

IN THE CIRCUIT COURT OF COOK COUNTY
 COUNTY DEPARTMENT, CHANCERY DIVISION

2017 NOV 30 PM 3:59

TIMOTHY C. EVANS, as Chief Judge)
 of the Circuit Court of Cook County,)
)
 Plaintiff,)
)
 v.)
)
 COUNTY OF COOK, a body politic and)
 corporate, TONI PRECKWINKLE,)
 President of the Cook County Board of)
 Commissioners, and MARIA PAPPAS,)
 Treasurer of Cook County,)
)
 Defendants.)

CLERK
 DOROTHY BROWN

Case No.

2017CH15851
 CALENDAR/ROOM 04
 TIME 00:00
 Injunction

**VERIFIED COMPLAINT FOR ENFORCEMENT OF THE CHIEF JUDGE'S
 ADMINISTRATIVE ORDER AND FOR INJUNCTIVE RELIEF**

Plaintiff, Timothy C. Evans, as Chief Judge of the Circuit Court of Cook County, (the "Chief Judge," "Circuit Court," or "Court"), by and through his attorney, Lisa Madigan, the Illinois Attorney General, and, pursuant to Illinois Supreme Court Rule 21(d), hereby petitions the Court for entry of an order compelling the Defendants to comply with the Chief Judge's General Administrative Order No. 2017-09 (hereinafter referred to as "Administrative Order"). Under Rule 21(d), Plaintiff seeks an injunction against Defendants, compelling them to take whatever action is necessary to comply with the Administrative Order, including the provision of sufficient financial support to ensure the proper operation of the court system, as detailed in said order, along with enjoining Defendants from taking any action in processing the termination, separation, or layoff of any employee of the Circuit Court without approval from the Chief Judge, or his designee. In support thereof, the Plaintiff states the following:

JURISDICTION AND VENUE

1. The courts have the authority to compel the expenditure of resources necessary to allow the judicial branch to perform its constitutional responsibilities. *Jorgensen v. Blagojevich*, 211 Ill. 2d, 286, 312 (2004); *People ex rel. Bier v. Scholz*, 77 Ill. 2d 12, 19-20 (1979).
2. Moreover, a County has no authority to unilaterally select specific non-judicial employees of a court for termination of employment or reduction in force; simply put, the Chief Judge, not the County, is the employer of non-judicial employees of a court. *See Orenic v. Ill. State Labor Relations Bd.*, 127 Ill. 2d 453, 480 (1989).
3. Pursuant to Supreme Court Rule 21(d), the circuit court has jurisdiction to compel a person or agency to comply with an administrative order of the chief circuit judge. Ill. Sup. Ct. Rule 21(d).
4. The circuit court also has the authority to grant a temporary restraining order and a preliminary or permanent injunction after proper notice has been provided to all parties. *See 735 ILCS 5/11-101, 11-102.*
5. Venue in Cook County is proper pursuant to 735 ILCS 5/2-101 because the Chief Judge's administrative order was entered in Cook County, Illinois, and the Defendants from whom the Chief Judge seeks compliance are located and conduct their official duties in Cook County, Illinois.

PARTIES

6. Plaintiff, Timothy C. Evans, is the Chief Judge of the Circuit Court of Cook County, who, in his capacity as chief circuit judge, entered Administrative Order No. 2017-09, dated November 30, 2017. (Exhibit 1).

7. Defendant, County of Cook, is a county in the State of Illinois and is a body politic and corporate. Cook County's governing board and legislative body is the Cook County Board of Commissioners ("County Board"), a governmental body which consists of 17 Commissioners elected by district and a Board President elected countywide. The County Board has an Office that is located in the City of Chicago, Cook County, Illinois. Defendant Cook County is hereinafter referred to as "Cook County," "the County," or "the County Board."
8. Defendant, Toni Preckwinkle, is the President of the Cook County Board, and the Board's Office is located in the City of Chicago, Cook County, Illinois.
9. Defendant, Maria Pappas, is the Treasurer of Cook County, and the Treasurer's Office is located in the City of Chicago, Cook County, Illinois.

