site activations and sectors for all incoming and outgoing calls, together with a complete listing (electronic/electronic mail provided if possible) of cell site identification number, physical address, latitude and longitude, sector identifiers, and true orientations/facings of all cell sites (including omni-directional and sectorized) in the market where the Target Device may be located; together with nationwide System Identify/Billing Identity (SID/BID) listing; and an engineering map identifying the same (if the provider possesses such an orientation(s). A list of any and all applicable cellular site(s)' number(s), locations(s), address(es), and/or latitude and longitude of any said site(s). Also, that cellular site(s)', list(s), latitude(s) and longitude(s), be provided, via electronic mail, in an electronic format, if available and/or possible;
3. Non-content Short Message Service (SMS) data (e.g. the automated systems messages delivered to a device from the network) for messages sent to and received from any of the following phone numbers:

217-790-0681;
 217-259-1872;
 217-250-1192;
 217-294-0246;
 815-685-7566;
 217-460-0049;
 217-820-0694;
 217-561-3309;
 217-820-0313;
 217-343-1778;

4. Text message records, such as detailed information in reference to all known sent and received text messages, including but not limited to: dates and times text messages were sent and received, phone numbers to which messages were sent or received, and content sent or received (e.g. text, photographs and video) for messages sent to and received from any of the following phone numbers:

217-790-0681;
 217-259-1872;
 217-250-1192;
 217-294-0246;
 815-685-7566;
 217-460-0049;
 217-820-0694;

217-561-3309;
217-820-0313;
217-343-1778;

5. Call detail records, including detailed information in reference to all known outgoing and incoming calls associated with the following phone numbers, dates and times the calls were made, and duration of the calls made or received:

217-790-0681;
217-259-1872;
217-250-1192;
217-294-0246;
815-685-7566;
217-460-0049;
217-820-0694;
217-561-3309;
217-820-0313;
217-343-1778;

6. Data and information identifying any device associated with the above account(s) including but not limited to the make, model, year and serial number associated with the device; the date the device became associated with the above account; personal cloud account information associated with the above account(s) including but not limited to account name, date of creation, account status, amount of storage and storage used, the type of content stored; any photos, videos, contacts saved to the personal cloud account; any and all payment information for the personal cloud account including credit card or debit card number or bank account number and associated payment information; date, time and IP address when data, information or content was saved to or uploaded to the personal cloud; date, time and IP address when data, information or content was deleted from the personal cloud; history of content being restored to devices from personal cloud account(s); and
7. Any data, information or content stored, uploaded to, edited in, or deleted from the account's personal cloud including but not limited to photos, videos, contacts, documents, voice memos, audio recordings, screenshots, files, or attachments that were created, uploaded, edited or deleted between October 1, 2018 through September 30, 2021.

Which have been used in the commission of, which constitute evidence of, or which constitute the fruits of the offenses of **Official Misconduct**, in violation of 720 ILCS 5/33-3; and **Bribery**, in violation of 720 ILCS 5/44-1;

And further, that the said search warrant was executed on September 22, 2022, at approximately 10:50 a.m., by **Sergeant Windy Westfall of the Illinois State Police (Special Investigations Unit)** by way of AT&T facsimile number;

And on or about November 3, 2022, at approximately 9:36 a.m., **Sergeant Windy Westfall** received electronic files from AT&T by way of the electronic mail;

And **Sergeant Windy Westfall** prepared a written inventory and said written inventory was signed by **Sergeant Windy Westfall** on this day, and the Court being fully advised in the premise;

IT IS HEREBY ORDERED that the written inventory signed by **Sergeant Windy Westfall** be, and hereby is, received by the Court and filed;

IT IS FURTHER ORDERED that said inventory be attached to this Order and made part hereof;

IT IS FURTHER ORDERED that the documents, instruments, articles and things listed in the said inventory shall remain in the custody and control of the **Illinois State Police** until further Order.

