

12 Person Jury

Law Division Motion Section Initial Case Management Dates for **12 Person Jury** (A, B, C, D, E, F, H, R, X, Z) will be heard In Person.

All other Law Division Initial Case Management Dates will be heard via Zoom

For more information and Zoom Meeting IDs go to https://www.cookcountycourt.org/HOME?Zoom-Links?Agg4906_SelectTab/12

Court Date: 9/24/2024 9:45 AM

FILED
7/22/2024 11:41 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2024L008080
Calendar, Z
28601881

IN THE CIRCUIT COURT OF COOK COUNTY, LAW DIVISION

J.W., T.W., T.L., L.R., R.B., C.J., T.D., D.P.,)
A.G., A.H., M.A., P.H., D.D., S.F., C.H., I.J.,)
M.H., S.M., J.M., P.J., Z.R., K.S., T.W. 2, L.H.,)
E.S., F.C., A.B., A.B. 2, A.F., A.H. 2, A.H. 3,)
A.J., A.O., A.P., A.R., A.R. 2, A.W., A.W. 2,)
B.D., B.G., B.H., B.W., C.G., C.R., C.S., C.W.,)
D.C., D.C. 2, D.D. 2, D.E., D.F., D.F. 2, D.M.,)
D.P. 2, D.R., D.S., D.W., D.W. 2, E.C., E.E.,)
E.L., E.M., E.R., F.S., G.C., G.C. 2, G.J., G.Q.,)
J.B., J.B. 2, J.B. 3, J.C., J.F., J.F. 2, J.F. 3, J.G.,)
J.H., J.J., J.J. 2, J.M. 2, J.N., J.R., J.R. 2, K.B.,)
K.G., K.H., K.H. 2, K.H. 3, K.R., K.W., L.M.,)
L.P., L.S., L.T., L.W., L.W. 2, M.A. 2, M.B.,)
M.B. 2, M.F., M.N., M.T., N.W., P.B., P.C.,)
P.S., R.C., R.D., R.H., R.J., R.M., R.M. 2, R.R.,)
S.G., S.K., S.M. 2, S.M. 3, S.R., S.R. 2, S.W.,)
T.D. 2, T.F., T.M., T.N., T.W. 3, T.W. 4, W.K.,)
W.M., R.R. 2, N.H., J.T., J.B. 4, T.M. 2., A.M.,)
D.J., J.J. 3, R.B. 2, K.R. 2, D.C. 3, C.C., D.E. 2,)
R.F., L.L., D.S. 2, X.R., C.R. 2, P.G., T.C.,)
M.R., R.C. 2, J.H. 2, Q.J., T.M. 3, M.M., R.P.,)
J.A., Z.A., S.B., L.B., S.B. 2, K.B. 2, F.C. 2,)
J.C. 2, J.C. 3, A.D., J.D., B.D. 2, J.D. 2, D.E. 3,)
C.H. 2, A.H. 4, J.I., A.J. 2, D.J. 2, T.J., M.K.,)
W.M. 2, T.P., E.P., A.R. 3, K.S. 2, L.W. 3,)
A.W. 3, M.W., R.W., P.B. 2, A.R. 4, D.D. 3,)
J.T. 2, D.J. 3, J.L., C.D., and M.S.

No. _____

Plaintiffs

vs.

COUNTY OF COOK COUNTY

Respondent

COMPLAINT

Jury Trial Demanded

FILED DATE: 7/22/2024 11:41 AM 2024L008080

Plaintiffs J.W., T.W., T.L., L.R., R.B., C.J., T.D., D.P., A.G., A.H., M.A., P.H., D.D., S.F., C.H., I.J., M.H., S.M., J.M., P.J., Z.R., K.S., T.W. 2, L.H., E.S., F.C., A.B., A.B. 2, A.F., A.H. 2, A.H. 3, A.J., A.O., A.P., A.R., A.R. 2, A.W., A.W. 2, B.D., B.G., B.H., B.W., C.G., C.R., C.S., C.W., D.C., D.C. 2, D.D. 2, D.E., D.F., D.F. 2, D.M., D.P. 2, D.R., D.S., D.W., D.W. 2, E.C., E.E., E.L., E.M., E.R., F.S., G.C., G.C. 2, G.J., G.Q., J.B., J.B. 2, J.B. 3, J.C., J.F., J.F. 2, J.F. 3, J.G., J.H., J.J., J.J. 2, J.M. 2, J.N., J.R., J.R. 2, K.B., K.G., K.H., K.H. 2, K.H. 3, K.R., K.W., L.M., L.P., L.S., L.T., L.W., L.W. 2, M.A. 2, M.B., M.B. 2, M.F., M.N., M.T., N.W., P.B., P.C., P.S., R.C., R.D., R.H., R.J., R.M., R.M. 2, R.R., S.G., S.K., S.M. 2, S.M. 3, S.R., S.R. 2, S.W., T.D. 2, T.F., T.M., T.N., T.W. 3, T.W. 4, W.K., W.M., R.R. 2, N.H., J.T., J.B. 4, T.M. 2, A.M., D.J., J.J. 3, R.B. 2, K.R. 2, D.C. 3, C.C., D.E. 2, R.F., L.L., D.S. 2, X.R., C.R. 2, P.G., T.C., M.R., R.C. 2, J.H. 2, Q.J., T.M. 3, M.M., R.P., J.A., Z.A., S.B., L.B., S.B. 2, K.B. 2, F.C. 2, J.C. 2, J.C. 3, A.D., J.D., B.D. 2, J.D. 2, D.E. 3, C.H. 2, A.H. 4, J.I., A.J. 2, D.J. 2, T.J., M.K., W.M. 2, T.P., E.P., A.R. 3, K.S. 2, L.W. 3, A.W. 3, M.W., R.W., P.B. 2, A.R. 4, D.D. 3, J.T. 2, D.J. 3, J.L., C.D., and M.S. (“Plaintiffs”) by and through their attorneys, Bailey Glasser LLP, DiCello Levitt LLP, and Levy Konigsberg LLP, bring this action against the County of Cook County, Illinois. Based upon the best information and belief, Plaintiffs allege the following:

NATURE OF THE CLAIM

1. For decades, employees, agents, and servants of County of Cook County (“Defendant” or “Cook County”) and the State of Illinois vis a vis the Office of the Chief Judge of the Circuit Court of Cook County (“State”) sexually abused Plaintiffs and/or knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently allowed or failed to prevent sexual abuse of Plaintiffs while Plaintiffs were children in the legal and physical custody of Cook County

and/or the State of Illinois and confined at the Cook County Juvenile Temporary Detention Center (formerly known as the Arthur J. Audy Home and hereinafter referred to as “JTDC”).

2. As a result of chronic mismanagement, patronage, overcrowding, and inadequate supervision, JTDC has been an environment of violence, fear, and sexual abuse for decades.

3. Cook County has had notice of such abuse for decades and nonetheless neglected to protect its confined youth from sexual abuse and failed to implement policies necessary to ensure such protection. It furthermore employed individuals it knew or should have known would sexually abuse juveniles in its care and custody.

4. In 1999, a federal class action lawsuit was filed against Cook County, citing staff-on-youth physical abuse, filthy conditions, understaffing, lack of medical care, overcrowding, and excessive use of room confinement.

5. While JTDC was originally designed to house no more than 500 youth, it regularly housed 600 and as many as 800 youth at one time, resulting in youth incarceration in “overflow” areas such as dayrooms with other youth.

6. The class-action lawsuit resulted in a settlement that required Cook County to improve conditions at the facility. Years later, in August 2007, the federal court presiding over the class action determined that Cook County was not complying with the terms of the settlement agreement and appointed a “Transitional Administrator” (“TA”) to oversee the transition of operations from Cook County to the Office of the Chief Judge of the Circuit Court of Cook County (“OCJ”) in anticipation of legislation mandating as much, and to bring JTDC into compliance with the settlement agreement.

7. To that end, in 2007, the State of Illinois passed Public Act 095-0194, House Bill 236, stripping the Cook County Board of its statutory authority to administer and operate JTDC

and transferring the administrative, budgetary, and operational control of JTDC to the Chief Judge of the Circuit Court of Cook County, an arm of the State of Illinois

8. The State of Illinois enacted this legislation as a result of mismanagement, patronage, and years of inhumane conditions at JTDC under Cook County's authority.

9. The law went into effect on January 1, 2008 and mandated that the OCJ appoint a new administrator to serve as superintendent of JTDC within 180 days. In mid-2008, the TA reported that JTDC was understaffed and needed more than 175 additional employees immediately in order to improve detainees' care.

10. Despite knowing that Cook County was failing to improve conditions and that JTDC needed an urgent influx of 175 additional employees to improve detainees' care, and despite the Chief Judge's lawful duty to appoint a new superintendent of JTDC, the Chief Judge neglected to so much as convene a search committee for the new head of JTDC until 2013 and failed to issue an appointment until 2015.

11. The TA worked in close contact and collaboration with the OCJ until May 20, 2015, at which time the Chief Judge's appointment of a new superintendent, an agent of the State of Illinois by and through the OCJ, was formalized. During this interim period, the OCJ and/or Cook County exercised control and retained the right to control the facility in whole or in part.

12. In 2022, a committee convened by the OCJ reported that JTDC is "isolating and deprivational" rather than rehabilitative. Most youth at JTDC spent at least 13 hours per day locked in small cells during from, at minimum, 7 p.m. to 7 a.m. Many youth spent several more hours locked in their room on top of these 13 hours per day as a result of JTDC staff's misuse of room confinement as a form of discipline.

13. The committee stated that “Semantics do not diminish the harsh reality that JTDC youth are locked in their cells for most of the day, every day.... No parent would be allowed to do this to their child.” Moreover, the committee concluded that “JTDC does not meet its affirmative duty to rehabilitate youth and help high-risk youth heal through trauma-informed, developmentally appropriate care,” and that “[t]he JTDC physical structure is inappropriate and should be replaced with smaller, community-based facilities that have specialized programs.”

14. Cook County implemented systematic and unconstitutional strip searches of juvenile inmates at JTDC during intake and throughout juveniles’ detention, which was a moving force of certain willful and wanton acts of sexual abuse perpetrated upon Plaintiffs. In addition to violating the Constitution of the United States, these pervasive patterns and practices within JTDC provided the opportunity for the sexual penetration and fondling of minors. While this conduct is criminal and unconstitutional, it is also violative of the administrative regulations governing the Illinois Department of Juvenile Justice, which requires that strip searches be performed by members of the same sex outside the view of others, that they shall be performed only when there is a reasonable suspicion to believe that the youth is carrying contraband in the area searched, and that they shall be performed by medically trained persons under sanitary conditions. 20 Ill. Adm. Code 2602.50(f)(1-4). Notwithstanding these written administrative regulations, the State of Illinois and Cook County perpetrated a policy and practice of strip-searching juveniles in an unlawful manner that caused the willful, wanton, and widespread sexual abuse of juveniles in its custody.

15. A 2023 Illinois Department of Juvenile Justice Inspection Report confirmed that this official practice and policy of unlawful strip-searches at intake continued until as recently as 2023. In addition to being violative of the Constitutions of the United States and the State of

Illinois, violative of governing administrative rules and regulations, it was also wholly ineffective in seizing contraband. In fact, between October 1, 2022 and April 30, 2022, JTDC conducted at least 1,203 strip searches and not a single search resulted in finding contraband. In fact, between June 1, 2022 and April 30, 2022, contraband was only found a total of four times, but only through use of the less-invasive wand or pat-down search on all four occasions.

16. The Illinois Department of Juvenile Justice also reported that JTDC staff implemented excessive room confinement of youth and left youth grievances unaddressed in some instances.

17. After passage of the Prison Rape Elimination Act (“PREA”) in 2003, the State of Illinois and Cook County routinely and knowingly failed to implement and ensure compliance with the prophylactic protections and requirements of the PREA, which was designed to eliminate sexual abuse of inmates.

18. This action is brought pursuant to common law and the Childhood Sexual Abuse Act as codified at 735 ILCS 5/13-202.2, and its basis is in tort.

19. This action alleges physical, psychological, and emotional injuries suffered as the result of conduct constituting childhood sexual abuse and sexual abuse as defined in Illinois Compiled Statute 735 ILCS 5/13-202.2 and negligence.

JURISDICTION

20. Plaintiffs invoke the jurisdiction of the State of Illinois and the venue of the Circuit Court of Cook County pursuant to Section 5/2-103 and 5/2-209 of the Illinois Code of Civil Procedure as the principal office of Cook County, a public or governmental corporation, is located in Cook County and because the tortious acts giving rise to this action occurred in Cook County.

21. The Law Division of the Circuit Court of Cook County has jurisdiction over this action in that each Plaintiff seeks recovery of monetary damages in excess of \$100,000.00 for personal injuries under the Childhood Sexual Abuse Act as codified at 735 ILCS 5/13-202.2

PARTIES

22. Plaintiffs are adults who were resident adolescent citizens of the State of Illinois at the time of the acts described herein and were born on or after July 24, 1983. Plaintiffs bring this action using a pseudonym to shield their identities because they are particularly vulnerable parties as victims of sexual abuse. *See Doe v. Northwestern Memorial Hospital*, 19 N.E.3d 178, 191 (Ill. App. Ct. 2014). Moreover, Plaintiffs' sexual abuse occurred while incarcerated at the Cook County Juvenile Temporary Detention Center, which pursuant to 55 ILCS 75/2 must meet the minimum standards established by the Illinois Department of Juvenile Justice. 705 ILCS 405/1-8, *et seq.*, protects the identity of all juvenile individuals in the juvenile court system, and all such court documents "are sealed and may never be disclosed to the general public or otherwise made widely available." 705 ILCS 405/1-8(a). Moreover, revealing Plaintiffs' identities as victims of childhood sexual abuse would subject Plaintiffs and their families to compounded humiliation, embarrassment, and emotional distress. Accordingly, filed concurrently herewith is a request for Plaintiffs to proceed using fictitious names pursuant to 735 ILCS 5/2-401(e) and to file this initial pleading without identifying information except as otherwise provided herein.

23. Plaintiffs join their claims in this action pursuant to the Illinois Code of Civil Procedure 735 ILCS 5 *et seq.* as Plaintiffs' right to relief arises out of the same transaction or series of transactions, and this action raises common questions of law or fact among all Plaintiffs against the County of Cook County, Illinois

24. Plaintiff J.W. is an adult resident citizen of Chicago, Illinois.

25. Plaintiff T.W. is an adult resident citizen of Chicago, Illinois.
26. Plaintiff T.L. is an adult resident citizen of Chicago, Illinois.
27. Plaintiff L.R. is an adult resident citizen of Nokomis, Florida.
28. Plaintiff R.B. is an adult resident citizen of Hobart, Indiana.
29. Plaintiff C.J. is an adult resident citizen of Chicago, Illinois.
30. Plaintiff T.D. is an adult resident citizen of Middlebury, Indiana.
31. Plaintiff D.P. is an adult resident citizen of Chicago, Illinois.
32. Plaintiff A.G. is an adult resident citizen of Chicago, Illinois.
33. Plaintiff A.H. is an adult resident citizen of Chicago, Illinois.
34. Plaintiff M.A. is an adult resident citizen of Dolton, Illinois.
35. Plaintiff P.H. is an adult resident citizen of Chicago, Illinois.
36. Plaintiff D.D. is an adult resident citizen of Hillside, Illinois.
37. Plaintiff S.F. is an adult resident citizen of Lansing, Illinois,
38. Plaintiff C.H. is an adult resident citizen of Chicago, Illinois.
39. Plaintiff I.J. is an adult resident citizen of Rantoul, Illinois.
40. Plaintiff M.H. is an adult resident citizen of Chicago, Illinois.
41. Plaintiff S.M. is an adult resident citizen of Glenview, Illinois.
42. Plaintiff J.M. is an adult resident citizen of Colorado Springs, Colorado.
43. Plaintiff P.J. is an adult resident citizen of Chicago, Illinois.
44. Plaintiff Z.J. is an adult resident citizen of Milwaukee, Wisconsin.
45. Plaintiff K.S. is an adult resident citizen of Chicago, Illinois.
46. Plaintiff T.W. 2 is an adult resident citizen of Danville, Illinois.
47. Plaintiff L.H. is an adult resident citizen of Chicago, Illinois.