BACKGROUND

10. By all measurable accounts, Cook County is facing economic difficulty in administering the functions and duties of local government.
11. In preparing the County's budget for fiscal year ("FY") 2018, the President of the County Board recommended wide-spread cuts across all departments of the County, along with a reduction in overall appropriations for the operations of the Circuit Court.
12. In mid-November 2017, the County's Department of Budget and Management Services informed the Chief Judge of the County's plan to reduce the court's budget by an additional 10% from the FY18 budget originally recommended by the President of the Cook County Board.

13. Recognizing the ensuing severe difficulty that such a budget reduction would create for the court's operations, the Chief Judge (on November 20, 2017), sent a letter to the President of the County Board. (Exhibit 2, Letter of November 20, 2017).
14. In his letter, the Chief Judge explained the adverse impact that a 10% cut to the court's FY18 budget as proposed by the County Board would have on the essential functioning of the court.
15. The County Board ignored the requests the Chief Judge made in his November 20, 2017 letter, and enacted a budget that inadequately appropriates financial resources for the operation of the court.
16. On November 21, 2017, the County Board approved and passed its FY18 budget, with an appropriation to the Office of the Chief Judge, which reduced funding for court operations by 8.5% from the amount approved for FY17 and 12.75% from the amount the court proposed for its FY18 budget.
17. The lack of adequate funding for the operations of the circuit court is widespread and affects nearly every division/department of the Office of the Chief Judge.
18. In addition to failing to appropriate sufficient money for the operations of the circuit court, the County Board also mandated through legislative action the termination of 161 of the Circuit Court's non-judicial employees.
19. The County's FY18 budget, as passed, will terminate a total of 323 employees countywide, out of which 161 are non-judicial employees of the court. The County therefore has forced the Circuit Court to absorb nearly 50% of all layoffs, while the Circuit Court's operations account for only 5.6% of the County's FY18 operating budget.

20. With respect to the County Board's unilateral decision to terminate 161 non-judicial employees of the court, the County has targeted for termination those employees with higher salaries and more seniority.
21. There are 13 different collective bargaining units representing employees of the court. Various collective bargaining agreements control the terms and conditions of unionized employees, many of whom have been targeted for termination by the County Board.
22. These collective bargaining agreements create binding, contractual relationships between the unionized employees and the Office of the Chief Judge of the Circuit Court of Cook County.
23. The collective bargaining agreements contain "inverse seniority" clauses, which require that, in the event of termination of employment due to a reduction in force, the termination of those employees with less seniority shall precede the termination of those employees with more seniority. (Exhibit 3, relevant portions of collective bargaining agreements).
24. By targeting those unionized employees who are higher paid employees with more seniority for termination due to reduction in force, the County Board not only will cause disruption to the essential functioning of the court, but also will force the Chief Judge to violate these collective bargaining agreements.

INADEQUATE FUNDING OF PROBATION SERVICES

25. For the FY18 budget, the Chief Judge analyzed the needs of the Adult Probation Department and determined that \$53,295,965 in general fund appropriations was necessary to fulfill its constitutional and statutory mandates.

26. The County Board appropriated \$48,442,308 for FY18, providing \$4,853,657 less than requested in general funds.
27. The County's budget plan included the reduction in force of supervisors within the Adult Probation Department's Pretrial Services Unit. Laying off these pretrial supervisors will adversely impact pre-trial reform efforts underway in Cook County and effectively eliminate home confinement as a condition of release on bail.
28. The reduction in force of pretrial supervisors within the Adult Probation Department will leave inexperienced employees to manage the operations of the bond court, which is active every day of the year.
29. The reduction of five supervisors within the pretrial unit stymies the pretrial reform effort currently underway in Cook County.
30. Additionally, the two remaining supervisors at the Central Bond Court (City of Chicago district) cannot logistically cover the operations at all of the bond courts and supervise fifty-six staff officers.
31. The lack of adequate supervisory oversight in the pretrial services unit caused by the inadequate funding and terminations will unnecessarily expose the Adult Probation Department to potential legal liability and to significant criticism from both local and national pretrial reform stakeholders.
32. The supervisor-to-officer ratio at the Central Bond Court under the FY18 budget would be 1 to 28. The Administrative Office of the Illinois Courts (AOIC) recommends a supervisor to officer ratio of 1 to 7. (Exhibit 4, AOIC Probation and Court Services Workload Model).
33. The only viable option to properly staff the Central Bond Court would be to cease pretrial