In executing said warrant I seized the following from the location described above and have returned the same before Presiding Judge Mark E. Bovard on November 16, 2022.

1. Cell phone location data for phone number (618) 525-1044 (Brady Allen's cell phone number);
2. Account payment history and information, including bank account information;
3. Financial Liability and Billing Party, and user information;
4. Length of service for Cricket and AT&T .

Sgt. Windy West #5210
Officer

Signed and sworn to before me on NOVEMBER 16, 2022.

MEB

Presiding Judge

STATE OF ILLINOIS)
) SS.
COUNTY OF COLES)

FILED 2022 MX 313
NOV 16 2022

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

Melissa Hurst
Circuit Clerk COLES COUNTY, ILLINOIS

NOW COME the People of the State of Illinois, through **Sergeant Windy Westfall, of the Illinois State Police (Special Investigations Unit)**, the Court being fully advised that on September 20, 2022, at approximately 8:34 A.M., Presiding Judge Mark E. Bovard of the Circuit Court of Coles County, Illinois, signed an Order authorizing the search of:

Meta Platforms, Inc. ("Facebook"), located at 1601 Willow Road, Menlo Park, CA 94025

And search for, seize, and analyze the following instruments articles and things, for the following dates/times: **October 1, 2018, through September 30, 2021**, to Wit:

1. **Basic subscriber information:** including by way of example but not limitation, the user identification number; name; e-mail address; date and time stamp of account creation; most recent logins; any and all registered mobile telephone number(s) associated with the listed account;
2. **Expanded Subscriber Content:** including by way of example but not limitation, profile contact information; mini-feed; status update history; shares; notes; wall postings; friend listings to include friends; Facebook ID's; group listings to include Facebook group ID's; future and past events; video listing with file names;
3. **Stored active sessions:** including date, time, device, IP address, machine cookie and browser information;
4. **Current and past address(es) associated with this account:** including by way of example but not limitation, current city, hometown and other places lived;
5. **Alternate names the account holder has on the account:** including by way of example but not limitation, nicknames or aliases;
6. **Third-party applications** (or "apps") the account holder subscribes to;
7. A history of the conversations Brady Allen had on **Facebook Chat** with Brianna Lee *or* Kara Chumbley *or* Halie Michalski *or* Carlie Wilson *or* Ashley Daigle.
8. **Credit card information**, including account name, account number and expiration date used in conjunction with this account;
9. **Email addresses** added by the account holder, including email addresses that may have subsequently been removed;
10. **Events** Brady Allen and Brianna Lee *or* Kara Chumbley *or* Halie Michalski *or* Carlie Wilson *or* Ashley Daigle have been invited to or joined;
11. A list, including but not limited to user names and account information, detailing **whether any of the following individuals follow Brady Allen's account(s):** Brianna Lee *or* Kara Chumbley *or* Halie Michalski *or* Carlie Wilson *or* Ashley Daigle;
12. A list, including but not limited to user names and account information, detailing **whether Brady Allen follows the account(s) for any of the following individuals:** Brianna Lee *or* Kara Chumbley *or* Halie Michalski *or* Carlie Wilson *or* Ashley Daigle;
13. A list, including but not limited to user names and account information, of **pending, sent and received friend requests** between Brady Allen's account(s) and account(s) for any of the following individuals: Brianna Lee *or* Kara Chumbley *or* Halie Michalski *or* Carlie Wilson *or* Ashley Daigle;
14. A list of **addresses** where the account holder has logged into his Facebook, Inc. account;
15. A list of the accounts this account holder has **linked to his Facebook, Inc.** account;
16. A list of **IP addresses**, dates and times associated with logins and logouts to this Facebook, Inc. account;
17. **Archives** of messages Brady Allen has sent and received on Facebook, Inc. including but not limited to messages through Facebook Messenger with Brianna Lee *or* Kara Chumbley *or* Halie Michalski *or* Carlie Wilson *or* Ashley Daigle;
18. A list of **video chats or audio calls** through Facebook Messenger between account(s) belonging to Brady Allen and Brianna Lee *or* Kara Chumbley *or* Halie Michalski *or* Carlie Wilson *or* Ashley Daigle, including but not limited to: the date of the video chat or audio call, who initiated the video chat or audio call, whether the video chat or audio call was received, and the duration of the video chat or audio call;
19. **Mobile phone numbers** the account holders have added to their accounts, including by way of example but not limited to verified mobile numbers he/she has added for security purposes;
20. **Photographs**, in their original format, connected to Brady Allen *or* Brianna Lee *or* Kara Chumbley *or* Halie Michalski *or*