48. Plaintiff E.S. is an adult resident citizen of Elmhurst, Illinois.
49. Plaintiff F.C. is an adult resident citizen of Justice, Illinois.
50. Plaintiff A.B is an adult resident citizen of Chicago, Illinois.
51. Plaintiff A.B. 2 is an adult resident citizen of Wautoma, Wisconsin.
52. Plaintiff A.F. is an adult resident citizen of Chicago, Illinois.
53. Plaintiff A.H. 2 is an adult resident citizen of Markham, Illinois.
54. Plaintiff A.H. 3 is an adult resident citizen of Gary, Indiana.
55. Plaintiff A.J. is an adult resident citizen of Lansing, Michigan.
56. Plaintiff A.O. is an adult resident citizen of Bridgeview, Illinois.
57. Plaintiff A.P. is an adult resident citizen of Rockford, Illinois.
58. Plaintiff A.R. is an adult resident citizen of Chicago, Illinois.
59. Plaintiff A.R. 2 is an adult resident citizen of Chicago, Illinois.
60. Plaintiff A.W. is an adult resident citizen of Chicago, Illinois.
61. Plaintiff A.W. 2 is an adult resident citizen of South Holland, Illinois.
62. Plaintiff B.D. is an adult resident citizen of Chicago, Illinois.
63. Plaintiff B.G. is an adult resident citizen of Chicago, Illinois.
64. Plaintiff B.H. is an adult resident citizen of Westville, Indiana.
65. Plaintiff B.W. is an adult resident citizen of Chicago, Illinois.
66. Plaintiff C.G. is an adult resident citizen of Chicago, Illinois.
67. Plaintiff C.R. is an adult resident citizen of Harvey, Illinois.
68. Plaintiff C.S. is an adult resident citizen of Chicago, Illinois.
69. Plaintiff C.W. is an adult resident citizen of Riverdale, Illinois.
70. Plaintiff D.C. is an adult resident citizen of Columbia Heights, Minnesota.

71. Plaintiff D.C. 2 is an adult resident citizen of Dallas, Texas.
72. Plaintiff D.D. 2 is an adult resident citizen of Evanston, Illinois.
73. Plaintiff D.E. is an adult resident citizen of Chicago, Illinois.
74. Plaintiff D.F. is an adult resident citizen of Chicago, Illinois.
75. Plaintiff D.F. 2 is an adult resident citizen of Chicago, Illinois.
76. Plaintiff D.M. is an adult resident citizen of Chicago Heights, Illinois.
77. Plaintiff D.P. 2 is an adult resident citizen of Chicago, Illinois.
78. Plaintiff D.R. is an adult resident citizen of Chicago, Illinois.
79. Plaintiff D.S. is an adult resident citizen of Chicago, Illinois.
80. Plaintiff D.W. is an adult resident citizen of Chicago, Illinois.
81. Plaintiff D.W. 2 is an adult resident citizen of Chicago, Illinois.
82. Plaintiff E.C. is an adult resident citizen of Chicago, Illinois.
83. Plaintiff E.E. is an adult resident citizen of Chicago, Illinois.
84. Plaintiff E.L. is an adult resident citizen of Chicago, Illinois.
85. Plaintiff E.M. is an adult resident citizen of Cicero, Illinois.
86. Plaintiff E.R. is an adult resident citizen of Chicago, Illinois.
87. Plaintiff F.S. is an adult resident citizen of Harvey, Illinois.
88. Plaintiff G.C. is an adult resident citizen of Oak Lawn, Illinois.
89. Plaintiff G.C. 2 is an adult resident citizen of Calumet Park, Illinois.
90. Plaintiff G.J. is an adult resident citizen of Chicago, Illinois.
91. Plaintiff G.Q. is an adult resident citizen of Chicago, Illinois.
92. Plaintiff J.B. is an adult resident citizen of Sauk Village, Illinois.
93. Plaintiff J.B. 2 is an adult resident citizen of DeKalb, Illinois.

94. Plaintiff J.B. 3 is an adult resident citizen of Chicago, Illinois.
95. Plaintiff J.C. is an adult resident citizen of Chicago, Illinois.
96. Plaintiff J.F. is an adult resident citizen of Saint Joseph, Illinois.
97. Plaintiff J.F. 2 is an adult resident citizen of Blue Island, Illinois.
98. Plaintiff J.F. 3 is an adult resident citizen of Chicago, Illinois.
99. Plaintiff J.G. is an adult resident citizen of Chicago, Illinois.
100. Plaintiff J.H. is an adult resident citizen of Berwyn, Illinois.
101. Plaintiff J.J. is an adult resident citizen of Bloomington, Illinois.
102. Plaintiff J.J. 2 is an adult resident citizen of Chicago, Illinois.
103. Plaintiff J.M. 2 is an adult resident citizen of Braidwood, Illinois.
104. Plaintiff J.N. is an adult resident citizen of Chicago, Illinois.
105. Plaintiff J.R. is an adult resident citizen of Elgin Illinois.
106. Plaintiff J.R. 2 is an adult resident citizen of Harvey, Illinois.
107. Plaintiff K.B. is an adult resident citizen of Gary, Indiana.
108. Plaintiff K.G. is an adult resident citizen of Chicago, Illinois.
109. Plaintiff K.H. is an adult resident citizen of Elmhurst, Illinois.
110. Plaintiff K.H. 2 is an adult resident citizen of Hazel Crest, Illinois.
111. Plaintiff K.H. 3 is an adult resident citizen of Lynwood, Illinois.
112. Plaintiff K.R. is an adult resident citizen of Chicago, Illinois.
113. Plaintiff K.W. is an adult resident citizen of Chicago, Illinois.
114. Plaintiff L.M. is an adult resident citizen of Chicago, Illinois.
115. Plaintiff L.P. is an adult resident citizen of Chicago, Illinois.
116. Plaintiff L.S. is an adult resident citizen of Buffalo Grove, Illinois.

117. Plaintiff L.T. is an adult resident citizen of Bunker Hill, Indiana.
118. Plaintiff L.W. is an adult resident citizen of Calumet City, Illinois.
119. Plaintiff L.W. 2 is an adult resident citizen of Country Club Hills, Illinois.
120. Plaintiff M.A. 2 is an adult resident citizen of Decatur, Georgia.
121. Plaintiff M.B. is an adult resident citizen of Chicago, Illinois.
122. Plaintiff M.B. 2 is an adult resident citizen of Chicago, Illinois.
123. Plaintiff M.F. is an adult resident citizen of Crete, Illinois.
124. Plaintiff M.N. is an adult resident citizen of Chicago, Illinois.
125. Plaintiff M.T. is an adult resident citizen of Louisville, Kentucky.
126. Plaintiff N.W. is an adult resident citizen of Harvey, Illinois.
127. Plaintiff P.B. is an adult resident citizen of Chicago, Illinois.
128. Plaintiff P.C. is an adult resident citizen of Sauk Village, Illinois.
129. Plaintiff P.S. is an adult resident citizen of Markham, Illinois.
130. Plaintiff R.C. is an adult resident citizen of Chicago, Illinois.
131. Plaintiff R.D. is an adult resident citizen of Bellwood, Illinois.
132. Plaintiff R.H. is an adult resident citizen of Chicago, Illinois.
133. Plaintiff R.J. is an adult resident citizen of Chicago, Illinois.
134. Plaintiff R.M. is an adult resident citizen of Ford Heights, Illinois.
135. Plaintiff R.M. 2 is an adult resident citizen of Chicago, Illinois.
136. Plaintiff R.R. is an adult resident citizen of Blue Island, Illinois.
137. Plaintiff S.G. is an adult resident citizen of Lisle, Illinois.
138. Plaintiff S.K. is an adult resident citizen of Chicago, Illinois.
139. Plaintiff S.M. 2 is an adult resident citizen of Hazel Crest, Illinois.

140. Plaintiff S.M. 3 is an adult resident citizen of Chicago, Illinois.
141. Plaintiff S.R. is an adult resident citizen of Chicago Heights, Illinois.
142. Plaintiff S.R. 2 is an adult resident citizen of Chicago, Illinois.
143. Plaintiff S.W. is an adult resident citizen of Chicago, Illinois.
144. Plaintiff T.D. 2 is an adult resident citizen of Chicago, Illinois.
145. Plaintiff T.F. is an adult resident citizen of Danville, Illinois.
146. Plaintiff T.M. is an adult resident citizen of Chicago, Illinois.
147. Plaintiff T.N. is an adult resident citizen of Normal, Illinois.
148. Plaintiff T.W. 3 is an adult resident citizen of Chicago, Illinois.
149. Plaintiff T.W. 4 is an adult resident citizen of Chicago, Illinois.
150. Plaintiff W.K. is an adult resident citizen of Summit, Illinois.
151. Plaintiff W.M. is an adult resident citizen of Chicago, Illinois.
152. Plaintiff R.R. 2 is an adult resident citizen of Blue Island, Illinois.
153. Plaintiff N.H. is an adult resident citizen of Oswego, Illinois.
154. Plaintiff J.T. is an adult resident citizen of Chicago, Illinois.
155. Plaintiff J.B. 4 is an adult resident citizen of Chicago, Illinois.
156. Plaintiff T.M. 2 is an adult resident citizen of Chicago, Illinois.
157. Plaintiff A.M. is an adult resident citizen of Danville, Illinois.
158. Plaintiff D.J. is an adult resident citizen of Chicago, Illinois.
159. Plaintiff J.J. 3 is an adult resident citizen of Chicago, Illinois.
160. Plaintiff R.B. 2 is an adult resident citizen of Chicago, Illinois.
161. Plaintiff K.R. 2 is an adult resident citizen of Chicago, Illinois.
162. Plaintiff D.C. 3 is an adult resident citizen of Rockford, Illinois.

163. Plaintiff C.C. is an adult resident citizen of Columbus, Ohio.
164. Plaintiff D.E. 2 is an adult resident citizen of Maywood, Illinois.
165. Plaintiff R.F. is an adult resident citizen of Chicago, Illinois.
166. Plaintiff L.L. is an adult resident citizen of Chicago, Illinois.
167. Plaintiff D.S. 2 is an adult resident citizen of Chicago, Illinois.
168. Plaintiff X.R. is an adult resident citizen of Chicago, Illinois.
169. Plaintiff C.R. 2 is an adult resident citizen of Chicago, Illinois.
170. Plaintiff P.G. is an adult resident citizen of Chicago, Illinois.
171. Plaintiff T.C. is an adult resident citizen of Modesto, California.
172. Plaintiff M.R. is an adult resident citizen of Chicago, Illinois.
173. Plaintiff R.C. 2 is an adult resident citizen of Chicago, Illinois.
174. Plaintiff J.H. 2 is an adult resident citizen of Chicago, Illinois.
175. Plaintiff Q.J. is an adult resident citizen of Bourbonnais, Illinois.
176. Plaintiff T.M. 3 is an adult resident citizen of Chicago, Illinois.
177. Plaintiff M.M. is an adult resident citizen of Chicago, Illinois.
178. Plaintiff R.P. is an adult resident citizen of Chicago, Illinois.
179. Plaintiff J.A. is an adult resident citizen of Chicago, Illinois.
180. Plaintiff Z.A. is an adult resident citizen of Homewood, Illinois.
181. Plaintiff S.B. is an adult resident citizen of Cincinnati, Ohio.
182. Plaintiff L.B. is an adult resident citizen of Chicago, Illinois.
183. Plaintiff S.B. 2 is an adult resident citizen of Chicago, Illinois.
184. Plaintiff K.B. 2 is an adult resident citizen of Chicago, Illinois.
185. Plaintiff F.C. 2 is an adult resident citizen of Robbins, Illinois.

186. Plaintiff J.C. 2 is an adult resident citizen of Chicago, Illinois.
187. Plaintiff J.C. 3 is an adult resident citizen of Chicago, Illinois.
188. Plaintiff A.D. is an adult resident citizen of Cicero, Illinois.
189. Plaintiff J.D. is an adult resident citizen of Chicago, Illinois.
190. Plaintiff B.D. 2 is an adult resident citizen of Evanston, Illinois.
191. Plaintiff J.D. 2 is an adult resident citizen of Chicago, Illinois.
192. Plaintiff D.E. 3 is an adult resident citizen of Maywood, Illinois.
193. Plaintiff C.H. 2 is an adult resident citizen of Palatine, Illinois.
194. Plaintiff A.H. 4 is an adult resident citizen of Chicago, Illinois.
195. Plaintiff J.I. is an adult resident citizen of Chicago, Illinois.
196. Plaintiff A.J. 2 is an adult resident citizen of Chicago, Illinois.
197. Plaintiff D.J. 2 is an adult resident citizen of Chicago, Illinois.
198. Plaintiff T.J. is an adult resident citizen of Chicago, Illinois.
199. Plaintiff M.K. is an adult resident citizen of Lombard, Illinois.
200. Plaintiff W.M. 2 is an adult resident citizen of Decatur, Illinois.
201. Plaintiff T.P. is an adult resident citizen of West Chicago, Illinois.
202. Plaintiff E.P. is an adult resident citizen of Manteno, Illinois.
203. Plaintiff A.R. 3 is an adult resident citizen of Carrier Mills, Illinois.
204. Plaintiff K.S. 2 is an adult resident citizen of Calumet Park, Illinois.
205. Plaintiff L.W. 3 is an adult resident citizen of Chicago, Illinois.
206. Plaintiff A.W. 3 is an adult resident citizen of Clarendon Hills, Illinois.
207. Plaintiff M.W. is an adult resident citizen of Crete, Illinois.
208. Plaintiff R.W. is an adult resident citizen of Chicago, Illinois.

209. Plaintiff R.P. 2 is an adult resident citizen of Chicago, Illinois.
210. Plaintiff P.B. 2 is an adult resident citizen of Chicago, Illinois.
211. Plaintiff A.R. 4 is an adult resident citizen of Calumet City, Illinois.
212. Plaintiff D.D. 3 is an adult resident citizen of Chicago, Illinois.
213. Plaintiff J.T. 2 is an adult resident citizen of Sauk Village, Illinois.
214. Plaintiff D.J. is an adult resident citizen of Chicago, Illinois.
215. Plaintiff J.L. is an adult resident citizen of Chicago Heights, Illinois.
216. Plaintiff C.D. is an adult resident citizen of Danville, Illinois.
217. Plaintiff M.S. is an adult resident citizen of Sauk Village, Illinois.

