

**FILED**

Date: 12/12/18

STATE OF ILLINOIS  
IN THE CIRCUIT COURT OF THE 17<sup>TH</sup> JUDICIAL CIRCUIT  
COUNTY OF WINNEBAGO

[Signature]  
Clerk of the Circuit Court  
By [Signature] Deputy  
Winnebago County, IL

THE PEOPLE OF THE STATE OF ILLINOIS

Plaintiff,

vs.

No. 18CF 3180  
18CF 3181

CHRISTOPHER J WILLIAMS,

10/12/1971

KATHRYN WILLIAMS

10/03/1969

Defendants.

**BILL OF INDICTMENT**

**The Grand Jury charges:**

**Count 1 of 24**

That between the 7th day of March, 2007 and the 30th day of August, 2018, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAMS** who at the time of the offense was over 18 years of age committed the offense of ATTEMPT, in that the said defendant with the intent to commit the offense of First Degree Murder, in violation of 720 ILCS 5/9-1, performed a substantial step toward the commission of that offense in that without lawful justification and with the intent to kill KW (DOB: 03/29/2005), the defendants knowingly reported false medical symptoms and medical diagnosis to medical personnel causing medical procedures and medication to be provided to KW other than as medically necessary and such that death could ensue, in violation of 720 ILCS 5/8-4(a). (Class X) (MAX 6-30 years 85% Truth in Sentencing: MSR 3 years: Fines up to \$25,000) (OFT Code =

0735000) 18 WF 1177

**Count 2 of 24**

That between the 7th day of March, 2007 and the 30th day of August, 2018, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAMS** who at the time of the offense was over 18 years of age committed the offense of **ATTEMPT**, in that the said defendants with the intent to commit the offense of **First Degree Murder**, in violation of 720 ILCS 5/9-1, performed a substantial step toward the commission of that offense in that without lawful justification and with the intent to kill KW (DOB: 03/07/2007), the defendants knowingly reported false medical symptoms and medical diagnosis to medical personnel causing medical procedures and medication to be provided to KW other than as medically necessary and such that death could ensue, in violation of 720 ILCS 5/8-4(a). (Class X) (MAX 6-30 years 85% Truth in Sentencing: MSR 3 years: Fines up to \$25,000) (OFT Code = 0735000)

**Count 3 of 24**

That between the 15th day of December, 2015 and the 28th day of March, 2018, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAMS** who at the time of the offense was over 18 years of age committed the offense of **AGGRAVATED BATTERY TO CHILD** in that the defendants knowingly and without legal justification causes great bodily harm or permanent disability or disfigurement to any child under the age of 13 years, in that they provided medication to KW (DOB: 03/29/2005) other than as medically necessary causing the child's growth to be permanently stunted, in violation of 720 ILCS 5/12-3.05(b)(1). (Class X) (MAX 6-30 IDOC 85% Truth in Sentencing: MSR 3 years; Fines up to \$25,000) (OFT Code = 0016102)

**Count 4 of 24**

That between the 15th day of March, 2015 and the 30th day of August, 2018, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAMS** who at the time of the offense was over 18 years of age committed the offense of **AGGRAVATED BATTERY TO CHILD** in that the defendants knowingly and without legal justification causes great bodily harm or permanent disability or disfigurement to any child under the age of 13 years, in that they caused KW (DOB: 03/7/2007) to be confined to a bed and wheelchair other than as medically necessary causing permanent damage to the child's tendons and ability to walk, in violation of 720 ILCS 5/12-3.05(b)(1). (Class X) (MAX 6-30 IDOC 85% Truth in Sentencing: MSR 3 years; Fines up to \$25,000) (OFT Code = 0016102)

**Count 5 of 24**

That between the 7th day of March, 2007 and the 28th day of March, 2018, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAMS** who at the time of the offense was over 18 years of age committed the offense of **AGGRAVATED BATTERY TO CHILD** in that the defendants knowingly and without legal justification causes great bodily harm to any child under the age of 13 years, in that they reported inaccurate information and medical diagnosis to medical professionals and consent causing the bowel of KW (DOB: 03/29/2005) other than as medically necessary causing the minor to rely on an ostomy bag, in violation of 720 ILCS 5/12-3.05(b)(1). (Class X) (MAX 6-30 IDOC 85% Truth in Sentencing: MSR 3 years; Fines up to \$25,000) (OFT Code = 0016102)