- Carlie Wilson *or* Ashley Daigle either by facial recognition or communications, that the account holders have uploaded to his/her account, including metadata information such as the date and time the photo was taken, GPS coordinates, make, model and possibly serial number of the device used;
21. **Videos**, in their original format, connected to Brady Allen *or* Brianna Lee *or* Kara Chumbley *or* Halie Michalski *or* Carlie Wilson *or* Ashley Daigle either by facial recognition or communications, that the account holders have uploaded to his/her account, including metadata information, including by way of example but not limitation, the date and time the photo was taken, GPS coordinates, make, model and possibly serial number of the device used;
 22. **Posts** by the account holder to his/her own timeline, including by way of example but not limitation, photos, videos and status updates;
 23. **Posts** to someone else's timeline or profile by the account holder, including by way of example but not limitation, photos, videos and status updates;
 24. **Screen names** the account holder has added to his account, the service they are associated with, and whether these names are hidden or visible on the account; and
 25. **Other accounts and all account information** that may be associated with this account after it has been identified.

Which have been used in the commission of, which constitute evidence of, or which constitute the fruits of the offenses of **Official Misconduct**, in violation of 720 ILCS 5/33-3; and **Bribery**, in violation of 720 ILCS 5/44-1;

And further, that the said search warrant was executed on September 22, 2022, at approximately 10:31 a.m., by **Sergeant Windy Westfall of the Illinois State Police (Special Investigations Unit)** by way of Meta Platforms, Inc. online Law Enforcement Portal;

And on or about October 25, 2022, at approximately 10:25 p.m., **Sergeant Windy Westfall** received electronic files from Meta Platforms, Inc. by way of the Law Enforcement Portal;

And **Sergeant Windy Westfall** prepared a written inventory and said written inventory was signed by **Sergeant Windy Westfall** on this day, and the Court being fully advised in the premise;

IT IS HEREBY ORDERED that the written inventory signed by **Sergeant Windy Westfall** be, and hereby is, received by the Court and filed;

IT IS FURTHER ORDERED that said inventory be attached to this Order and made part hereof;

IT IS FURTHER ORDERED that the documents, instruments, articles and things listed in the said inventory shall remain in the custody and control of the **Illinois State Police** until further Order.

In executing said warrant I seized the following from the location described above and have returned the same before Presiding Judge Mark E. Bovard on November 16, 2022.

1. Detailed account information for users: Brady Allen, Kara Chumbley, Brianna Lee, Ashley Dagle, Halie Michalski, and Carlee Wilson;
2. Photos from accounts associated with (217)294-0246; (217)790-0681; (217)820-0694; (618)525-1044; (815)685-7566; brady_allen89@yahoo.com; carleewilson22@gmail.com; and facebook.com/bradyallen89; and
3. User names, friend lists, IP addresses, email addresses, cell phone numbers, and posts.

Sgt. Windy Westfall 521
Officer

Signed and sworn to before me on NOVEMBER 16, 2022.