operations in all five suburban districts and reassign the three supervisors and staff from the suburban districts to the Central Bond Court. Otherwise, the result will be that risk assessments and recommendations will not be provided to the court to assist judges in Central Bond Court in making informed decisions on pretrial release, thereby placing current release/detention options in jeopardy.

34. Either outcome will result in a substantial reduction of pretrial risk assessments available for criminal defendants before the Court. As a consequence, the recent Supreme Court recommendation (#39) which requires that 85% of eligible defendants be interviewed and assessed prior to a bond hearing cannot be met. (*See* Administrative Office of the Illinois Courts, Illinois S. Ct., *Circuit Court of Cook County Pretrial Operational Review* (March 2014), p.59, attached hereto as Exhibit 5).
35. Additionally, the lack of resources creates a conflict with Circuit Court Order 18.8A (eff. Sept. 18, 2017), which requires the assessment for pretrial release of all misdemeanor defendants to begin on January 1, 2018. The lack of supervisors to train and oversee operations will make it impossible to comply with General Order 18.8A. (Exhibit 6, General Order 18.8A).
36. The FY18 budget also mandates the layoff of two of the five Home Confinement Supervisors, which would gravely impair, if not effectively end, operation of the Home Confinement Unit.
37. The Home Confinement Unit supervises both probationers and pretrial defendants on court-ordered GPS and electronic monitoring throughout Cook County. The GPS Program supervises individuals charged with certain domestic violence related offenses and offers options for victim participation as well.

38. Currently, the Adult Probation Department is operating at a deficit of mid-level managers attempting to cover operations 24 hours a day, 7 days a week, and 365 days a year, with only five supervisors. The reduction of two supervisors would leave only one supervisor assigned to each shift, which is not sufficient for full 24-hour coverage.
39. It is not practicable to reduce staffing at a time when the Adult Probation Department is experiencing an increase in the number of persons being ordered to GPS and Electronic Monitoring as a direct result of the Chief Judge's General Order 18.8A.
40. The court is relying on the Home Confinement Unit to provide electronic monitoring as a condition of release on probation.
41. Without adequate supervision of the GPS/Electronic Monitoring programs, the public is placed at increased risk of harm.
42. The FY18 budget also eliminates 18 additional supervisors who supervise probation officers at the Leighton Criminal Courthouse and the courthouses in the five suburban districts. The supervisor-to-officer ratio at District 2 would be 1 to 17, District 4 would be 1 to 24, District 5 would be 1 to 23, District 6 would be 1 to 29, and District 3 would have zero supervisors to manage the 16 assigned staff. All of these ratios are significantly out of compliance with the AOIC's recommended workload models of 1:7. (Exhibit 4).
43. The terminations also include supervisors who are experienced with the Public Safety Assessment tool, which is an evidence-based assessment used by the pretrial services officers to predict the risk of a detainee committing another crime while released on bail or the risk of the detainee failing to appear for his or her court date.
44. By terminating those supervising probation officers who have experience with supervising pretrial services officers in the use of the Public Safety Assessment tool, the

success of predicting risk factors for purposes of bond will be seriously jeopardized, adversely affecting both the pretrial detainees and public safety.