**Count 6 of 24**

That between the 7th day of March, 2007 and the 30th day of August, 2018, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAMS** who at the time of the offense was over 18 years of age committed the offense of **AGGRAVATED BATTERY TO CHILD** in that the defendants knowingly and without legal justification causes great bodily harm to any child under the age of 13 years, in that they reported inaccurate information and medical diagnosis to medical professionals and consent causing the bowel of KW (DOB: 03/7/2007) other than as medically necessary causing the minor to rely on an ostomy bag, in violation of 720 ILCS 5/12-3.05(b)(1). (Class X) (MAX 6-30 IDOC 85% Truth in Sentencing: MSR 3 years; Fines up to \$25,000) (OFT Code = 0016102)

**Count 7 of 24**

That between the 15th day of December, 2018 and the 28th day of March, 2018, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAMS** who at the time of the offense was over 18 years of age committed the offense of **AGGRAVATED BATTERY TO CHILD** in that the defendants knowingly and without legal justification causes great bodily harm to any child under the age of 13 years, in that they reported inaccurate information and medical diagnosis and consented to medical professionals inserting intravenous lines and feeding tubes to be inserted in KW (DOB: 03/29/2005) other than as medically necessary, in violation of 720 ILCS 5/12-3.05(b)(1). (Class X) (MAX 6-30 IDOC 85% Truth in Sentencing: MSR 3 years; Fines up to \$25,000) (OFT Code = 0016102)

**Count 9 of 24**

That between the 15th day of December, 2018 and the 28th day of March, 2018, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAMS** who at the time of the offense was over 18 years of age committed the offense of **AGGRAVATED BATTERY TO CHILD** in that the defendants knowingly and without legal justification causes great bodily harm to any child under the age of 13 years, in that they caused medication to be provided other than as medically necessary to KW (DOB: 03/29/2005) causing withdrawal, in violation of 720 ILCS 5/12-3.05(b)(1). (Class X) (MAX 6-30 IDOC 85% Truth in Sentencing: MSR 3 years; Fines up to \$25,000) (OFT Code = 0016102)



**Count 8 of 24**

That between the 15th day of December, 2018 and the 30th day of August, 2018, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAMS** who at the time of the offense was over 18 years of age committed the offense of **AGGRAVATED BATTERY TO CHILD** in that the defendants knowingly and without legal justification causes great bodily harm to any child under the age of 13 years, in that they reported inaccurate information and medical diagnosis and consented to medical professionals inserting intravenous lines and feeding tubes to be inserted in KW (DOB: 03/7/2007) other than as medically necessary, in violation of 720 ILCS 5/12-3.05(b)(1). (Class X) (MAX 6-30 IDOC 85% Truth in Sentencing: MSR 3 years; Fines up to \$25,000) (OFT Code = 0016102)

**Count 10 of 24**

That between the 15th day of December, 2018 and the 30th day of August, 2018, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAMS** who at the time of the offense was over 18 years of age committed the offense of **AGGRAVATED BATTERY TO CHILD** in that the defendants knowingly and without legal justification causes great bodily harm to any child under the age of 13 years, in that they caused medication to be provided other than as medically necessary to KW (DOB: 03/7/2005) causing withdrawal, in violation of 720 ILCS 5/12-3.05(b)(1). (Class X) (MAX 6-30 IDOC 85% Truth in Sentencing: MSR 3 years; Fines up to \$25,000) (OFT Code = 0016102)

**Count 11 of 24**

That between the 7th day of March, 2007 and the 30th day of August, 2018, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAM** committed the offense of **AGGRAVATED DOMESTIC BATTERY**, in that the defendants, in committing a domestic battery in violation of 720 ILCS 5/12-3.2 knowingly caused great bodily harm to KW (DOB: 03/29/2005), a family member, in that they provided medication and consented to medical procedures for KW (DOB: 03/29/2005) other than as medically necessary, in violation of 720 ILCS 5/12-3.3. (Class 2 Felony). (Maximum 3-7 year IDOC; MSR 4 years; 85% Truth in Sentencing; 60 days WCJ min no Day for Day; Maximum fine \$25,000.00) (OFT Code = 0012300)

**Count 12 of 24**

That between the 7th day of March, 2007 and the 30th day of August, 2018, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAM** committed the offense of **AGGRAVATED DOMESTIC BATTERY**, in that the defendants, in committing a domestic battery in violation of 720 ILCS 5/12-3.2 knowingly caused great bodily harm to KW (DOB: 03/7/2007), a family member, in that they provided medication and consented to medical procedures for KW (DOB: 03/7/2007) other than as medically necessary, in violation of 720 ILCS 5/12-3.3. (Class 2 Felony). (Maximum 3-7 year IDOC; MSR 4 years; 85% Truth in Sentencing; 60 days WCJ min no Day for Day; Maximum fine \$25,000.00) (OFT Code = 0012300)