218. Pursuant to 55 ILCS 5/5-1001, the Defendant is the County of Cook County (hereinafter “Defendant,” “Cook County,” or “County”), a body politic and corporate which has been established in the State of Illinois. By and through the Cook County Board of County Commissioners and or the Cook County Board, the County confined minors, including all Plaintiffs herein, at the Cook County Juvenile Temporary Detention Center (“JTDC”). These entities are charged with the care, custody, and control of the juveniles housed at its facilities as well as the control of its employees, officers, and agents who committed sexual abuse against the Plaintiffs.

FACTUAL ALLEGATIONS

219. Plaintiffs reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

220. Cook County and its employees, agents, and servants perpetrated sexual abuse upon minors in its custody through acts of rape, fondling, digital penetration, fellatio, cunnilingus, and other forms of sexual abuse by Cook County employees and agents.

221. Cook County has caused and permitted a culture of sexual abuse to flourish unabated at JTDC. Upon information and belief, the Cook County Board, the Cook County Board of Commissioners, and the State of Illinois are aware and have for decades been aware that the conditions identified above as connected to sexual abuse and conditions of JTDC were and are endemic.

222. At all times relevant to the wrongful conduct complained of herein and as to all Counts set forth below, Plaintiffs were children under the age of eighteen years in the legal and physical custody, direct and exclusive control, and supervision of Cook County and its agents, servants, and employees, who were responsible for Plaintiffs' care, safety, and rehabilitation. Additionally or in the alternative, on and after January 1, 2008, certain Plaintiffs were in the legal and physical custody of Cook County and or the State of Illinois by and through the Office of the Chief Judge of the Circuit Court of Cook County, either or both of which had the right to control the agents, servants, and employees, including but not limited to correctional staff, medical staff, probation services and other court staff, Rapid Response Team members, and all other staff at JTDC at all relevant times stated herein.

223. At all relevant times herein, Plaintiffs' abusers were 17 years of age or older and held a position of trust, authority, superiority, influence, and/or supervision in relation to Plaintiffs.

224. The sexual abuse and conduct described herein was perpetrated by employees and agents of Cook County for the purpose of sexual gratification or arousal of the perpetrator(s) and/or the victim. Additionally or in the alternative, the sexual abuse and conduct described herein on and after January 1, 2008 was perpetrated by employees and agents of the OCJ and/or Cook County for the purpose of sexual gratification or arousal of the perpetrator(s) and/or the victim.

225. At all relevant times and as to each Count set forth below, servants, employees, or other agents of Cook County committed the sexual conduct and abuse identified herein, *infra*, in the course and scope of their employment while upon the premises in possession of Cook County upon which the abusers were privileged to enter only as servants of Cook County. Additionally or in the alternative, on and after January 1, 2008 servants, employees, or other agents of Cook County and/or the State of Illinois committed the sexual conduct and abuse identified herein, *infra*, in the course and scope of their employment while upon the premises in possession of Cook County and/or the State of Illinois and upon which the abusers were privileged to enter only as servants of Cook County and/or the State of Illinois.

226. At all relevant times and as to each Count set forth below, Cook County knew or had reason to know that it had the ability to control these abusers and knew or should have known of the necessity and opportunity for exercising such control. Additionally or in the alternative, on and after January 1, 2008, Cook County and/or the State of Illinois knew or had reason to know that it had the ability to control these abusers and knew or should have known of the necessity and opportunity for exercising such control.

227. The sexual abuse and sexual conduct set forth herein lacked consent, and Plaintiffs did not have the capacity to consent by virtue of being, at all relevant times, minors and/or in the legal and physical custody of Cook County and or the State of Illinois. Moreover, the sexual abuse and sexual conduct complained of herein was often accompanied by the use of force, compulsion, undue influence, duress, quid pro quo, coercion, intimidation, and/or threat of physical harm and/or retaliation. Plaintiffs did not factually or legally consent to the abuse described herein. Moreover, Plaintiffs are presumed to have been unable to give knowing consent pursuant to 720 ILCS 5/11-0.1.

Sexual Abuse of J.W.

65. When Plaintiff J.W. was 14 years old and housed at JTDC from the ages of 14 to 17, a nurse named Ms. Banks and a staff member named Officer Stewart, while acting in the course and scope of their employment and under the control of Cook County, sexually abused J.W. from 2000 to 2003.

66. Ms. Banks was at all relevant times a light-skinned black female estimated to be in her mid 30s and approximately 5'9 in height. She often wore her hair in a ponytail.

67. Officer Stewart was at all relevant times a heavy-set black male of medium complexion and approximately 6'1 in height. He was bald and wore a large ring on one hand.

68. J.W. expects to learn the full names and identities of his abusers through the course of discovery.

69. In 2000 when J.W. was 14 years old, Stewart forced him to fight another inmate, causing injuries for which he went to the medical unit. Banks, who was the evening shift nurse within the medical unit, told J.W. that he could stay outside of his cell longer in exchange for sexual favors. J.W. capitulated to this coercion, and Banks administered oral copulation on him.

70. After this incident, J.W. Abuser 1 ultimately sexually abused him over 15 times across multiple stays at JTDC between 2000 and 2003. The abuse included both oral copulation and sexual intercourse. On some occasions, staff members permitted Banks to keep J.W. in the medical unit overnight, which allowed her to sexually abuse him multiple times in one day. Banks repeatedly told J.W. to visit her once he was out of the facility, and that he could live with her once he aged out of the system. She regularly gave him snacks and marijuana, as well as her personal phone number so she could continue the abuse outside of the facility, but he never attempted to contact or visit her once he was released.

71. When J.W. was 14 or 15 in 2000 or 2001, Stewart entered his cell during nightly head count and ordered him to undress. When J.W. refused, Stewart threatened to send him to the segregation unit. Under this threat, Stewart forcefully undressed and raped J.W. Stewart sexually abused J.W. in this manner over 30 times across multiple stays in Cook County between 2000 and 2003. This abuse included both oral copulation and rape. During each stay at JTDC, J.W. was almost always placed in the same cell within J.W.'s housing unit. The cell was made of glass, and the inside of the cell was fully visible from the TV area. During these repeated incidents of abuse, J.W. watched as staff members walked in and around the TV area but never attempted to stop the abuse. Stewart gave J.W. extra food, cigarettes, and better jobs around the facility when he complied with the abuse. He threatened to revoke J.W.'s phone time and to send him to segregation if J.W. ever reported the abuse. J.W. repeatedly asked staff members to stop placing him on J.W. Abuser 2's unit, but this request was typically denied.

72. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

73. At the relevant times herein, Plaintiff J.W. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

74. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn

Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

75. At the time of the above-described sexual abuse of Plaintiff J.W., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

76. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of T.W.

77. When Plaintiff T.W. was 16 years old and housed at JTDC, a gym teacher named Coach Webber, a staff member named CO Yanni, and a science teacher (hereinafter "T.W. Abuser 3" unless otherwise indicated), while acting in the course and scope in their employment and under the control of Cook County, sexually abused T.W. in 2005.

78. Coach Webber was at all relevant times a black male of medium complexion estimated to be in his late 30s to early 40s and approximately 5'4 to 5'6 in height. He was bald, slightly heavy-set, and had a goatee.

79. CO Yanni was at all relevant times a black female of medium complexion, estimated to be in her early 20s and approximately 5'5 to 5'6 in height. She alternately wore sew-in hair weaves and her natural hair.

80. T.W. Abuser 3 was at all relevant times a white male estimated to be in his late 30s to early 40s and approximately 5'11 to 6'0 in height. He had short gray hair, a large nose, and wore glasses.

81. T.W. expects to learn the full names and identities of his abusers through the course of discovery.

82. Webber ran the facility's gym and taught gym classes to T.W. and other youths. Before and after gym classes, Webber regularly brought T.W. into his private office near the gym. Once inside the office, Webber ordered him to undress and masturbate himself while he watched, touched T.W.'s back, buttocks, and genitals, kissed his face and neck, and masturbated himself. Webber said that he had to comply with the abuse if he wanted to use the gym, and manipulated T.W. into believing that the abuse was a normal occurrence within the facility. He gave him restaurant food and let him play video games as a reward for not disclosing the abuse.

83. On one occasion, a staff member entered Webber's office while he was sexually abusing the Plaintiff. Webber took the staff member outside and spoke with him for a few minutes until the staff member left, upon which time Webber continued the sexual abuse. The staff member never interacted with T.W. again, and no one in the facility followed up with T.W. regarding the sexual abuse.

84. Yanni frequently escorted T.W. to the gym at Webber's request and sometimes stood guard outside of Webber's office as he abused T.W. On multiple occasions, Webber ordered T.W. to administer oral copulation on Yanni while he watched and masturbated. Yanni frequently fondled T.W.'s genitals and buttocks over and under the clothes. When T.W. was discharged from JTDC, Yanni gave him her phone number and said that he could call her if he wanted to "get together" with her. T.W. was very uncomfortable and did not attempt to contact Yanni once he left the facility.

85. Webber sexually abused T.W. approximately six to eight times over the course of T.W.'s 30 day stay in 2015. Yanni sexually abused T.W. for approximately three of those incidents.

86. T.W. Abuser 3 was a science teacher and taught classes to T.W. and other youths during the weekdays. On one occasion at the end of class, T.W. Abuser 3 gave T.W. a note which instructed him to go to the nearby laundry room, masturbate, ejaculate on the note, and leave the note inside the laundry room for T.W. Abuser 3 to retrieve. The note also said that T.W. Abuser 3 would write a good report for T.W. if he complied and would take behavioral points from T.W. if he refused. T.W. Abuser 3 successfully coerced T.W. into complying with the orders on the note. After this incident, T.W. Abuser 3 regularly touched and caressed T.W. over the clothes, kissed his neck, and made sexual comments towards him every time he attended class.

87. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

88. At the relevant times herein, Plaintiff T.W. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

89. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

90. At the time of the above-described sexual abuse of Plaintiff T.W., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

91. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of T.L.

92. When Plaintiff T.L. was 15 years old and housed at JTDC, a staff member (hereinafter “T.L. Abuser 1” unless otherwise indicated), while acting in the course and scope in their employment and under the control of Cook County, sexually abused T.L. from March to July of 2002.

93. T.L. Abuser 1 was at all relevant times a black male, estimated to be in his late 40s to early 50s, and approximately 6’0 in height. He was bald and wore glasses. T.L. expects to learn the full name and identity of his abuser through the course of discovery.

94. Starting in approximately March of 2002, T.L. Abuser 1 regularly followed T.L. into the bathroom where he would grope T.L.’s private parts over the clothes and make sexual comments. Eventually, T.L. Abuser 1 demanded sexual favors under the threat of physical harm and confinement. T.L. Abuser 1 groped and administered oral copulation to T.L. inside the facility’s bathroom approximately three to four times a week for four months. On some occasions, T.L. Abuser 1 handcuffed T.L.’s hands and/or feet when he attempted to resist the abuse, then sexually abused T.L. while he was restrained. T.L. verbally reported T.L. Abuser 1’s sexually and physically abusive behavior to a “white shirt” authority figure, but the white shirt did not believe T.L., and no one at the facility followed up with him regarding this report.

95. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

96. At the relevant times herein, Plaintiff T.L. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

97. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

98. At the time of the above-described sexual abuse of Plaintiff T.L., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

99. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of L.R.

100. When Plaintiff L.R. was 8 or 9 years old and housed at JTDC, two staff members (hereinafter “L.R. Abuser 1” and “L.R. Abuser 2,” collectively “L.R. Abusers,” unless otherwise indicated), while acting in the course and scope in their employment and under the control of Cook County, sexually abused L.R. in 1995 or 1996.

101. L.R. Abuser 1 was at all relevant times a black male estimated to be in his late 20s and of above average in height. He had a short haircut.

102. L.R. Abuser 2 was at all relevant times a white male, of medium build, estimated to be in his 30s, and above average in height. He had brown hair.

103. L.R. expects to learn the full names and identities of his abusers through the course of discovery.

104. As part of L.R.’s intake process, L.R. Abusers brought him into the intake room and ordered him to undress. Under the guise of a strip search, L.R. Abuser 1 groped and fondled L.R.’s naked body, grabbed and squeezed his genitals for approximately 20 seconds, and rubbed his fingers down the middle of L.R.’s buttocks while L.R. Abuser 2 watched and made sexual comments.

105. These strip searches were conducted upon L.R. without individualized, reasonable suspicion, nor compliance with the constitutions, laws, and regulations of both the United States and the State of Illinois. These searches were a pretext for sexual abuse.

106. Approximately one week after this strip search, L.R. Abusers entered the bathroom while L.R. was taking a shower and demanded sexual favors from him under the threat of physical harm. L.R. Abuser 2 forced L.R. to give him oral copulation while L.R. Abuser 1 watched,

masturbated, and ejaculated on L.R.'s face. One of the L.R. Abusers gave L.R. an extra slice of pizza at dinner afterwards.

107. Approximately three to four days after this incident, L.R. Abusers entered L.R.'s cell and ordered him to follow them to the cell of another youth. L.R. Abusers then forced L.R. and the other youth to perform oral copulation on each other while L.R. Abusers watched and masturbated, again under the threat of physical harm. L.R. Abusers told L.R. and the other youth that they "better not say nothing or we'll hurt you," and additionally threatened to revoke L.R.'s meals and extend his sentence so he could "never go home."

108. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

109. At the relevant times herein, Plaintiff L.R. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

110. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

111. At the time of the above-described sexual abuse of Plaintiff L.R., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

112. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of R.B.

113. When Plaintiff R.B. was 15 years old and housed at JTDC, two staff members (hereinafter "R.B. Abuser 1" and "R.B. Abuser 2" unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County, sexually abused R.B. in 1998.

114. R.B. Abuser 1 was at all relevant times a black male estimated to be in his 30s and approximately 5'11 in height. He had a beard and tattoos on his arms.

115. R.B. Abuser 2 was at all relevant times a black female estimated to be in her 30s and approximately 5'7 in height. She had short hair.

116. R.B. expects to learn the full names and identities of her abusers through the course of discovery.

117. During her first week at JTDC, R.B. was walking back from school when R.B. Abuser 1 approached her in the hallway and pulled her aside to a small alcove in the hallway. R.B. Abuser 1 forcefully grabbed R.B.'s breasts over the clothes, then put his hands under her clothes to grope her breasts and rub her genitals. R.B. Abuser 1 then digitally penetrated R.B. hard enough to cause severe pain. R.B. was pregnant and in an advanced trimester at the time of abuse such that she worried that this penetration would harm the baby or induce labor.

118. During this abuse, R.B. Abuser 1 verbally harassed her, stating that "this is what you get" and "this is what happens to girls like you [inside the facility]." R.B. Abuser 1 sexually abused R.B. in this manner approximately five to seven more times over the course of her short stay at the facility. When R.B. attempted to resist the abuse, R.B. Abuser 1 told her that he would physically harm her and report her for causing trouble if she did not comply.

