

IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT
SANGAMON COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,)

Plaintiff,)

vs.)

RE: Springfield Police Department)

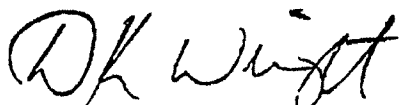
Report # S20-62175)

No. 21 MR- 410

MOTION FOR APPOINTMENT OF SPECIAL PROSECUTOR

COMES NOW Sangamon County State's Attorney, Daniel K. Wright, and pursuant to the provisions of 55 ILCS 5/3-9008 moves for the appointment of a Special Prosecutor in this case. The subject matter presents either a conflict of interest for the State's Attorney's Office, or alternatively, an appearance of impropriety. It is in the interest of justice that a Special Prosecutor be appointed to avoid any such appearance. In this particular cause, the reason for requesting the order Appointing Special Prosecutor is because the subject of the related investigation is the alleged victim in an uncharged matter and is also the parent of a child victim in a pending felony case.

WHEREFORE, the People pray for the appointment of a Special Prosecutor.



Daniel K. Wright

IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT
SANGAMON COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,)

Plaintiff,)

vs.)

RE: Springfield Police Department)
Report # S20-62175)

No. 21 MR- 410

ORDER APPOINTING SPECIAL PROSECUTOR

This cause comes on for hearing on the motion of the State's Attorney for the appointment of a Special Prosecutor, and the Court having examined the Motion, and being fully advised in the premises, FINDS, pursuant to the provisions of 55 ILCS 5/3-9008(a)(15) that the interests of justice require the appointment of a Special Prosecutor. The court further finds that the subject matter of this case involves the offenses of Theft and Official Misconduct.

IT IS THEREFORE ORDERED:

- A. The Court requests the Office of the State's Attorney's Appellate Prosecutor accept the offer of appointment as Special Prosecutor of this cause. Further, if accepted, the Court further requests that the Director of the Office of State's Attorney's Appellate Prosecutor designate an attorney or attorneys employed by the agency to serve as a Special Prosecutor(s) for this cause. Such designated attorney or attorney(s) shall file their entry of appearance(s) in this cause by filing their oath(s) of the office with the Circuit Clerk of this Court.
- B. In further accordance with the statute, the filing of the oath of office shall constitute a recognition and acknowledgement that service as the Special Prosecutor in this cause is at the pleasure of the Illinois Attorney General, who may substitute his/her office as Special Prosecutor as provided by law.
- C. The State's Attorney's Office of Sangamon County is directed to deliver to the Special Prosecutor all documents, reports or other information related to this cause.

Date: 4-7-21

Enter: 

IN THE CIRCUIT COURT
FOR THE SEVENTH JUDICIAL CIRCUIT OF ILLINOIS

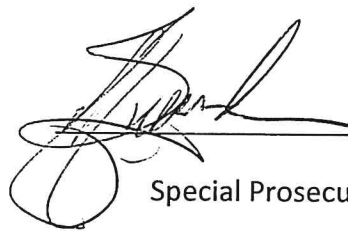
SANGAMON COUNTY, SPRINGFIELD, ILLINOIS

CRIMINAL DIVISION

21-CF811

COUNT I - FORGERY

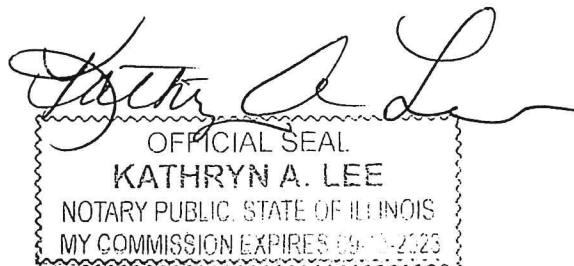
THE GRAND JURORS chosen, selected and sworn, in and for the County of Sangamon and State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths, present that on or about the 9TH day of January, in the year Two Thousand and Twenty, in the County of Sangamon, in the aforesaid State of Illinois, **JENNY THORNLEY, DOB 6-25-80**, committed the offense of **FORGERY**, in that she, with the intent to defraud, knowingly altered a document, being an overtime approval form purportedly signed by Jack Garcia on June 18, 2019, to make it false in that such document was apparently capable of defrauding another, in violation of 720 ILCS 5/17-3(1) and against the peace and dignity of the same People of the State of Illinois. (F-3)