**Count 13 of 24**

That between the 15th day of December, 2018 and the 30th day of August, 2018, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAM** committed the offense of **AGGRAVATED DOMESTIC BATTERY**, in that the defendants, in committing a domestic battery in violation of 720 ILCS 5/12-3.2 knowingly caused great bodily harm to KW (DOB: 03/29/2005), a family member, in that they provided medication and consented to medical procedures for KW (DOB: 03/29/2005) other than as medically necessary, in violation of 720 ILCS 5/12-3.3. (Class 2 Felony). (Maximum 3-7 year IDOC; MSR 4 years; 85% Truth in Sentencing; 60 days WCJ min no Day for Day; Maximum fine \$25,000.00) (OFT Code = 0012300)

**Count 14 of 24**

That between the 15th day of December, 2018 and the 30th day of August, 2018, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAM** committed the offense of **AGGRAVATED DOMESTIC BATTERY**, in that the defendants, in committing a domestic battery in violation of 720 ILCS 5/12-3.2 knowingly caused great bodily harm to KW (DOB: 03/7/2007), a family member, in that they provided medication and consented to medical procedures for KW (DOB: 03/7/2007) other than as medically necessary, in violation of 720 ILCS 5/12-3.3. (Class 2 Felony). (Maximum 3-7 year IDOC; MSR 4 years; 85% Truth in Sentencing; 60 days WCJ min no Day for Day; Maximum fine \$25,000.00) (OFT Code = 0012300)

**Count 15 of 24**

That between the 15th day of December, 2015 and the 28th day of March, 2018, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAMS** committed the offense of **AGGRAVATED BATTERY TO CHILD <13**, in that the defendants who was at least 18 years of age, knowingly and without legal justification causes bodily harm to any child under the age of 13 years, in that they caused KW (DOB: 03/29/2005) to be catheterized other than medically necessary, in violation of 720 ILCS 5/12-3.05(b)(2). (Class 3 Felony) (MAX 2-5 years IDOC: MSR 1 years; Fines up to \$25,000) (OFT Code = 0016103)

**Count 16 of 24**

That between the 15th day of December, 2015 and the 28th day of March, 2018, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAMS** committed the offense of **AGGRAVATED BATTERY TO CHILD <13**, in that the defendants who was at least 18 years of age, knowingly and without legal justification causes bodily harm to any child under the age of 13 years, in that they caused KW (DOB: 03/7/2007) to be catheterized other than medically necessary, in violation of 720 ILCS 5/12-3.05(b)(2). (Class 3 Felony) (MAX 2-5 years IDOC: MSR 1 years; Fines up to \$25,000) (OFT Code = 0016103)



**Count 17 of 24**

That between the 15th day of December, 2015 and the 30th day of August, 2018, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAMS** committed the offense of **RECKLESS CONDUCT WITH GREAT BODILY HARM**, in that the defendants, by any means lawful or unlawful, recklessly performs an act or acts that cause great bodily harm or permanent disability or disfigurement to another person, in that the defendants, took KW (DOB: 03/29/2005) to medical professionals and inaccurately reported symptoms and diagnosis and consented to medical procedures and provided medication to KW other than medically necessary in violation of 720 ILCS 5/12-5(a)(2). (Class 4 Felony) (MAX 1-3 years IDOC: MSR 1 year: Fines up to \$25,000) (OFT Code = 0016131)

**Count 18 of 24**

That between the 15th day of December, 2015 and the 30th day of August, 2018, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAMS** committed the offense of **RECKLESS CONDUCT WITH GREAT BODILY HARM**, in that the defendants, by any means lawful or unlawful, recklessly performs an act or acts that cause great bodily harm or permanent disability or disfigurement to another person, in that the defendants, took KW (DOB: 03/7/2007) to medical professionals and inaccurately reported symptoms and diagnosis and consented to medical procedures and provided medication to KW other than medically necessary in violation of 720 ILCS 5/12-5(a)(2). (Class 4 Felony) (MAX 1-3 years IDOC: MSR 1 year: Fines up to \$25,000) (OFT Code = 0016131)

**Count 19 of 24**

That between the 15th day of December, 2015 and the 30th day of August, 2018, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAMS** committed the offense of **RECKLESS CONDUCT** in that the defendants, by any means lawful or unlawful, recklessly performs an act or acts that endanger the safety of another person, in that the defendants consented to medical procedures, reported inaccurate information to medical professionals and provided medication to KW (DOB: 3/29/2005) other than medically necessary, in violation of 720 ILCS 5/12-5(a)(1). (Class A Misdemeanor) (MAX up to 1 year Jail; Probation up to 2 years; Fines up to \$2,500) (OFT Code = 0016130)