119. During her time at the facility, R.B. had special permission to shower and use the bathroom more frequently due to her pregnancy. R.B. Abuser 2 regularly followed R.B. into the bathroom and made sexual comments about her breasts, body, and pubic hair, and said that she deserved this harassment because she was "just a whore anyways" due to her pregnancy. When R.B. was the only one in the bathroom, R.B. Abuser 2 regularly groped, slapped, and pinched R.B.'s breasts while making sexual and demeaning comments. The facility allotted R.B. extra snacks between meals due to her pregnancy; if R.B. attempted to resist R.B. Abuser 2's abuse, she revoked these extra snacks. R.B. Abuser 2 verbally harassed R.B. four to five times a week over the course of her stay at the facility, and the sexual touching occurring approximately two to three times a week.

120. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

121. At the relevant times herein, Plaintiff R.B. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

122. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

123. At the time of the above-described sexual abuse of Plaintiff R.B., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

124. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County

employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of C.J.

125. When Plaintiff C.J. was 14 and housed at JTDC, two staff members (hereinafter “C.J. Abuser 1” and “C.J. Abuser 2,” collectively “C.J. Abusers,” unless otherwise indicated), while acting in the course and scope in their employment and under the control of Cook County, sexually abused C.J. in 2004 and 2005.

126. C.J. Abuser 1 was at all relevant times a heavy-set black male estimated to be in his late 30s and approximately 6’0 in height.

127. C.J. Abuser 2 was at all relevant times a black female estimated to be in her mid 40s to early 50s and approximately 5’8 in height. She had short black hair.

128. C.J. expects to learn the full names and identities of his abusers through the course of discovery.

129. Approximately five to six months into C.J.’s stay at JTDC, C.J. Abuser 1 began entering C.J.’s cell during nightly count time. Initially C.J. Abuser 1 approached him in a friendly manner and made conversation with him from the doorway of his cell, but he eventually started to enter the cell and touch C.J.’s genitals over the clothes. After a few weeks of this conduct, C.J. Abuser 1 touched C.J.’s genitals under the clothes during these nightly visits, then escalated to manual masturbation, oral copulation, and sodomy. C.J. Abuser 1 sexually abused C.J. approximately twice a week for three to six months. C.J. Abuser 1 locked C.J. in his cell for days at a time and revoked his phone calls when C.J. attempted to resist the abuse or if C.J. Abuser 1

thought he would report the abuse. He gave C.J. extra time in the day room, outside food from the staff room, and the chance to play video games as a reward for complying with the abuse.

130. C.J. verbally reported C.J. Abuser 1's sexually abusive behavior to a "white shirt" authority figure as well as a community group activist. Both the white shirt and the activist dismissed his report and said that he was lying about the abuse to get attention and avoid trouble. No one else at the facility followed up regarding these incidents, and C.J. Abuser 1 continued to sexually abuse C.J. for several months after the attempted reports.

131. A few weeks after C.J. Abuser 1 started sexually abusing C.J., C.J. Abuser 2 entered C.J.'s cell late at night and grabbed his genitals over the clothes and made a sexual comment implying that she heard about C.J. Abuser 1's sexually abusive behavior. Two times after this incident, C.J. Abuser 2 manually masturbated C.J., administered oral copulation on him, and had sexual intercourse with him inside his cell during the late-night shift. C.J. Abuser 2 gave C.J. extra time in the yard and allowed him to stay up later as a reward for complying with the abuse. C.J. felt as though C.J. Abusers were working together to alternatively punish and reward him, as they both gave him extra privileges and took away his privileges in concordance with one another.

132. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

133. At the relevant times herein, Plaintiff C.J. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

134. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

135. At the time of the above-described sexual abuse of Plaintiff C.J., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

136. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of T.D.

137. When Plaintiff T.D. was 16 years old housed at JTDC, a staff member (hereinafter "T.D. Abuser 1" unless otherwise indicated), while acting in the course and scope in their

employment and under the control of Cook County, sexually abused T.D. in late 2003 or early 2004.

138. T.D. Abuser 1 was at all relevant times a stocky, dark-skinned black male estimated to be in his late 30s and approximately 5'7 to 5'8 in height. He had a short fade haircut and wore glasses. T.D. expects to learn the full name and identity of his abuser through the course of discovery.

139. T.D. and several other youths were being escorted by T.D. Abuser 1 and another male staff member between the tunnel that connects the Cook County magistrate court and the intake room within JTDC. T.D. was handcuffed to another inmate beside him by his left arm. T.D. Abuser 1 suddenly stopped the handcuffed youths and ordered them to strip and line up against the wall for a strip search. T.D. became very uncomfortable and did not immediately comply. T.D. Abuser 1 told the other staff member to forcefully undress T.D. and press him against the wall. The staff member did so, and painfully pushed T.D.'s face and chest against the wall. T.D. Abuser 1 then forcefully digitally penetrated T.D.'s anus, enough to cause him severe pain.

140. These strip searches were conducted upon T.D. without individualized, reasonable suspicion, nor compliance with the constitutions, laws, and regulations of both the United States and the State of Illinois. These searches were a pretext for sexual abuse.

141. One to two days after this incident, T.D. reported the abuse to a female staff member named Officer Brown. Brown told T.D. that it was the abuser's word against his and that no one would believe him since inmates lied about sexual abuse. A few days after telling Brown, T.D. flagged down a "white hat" authority figure and again verbally reported T.D. Abuser 1's sexually abusive behavior. The white hat laughed and said that he did not believe T.D.

142. In the last few days of T.D.'s approximately two-week stay, T.D. reported the incident to a male staff member named Officer Moe. Moe said that there was nothing the facility could do about the abuse and that there would be "no point" of reporting the abuse to any of his superiors.

143. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

144. At the relevant times herein, Plaintiff T.D. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

145. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

146. At the time of the above-described sexual abuse of Plaintiff T.D., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

147. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of D.P.

148. When Plaintiff D.P. was 12 years old and housed at JTDC, a staff member (hereinafter "D.P. Abuser 1" unless otherwise indicated), while acting in the course and scope in their employment and under the control of Cook County, sexually abuse D.P. in 1996.

149. D.P. Abuser 1 was at all relevant times a petite, dark-skinned black female estimated to be in her 30s and approximately 5'7 in height. She often wore earrings. D.P. expects to learn the full name and identity of her abuser through the course of discovery.

150. Throughout D.P.'s entire stay at JTDC, D.P. Abuser 1 regularly pulled D.P. aside, sometimes along with one to two other youths, and took her to her cell, or occasionally the bathroom if it was empty. There, D.P. Abuser 1 ordered her to take off her clothes and forcefully undressed her if she refused to comply. Once she was undressed, D.P. Abuser 1 stood and stared at D.P.'s naked body for several minutes at a time, often making sexual comments about her body and pregnancy (D.P. was visibly pregnant during the period of abuse). On some occasions, D.P. Abuser 1 groped D.P.'s naked body and grabbed and slapped her breasts and buttocks. D.P. Abuser 1 sexually abused D.P. in this manner approximately one to three times a day for six months. D.P.

Abuser 1 also grabbed and groped D.P.'s breasts and buttocks over the clothes on a daily basis throughout the facility, and often made demeaning sexual comments towards her. When D.P. attempted to resist the touching or undressing, D.P. Abuser 1 struck her on the face, breasts, or belly. She often said that she would take away her baby once she gave birth, and that she would "never see her baby again" if she didn't comply with her sexually abusive behavior.

151. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

152. At the relevant times herein, Plaintiff D.P. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

153. Cook County and its employees, agents, and servants knew or should have known that this staff members was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

154. At the time of the above-described sexual abuse of Plaintiff D.P., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff

members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

155. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of A.G.

156. When Plaintiff A.G. was 15 years old and housed at JTDC, a staff member named Ms. Perkins, while acting in the course and scope in their employment and under the control of Cook County, sexually abused A.G. in 2002.

157. Ms. Perkins was at all relevant times a black female estimated to be in her mid 20s and approximately 5'6 to 5'7 in height. A.G. expects to learn the full name and identity of his abusers through the course of discovery.

158. Approximately one month into A.G.'s three month stay at JTDC, A.G. Abuser 1 entered the bathroom while A.G. was showering by himself and offered him more time outside of his cell and less chores around the facility in exchange for sexual favors. A.G. capitulated to this coercion, and Perkins masturbated him and administered oral copulation on him. Perkins sexually abused A.G. in this manner two more times after this incident.

159. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

160. At the relevant times herein, Plaintiff A.G. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

161. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

162. At the time of the above-described sexual abuse of Plaintiff A.G., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

163. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County

employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of A.H.

164. When Plaintiff A.H. was 15 years old and housed at JTDC, three staff members (hereinafter “A.H. Abuser 1,” “A.H. Abuser 2,” and “A.H. Abuser 3,” collectively “A.H. Abusers,” unless otherwise indicated), while acting in the course and scope in their employment and under the control of Cook County, sexually abused A.H. in 2000.

165. A.H. Abuser 1 was at all relevant times a muscular, dark-skinned black male estimated to be in his 40s and approximately 5’10 in height.

166. A.H. Abuser 2 was at all relevant times a muscular black male estimated to be in his 50s and approximately 6’6 in height. He had black and gray hair and wore glasses.

167. A.H. Abuser 3 was at all relevant times a heavy-set black male estimated to be in his 40s and approximately 6’0 tall. He had a goatee.

168. A.H. expects to learn the full name and identity of his abusers through the course of discovery.

169. Starting in the second or third week of A.H.’s stay at JTDC, A.H. Abusers began sexually abusing A.H. independently from each other and in a very similar manner. Approximately two to four times a week, A.H. Abusers individually entered A.H.’s cell late at night, groped his genitals and buttocks over the clothes, and masturbated him. On some occasions, A.H. Abusers ordered A.H. to give oral copulation, but he refused. When he attempted to resist abuse or refused oral copulation, the offending A.H. Abuser physically beat him and sent him to confinement. A.H.

Abusers rewarded him with extra food (pizza, chicken, beef, chips) and cigarettes when he complied with the abuse.

170. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

171. At the relevant times herein, Plaintiff A.H. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

172. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

173. At the time of the above-described sexual abuse of Plaintiff A.H., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

174. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting

Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of M.A.

175. When Plaintiff M.A. was 12 or 13 years old and housed at JTDC, several staff members (hereinafter “M.A. Abusers” unless otherwise indicated), while acting in the course and scope in their employment and under the control of Cook County, sexually abused M.A. in 2006.

176. M.A. Abusers were a group of approximately ten staff members. One of M.A. Abusers was named Ms. C, and another was named Mr. Green. M.A. expects to learn the full names and identities of his abusers through the course of discovery.

177. M.A. Abusers regularly strip-searched M.A. in his cell at random times throughout the day. Groups of five or more staff members frequently entered his cell, searched his room, and ordered him to undress. Multiple staff members, both male and female, fondled his genitals and searched around his anus while making sexual comments about M.A.’s body and genitals. When M.A. attempted to resist the sexually abusive behavior of M.A. Abusers, they locked him inside his cell for extended periods of time, ranging from a few hours to several days. M.A. Abusers conducted these strip searches on a daily basis.

178. These strip searches were conducted upon M.A. without individualized, reasonable suspicion, nor compliance with the constitutions, laws, and regulations of both the United States and the State of Illinois. These searches were a pretext for sexual abuse.

179. Additionally, Ms. C sexually abused M.A. independently from the strip searches. Ms. C was at all relevant times a black female estimated to be in her late 20s and approximately 5'8 in height. She wore long sew-in braids in her hair and worked the late night shift.

180. Ms. C regularly made sexual comments towards M.A. and frequently said that he could come live with and have sexual intercourse with her once he was discharged from the facility. After a few months of this behavior, Ms. C entered M.A.'s cell while the other youths were asleep and offered him cigarettes and extra food if he allowed her to masturbate him, a coercive tactic which proved successful. She threatened to lock him inside his cell for days at a time if he ever disclosed the abuse to his family or other staff members in the facility. Ms. C sexually abused M.A. in this manner approximately three more times after this incident.

181. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

182. At the relevant times herein, Plaintiff M.A. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

183. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for

reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

184. At the time of the above-described sexual abuse of Plaintiff M.A., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

185. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of P.H.

186. When Plaintiff P.H. was 15 years old and housed at JTDC, a medical staff member (hereinafter "P.H. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused P.H. in 2007.

187. P.H. Abuser 1 was at all relevant times a slightly heavy-set white male estimated to be in his mid 30s and of average height. He had dark hair. P.H. expects to learn the full name and identity of his abuser through the course of discovery.

188. P.H. was brought to the medical unit for P.H. Abuser 1 could sexually abuse him under the guise of a physical as part of the intake process. P.H. Abuser 1 had P.H. undress and lay down, at which point he masturbated P.H. and measured his erect genitals. P.H. Abuser 1 offered P.H. cigarettes as a reward for complying with the “physical.” About a month later, P.H. visited the medical unit so he could get treatment for his asthma. P.H. Abuser 1 again had P.H. undress and lay down, then masturbated the Plaintiff. P.H. left the facility shortly after this second incident.

189. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

190. At the relevant times herein, Plaintiff P.H. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

191. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

192. At the time of the above-described sexual abuse of Plaintiff P.H., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff

members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

193. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of D.D.

194. When Plaintiff D.D. was 12 years old and housed at JTDC, a staff member (hereinafter "D.D. Abuser 1" unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County, sexually abused D.D. in 2003.

195. D.D. Abuser 1 was at all relevant times a dark-skinned male of mixed ethnicity estimated to be in middle age and of above-average height. He was of medium build with a "potbelly," had balding gray hair and facial hair, and wore glasses. D.D. expects to learn the full name and identity of her abuser through the course of discovery.

196. While D.D. was housed at JTDC in late fall of 2003, she attended regular court hearings which were held in the same building as the detention facility. D.D. Abuser 1 escorted her to and from these court hearings and frequently pulled her into an isolated area near the hallway (a corner, a service elevator, a nearby closet, etc.) and fondled her buttocks and genitals over the clothes. On one occasion, he put his hand down her pants and rubbed her genitals for an extended

period. On another occasion, he unzipped his pants and exposed his genitals, then grabbed D.D.'s wrist and forced her to touch his genitals. He once offered her a Snickers candy bar in exchange for sexual favors, but she refused. When D.D. attempted to resist the abuse, D.D. Abuser 1 threatened to revoke her phone calls, meals, and time outside of her cell, and said that he would physically harm her. D.D. Abuser 1 sexually abused D.D. in this way approximately five to ten times over the course of one to two weeks.

197. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

198. At the relevant times herein, Plaintiff D.D. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

199. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

200. At the time of the above-described sexual abuse of Plaintiff D.D., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff

members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

201. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of S.F.

202. When Plaintiff S.F. was 14 years old and housed at JTDC, a staff member (hereinafter "S.F. Abuser 1" unless otherwise indicated), while acting in the course and scope in their employment and under the control of Cook County, sexually abused S.F. in 2005.

203. S.F. Abuser 1 was at all relevant times a black female estimated to be in her 30s and approximately 5'7 in height. S.F. expects to learn the full name and identity of her abuser through the course of discovery.