Presiding Judge

STATE OF ILLINOIS)
) SS.
COUNTY OF COLES)

FILED 2022 MKS 14
NOV 16 2022

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

Melissa Hurst
Circuit Clerk COLES COUNTY, ILLINOIS

NOW COME the People of the State of Illinois, through **Sergeant Windy Westfall, of the Illinois State Police (Special Investigations Unit)**, the Court being fully advised that on September 20, 2022, at approximately 8:34 A.M., Presiding Judge Mark E. Bovard of the Circuit Court of Coles County, Illinois, signed an Order authorizing the search of:

Match Group LLC, ("Tinder"), located at 8750 N. Central Expressway, Suite 1400, Dallas, TX 75231

And search for, seize, and analyze the following instruments articles and things, for the following dates/times: **October 1, 2018, through September 30, 2021**, to Wit:

1. **Information Collected Directly From Users:** Any information associated with the above users, including but not limited to the user's full name; log in credentials; gender; date of birth; personality details; lifestyle; interests; content (such as photos and videos); content accessed through the user's camera or photo album; sensitive information (such as racial or ethnic origins, sexual orientation, and religious belief); financial information (such as the user's credit or debit card); survey or focus group participation (such as insights into products and services as well as responses to Tinder's questions and testimonials); information gathered from participation in promotions or events or contests; information given during communications with Tinder's customer care team; information collected about others that is given by the user; and any chats between Brady Allen and Brianna Lee or Kara Chumbley or Ashley Daigle; and content any of the above users publish;
2. **Information Received From Others:** Any information collected about the user from others, including from other users, through any and all social media accounts linked to the user's Tinder account(s), and from Tinder's partners;
3. **Usage Information:** Any information collected regarding how the user's activity on Tinder services, such as date and time the user logged in; features the user has been using; searches and search parameters; clicks and pages which have been shown to the user; referring webpage addresses; and advertisements the user clicks on;
4. **Interactions Between the User and Others:** Any information regarding how Brady Allen interacts with Brianna Lee or Kara Chumbley or Ashley Daigle, such as: users Brady Allen connects and interacts with; time and date of the users' exchanges; the number of messages the users send and receive; and the content of the interactions;
5. **Device Information:** Any information collected about the device(s) Brady Allen uses to access Tinder services, including hardware and software information such as IP address; device ID and type; device-specific and apps settings and characteristics; app crashes; advertising IDs such as Google's AAID and Apple's IDFA; browser type, version and language; operating system; time zones; identifiers associated with cookies or other technologies that may identify the user's device or browser; information on the user's wireless and mobile network connection; and information on device sensors such as accelerometers, gyroscopes, and compasses; and
6. **Location Data.** Any precise or approximate location information obtained by Tinder for Brady Allen's account GPS location data and IP addresses.

Which have been used in the commission of, which constitute evidence of, or which constitute the fruits of the offenses of **Official Misconduct**, in violation of 720 ILCS 5/33-3; and **Bribery**, in violation of 720 ILCS 5/44-1;

And further, that the said search warrant was executed on September 22, 2022, at approximately 10:37 a.m., by **Sergeant Windy Westfall of the Illinois State Police (Special Investigations Unit)** by way of Match Group LLC, online Law Enforcement Portal;

And on or about November 4, 2022, at approximately 5:38 p.m., **Sergeant Windy Westfall** received electronic files from Match Group LLC, by way of the Law Enforcement Portal;

And **Sergeant Windy Westfall** prepared a written inventory and said written inventory was signed by **Sergeant Windy Westfall** on this day, and the Court being fully advised in the premise;

IT IS HEREBY ORDERED that the written inventory signed by **Sergeant Windy Westfall** be, and hereby is, received by the Court and filed;

IT IS FURTHER ORDERED that said inventory be attached to this Order and made part hereof;

IT IS FURTHER ORDERED that the documents, instruments, articles and things listed in the said inventory shall remain in the custody and control of the **Illinois State Police** until further Order.

In executing said warrant I seized the following from the location described above and have returned the same before Presiding Judge Mark E. Bovard on November 16, 2022.

1. Account information for user: Brady Allen.
2. Photos from Brady Allen's account.

Sgt. Winky Westfall #521

Officer

Signed and sworn to before me on November 16, 2022.



Presiding Judge