**Count 20 of 24**

That between the 15th day of December, 2015 and the 30th day of August, 2018, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAMS** committed the offense of **RECKLESS CONDUCT** in that the defendants, by any means lawful or unlawful, recklessly performs an act or acts that endanger the safety of another person, in that the defendants consented to medical procedures, reported inaccurate information to medical professionals and provided medication to KW (DOB: 3/7/2007) other than medically necessary, in violation of 720 ILCS 5/12-5(a)(1). (Class A Misdemeanor) (MAX up to 1 year Jail; Probation up to 2 years; Fines up to \$2,500) (OFT Code = 0016130)

**Count 21 of 24**

That on or about the 15th day of December, 2015 and the 30th day of August, 2018, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAMS** committed the offense of **ENDANGER LIFE/HEALTH OF CHILD**, in that the defendants knowingly caused or permitted the life or health of a child under the age of 18 to be endangered in that they reported inaccurate information to medical professionals, consented to medical procedures and provided medication and medical care to KW (DOB: 3/29/2005) other than as medically necessary, in violation of 720 ILCS 5/12C-5(a)(1). (Class A Misdemeanor) (MAX up to 1 year jail; Probation up to 2 years; Fines up to \$2,500) (OFT Code = 0017276

**Count 22 of 24**

That on or about the 15th day of December, 2015 and the 30th day of August, 2018, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAMS** committed the offense of **ENDANGER LIFE/HEALTH OF CHILD**, in that the defendants knowingly caused or permitted the life or health of a child under the age of 18 to be endangered in that they reported inaccurate information to medical professionals, consented to medical procedures and provided medication and medical care to KW (DOB: 3/7/2007) other than as medically necessary, in violation of 720 ILCS 5/12C-5(a)(1). (Class A Misdemeanor) (MAX up to 1 year jail; Probation up to 2 years; Fines up to \$2,500) (OFT Code = 0017276)

**Count 23 of 24**

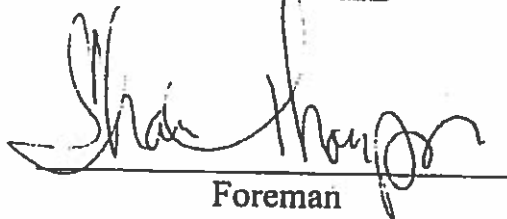
That between the 15th day of December, 2015 and the 30th day of December, 2017, in the County of Winnebago, State of Illinois, **CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAMS** committed the offense of **THEFT BY DECEPTION >500<10K**, in that the defendants knowingly obtained by deception control over property of the owner of **Make a Wish Foundation**, a canine whose value exceeded \$500 and not exceeding \$10,000 in value, and knowingly used, the property in such manner as to deprive the owner permanently of such use or benefit, in violation of 720 ILCS 5/16-1(a)(2). (Class 3 Felony) (MAX 2-5 years IDOC: MSR 1 year: Fines \$25,000) (OFT Code = 0015496)

**Count 24 of 24**

That between the 15th day of December 2015 and the 30th day of  
December, 2017, in the County of Winnebago, State of Illinois,

**CHRISTOPHER J WILLIAMS** and **KATHRYN WILLIAMS** committed  
the offense of **THEFT BY DECEPTION, DEPRIVE \$10K<\$100K**, in that  
the defendants knowingly obtained by deception, control over property,  
namely an all-expense paid trip to Disney, with a value exceeding \$10,000  
but not exceeding \$100,000 of Make A Wish Foundation and knowingly  
used, the property in such manner as to deprive the owner permanently of  
such use or benefit, in violation of 720 ILCS 5/16-1(a)(2)(C). (Class 2  
Felony) (MAX 3-7 years IDOC: MSR 2 years: Fines up to \$25,000) (OFT  
Code = 0011194)

A TRUE BILL

  
Foreman



LIST OF WITNESSES

BOB JUANEZ


STATE OF ILLINOIS  
IN THE CIRCUIT COURT OF THE 17<sup>TH</sup> JUDICIAL CIRCUIT  
COUNTY OF WINNEBAGO

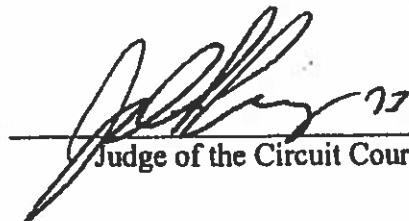
The within indictment returned in open court this 12 day of

Dec., 2018. Bail set at \$ 100,000.00

Warrant to be issued

No warrant issued

NEED TO SUPPRESS

  
\_\_\_\_\_  
Judge of the Circuit Court

CHRISTOPHER J WILLIAMS  
10/12/1971  
8052 Kelley Rd  
Winnebago, IL 61088

KATHRYN WILLIAMS  
10/3/1969  
8052 Kelley Rd  
Winnebago, IL 61088