204. Starting a few days into S.F.'s stay at JTDC, S.F. Abuser 1 regularly approached S.F. in a friendly manner. She gave S.F. extra snacks and hygiene products and made friendly conversation whenever she saw her. On one occasion, S.F. and some other youths were talking to each other about boys, and S.F. Abuser 1 approached the girls and asked them about their sex lives and sexual fantasies. After approximately two weeks of this behavior, S.F. was in the bathroom alone and dressing herself after her shower, when S.F. Abuser 1 approached her and grabbed S.F.'s

genitals with an ungloved hand and attempted to digitally penetrate her. S.F. grabbed her hand and pushed it away. S.F. Abuser 1 asked what was wrong, and again grabbed her genitals and attempted to digitally penetrate her, this time more forcefully. S.F. stepped back and told her to stop. S.F. Abuser 1 said that she “better not tell nobody” about her sexually abusive behavior and left the bathroom. S.F. Abuser 1 stopped giving S.F. extra snacks and hygiene products after this incident and revoked her phone calls for the remainder of her stay as punishment for resisting the abuse.

205. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

206. At the relevant times herein, Plaintiff S.F. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

207. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

208. At the time of the above-described sexual abuse of Plaintiff S.F., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff

members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

209. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of C.H.

210. When Plaintiff C.H. was 14 years old and housed at JTDC, a staff member (hereinafter "C.H. Abuser 1" unless otherwise indicated), while acting in the course and scope in their employment and under the control of Cook County, sexually abused C.H. in 2003 and 2004.

211. C.H. Abuser 1 was at all relevant times a black female estimated to be in her 30s and approximately 5'11 in height. She wore her hair in braids and worked on unit 4H. C.H. expects to learn the full name and identity of his abuser through the course of discovery.

212. Within the first month of C.H.'s stay at JTDC, C.H. Abuser 1 regularly stopped by his cell during nightly head count and said that he had to show her his genitals or else she would revoke his food and keep him locked inside his cell. After a few weeks of this behavior, she entered his cell and forcibly masturbated him, again under the threat of withholding food and freedom from his cell. C.H. Abuser 1 sexually abused C.H. in this way three to five times a week for approximately one year. When C.H. refused her sexual advances, C.H. Abuser 1 told the other

staff members to take away his meals and phone time, and locked him inside his cell for extended periods, ranging from a few hours to several days at a time. She gave him cigarettes and outside food as a reward for enduring the abuse.

213. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

214. At the relevant times herein, Plaintiff C.H. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

215. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

216. At the time of the above-described sexual abuse of Plaintiff C.H, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

217. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of I.J.

218. When Plaintiff I.J. was 15 years old and housed at JTDC, a staff member (hereinafter "I.J. Abuser 1" unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County, sexually abused I.J. in 2003.

219. I.J. Abuser 1 was at all relevant times a tall, heavy-set black male estimated to be in his mid to late 20s. He had a crew cut and patrolled in and around the facility's medical unit. I.J. expects to learn the full name and identity of his abuser through the course of discovery.

220. Early in I.J.'s stay at JTDC in approximately November of 2003, I.J. Abuser 1 approached I.J. during recreational time and said that he needed a "check-up." I.J. Abuser 1 then took him to a glass cell near the medical unit, where he locked the door and ordered I.J. to undress and masturbate while he watched. I.J. Abuser 1 sexually abused I.J. in this manner one more time after this incident. He threatened I.J. with physical harm and an extended sentence if he ever disclosed the abuse, and gave him cigarettes, outside food, and allowed him to watch movies as a reward for complying with the abuse.

221. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

222. At the relevant times herein, Plaintiff I.J. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

223. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

224. At the time of the above-described sexual abuse of Plaintiff I.J., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

225. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County

employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of M.H.

226. When Plaintiff M.H. was 15 years old and housed at JTDC, a staff member (hereinafter “M.H. Abuser 1” unless otherwise indicated), while acting in the course and scope in their employment and under the control of Cook County, sexually abused M.H. in 2002.

227. M.H. Abuser 1 was at all relevant times a light-skinned black or biracial male estimated to be in his 30s and approximately 5’7 in height. He had short hair. M.H. expects to learn the full name and identity of her abuser through the course of discovery.

228. M.H. Abuser 1 approached M.H. as she entered the bathroom and said that he needed to speak with her. M.H. asked if it could wait until she was done showering, which angered M.H. Abuser 1. He grabbed M.H. by her arm and pulled her close, then put his hand down her pants and rubbed her genitals for approximately one minute. He said that his genitals were erect and told her to touch it, but she refused and pulled away from him. As she ran away to the shower area, M.H. Abuser 1 said that he would “see [her] next time.” M.H. was terrified and waited for an extended period before exiting the bathroom in case M.H. Abuser 1 still waited outside for her. After this incident, M.H. Abuser 1 regularly made sexual comments and gestures towards M.H. whenever he saw her around the facility. On one occasion, he said that she could never tell anyone about the bathroom incident because no one would believe her and she would get in trouble for lying, and that he would extend her sentence if she ever disclosed the abuse.

229. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

230. At the relevant times herein, Plaintiff M.H. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

231. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

232. At the time of the above-described sexual abuse of Plaintiff M.H., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

233. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County

employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of S.M.

234. When Plaintiff S.M. was 15 years old and housed at JTDC, multiple staff members, while acting in the course and scope in their employment and under the control of Cook County, sexually abused S.M. in 2004 or 2005.

235. During her stay at JTDC, S.M. attended regular court hearings which were held in the same building as the detention facility. Every time she went to and from court, a group of staff members in charge of escorting youths to and from the court house performed strip searches on S.M. inside the facility's intake room. During these strip searches, a group of two to four staff members, both male and female, ordered S.M. to undress, lift her own breasts, and squat and cough. These strip searches happened approximately 10 to 14 times over the course of S.M.'s approximately three month stay at JTDC. Approximately four times, these staff members digitally penetrated S.M. as part of this strip search. On some occasions, the staff members on her housing unit conducted a second strip search inside her cell after she returned from court, despite the fact that she had already been strip searched in the intake room mere minutes beforehand.

236. These strip searches were conducted upon S.M. without individualized, reasonable suspicion, nor compliance with the constitutions, laws, and regulations of both the United States and the State of Illinois. These searches were a pretext for sexual abuse.

237. One of the staff members named Ms. Mac conducted the housing unit strip searches also sexually abused S.M. independently from the strip searches. Ms. Mac was at all relevant times

a heavy-set black female estimated to be in her late 30s to early 40s and approximately 5'11 in height. She had tattoos on her arms. S.M. expects to learn the full name and identity of her abuser through the course of discovery.

238. Mac was a “white shirt” authority figure who regularly made sexual comments towards S.M. and other youths in the facility. While S.M. was showering, Mac approached her while she was showering and said that she wasn’t cleaning herself right, then used her bare hands to touch S.M.’s genitals and buttocks for several minutes at a time. S.M. became uncomfortable and pushed her away, so Mac locked her inside her cell for 24 hours as punishment for resisting the abuse. Mac sexually abused S.M. in this manner one more time after this incident, and again locked her inside her cell for 24 hours when she resisted the abuse. S.M. reported Mac’s sexually abusive behavior to another staff member, but the staff member said that since S.M. Abuser 1 was a white shirt she could face no repercussions for the sex abuse.

239. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

240. At the relevant times herein, Plaintiff S.M. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

241. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn

Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

242. At the time of the above-described sexual abuse of Plaintiff S.M., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

243. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of J.M.

244. When Plaintiff J.M. was 11 or 12 years old and housed at JTDC, a staff member (hereinafter "J.M. Abuser 1" unless otherwise indicated), while acting in the course and scope in their employment and under the control of Cook County, sexually abused J.M. in approximately 2004.

245. J.M. Abuser 1 was at all relevant times a black female estimated to be in her 30s or 40s. She had a deep voice. J.M. expects to learn the full name and identity of her abuser through the course of discovery.

246. Starting from the first few days of J.M.'s stay at the facility, J.M. Abuser 1 frequently gave J.M. extra food and allowed her to do extra chores around the facility in exchange for extra time out of her cell. While she did these chores, J.M. Abuser 1 caressed her arms, back, and neck over the clothes and made sexual comments towards her. On one occasion, J.M. Abuser 1 said to "come here and let me squeeze a little something," then reached her hand down J.M.'s pants and digitally penetrated her for 30 to 60 seconds with an ungloved hand. This digital penetration was not part of a strip search. J.M. Abuser 1 sexually abused J.M. in this manner one or two more times after this incident over the course of J.M.'s one-to-two week stay at the facility.

247. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

248. At the relevant times herein, Plaintiff J.M. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

249. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the

abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

250. At the time of the above-described sexual abuse of Plaintiff J.M., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

251. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of P.J.

252. When Plaintiff P.J. was 12 years old and housed at JTDC, a "white shirt" authority figure named Fullilove while acting in the course and scope in their employment and under the control of Cook County, sexually abused P.J. in 2003.

253. Fullilove was at all relevant times a dark-skinned black male approximately 6'1 to 6'2 in height. P.J. expects to learn the full name and identity of her abuser through the course of discovery.

254. Fullilove was a high-ranking “white shirt” authority figure who had his own office and held significant influence over the youths of JTDC. Within the first few weeks of P.J.’s stay at JTDC, Fullilove entered P.J.’s cell during “quiet hour,” a period during the day where youths were kept inside their cells, and offered to let her out of her cell if she helped him clean up around his office. He then led her into his office and said that he would extend her sentence at the facility unless she gave him sexual favors. After this incident, Fullilove regularly entered P.J.’s cell during quiet hour approximately four times a week, then brought her to his office or the stairwell near his office where he groped her chest, digitally penetrated her, forced her to masturbate him, and forced her to administer oral copulation on him. This abuse occurred on a near-daily basis for approximately six months. Fullilove allowed P.J. extra phone calls, extra time outside of her out of her cell, and chips and candy as a reward for complying with the abuse.

255. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

256. At the relevant times herein, Plaintiff P.J. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

257. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the

abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

258. At the time of the above-described sexual abuse of Plaintiff P.J., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

259. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of Z.R.

260. When Plaintiff Z.R. was housed at JTDC between the ages of 13 and 16, a staff member named Ms. Cook, while acting in the course and scope in their employment and under the control of Cook County, sexually abused Z.R. from 1999 to 2002.

261. Ms. Cook was at all relevant times a heavy-set, black, female, estimated to be in her 30s and of above average height. She frequently wore jewelry and had her hair done. Z.R. expects to learn the full name and identity of her abuser through the course of discovery.

262. Early in Z.R.'s first stay at JTDC around the year 1999 or 2000 at the age of 13, Cook entered the bathroom while Z.R. and another girl showered and made sexual jokes and comments towards Z.R. As Z.R. exited the shower, Cook groped her bare breast and made a sexual comment about her body. Z.R. was uncomfortable and quickly exited the bathroom.

263. A few weeks after this incident, Cook approached Z.R. in her cell, where she groped her breasts under the clothes and caressed her nipples while making sexual comments. Z.R. was afraid and froze up while Cook touched her.

264. A few days after this second incident, Cook again approached her in her cell and said that it was "perfectly natural" for Z.R. to be attracted to adult women, that "me touching you would be no different to your girlfriend touching you," and that she should just relax and allow Cook to sexually abuse her. She then groped Z.R.'s breasts under the clothes, caressed her nipples, and rubbed her genitals under the clothes. Cook made sexual comments towards Z.R. and groped her breasts, buttocks, and genitals over the clothes on a near daily basis whenever she saw her across her multiple stays at Cook County between 1999 and 2003. She often told Z.R. that no one else at the facility would believe her if she reported the sexual abuse, and that she would get in trouble for lying and "never go home" as a result. She gave her extra food and snacks as a reward for not disclosing the abuse to other staff members.

265. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

266. At the relevant times herein, Plaintiff Z.R. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

267. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

268. At the time of the above-described sexual abuse of Plaintiff Z.R., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

269. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of K.S.

270. When Plaintiff K.S. was 14 or 15 years old and housed at JTDC, a staff member (hereinafter “K.S. Abuser 1” unless otherwise indicated), while acting in the course and scope in their employment and under the control of Cook County, sexually abused K.S. in 2004 or 2005.

271. K.S. Abuser 1 was at all relevant times a heavy-set, white, male, estimated to be in his mid 40s and of average height. K.S. expects to learn the full name and identity of his abuser through the course of discovery.

272. During one of K.S.’s first stays at JTDC in 2004 or 2005, K.S. Abuser 1 approached K.S. late at night in his cell and made friendly conversation, then groped his genitals and buttocks over the clothes. After a few days of similar behavior, K.S. Abuser 1 groped K.S.’s genitals and buttocks under the clothes. After another few days, he threatened to write K.S. up and extend his sentence unless he masturbated him. Under this threat of an extended sentence, K.S. Abuser 1 coerced K.S. into masturbating him two to three times, always late at night inside his cell. On some occasions, he gave him extra snacks as a reward for complying with the abuse.

273. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

274. At the relevant times herein, Plaintiff K.S. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

275. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred,

and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

276. At the time of the above-described sexual abuse of Plaintiff K.S., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

277. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of T.W. 2

278. When Plaintiff T.W. 2 was 14 or 15 years old and housed at JTDC, a staff member named Mr. House, while acting in the course and scope of their employment and under the control of Cook County, sexually abused T.W. in 2005.

279. Mr. House was at all relevant times a black male estimated to be in his late 20s to early 30s and approximately 5'8 in height. He wore his hair in long dreadlocks. T.W. 2 expects to learn the full name and identity of his abuser through the course of discovery.

280. Several months into T.W. 2's stay at JTDC, House ordered T.W. 2 to follow him to the third-floor bathroom towards the back of the unit. T.W. 2 complied, and when he entered the bathroom House called in two other incarcerated youths and ordered them to forcefully undress T.W. 2 and hold him face-down on the floor. The two youths complied and House raped T.W. 2 while the two youths physically restrained him. After the abuse, House threatened him with physical harm if he ever reported the incident.

281. T.W. 2 was in severe pain after the sexual abuse. One to two days later, two staff members noticed T.W. 2 had trouble sitting down and sent him to the nurse's office. T.W. 2 told the nurse about House raping him. The nurse inspected his anus and confirmed he had serious injuries to the area due to the sexual assault, then sent him to Cook County Hospital for further treatment. There, T.W. 2 told the doctor about House raping him, so the doctor inspected his anus and also confirmed the serious injuries to the area due to the sexual assault and gave him numbing cream for the pain.

282. When T.W. 2 returned to JTDC, he was transferred to another unit and verbally reported House's sexually abusive behavior to several staff members, who all dismissed his report and said that he was lying.

283. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

284. At the relevant times herein, Plaintiff T.W. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

285. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

286. At the time of the above-described sexual abuse of Plaintiff T.W. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

287. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of L.H.

288. When Plaintiff L.H. was 17 years old and housed at JTDC, a staff member (hereinafter “L.H. Abuser 1” unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County, sexually abused L.H. in 2000.

289. L.H. Abuser 1 was at all relevant times a black male estimated to be in his 30s and of average height. He had a short haircut. L.H. expects to learn the full name and identity of his abuser through the course of discovery.