Special Prosecutor

FILED
SEP 22 2021

David R. [Signature]
Clerk of the
Circuit Court

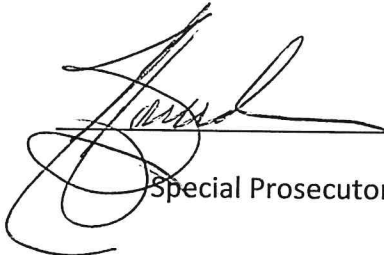


COPY

COUNT II OF VII - FORGERY

21-CF-811

THE GRAND JURORS chosen, selected and sworn, as aforesaid, in and for the County of Sangamon aforesaid, in the name and by the authority of the People of the State of Illinois aforesaid, upon their oaths aforesaid, do further present that in the County of Sangamon, in the aforesaid State of Illinois, that on or about the 9th day of January, in the year Two Thousand and Twenty, **JENNY THORNLEY, DOB 6-25-80**, committed the offense of **FORGERY**, in that she, with intent to defraud, delivered a document, being an overtime approval form purportedly signed by Jack Garcia on June 18, 2019, knowing it to have been thus made or altered, in violation of 720 ILCS 5/17-3(2) and against the peace and dignity of the same People of the State of Illinois. (F-3)


Special Prosecutor

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SEP 22 2021

Clerk of the Circuit Court 18


OFFICIAL SEAL
KATHRYN A. LEE
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 09-15-2023

COPY

COUNT III OF VII – FORGERY

21-CF-811

THE GRAND JURORS chosen, selected and sworn, as aforesaid, in and for the County of Sangamon aforesaid, in the name and by the authority of the People of the State of Illinois aforesaid, upon their oaths aforesaid, do further present that in the County of Sangamon, in the aforesaid State of Illinois, that on or about the 9th day of January, in the year Two Thousand and Twenty, **JENNY THORNLEY, DOB 6-25-80**, committed the offense of **FORGERY**, in that she, with the intent to defraud, knowingly altered a document, being an overtime approval form purportedly signed by Jack Garcia on October 29, 2019, to make it false in that such document was apparently capable of defrauding another, in violation of 720 ILCS 5/17-3(1) and against the peace and dignity of the same People of the State of Illinois. (F-3)


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COUNT IV OF VII – FORGERY

21-CF-811

THE GRAND JURORS chosen, selected and sworn, as aforesaid, in and for the County of Sangamon aforesaid, in the name and by the authority of the People of the State of Illinois aforesaid, upon their oaths aforesaid, do further present that in the County of Sangamon, in the aforesaid State of Illinois, that on or about the 9th day of January, in the year Two Thousand and Twenty, **JENNY THORNLEY, DOB 6-25-80**, committed the offense of **FORGERY**, in that she, with intent to defraud, delivered a document, being an overtime approval form purportedly signed by Jack Garcia on October 29, 2019, knowing it to have been thus made or altered, in violation of 720 ILCS 5/17-3(2) and against the peace and dignity of the same People of the State of Illinois. (F-3)


Special Prosecutor

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Circuit Court

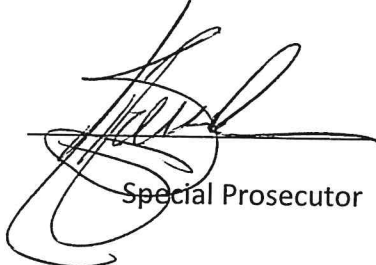

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NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 09-15-2023