45. The reduction in force of supervisors within the Adult Probation Department will mean that less experienced pretrial officers will be expected to perform their duties without assistance and monitoring of supervisors, a result that will undermine the pretrial services program, depriving judges of accurate assessments in determining levels of bond.
46. The County's inadequate appropriation for staffing the Adult Probation Department will also eliminate positions vital to its operations, including information services.
47. The County has targeted the termination of the Director of Information Services within the Adult Probation Department. This position is critical to securing and developing strategies for the Adult Probation Department's new case management system.
48. The County also has eliminated five of the six cashier positions in the Adult Probation Department. These terminations significantly impair the Court's ability to process the collection of crime victims' restitution, along with court-ordered probation fees, pretrial fees, and GPS and electronic monitoring fees. These collections total approximately \$5 million and partly offset the cost of providing probation services.
49. The County's decision to terminate supervisory staff within the Adult Probation Department will reverse the implementation of criminal justice reforms in Cook County.
50. The County's decision to terminate 36 support staff within the Juvenile Probation Department will, among other things, severely impair its ability to staff reception areas, prepare and maintain reports and records, maintain the vehicle fleet, process IV-E reimbursements (estimated at \$300,000 to the County in FY18), enroll and monitor youths on electronic monitoring, process payroll, assist with the expungement of juvenile

court records, and perform background checks using the Law Enforcement Agency Data System (“LEADS”).

INADEQUATE FUNDING OF THE SOCIAL SERVICE DEPARTMENT

51. The Chief Judge requested \$13,425,969 in appropriations for the Social Service Department, but the County Board provided \$239,995 less than requested.
52. Through the FY18 budget, the County has unilaterally mandated the lay off 15 of the 21 non-judicial supervisors within the Social Service Department.
53. Of the 15 supervisory layoffs, two are supervisors who have spent months training for implementation of a new Misdemeanor Pretrial Service program to begin in January of 2018.
54. As a result of the County’s unlawful decision to lay off these employees, the Misdemeanor Pretrial Services program will not be operational because the remaining supervisors are not trained in the program or in the use of the program’s Public Safety Assessment tool.
55. Before the FY18 budget, each supervisor in the Social Service Department was responsible for managing a group of approximately seven caseworkers, who supervised a combined total of more than 400 offenders.
56. If the layoffs within this department take effect, the number of offenders over whom each supervisor will be responsible for managing will balloon to over 700.
57. The elimination of supervisory positions will require remaining supervisors to travel to multiple locations, in addition to handling excessive caseloads, severely compromising the department’s ability to provide effective services.

INADEQUATE FUNDING OF THE JUVENILE TEMPORARY DETENTION CENTER

58. The Juvenile Temporary Detention Center (“JTDC”) provides temporary secure housing for youths, primarily from the ages of 12 through 17 years, who are awaiting adjudication of their cases by the Juvenile Justice Division of the Circuit Court.
59. The JTDC also provides care for youths who have been transferred from the jurisdiction of the Juvenile Justice Division to the Criminal Division. These youths would otherwise be incarcerated in the Cook County Department of Corrections.
60. The JTDC plays a critical role in addressing how the judicial system handles children who have entered the criminal justice system.
61. From August 2007 to May 2015, the JTDC had operated pursuant to federal oversight under a consent decree in *Doe v. Cook County*, 99 CV 3905 (N.D. Ill.), to address deficient living conditions and violence that previously permeated the JTDC.
62. The JTDC is no longer operating pursuant to the federal consent decree, and measures put into place during the period of federal court oversight have greatly improved the conditions at the JTDC.
63. Yet the County’s FY18 budget disregards both the best interest of the children residing at the JTDC and the organizational structure and staffing plan implemented by the federal court in response to the County’s well-documented failure over the years to ensure constitutionally adequate staffing that humanely serves the children of the JTDC.
64. To maintain the reforms of the JTDC, which are necessary to meet the constitutional and statutory duties owed to the children who reside there, the Chief Judge requested that the County appropriate \$73,527,868 for the operation of the JTDC.
65. The County appropriated for FY18 \$61,462,380, for a shortfall of \$12,065,488.