290. Within L.H.’s first or second day at JTDC, L.H. Abuser 1 gave him cigarettes and gained his trust by making friendly conversation with him. After a few days of this behavior, L.H. Abuser 1 entered L.H.’s cell in the evening and said that he could keep giving him cigarettes and marijuana in exchange for sexual favors. Under this coercion, L.H. Abuser 1 groped L.H. under the clothes and digitally penetrated him. L.H. Abuser 1 sexually abused L.H. in this manner five to six times total over the course of a few weeks. When L.H. attempted to resist the abuse, L.H. Abuser 1 locked him inside his cell for hours at a time as punishment.

291. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

292. At the relevant times herein, Plaintiff L.H. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

293. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred,

and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

294. At the time of the above-described sexual abuse of Plaintiff L.H., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

295. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of E.S.

296. When Plaintiff E.S. was 12 or 13 years old and housed at JTDC, a staff member (hereinafter "E.S. Abuser 1" unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County, sexually abused E.S. in 2001.

297. E.S. Abuser 1 was at all relevant times a bald black male estimated to be in his late 20s to early 30s and of average height. E.S. expects to learn the full name and identity of her abuser through the course of discovery.

298. Every day throughout E.S.'s one-to-two week stay at JTDC, E.S. Abuser 1 regularly approached her and made sexual comments towards her, caressed her neck and hair, groped her breasts and buttocks over the clothes, and repeatedly said how he wanted to have sexual intercourse with her when she was released. On one occasion, he asked her if she was a virgin, said how he wanted to take her virginity, and claimed that he'd find her address from her file and visit her at home so he could sexually abuse her there. He occasionally gave her food from McDonald's because she was his "girlfriend" and he thought she was "special" compared to the other girls in the facility. E.S. Abuser 1 sexually abused E.S. in this manner every day for one-to-two weeks until she left the facility.

299. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

300. At the relevant times herein, Plaintiff E.S. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

301. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of

known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

302. At the time of the above-described sexual abuse of Plaintiff E.S., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

303. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of F.C.

304. When Plaintiff F.C. was 13 years old and housed at JTDC, a staff member known as Mr. C, while acting in the course and scope of their employment and under the control of Cook County, sexually abused F.C. in November of 2005.

305. Mr. C was at all relevant times a stocky, light-skinned black male estimated to be in his mid 30s to early 40s and approximately 5'9 in height. He had a fade haircut. F.C. expects to learn the full name and identity of his abuser through the course of discovery.

306. One to two months into F.C.'s stay at JTDC, Mr. C entered the bathroom while F.C. dried himself off after a shower. Mr. C groped F.C.'s bare buttocks and said that "I like what I see," which shocked and discomfited the plaintiff. F.C. quickly left the bathroom and went back to his cell. A few hours later, Mr. C entered his cell and said that he would get F.C. a "yellow shirt" if he did not disclose the previous abuse to anyone. Receiving a "yellow shirt" was a privilege at JTDC, as it gave youths many extra privileges such as extra TV time, extra food, better cells, and coveted chores such as folding laundry or late-night cleaning time. F.C. agreed, and Mr. C made him a yellow shirt in exchange for his silence on the sexual abuse. After two to four weeks of being a "yellow shirt," F.C. still felt uncomfortable being on the same housing unit as Mr. C, and spoke with a female supervisor about moving to another housing unit so he could avoid Mr. C. F.C. was moved to another unit and did not see Mr. C again.

307. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at JTDC.

308. At the relevant times herein, Plaintiff F.C. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

309. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the

abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

310. At the time of the above-described sexual abuse of Plaintiff F.C., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

311. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of A.B.

1630. When Plaintiff A.B was 13 years old and housed at JTDC, a guard (hereinafter "A.B. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused A.B. in 2002.

367. A.B. Abuser 1 was at all relevant times a black male, estimated to be in his 35-40s and approximately 6'0" in height. He was bald and had brown eyes. A.B Abuser 1 would wear a hat and walked with a limp. A.B. expects to learn the full name and identity of his abuser through the course of discovery.

368. On at least three occasions, A.B. Abuser 1 sexually abused A.B. in A.B.'s cell during lock-up time. A.B. Abuser 1 gave A.B. pornography to watch to become aroused. A.B. Abuser 1 would begin to touch A.B. once aroused from pornography. A.B. Abuser 1 would stroke A.B.'s penis over and underneath A.B. clothes. A.B. Abuser 1 would force A.B. to take off his clothing in entirety. A.B. Abuser 1 would stroke A.B.'s penis until A.B. became fully erect. A.B. Abuser 1 also forced A.B. to touch A.B. Abuser 1 penis underneath his clothes.

369. A.B. recalls drinking something that made A.B. fall asleep, such as sleeping medication. A.B. Abuser 1 penetrated A.B.'s anus while A.B. was asleep.

370. A.B. Abuser 1 would bribe A.B. for his silence by providing A.B. with cigarettes, better quality of food and pornography. A.B. Abuser 1 threatened that A.B. would lose these privileges if A.B. did not comply.

371. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

372. At the relevant times herein, Plaintiff A.B. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

373. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the

abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

374. At the time of the above-described sexual abuse of Plaintiff A.B., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

375. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of A.B. 2

376. When Plaintiff A.B. 2 was 14 years old and housed at JTDC, Brother Evans, a guard, while acting in the course and scope of his employment and under the control of Cook County, sexually abused A.B. 2 in 2006.

377. Brother Evans was at all relevant times a black male, estimated to be in his 30s and approximately 5'5" in height. He was bald and had dark brown eyes. Brother Evans would wear reading glasses. A.B. 2 expects to learn the full name and identity of his abuser through the course of discovery.

378. On at least one occasion, Brother Evans sexually abused A.B. 2 in the shower area. Brother Evans told A.B. 2 that he needed to be strip searched and instructed A.B. 2 to follow him to the bathroom shower area. After A.B. 2 began undressing, Brother Evans told A.B. 2 to bend over and spread his buttocks. Brother Evans penetrated A.B. 2's anus with his thumb. A.B. 2 jumped, and Brother Evans became angry. Brother Evans instructed A.B. 2 to tell anyone who asked that all he did was search A.B. 2. Brother Evans did not wear gloves when he penetrated A.B. 2's rectum with his thumb.

379. These strip searches were conducted upon A.B. 2 without individualized, reasonable suspicion, nor compliance with the constitutions, laws, and regulations of both the United States and the State of Illinois. These searches were a pretext for sexual abuse.

380. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

381. At the relevant times herein, Plaintiff A.B. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

382. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the

abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

383. At the time of the above-described sexual abuse of Plaintiff A.B. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

384. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of A.F.

1. When Plaintiff A.F. was 16 years old and housed at JTDC, a guard (hereinafter "A.F. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused A.F. in 2004.

2. A.F. Abuser 1 was at all relevant times a black male, estimated to be in his 35-40s and approximately 5'4" to 5'5" in height. He had a grey medium afro hairstyle, and he was balding in the middle. A.F. Abuser 1 had dark brown eyes. A.F. expects to learn the full name and identity of his abuser through the course of discovery.

3. On at least one occasion, A.F. Abuser 1 sexually abused A.F. in a bathroom stall. A.F. Abuser 1 called A.F. into the bathroom stall to discuss a verbal altercation A.F. had with another inmate. A.F. Abuser 1 put his bare hand into A.F.'s underwear. A.F. Abuser 1 rubbed A.F.'s penis for approximately two to three minutes.

4. The above-described sexual abuse and/or acts perpetrated by this staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

5. At the relevant times herein, Plaintiff A.F. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

6. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

7. At the time of the above-described sexual abuse of Plaintiff A.F., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

8. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of A.H. 2

9. When Plaintiff A.H. 2 was 15 years old and housed at JTDC, Mr. Young, a guard, while acting in the course and scope of his employment and under the control of Cook County, sexually abused A.H. 2 in 2001.

10. Mr. Young was at all relevant times a black male, estimated to be in his 50s and approximately 5'6" in height. He had gray and black hair. A.H. 2 expects to learn the full name and identity of his abuser through the course of discovery.

11. On at least five to ten occasions, Mr. Young performed oral copulation on A.H. 2 in the shower area.

12. Mr. Young bribed A.H. 2 for his silence by providing marijuana, food and cigarettes to A.H.

13. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

14. At the relevant times herein, Plaintiff A.H. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

15. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

16. At the time of the above-described sexual abuse of Plaintiff A.H. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

17. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of A.H. 3

18. When Plaintiff A.H. 3 was 15 years old and housed at JTDC, a correctional officer (hereinafter “A.H. 3 Abuser 1” unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County, sexually abused A.H. 3 in 2000.

19. A.H. 3 Abuser 1 was at all relevant times a black female, estimated to be in her 30s, approximately 5’7” in height, and approximately 150 to 160 lbs. She had brown hair and brown eyes. A.H. 3 expects to learn the full name and identity of her abuser through the course of discovery.

20. On at least one occasion, A.H. 3 Abuser 1 sexually abused A.H. 3 in A.H. 3’s cell. A.H. 3 Abuser 1 forced A.H. 3 take of her clothes for a strip search upon entering the facility. A.H. 3 overheard people making sexual comments towards her such as, “she’s gonna be my new bitch.” A.H. 3 Abuser 1 put A.H. 3 in a cell naked and alone. A.H. 3 Abuser 1 came back to the cell and began to penetrate A.H. 3’s vagina with her fingers. A.H. 3 Abuser 1 stopped penetrating A.H. 3’s vagina when A.H. 3 began screaming.

21. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

22. At the relevant times herein, Plaintiff A.H. 3 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

23. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred,

and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

24. At the time of the above-described sexual abuse of Plaintiff A.H. 3, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

25. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of A.J.

26. When Plaintiff A.J. was 15 years old and housed at JTDC, a guard (hereinafter "A.J. Abuser 1" unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County, sexually abused A.J. in 2007.

27. A.J. Abuser 1 was at all relevant times a white female, estimated to be in her mid-40s and a little under 6'0" ft in height. She had blonde hair and grey eyes. A.J. expects to learn the full name and identity of her abuser through the course of discovery.

28. On at least one occasion, A.J. Abuser 1 sexually abused A.J. in an empty cell on A.J.'s unit. A.J. was woken up in the middle of the night and was told that A.J. needed to be searched. A.J. Abuser 1 took A.J. into an empty cell. A.J. Abuser 1 penetrated A.J.'s vagina with a flashlight and then with A.J. Abuser 1's fingers. A.J. Abuser 1 did not wear gloves, and the sexual abuse lasted approximately five minutes.

29. A.J. Abuser 1 threatened A.J. by stating A.J. would never go home if she told anyone about the sexual abuse.

30. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

31. At the relevant times herein, Plaintiff A.J. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

32. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the

abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

33. At the time of the above-described sexual abuse of Plaintiff A.J., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

34. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of A.O.

35. When Plaintiff A.O. was 16 years old and housed at JTDC, Officer Martinez, a correctional officer, while acting in the course and scope of his employment and under the control of Cook County, sexually abused A.O. in 2005.

36. Officer Martinez was at all relevant times a Hispanic male, estimated to be in his late 30s, approximately 6'3" in height, and weighing approximately 300 pounds. He had a short haircut and brown eyes. A.O. expects to learn the full name and identity of his abuser through the course of discovery.

37. On one occasion, Officer Martinez sexually abused A.O. in cell deck 5C. Officer Martinez entered the cell and held A.O. down on the bed. Officer Martinez stripped A.O.'s clothing off of him. Officer Martinez digitally penetrated A.O.'s anus for a few minutes.

38. Officer Martinez threatened A.O. stating he would strangle A.O. to death if A.O. ever told anyone about the sexual abuse.

39. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

40. At the relevant times herein, Plaintiff A.O. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

41. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

42. At the time of the above-described sexual abuse of Plaintiff A.O., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff

members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

43. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of A.P.

44. When Plaintiff A.P. was 12 to 13 years old and housed at JTDC, a guard (hereinafter "A.P. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused A.P. in 1997.

45. A.P. Abuser 1 was at all relevant times a black male, estimated to be in his 30s or 40s and approximately 5'8" to 6'0" ft in height. He was bald with brown eyes and a mustache. A.P. expects to learn the full name and identity of his abuser through the course of discovery.

46. On at least six occasions, A.P. Abuser 1 sexually abused A.P. in a supply closet. A.P. was a porter during the night shift. A.P. was responsible for sweeping and mopping. A.P. Abuser 1 would pull A.P. into the cleaning supply closet there they would be alone. A.P. Abuser 1 would grope A.P.'s buttocks. A.P. Abuser 1 would force A.P. to perform oral copulation on him until he reached orgasm.

47. A.P. Abuser 1 bribed A.P. for his silence by giving A.P. extra time out of his cell, providing A.P. extra food and snacks, and providing A.P. tobacco. A.P. Abuser 1 told A.P. to not tell anybody about the sexual abuse or else A.P. Abuser 1 would take away his privileges.

48. A.P. verbally told a correctional officer at the facility about the abuse.

49. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

50. At the relevant times herein, Plaintiff A.P. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

51. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

52. At the time of the above-described sexual abuse of Plaintiff A.P., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

53. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of A.R.

54. When Plaintiff A.R. was 11 to 12 years old and housed at JTDC, a staff member (hereinafter "A.R. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused A.R. in 2000.

55. A.R. Abuser 1 was at all relevant times a black male, estimated to be in his mid-30s to early 40s and approximately 6'1" in height. He had a small afro hair style and dark colored eyes. A.R. Abuser 1 wore glasses and had facial hair. A.R. expects to learn the full name and identity of his abuser through the course of discovery.

56. On at least one occasion, A.R. Abuser 1 sexually abused A.R. in the processing area when A.R. was waiting for his mother one evening. A.R. had fallen asleep, and when he woke up, he was completely undressed. A.R. Abuser 1 was in the cell when A.R. woke up. A.R. Abuser 1 told A.R. he undressed A.R. because he was misbehaving. A.R. Abuser 1 then grabbed A.R.'s buttocks. A.R. Abuser 1 was not wearing gloves when grabbing A.R.'s buttocks. A.R. Abuser 1 then penetrated A.R.'s anus with his penis, which lasted for approximately 15 minutes. A.R. experienced severe pain after A.R. Abuser 1 sexually abused him.

57. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

58. At the relevant times herein, Plaintiff A.R. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

59. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

60. At the time of the above-described sexual abuse of Plaintiff A.R., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

61. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County

employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of A.R. 2

62. When Plaintiff A.R. 2 was 16 years old and housed at JTDC, Officer Yvonne, a correctional officer, while acting in the course and scope of her employment and under the control of Cook County, sexually abused A.R. 2 in 2003.

63. Officer Yvonne was at all relevant times a black female, estimated to be in her 20s and approximately 5'5" in height. She had dark brown eyes and weighed around 170-180 pounds. A.R. 2 expects to learn the full name and identity of his abuser through the course of discovery.

64. On at least five occasions, Officer Yvonne sexually abused A.R. 2 in A.R. 2's unit and an office. On the first occasion, Officer Yvonne approached A.R. 2 and asked, "Can you do something for me?" Officer Yvonne then brought A.R. 2 into an office. Officer Yvonne began seducing A.R. 2 by grabbing his penis with her bare hands. Officer Yvonne told A.R. 2 to "lick her before he penetrated her." Officer Yvonne then forced A.R. 2 to perform oral copulation on her. Officer Yvonne then forced A.R. 2 to penetrate her vagina with his penis, and this lasted approximately 10 to 15 minutes until A.R. 2 ejaculated.