COPY

COUNT V OF VII – THEFT


21-CF-811

THE GRAND JURORS chosen, selected and sworn, as aforesaid, in and for the County of Sangamon aforesaid, in the name and by the authority of the People of the State of Illinois aforesaid, upon their oaths aforesaid, do further present that in the County of Sangamon, in the aforesaid State of Illinois, that on or about the 9th day of January, in the year Two Thousand and Twenty, **JENNY THORNLEY, DOB 6-25-80**, committed the offense of **THEFT**, in that she knowingly obtained unauthorized control of government property, being United States currency, from the Illinois State Police Merit Board, an agency of the government of the State of Illinois, between the dates of October 1, 2019 – November 30, 2019 and in excess of \$10,000 but not exceeding \$100,000, in furtherance of a single intent in violation of 720 ILCS 5/16-1(a)(1). (F-1)


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COPY

COUNT VI OF VII – OFFICIAL MISCONDUCT

21-CF-811

THE GRAND JURORS chosen, selected and sworn, as aforesaid, in and for the County of Sangamon aforesaid, in the name and by the authority of the People of the State of Illinois aforesaid, upon their oaths aforesaid, do further present that in the County of Sangamon, in the aforesaid State of Illinois, that on or about the 9th day of January, in the year Two Thousand and Twenty, **JENNY THORNLEY, DOB 6-25-80**, committed the offense of **OFFICIAL MISCONDUCT**, in that she, a public employee in her official capacity, knowingly performed an act that she knew she was forbidden by law to perform, being the forgery of the signature of Jack Garcia, Executive Director of the Illinois State Police Merit Board, on January 9, 2020 in violation of 720 ILCS 5/33-3(2). (F-3)


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MY COMMISSION EXPIRES 09-15-2023

COPY

COUNT VII OF VII – OFFICIAL MISCONDUCT

21-CF-811

THE GRAND JURORS chosen, selected and sworn, as aforesaid, in and for the County of Sangamon aforesaid, in the name and by the authority of the People of the State of Illinois aforesaid, upon their oaths aforesaid, do further present that in the County of Sangamon, in the aforesaid State of Illinois, that on or about the 9th day of January, in the year Two Thousand and Twenty, **JENNY THORNLEY, DOB 6-25-80**, committed the offense of **OFFICIAL MISCONDUCT**, in that she, between the dates of October 1, 2019 – November 30, 2019, and being a public employee, in her official capacity, performed an act that she knew she was forbidden by law to perform, being the theft of property from the Illinois State Police Merit Board, an agency of the government of the State of Illinois, in violation of 720 ILCS 5/33-3(2). (F-3)


Special Prosecutor


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SEP 22 2021
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Circuit Court


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MY COMMISSION EXPIRES 09-15-2023

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IN THE CIRCUIT COURT
FOR THE SEVENTH JUDICIAL
CIRCUIT OF ILLINOIS

Sangamon County, Springfield, IL
Criminal Division

21-CF-

811

THE PEOPLE

vs.

JENNY THORNLEY

INDICTMENT FOR

COUNT I FORGERY

COUNT II FORGERY

COUNT III FORGERY

COUNT IV FORGERY

COUNT V THEFT

COUNT VI OFFICIAL MISCONDUCT

COUNT VII OFFICIAL MISCONDUCT

A TRUE BILL

Sharon Zava

Foreperson of the Grand Jury

THE WITHIN Indictment returned in open Court this _____ A.D., 2021.

Bail set at \$ _____

~~Certified~~ Warrant of Arrest ~~ordered~~

NOT TO ~~be~~ (Strike one) issue.

[Signature]

Judge of the Circuit Court

COPY

Paula Rogers

FILED
SEP 22 2021

Clerk of the
Circuit Court

IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT
SANGAMON COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,)

Plaintiff,)

vs.)

JENNY THORNLEY,)

Defendant.)

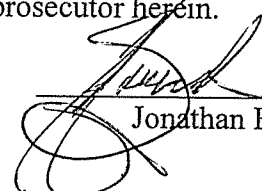
No. 21-CF- 811

FILED
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Clerk of the
Circuit Court 18

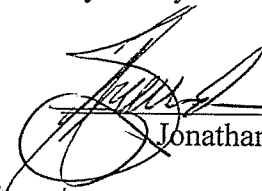
ENTRY OF APPEARANCE

I, Jonathan Barnard, of the Office of the State's Attorneys Appellate Prosecutor, pursuant to Supreme Court Rule 13 and the appointment order of this court, hereby enter the appearance of the State's Attorneys Appellate Prosecutor as special prosecutor herein.