66. The JTDC operates with an integrated system structured to ensure the constitutional rights of all children housed in detention there.
67. The County's inadequate funding of the JTDC damages if not destroys this structure by significantly undermining detention oversight and implementation of legal standards.
68. The FY18 appropriation for the JTDC will force it to operate with critical staff shortages, which will likely result again in federal court oversight of the JTDC.

THE COUNTY'S UNILATERAL DECISION TO TERMINATE COURT EMPLOYEES

69. Through Budget Amendment 2S-1, the County has unilaterally made the decision to terminate 161 specific non-judicial employees of the Circuit Court.
70. Of these 161 employees, many are highly skilled managers and supervisors in their respective divisions and departments within the Circuit Court. The termination of these employees will cause significant disruption to the operations of the Court, as employees with less experience and institutional knowledge will be left to handle the bulk of the Court's work. Others are designated as support staff, whose responsibilities include staffing reception areas, preparing reports, maintaining records, maintaining vehicle fleet, processing IV-E reimbursements (estimated at \$300,000 to the County in FY18), enrolling and monitoring youths on electronic monitoring, processing payroll, assisting with the expungement of juvenile court records, and performing background checks using the Law Enforcement Agency Data System ("LEADS").
71. The County is not an employer of any of these non-judicial employees of the Circuit Court.
72. Nevertheless, the County has decided to terminate funding for the payroll positions of these non-judicial employees in the imminent future.

73. Under the budget imposed by the County, County funding for employees who are not a part of a collective bargaining unit will be terminated on or before December 9, 2017.
74. On information and belief, employees who are part of a collective bargaining unit will be terminated in January of 2018.
75. However, FY18 in Cook County begins on December 1, 2017, and as of that date, there is no appropriation to fund the employment of the court's 161 non-judicial employees who have been targeted for termination.
76. On information and belief, the County is planning to cease payment to some non-judicial employees and effectuate their terminations as early as November 30, 2017.
77. The County's decision to unilaterally terminate by failing to appropriate salaries and wages for the 161 non-judicial employees for FY18 undermines the Court's ability to continue to fulfill its basic operations.
78. Moreover, by targeting those non-judicial employees with more seniority for termination, the County will force the Chief Judge to violate a number of collective bargaining agreements, which provide that reductions in force follow an inverse seniority model. (Exhibit 3—relevant portions of collective bargaining agreements).
79. These layoffs will undermine the functioning of the Office of the Chief Judge and its departments, including the Court's core functions to provide and promote public safety and access to justice.

**THE COUNTY'S REJECTION OF
THE CHIEF JUDGE'S REASONABLE ALTERNATIVE SOLUTIONS**

80. On October 20, 2017, the Chief Judge's Office submitted a detailed 10% budget reduction plan in an effort to arrive at a workable, mutually agreeable solution to help to solve the County's fiscal difficulties.

81. The Chief Judge's plan included payroll savings realized from furlough days of the court's employees.
82. The Chief Judge had indicated to the County that it was his intention to approach the various collective bargaining representatives for their agreement and, if the furlough arrangements ultimately fell short, then the court would select certain positions for elimination to fulfill budgetary obligations imposed by the County.
83. In a letter of October 20, 2017, the Chief's Judge's Office proposed a number of budgetary proposals to assist the County Board in meeting its FY18 financial goals. These included the following proposals:
 - a. Closure of Municipal Branch Courts 29 and 42 at 2452 W. Belmont in Chicago;
 - b. 20 furlough days for all staff;
 - c. 198 position reductions (vacant), including 75 that were eliminated in the President of the County Board's proposed budget;
 - d. A 50% reduction in funding for Juvenile Detention Alternative Programs;
 - e. Suspension of American Correctional Association training for Adult Probation;
 - f. Consolidation of specialty caseloads in the Social Service Department;
 - g. Suspension of the Mortgage Foreclosure Mediation Program;
 - h. Suspension of the Child Support Enforcement operation in the Domestic Relations Division (if furlough negotiations with the unions fail);
 - i. Reduction of the Public Guardian's representation in Domestic Relations matters;
 - j. Suspension of the Public Guardian's home care unit;
 - k. Increasing revenues in the Public Guardian's Office; and
 - l. Reduction of various other non-personnel accounts.

