

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
COUNTY OF CARROLL

FILED

MAR 24 2025

CIRCUIT CLERK
PATRICIA A. NIHER

THE PEOPLE OF THE STATE OF
ILLINOIS

Plaintiff

vs.

MATTHEW A. HERPSTREITH,
D.o.b. 10/06/1980

Defendant

No. 2025-CF- 21

Information

Now, comes Charles M. Colburn, Special Prosecutor, in the name and by the authority of the People of the State of Illinois, charges:

COUNT I

On or about July 28, 2024, in Carroll County, State of Illinois, MATTHEW A. HERPSTREITH committed the offense of

RECKLESS HOMICIDE
(Class 3 Felony)

in that said defendant, while acting in a reckless manner, performed acts likely to cause death or great bodily harm to some individual in that he operated a motor vehicle, a Dodge Ram 1500 pickup truck, on IL-78 north of Mt. Carroll, Illinois, shortly after 3 am and as driver was not keeping a proper lookout, was inattentive to the roadway on which he was traveling, had been consuming alcoholic beverages continually since late afternoon the prior day, and was otherwise distracted and tired and at that time drove said motor vehicle into and over Jackson Kradle, who was a pedestrian thereon Il-78, thereby causing the death of Jackson Kradle, in violation of 720 ILCS 5/9-3(a).

COUNT II

On or about July 28, 2024, in Carroll County, State of Illinois, MATTHEW A. HERPSTREITH committed the offense of

RECKLESS CONDUCT (Class 4 Felony)

in that the defendant, while acting in a reckless manner, caused great bodily harm to Jackson Kradle in that he operated a motor vehicle, a Dodge Ram 1500 pickup truck, on IL-78 north of Mt. Carroll, Illinois, shortly after 3 a.m. and as driver was not keeping a proper lookout, was inattentive to the roadway on which he was traveling, had been consuming alcoholic beverages since late afternoon the prior day, and was otherwise distracted and tired and at the time drove said motor vehicle into and over Jackson Kradle, who was a pedestrian thereon IL-78, thereby causing the death of Jackson Kradle in violation of 720 ILCS 5/12-5(a)(2).

COUNT III

On or about July 28, 2024, in Carroll County, State of Illinois, MATTHEW A. HERPSTREITH committed the offense of

OBSTRUCTING JUSTICE (Class 4 Felony)

in that the defendant, with the intent to obstruct the prosecution of said Matthew A. Herpstreith, knowingly furnished false information to the Carroll County Sheriff's Department in that, shortly after he drove a Dodge Ram 1500 pickup truck on IL-78 into and over Jackson Kradle who was a pedestrian thereon IL-78, he advised in a written statement to the Carroll County Sheriff's Department that he "went around" Jackson Kradle, which was a false statement which materially impeded the administration of justice, in violation of 720 ILCS 5/31-4(a).

COUNT IV

On or about July 28, 2024, in Carroll County, State of Illinois, MATTHEW A. HERPSTREITH committed the offense of

ATTEMPT (OBSTRUCTING JUSTICE) (Class A Misdemeanor)

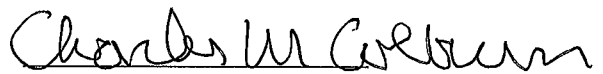
in that the defendant, with the intent to commit the offense of Obstructing Justice in violation of 720 ILCS 5/31-4(a), knowingly performed an act which constituted a substantial step toward the commission of that offense, in that he, shortly after he drove a Dodge Ram 1500 pickup truck on IL-78 into and over Jackson Kradle who was a pedestrian thereon IL-78, spray washed said pickup truck at a commercial car wash in order to wash away bodily tissue and fluids and destroy evidence of the defendant's vehicle running over Jackson Kradle, in violation of 720 ILCS 5/8-4(a).

COUNT V

On or about July 28, 2024, in Carroll County, State of Illinois, MATTHEW A. HERPSTREITH committed the offense of

FAILURE TO REDUCE SPEED (Petty Offense)

in that the defendant, while driving a Dodge Ram 1500 pickup truck failed to reduce speed as necessary to avoid colliding with a person on the highway in compliance with legal requirements and the duty of all persons to use due care in that defendant drove said pick up truck on IL-78 into and over Jackson Kradle who was a pedestrian thereon IL-78, in violation of 625 ILCS 5/11-601.


CHARLES M. COLBURN
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State of Illinois)

County of Carroll)

The undersigned, on oath, says that the facts set forth in the foregoing information are true and correct to the best of my knowledge and belief.



Charles M. Colburn

Charles M. Colburn

Special Prosecutor

State's Attorneys Appellate Prosecutor

Subscribed and sworn before me this 24th day of March, 2025.

Kelli S. Downs

Notary Public