Jonathan Barnard

OATH OF OFFICE

I, Jonathan Barnard, an attorney duly licensed to practice law in the State of Illinois, accept the appointment of the court to act as special prosecutor herein, and do solemnly swear to uphold the Constitutions of the United States and the State of Illinois, and to fulfill the duties and obligations of the office of special prosecutor to the best of my ability.


Jonathan Barnard

Subscribed and sworn to before me this 21 day of September, 2021.


Notary Public



Jonathan Barnard
Special Prosecutor
State's Attorneys Appellate Prosecutor
725 S. Second Street
Springfield, IL 62704
Tel: (217)782-1628/Fax: (217)782-6305



STATE'S ATTORNEYS APPELLATE PROSECUTOR

Administrative Office • 725 South Second Street • Springfield, IL 62704 • 217-782-1628 • Fax 217-782-6305

PATRICK J. DELFINO
DIRECTOR

BEN GOETTEN
CHAIRMAN

DAVID J. ROBINSON
CHIEF DEPUTY DIRECTOR

DEPUTY DIRECTORS

EDWARD R. PSENICKA
SECOND DISTRICT

THOMAS D. ARADO
THIRD DISTRICT

DAVID J. ROBINSON
FOURTH DISTRICT

PATRICK D. DALY
FIFTH DISTRICT

BOARD OF GOVERNORS

FIRST DISTRICT:

KIMBERLY M. FOXX
STATE'S ATTORNEY
COOK COUNTY

SECOND DISTRICT:

ROBERT BERLIN
STATE'S ATTORNEY
DuPAGE COUNTY

ERIC WEIS
STATE'S ATTORNEY
KENDALL COUNTY

THIRD DISTRICT:

COLBY HATHAWAY
STATE'S ATTORNEY
HENDERSON COUNTY

STEWART J. UMHOLTZ
STATE'S ATTORNEY
TAZEWELL COUNTY

FOURTH DISTRICT:

BEN GOETTEN
STATE'S ATTORNEY
JERSEY COUNTY

GRAY H. NOLL
STATE'S ATTORNEY
MORGAN COUNTY

FIFTH DISTRICT:

DENTON AUD
STATE'S ATTORNEY
WHITE COUNTY

MICHAEL M. HAVERA
STATE'S ATTORNEY
CHRISTIAN COUNTY

BRANDON J. ZANOTTI
STATE'S ATTORNEY
WILLIAMSON COUNTY

PEOPLE OF THE STATE OF ILLINOIS

Plaintiff,

VS.

JENNY THORNLEY

2880 Hilltop Rd.

Springfield, IL 62712

DOB 6-25-80

Defendant.

21-CF- 811

Offense and description of charge(s):

COUNTS I & III FORGERY 720 ILCS 5/17-3(1) F-3

COUNTS II & IV FORGERY 720 ILCS 5/17-3(2) F-3

COUNT V THEFT 720 ILCS 5/16-1(a)(1) F-1

COUNTS VI & VII OFFICIAL MISCONDUCT 720 ILCS 5/33-3(3)

Dear Jenny Thornley,

Please be advised that a criminal complaint charging you with the above captioned offenses has been filed in the Circuit Court for the Seventh Judicial Circuit.

You are hereby notified that you must appear in person on October 28, 2021, at 11:00 a.m., in Courtroom 7C, of the Sangamon County Complex, 200 South 9th Street, Springfield, Sangamon County, Illinois. An entry of appearance by your attorney does not relieve you of your duty to appear in court on the above date and time.

If you fail to appear on the above date, a warrant may be issued for your arrest.

By: ~~Ben Goetten~~

BY: JONATHAN H. BARNARD

SPECIAL PROSECUTOR

STATE'S ATTORNEYS APPELLATE PROSECUTOR

9/22/21

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SEP 22 2021
Clerk of the
Circuit Court
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