(Letter of October 20, 2017, attached as Exhibit 7).

84. The Chief Judge's proposed budget plan would provide an estimated savings of \$22 million in personnel costs and \$4.4 million in non-personnel costs.
85. In passing the FY18 budget, the County rejected the Chief Judge's proposal.

THE CHIEF JUDGE'S ADMINISTRATIVE ORDER

86. On November 30, 2017, the Chief Judge entered Administrative Order No. 2017-09. (Exhibit 1).
87. The Administrative Order provides, in pertinent part, the following:

IT IS HEREBY ORDERED that the County of Cook shall:

1. Provide sufficient funds to the Court to enable it to perform all of its legally required duties, including, but not limited to those detailed above, and specifically to provide funds in the amount of \$290,538,836, including continued funding for the 161 positions designated in the budget for layoffs and court operations at the Court's Branches 29 and 42 at 2452 W. Belmont Ave. in Chicago;
2. Refrain from implementing or processing the termination, separation, or layoff of any employee of the judiciary without approval by the Chief Judge or his designee;
3. Provide additional funds in the approximate amount of \$6,050,225, to employ sufficient pretrial services staff for implementation of Cook Co. Gen. Order 18.8A (eff. Sept. 18, 2017) and Illinois Public Act 100-1 (eff. Jan. 1, 2018) (Bail Reform Act of 2017);
4. Provide sufficient funds to the Circuit Clerk of Cook County, pursuant to the Counties Code, 55 ILCS 5/5-1106, to enable the Clerk to fully perform all the Clerk's duties pursuant to the Clerks of Courts Act, 705 ILCS 105/0.01, *et seq.*, including, but not limited to, the duty to attend all sessions of the court, preserve all the files and papers of the court, and make, keep and preserve complete records of all the proceedings and determinations of the court, except in cases otherwise provided by law, and to do and perform all other duties pertaining to the office or the Circuit Clerk, as may be required by law or the rules and orders of the Court, respectively;
5. Provide sufficient funds to the Sheriff of Cook County, pursuant to the Counties Code, 55 ILCS 5/5-1106, to enable the Sheriff to fully perform his duties pursuant to the Counties Code, 55 ILCS 5/3-6023, to attend upon all sessions of the courts, to obey the

lawful orders and directions of the court, and to maintain the security of all courthouse facilities; and

6. Provide sufficient funds to the Cook County Public Defender to enable her to adequately represent arrestees in police custody, pursuant to Cook Co. Cir. Ct. Gen. Admin. Order 2017-01 (eff. Mar. 14, 2017).

IT IS HEREBY FURTHER ORDERED that the Circuit Clerk shall fully perform all her duties pursuant to the Clerks of Courts Act, 705 ILCS 105/0.01, *et seq.*, including, but not limited to, attend upon all sessions of the Court, preserve all the files and papers of the Court, make, keep and preserve complete records of all the proceedings and determinations of the Court, except in cases otherwise provided by law, and do and perform all other duties pertaining to her office, as may be required by law or the rules and orders of the Court, respectively, at all courthouse facilities.

IT IS HEREBY FURTHER ORDERED that the Sheriff of Cook County shall fully perform all his duties pursuant to the Counties Code, 55 ILCS 5/3-6023, to attend upon all sessions of the Court held in Cook County, to obey the lawful orders and directions of the Court, and to maintain the security of all courthouse facilities.

IT IS FURTHER ORDERED that the Cook County Treasurer comply with the provisions of this order requiring the processing and payment of funds.

(Exhibit 1).

88. The Administrative Order was made effective immediately upon entry. (Exhibit 1).

CLAIM FOR RELIEF
ENFORCEMENT OF THE COURT'S ADMINISTRATIVE ORDER

89. Plaintiff re-alleges and incorporates by reference paragraphs 1-88.

90. Illinois Supreme Court Rule 21(d) provides the following:

Proceedings to Compel Compliance With Certain Orders Entered by a Chief Circuit Judge. Any proceeding to compel a person or agency other than personnel of the circuit court to comply with an administrative order of the chief circuit judge shall be commenced by filing a complaint and summons and shall be tried without a jury by a judge from a circuit other than the circuit in which the complaint was filed. The proceedings shall be held as in other civil cases.

91. Chief Judge Evans is entitled to an order enforcing his Administrative Order No. 2017-09 and compelling the Defendants to take action to comply with the Administrative Order.

WHEREFORE, Plaintiff, Timothy C. Evans, as Chief Judge of the Circuit Court of Cook County, prays for relief from the Court as follows:

(1) The entry of an order compelling Defendants to fully comply with Administrative Order No. 2017-09, including the following:

- a. A temporary restraining order, preliminary injunction and permanent injunction, requiring the County and its Treasurer to provide sufficient funds to the court to enable it to perform all of its legally required duties, and specifically to provide funds in the amount of \$290,538,836.00;
- b. A temporary restraining order, preliminary injunction, and permanent injunction requiring the County and its Treasurer to continue to fund the 161 non-judicial positions designated in the FY18 budget for layoff/termination;
- c. A temporary restraining order, preliminary injunction and permanent injunction, requiring the County and its Treasurer to provide additional funds in the approximate amount of \$6,050,225, to employ sufficient pretrial services staff for

implementation of Cook Co. Gen. Order 18.8A (eff. Sept. 18, 2017) and Illinois Public Act 100-1 (eff. Jan. 1, 2018) (Bail Reform Act of 2017);

- d. A temporary restraining order, preliminary injunction and permanent injunction prohibiting the County, its Treasurer and the County Board President from implementing and/or processing the termination, separation, or layoff of any employee of the judiciary without approval from the Chief Judge or his designee;
- e. A temporary restraining order, preliminary injunction and permanent injunction, ordering the County and its Treasurer to provide sufficient funds to the Circuit Clerk of Cook County to enable the Clerk to fully perform all the clerk's duties pursuant to the Clerks of Courts Act, including, but not limited to, the duty to attend all sessions of the court, preserve all the files and papers of the court, and make, keep and preserve complete records of all the proceedings and determinations of the court, except in cases otherwise provided by law, and to do and perform all other duties pertaining to the office or the circuit clerk, as may be required by law or the rules and orders of the court, respectively; and
- f. A temporary restraining order, preliminary injunction and permanent injunction, ordering the County and its Treasurer to provide sufficient funds to the Sheriff of Cook County to enable the Sheriff to fully perform his duties pursuant to the Counties Code, to attend upon all sessions of the courts, to obey the lawful orders and directions of the court, and to maintain the security of all courthouse facilities; and
- g. A temporary restraining order, preliminary injunction and permanent injunction, ordering the County and its Treasurer to provide sufficient funds to the Cook

County Public Defender to enable her to adequately represent arrestees in police custody;

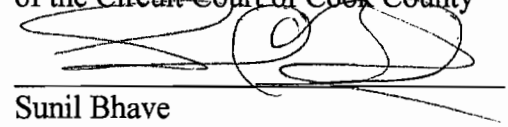
(2) Such other and further relief as the Court finds equitable and just.

Dated: November 30, 2017.

Respectfully submitted,

Timothy C. Evans, as Chief Judge
of the Circuit Court of Cook County

By:



Sunil Bhav
Hellin Jang
Amy McCarthy
Assistant Attorneys General
General Law Bureau
100 W. Randolph Street, 13th Floor
Chicago, Illinois 60601
(312) 814-2098/ 7199/ 2380
sbhave@atg.state.il.us
hjang@atg.state.il.us
amccarthy@atg.state.il.us

LISA MADIGAN
Attorney General of Illinois
Atty. Code 99000