65. On at least one occasion, Office Yvonne performed oral copulation on A.R. 2 until A.R. 2 ejaculated onto the floor.

66. Officer Yvonne bribed A.R. 2 for his silence by providing him with additional recreational time.

67. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

68. At the relevant times herein, Plaintiff A.R. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

69. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

70. At the time of the above-described sexual abuse of Plaintiff A.R. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

71. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County

employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of A.W.

72. When Plaintiff A.W. was 13 to 14 years old and housed at JTDC, Craig McLoren, a correctional officer, while acting in the course and scope of his employment and under the control of Cook County, sexually abused A.W. in 2006.

73. Craig McLoren was at all relevant times a black male, estimated to be 35 to 40 years old and approximately 5'7" in height. He had short black hair and brown eyes. McLoren was approximately 180 pounds and wore earrings. A.W. expects to learn the full name and identity of his abuser through the course of discovery.

74. On at least one occasion, McLoren sexually abused A.W. on the deck. When A.W. was having an argument with another inmate, McLoren grabbed A.W. and pulled him away to an area without cameras. McLoren accused A.W. of having contraband and searched him while wearing gloves. McLoren then took his gloves off and put his hand in A.W. pants. McLoren fondled A.W.'s genitals and buttocks for approximately five minutes.

75. McLoren threatened A.W. by stating if A.W. told anyone about the sexual abuse he would never go home.

76. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

77. At the relevant times herein, Plaintiff A.W. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

78. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

79. At the time of the above-described sexual abuse of Plaintiff A.W., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

80. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of A.W. 2

81. When Plaintiff A.W. 2 was 14 years old and housed at JTDC, a guard (hereinafter “A.W. 2 Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused A.W. 2 in 1993.

82. A.W. 2 Abuser 1 was at all relevant times a white male, estimated to be in his late 30s and approximately 6’2” in height. He had red hair and blue eyes. A.W. 2 expects to learn the full name and identity of his abuser through the course of discovery.

83. On at least two occasions, A.W. 2 Abuser 1 sexually abused A.W. 2. On both occasions, A.W. 2 Abuser 1 followed A.W. 2 into his cell in the evening. A.W. 2 Abuser 1 groped A.W. 2’s penis and forced A.W. 2 to masturbate his penis. A.W. 2 Abuser 1 then forced A.W. 2 to perform oral copulation on him until he ejaculated into A.W. 2’s mouth. A.W. 2 Abuser 1 would then digitally penetrate A.W. 2’s anus.

84. A.W. 2 Abuser 1 threatened to kill A.W. 2 if A.W. 2 ever told anyone about the sexual abuse. A.W. 2 Abuser 1 also bribed A.W. 2 for his silence by giving him cigarettes and extra food.

85. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

86. At the relevant times herein, Plaintiff A.W. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

87. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

88. At the time of the above-described sexual abuse of Plaintiff A.W. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

89. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of B.D

90. When Plaintiff B.D. was 15 years old and housed at JTDC, a guard (hereinafter “B.D. Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused B.D. in 1999.

91. B.D. Abuser 1 was at all relevant times a black male, estimated to be in his mid-30s and at least 6’0” in height. He was bald and wore glasses. He was heavy set, weighing approximately 245 pounds. B.D. expects to learn the full name and identity of his abuser through the course of discovery.

92. On at least one occasion, B.D. Abuser 1 sexually abused B.D. in the dayroom. B.D. was waiting in the dayroom before being transferred to another facility. While B.D. was waiting, B.D. Abuser 1 cornered B.D. and forcefully put his hands down B.D.’s pants. B.D. Abuser 1 grabbed B.D.’s penis and masturbated B.D.’s penis for approximately ten minutes. B.D. Abuser 1 told B.D. not to tell anyone about the sexual abuse and told B.D. “I’m going to give you the best head of your life.”

93. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

94. At the relevant times herein, Plaintiff B.D. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

95. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached

various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

96. At the time of the above-described sexual abuse of Plaintiff B.D., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

97. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of B.G.

98. When Plaintiff B.G. was 15 to 16 years old and housed at JTDC, Thaddeus Young, a school counselor at the facility, while acting in the course and scope of his employment and under the control of Cook County, sexually abused B.G. in 2004.

99. Thaddeus Young was at all relevant times a black male, estimated to be in his 30s and approximately 5'7" in height, weighing approximately 175 to 185 pounds. He had short black

hair and brown eyes. Young wore glasses. B.G. expects to learn the full name and identity of his abuser through the course of discovery.

100. On at least two occasions, Thaddeus Young sexually abused B.G. in Young's office. On one occasion, B.G. was called into Young's office after having a fight with another student. Young then began touching B.G. When B.G. pushed Young away, Young told B.G. he would give B.G. food, cigarettes, and extra phone time if we complied. Young then forced B.G. to masturbate his penis until he ejaculated. On the other occasions, Young masturbated B.G.'s penis and forced B.G. to masturbate his penis.

101. Young threatened to make B.G.'s life harder at the facility if B.G. ever told anyone about the sexual abuse.

102. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

103. At the relevant times herein, Plaintiff B.G. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

104. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the

abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

105. At the time of the above-described sexual abuse of Plaintiff B.G., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

106. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of B.H.

107. When Plaintiff B.H. was 14 years old and housed at JTDC, Officer House and Officer Yanni, both correctional officers, while acting in the course and scope of their employment and under the control of Cook County, sexually abused B.H. in 2004.

108. Officer House was at all relevant times a black male, estimated to be in his 30s and approximately 5'9" in height. He had black hair and brown eyes.

109. Officer Yanni was at all relevant times a black female, estimated to be in her late 20s to early 30s. She had short brown hair with blonde highlights and brown eyes. She was approximately 130 pounds, and oftentimes she wore a hat.

110. B.H expects to learn the full identity of his abusers through the course of discovery.

111. On at least four occasions, Officer House sexually abused B.H. in B.H.'s cell. Officer House would enter the cell and demand B.H. to remove his jumpsuit. B.H. refused resulting in Officer House slapping B.H. Officer House forced B.H. to insert his bare hand into Officer House's uniform and masturbate his penis for approximately two minutes. Officer House threatened to place B.H. in lock-down if he ever told anyone about the sexual abuse.

112. On at least three occasions, Officer Yanni sexually abused B.H. in B.H's cell. Officer Yanni forced B.H to perform oral copulation on her. Officer Yanni would also perform oral copulation on B.H. Officer Yanni would bribe B.H. for his silence by bringing B.H. snacks, cigarettes, and marijuana.

113. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

114. At the relevant times herein, Plaintiff B.H. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

115. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently

breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

116. At the time of the above-described sexual abuse of Plaintiff B.H., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

117. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of B.W.

118. When Plaintiff B.W. was 16 years old and housed at JTDC, Mrs. Jones and two guards (hereinafter "B.W. Abuser 2" and "B.W. Abuser 3" collectively "B.W. Abusers" - unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County, sexually abused B.W. in 2001.

119. Mrs. Jones was at all relevant times a black female, estimated to be in her mid-40s and approximately 5'5" in height. She wore a gray wig and had brown eyes.

120. B.W. Abuser 2 was at all relevant times a black male, estimated to be in his 40s and approximately 6'2" in height. He had black hair and brown eyes.

121. B.W. Abuser 3 was at all relevant times a black male, estimated to be in his 40s and approximately 5'9" in height. He was bald and had a goatee.

122. Mrs. Jones and B.W. Abuser 3 were married.

123. B.W. expects to learn the full name and identity of his abusers through the course of discovery.

124. On at least five occasions, B.W. Abusers sexually abused B.W. separately. B.W. was sexually abused in the shower area and downstairs by the school elevator. B.W. Abusers would masturbate B.W.'s penis. None of B.W.'s abuses wore gloves when masturbating B.W.'s penis. Each instance of abuse lasted approximately 20 seconds.

125. B.W. Abusers told B.W. not to tell anyone about the sexual abuse.

126. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

127. At the relevant times herein, Plaintiff B.W. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

128. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse

occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

129. At the time of the above-described sexual abuse of Plaintiff B.W., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

130. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of C.G.

131. When Plaintiff C.G. was 15 years old and housed at JTDC, Guard Martin, a guard, while acting in the course and scope of his employment and under the control of Cook County, sexually abused C.G. in 1998.

132. Guard Martin was at all relevant times a black male, estimated to be in his mid-30s and approximately 5'8" in height. He had a short fade hairstyle and brown eyes. C.G. expects to learn the full name and identity of his abuser through the course of discovery.

133. On at least nine occasions, Guard Martin sexually abused C.G. in C.G.'s cell. Guard Martin would enter C.G.'s cell at night. Guard Martin would force C.G. to perform oral copulation on him while they were alone at night. Guard Martin would ejaculate in C.G.'s mouth. Guard Martin would also masturbate C.G.'s penis.

134. Martin would threaten C.G. by saying that if he ever said anything Martin would take him from his family for the rest of his life. Martin would also threaten C.G. with suicide watch, solitary confinement and an extended sentence.

135. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

136. At the relevant times herein, Plaintiff C.G. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

137. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the

abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

138. At the time of the above-described sexual abuse of Plaintiff C.G., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

139. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of C.R.

140. When Plaintiff C.R. was 14 years old and housed at JTDC, a guard (hereinafter "C.R. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused C.R. in 1999.

141. C.R. Abuser 1 was at all relevant times a black male, estimated to be in his 60s and approximately 5'5" in height. He was bald and had brown eyes. C.R. expects to learn the full name and identity of his abuser through the course of discovery.

142. While housed at JTDC, C.R. Abuser 1 would make sexual comments to C.R. On at least one occasion, C.R. Abuser 1 sexually abused C.R. in the T.V. room. C.R. Abuser 1 took C.R. into the T.V. room and gave C.R. a cigarette. C.R. and C.R. Abuser 1 were both smoking cigarettes while watching Jerry Springer. C.R. Abuser 1 stuck his hand inside C.R.'s pants and pulled C.R.'s genitals out. C.R. Abuser 1 masturbated C.R.'s penis. C.R. Abuser 1 attempted to perform oral copulation on C.R., but C.R. pushed C.R. Abuser 1 off of him.

143. C.R. Abuser 1 bribed C.R. for his silence by providing C.R. with outside food, snacks, and cigarettes.

144. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

145. At the relevant times herein, Plaintiff C.R. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

146. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

147. At the time of the above-described sexual abuse of Plaintiff C.R., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

148. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of C.S.

149. When Plaintiff C.S. was 17 years old and housed at JTDC, Sgt. Boseman and Lt. Edwards (collectively "C.S. Abusers" unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County, sexually abused C.S. in 2007.

150. Sgt. Bowman was at all relevant times a black male, estimated to be in his late 20s to early 30s and approximately 6'1" in height. He had short brown hair and brown eyes. He had tattoos on his neck and arm.

151. Lt. Edwards was at all relevant times a black male, estimated to be in his late 20s to early 30s and approximately 5'8" in height. He had short hair with waves and brown eyes. He had a nose piercing.

152. C.S. expects to learn the full name and identity of her abusers through the course of discovery.

153. On at least five occasions, Sgt. Bowman and Lt. Edwards sexually abused C.S. together and separately.

154. On at least one occasion, Sgt. Bowman and Lt. Edwards entered C.S.'s cell with a female officer. C.S. Abusers put C.S. into a headlock and covered C.S.'s mouth. C.S. Abusers digitally penetrated C.S.'s anus. C.S. Abusers also penetrated C.S.'s vagina with their penises. The sexual abuse lasted approximately 20 minutes.

155. On at least two occasions, a female officer would handcuff C.S. to her bed face up when C.S. was in the psychiatric ward. In one instance, Sgt. Bowman entered the cell and penetrated C.S. with his penis. In another instance, Lt. Edwards entered the cell and penetrated C.S. with his penis.

156. The above-described sexual abuse and/or acts perpetrated by their staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

157. At the relevant times herein, Plaintiff C.S. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

158. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn

Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

159. At the time of the above-described sexual abuse of Plaintiff C.S., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

160. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of C.W.

161. When Plaintiff C.W. was 15 years old and housed at JTDC, a guard (hereinafter "C.W. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused C.W. in 2002.

162. C.W. Abuser 1 was at all relevant times a black male, estimated to be in his early to mid-30s and approximately 5'7" in height. He had long blackish brown hair with dreadlocks

and wore glasses. He had an athletic build. C.W. expects to learn the full name and identity of her abuser through the course of discovery.

163. On at least one occasion, C.W. Abuser 1 sexually abused C.W. in her cell. C.W. Abuser 1 quietly opened the door and entered C.W.'s cell. C.W. Abuser 1 forced C.W to masturbate his penis until he ejaculated. The sexual abuse lasted approximately five minutes until another female guard came back to C.W.'s unit.

164. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

165. At the relevant times herein, Plaintiff C.W. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

166. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

167. At the time of the above-described sexual abuse of Plaintiff C.W., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff

members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

168. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of D.C

169. When Plaintiff D.C. was 15 years old and housed at JTDC, Officer Ball, a correctional officer, while acting in the course and scope of his employment and under the control of Cook County, sexually abused D.C. in 1999.

170. Officer Ball was at all relevant times a white male, estimated to be in his mid-30s and approximately 5'6" in height. He had long curly hair and wore glasses. D.C. expects to learn the full name and identity of his abuser through the course of discovery.

171. On at least one occasion, Officer Ball sexually abused D.C. in D.C.'s cell. Officer Ball forced his hands inside D.C.'s pants and fondled D.C.'s penis. Office Ball was not wearing gloves when fondling D.C.'s penis. Officer Ball then performed oral copulation on D.C. for approximately three to five minutes.

172. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and

Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

173. At the relevant times herein, Plaintiff D.C. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

174. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

175. At the time of the above-described sexual abuse of Plaintiff D.C., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

176. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to

make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of D.C. 2

177. When Plaintiff D.C. 2 was 15 years old and housed at JTDC, a correctional officer (hereinafter “D.C. 2 Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused D.C. 2 in 2004.

178. D.C. 2 Abuser 1 was at all relevant times a white male, estimated to be in his late 30s to 40s and approximately 6’1” in height. He had buzz cut, blonde hair and blue eyes. He had a thick mustache. D.C. 2 expects to learn the full name and identity of her abuser through the course of discovery.

179. On at least two occasions, D.C. 2 Abuser 1 sexually abused D.C. 2 in the strip search area. D.C. 2 Abuser 1 called D.C. 2 into the strip search room and told D.C. 2 to take off all his clothing. D.C. 2 Abuser 1 grabbed D.C.2 buttocks and masturbated D.C. 2’s penis until he ejaculated. On both occasions, the sexual abuse lasted for approximately 10 to 15 minutes. D.C. 2 Abuser 1 told D.C. 2 that this was part of the strip search procedure that all juveniles had to go through.

180. These strip searches were conducted upon D.C. 2 without individualized, reasonable suspicion, nor compliance with the constitutions, laws, and regulations of both the United States and the State of Illinois. These searches were a pretext for sexual abuse.

181. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

182. At the relevant times herein, Plaintiff D.C. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

183. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

184. At the time of the above-described sexual abuse of Plaintiff D.C. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

185. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of D.D. 2

186. When Plaintiff D.D. 2 was 15 years old and housed at JTDC, a correctional officer (hereinafter “D.D. 2 Abuser 1” unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County, sexually abused D.D. 2 in 2003.

187. D.D. 2 Abuser 1 was at all relevant times a black female, estimated to be in her 30s or 40s and approximately 5’6” in height. She had a short bob hairstyle and brown eyes. D.D. 2 expects to learn the full name and identity of his abuser through the course of discovery.

188. On at least three occasions, D.D. 2 Abuser 1 sexually abused D.D. 2 during phone time. D.D. Abuser 1 would take D.D. 2 into a secluded room for his phone time. D.D. 2 Abuser 1 asked D.D. 2 if she could help him release stress. D.D. 2 Abuser 1 opened D.D. 2’s pants and stimulated D.D. 2’s penis until his penis became erect. D.D. 2 Abuser 1 would then perform oral copulation on D.D. 2 until he ejaculated in D.D. 3 Abuser 1’s mouth. D.D. 2 Abuser 1 would also guide D.D. 2’s hand to her breast through an opening on her shirt to fondle her breast.

189. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

190. At the relevant times herein, Plaintiff D.D. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

191. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached

various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

192. At the time of the above-described sexual abuse of Plaintiff D.D. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

193. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of D.E

194. When Plaintiff D.E. was 16 years old and housed at JTDC, a guard (hereinafter "D.E. Abuser 1" unless otherwise indicated), and guard (hereinafter "D.E Abuser 2" unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County, sexually abused D.E. in 2006.

195. D.E. Abuser 1 was at all relevant times a black female, estimated to be in her 40s and approximately 5'6" in height. She had short black hair and brown eyes.

196. D.E. Abuser 2 was at all relevant times a black male, estimated to be in his 40s and approximately 5'7" in height. He had long black hair and brown eyes.

197. D.E. expects to learn the full name and identity of his abusers through the course of discovery.

198. On at least two occasions, D.E. Abuser 1 and D.E. Abuser 2 sexually abused D.E. in the shower area.

199. On multiple occasions, D.E. Abuser 1 would enter D.E.'s room and the shower area when D.E. was naked. On at least one occasion, D.E. Abuser 1 entered D.E.'s cell at night. D.E. Abuser 1 masturbated D.E.'s penis under his clothes.

200. On at least one occasion, D.E. Abuser 2 entered the shower area at night when D.E. was in the shower. D.E. Abuser 2 masturbated D.E.'s penis while D.E. was in the shower.

201. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

202. At the relevant times herein, Plaintiff D.E. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

203. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached

various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

204. At the time of the above-described sexual abuse of Plaintiff D.E., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

205. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of D.F.

206. When Plaintiff D.F. was 15 years old and housed at JTDC, a correctional officer (hereinafter "D.F. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused D.F. in 2003.

207. D.F. Abuser 1 was at all relevant times a white male, estimated to be in his mid-50s and approximately 6'4" in height. He had long black braids and black eyes. He weighed

approximately 300 pounds and walked with a slight limp. D.F. expects to learn the full name and identity of his abuser through the course of discovery.

208. On at least two occasions, D.F. Abuser 1 sexually abused D.F. in D.F.'s cell.

209. On the first occasion, D.F. Abuser 1 walked D.F. back to his room. Once they arrived at D.F.'s cell, D.F. Abuser 1 rubbed D.F.'s buttocks over his pants.

210. On the second occasion, D.F. Abuser 1 reached his hand down D.F.'s pants and underwear. D.F. Abuser 1 then groped D.F.'s penis. D.F. fought D.F. Abuser 1 off of him, and D.F. Abuser 1's finger was broken in the struggle. D.F. Abuser 1 was sent to the hospital for his broken finger.

211. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

212. At the relevant times herein, Plaintiff D.F. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

213. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

214. At the time of the above-described sexual abuse of Plaintiff D.F., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

215. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of D.F. 2

216. When Plaintiff D.F. 2 was 14 years old and housed at JTDC, Officer O'Neal and Officer Johnson, while acting in the course and scope of their employment and under the control of Cook County, sexually abused D.F. 2 in 1999.

217. Officer O'Neal was at all relevant times a black male, estimated to be in his 30s to 40s and approximately 5'11" in height. He had short black hair and brown eyes.

218. Officer Johnson was at all relevant times a black male, estimated to be in his 30s to 40s and approximately 5'9" in height. He had short black hair and brown eyes.

219. D.F. 2 expects to learn the full name and identity of his abusers through the course of discovery.

220. On at least two occasions, Officer O'Neal sexually abused D.F. 2 in his cell. Officer O'Neal would force D.F. 2 to perform oral copulation on him. Officer O'Neal would then digitally penetrate D.F. 2's anus. Officer O'Neal did not wear gloves when digitally penetrating D.F. 2's anus.

221. On at least two occasions, Officer Johnson sexually abused D.F. 2 in his cell. Officer Johnson would force D.F. 2 to perform oral copulation on him. Officer Johnson would then digitally penetrate D.F. 2's anus. Officer Johnson did not wear gloves when digitally penetrating D.F. 2's anus.

222. Both Officer O'Neal and Officer Johnson threaten to beat up or starve D.F. 2 if D.F. 2 ever told anyone about the sexual abuse.

223. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

224. At the relevant times herein, Plaintiff D.F. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

225. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for

reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

226. At the time of the above-described sexual abuse of Plaintiff D.F. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

227. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of D.M.

228. When Plaintiff D.M. was 15 years old and housed at JTDC, staff members (hereinafter "D.M. Abuser 1," "D.M. Abuser 2," and "D.M. Abuser 3" - collectively "D.M. Abusers" - unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County, sexually abused D.M. in 2000.

229. D.M. Abuser 1 was at all relevant times a muscular black male, estimated to be in his mid-20s to 30s and approximately 5'10" in height. He had black hair and brown eyes. He had a tattoo on his arm.

230. D.M. Abuser 2 was at all relevant times a black female. She had black hair and brown eyes.

231. D.M. Abuser 3 was at all relevant times a black female. She had black hair and brown eyes.

232. D.M. expects to learn the full name and identity of her abusers through the course of discovery.

233. Shortly after initial intake, D.M. took a shower. D.M. Abuser 1 entered the shower area and masturbated D.M.'s vagina by digitally penetrating her vagina. While masturbating D.M., D.M. Abuser 1 said, "Don't act like you're not used to it."

234. On another occasion, D.M. Abuser 2 began touching D.M. when D.M. was in the shower. D.M. Abuser 2 touched the outside of D.M.'s vagina and digitally penetrated D.M.'s vagina. D.M. Abuser 2 attempted to force D.M. to engage in other sexual acts, but D.M. refused. D.M. was placed into solitary confinement for approximately two to three days for refusing to touch D.M. Abuser 2.

235. On another occasion, D.M. Abuser 3 began touching D.M. when D.M. was in the shower. D.M. Abuser 3 touched the outside of D.M.'s vagina and digitally penetrated D.M.'s vagina. D.M. Abuser 3 attempted to force D.M. to engage in other sexual acts, but D.M. refused. D.M. was placed into solitary confinement for approximately two to three days for refusing to touch D.M. Abuser 3.

236. Other juveniles were present when D.M. Abusers sexually abused D.M.

237. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and

Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

238. At the relevant times herein, Plaintiff D.M. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

239. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

240. At the time of the above-described sexual abuse of Plaintiff D.M., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

241. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to

make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of D.P. 2

242. When Plaintiff D.P. 2 was 13 years old and housed at JTDC, a detention officer (hereinafter “D.P. 2 Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused D.P. 2 in 2003.

243. D.P. 2 Abuser 1 was at all relevant times a black male, estimated to be in his mid-40s and approximately 5’11” in height. He was bald and had dark brown eyes. He weighed approximately 270 pounds and had a full blackish grey beard. D.P. 2 expects to learn the full name and identity of his abuser through the course of discovery.

244. On at least one occasion, D.P. 2 Abuser 1 sexually abused D.P. 2 in D.P. 2’s cell. D.P. 2 Abuser 1 entered D.P. 2’s cell and demanded a strip search. While completely nude, D.P. 2 Abuser 1 forced D.P. 2 to face the wall and bend over. D.P. 2 Abuser 1 penetrated D.P. 2’s anus with his penis.

245. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

246. At the relevant times herein, Plaintiff D.P. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

247. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred,

and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

248. At the time of the above-described sexual abuse of Plaintiff D.P. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

249. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of D.R.

250. When Plaintiff D.R. was 13 years old and housed at JTDC, a guard (hereinafter "D.R. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused D.R. in 2004.

251. D.R. Abuser 1 was at all relevant times a white male, estimated to be in his mid-30s to early 40s and approximately 5'10" in height. He was bald and had light brown eyes. He had a tattoo on his neck and weighed approximately 200 pounds. D.R. expects to learn the full name and identity of his abuser through the course of discovery.

252. On at least six occasions, D.R. Abuser 1 sexually abused D.R. in the shower area. D.R. Abuser 1 would be pull D.R. aside for random searches. D.R. Abuser 1 would take him to the wall behind the shower area with no one else present. D.R. Abuser 1 would masturbate D.R.'s penis with his bare hand for approximately two to three minutes.

253. D.R. Abuser 1 threatened D.R. with violence or to extend his time if he told anyone about the sexual abuse.

254. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

255. At the relevant times herein, Plaintiff D.R. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

256. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the

abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

257. At the time of the above-described sexual abuse of Plaintiff D.R., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

258. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of D.S.

259. When Plaintiff D.S. was 15 years old and housed at JTDC, a guard (hereinafter "D.S. Abuser 1" unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County, sexually abused D.S. in 2006.

260. D.S. Abuser 1 was at all relevant times black female, estimated to be in her late 30s and approximately 5'5" in height. She had brownish black hair and brown eyes. She weighed approximately 150 pounds and wore glasses. She also had a tattoo on her neck. D.S. expects to learn the full name and identity of his abuser through the course of discovery.

261. On at least two occasions, D.S. Abuser 1 sexually abused D.S. at the front desk. D.S. Abuser 1 would take D.S around the corner from the front desk to make a phone call. When alone together, D.S. Abuser 1 began flirting with D.S and forced D.S to pull out his genitals. D.S. Abuser 1 masturbated D.S.'s penis until he ejaculated. D.S. Abuser 1 also forced D.S to rub her breasts and digitally penetrate her vagina.

262. D.S. Abuser 1 bribed D.S. for his silence with outside food and snacks.

263. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

264. At the relevant times herein, Plaintiff D.S. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

265. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

266. At the time of the above-described sexual abuse of Plaintiff D.S., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff

members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

267. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of D.W.

268. When Plaintiff D.W. was 14 years old and housed at JTDC, Officer Jenkins, while acting in the course and scope of his employment and under the control of Cook County, sexually abused D.W. in 2004.

269. Officer Jenkins was at all relevant times a black male, estimated to be in his late 30s and approximately 5'10" in height. He was bald and had brown eyes. D.W. expects to learn the full name and identity of his abuser through the course of discovery.

270. On at least one occasion, Officer Jenkins sexually abused D.W. One day, Officer Jenkins transported D.W. after a dentist's appointment. D.W. had been medicated and felt drowsy and dizzy. When they got back to D.W.'s cell Officer Jenkins laid D.W. down and pulled down D.W.'s pants. Officer Jenkins proceeded to grab D.W.'s buttocks and penetrated D.W.'s anus with his thumb. The sexual abuse lasted approximately two to three minutes.

271. Officer Jenkins bribed D.W. for his silence by making him a “gold shirt.” This meant that D.W would be allowed special privileges such as late lights out, extra snacks, and being allowed to play video games.

272. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

273. At the relevant times herein, Plaintiff D.W. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

274. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

275. At the time of the above-described sexual abuse of Plaintiff D.W., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

276. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of D.W. 2

277. When Plaintiff D.W. 2 was 16 to 17 years old and housed at JTDC, Officer Green, a correctional officer, while acting in the course and scope of his employment and under the control of Cook County, sexually abused D.W. 2 in 2005.

278. Officer Green was at all relevant times a black male, estimated to be in his 40s and approximately 6'3" to 6'5" in height. He had curly salt and pepper hair and multi-colored eyes. D.W. 2 expects to learn the full name and identity of his abuser through the course of discovery.

279. On at least four occasions, Officer Green sexually abused D.W. 2. Officer Green came into D.W. 2's cell at night when it was supposed to be bedtime. Green would take D.W. 2 to another room by himself. Officer Green would try to arouse D.W. 2 by touching D.W. 2's penis with his bare hands. Officer Green would perform oral copulation on D.W. 2 for approximately 20 minutes.

280. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and

Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

281. At the relevant times herein, Plaintiff D.W. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

282. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

283. At the time of the above-described sexual abuse of Plaintiff D.W. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

284. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to

make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of E.C.

285. When Plaintiff E.C. was 15 years old and housed at JTDC, a correctional officer (hereinafter “E.C. Abuser 1” unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County, sexually abused E.C. in 1998.

286. E.C. Abuser 1 was at all relevant times a black female, estimated to be in her 30s and approximately 5’6” in height. She had short black hair that she wore in a ponytail and brown eyes. E.C. expects to learn the full name and identity of his abuser through the course of discovery.

287. On at least two occasions, E.C. Abuser 1 sexually abused E.C. in the bathroom. E.C. Abuser 1 would take E.C. into the bathroom during shift change and force E.C. to pull down his pants. E.C. Abuser 1 would then perform oral copulation on E.C. while forcing E.C. to fondle her vagina.

288. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

289. At the relevant times herein, Plaintiff E.C. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

290. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached

various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

291. At the time of the above-described sexual abuse of Plaintiff E.C., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

292. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of E.E.

293. When Plaintiff E.E. was 14 years old and housed at JTDC, Mr. Johnson, while acting in the course and scope of his employment and under the control of Cook County, sexually abused E.E. in 1998.

294. Mr. Johnson was at all relevant times a black male, estimated to be in his mid-30s and approximately 6'0" to 6'2" in height. He was bald and had brown eyes. He typically dressed

in colorful suits. E.E. expects to learn the full name and identity of his abuser through the course of discovery.

295. On at least ten occasions, Mr. Johnson sexually abused E.E. in his cell in unit 4D. While E.E. would be handcuffed in his cell, Mr. Johnson would grab E.E.'s penis and masturbate him for approximately three minutes. Mr. Johnson did not wear gloves while masturbating E.E.'s penis

296. Mr. Johnson would bribe E.E. for his silence with cigarettes and made promises to get him out of the hole.

297. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

298. At the relevant times herein, Plaintiff E.E. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

299. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

300. At the time of the above-described sexual abuse of Plaintiff E.E., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

301. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of E.L.

302. When Plaintiff E.L. was 15 years old and housed at JTDC, a staff member (hereinafter "E.L. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused E.L. in 2002.

303. E.L. Abuser 1 was at all relevant times a black male, estimated to be in his 40s and approximately 5'10" to 6'0" in height. He had grey hair with a high-top faded hairstyle and wore glasses. E.L. expects to learn the full name and identity of his abuser through the course of discovery.

304. On at least two occasions, E.L. Abuser 1 sexually abused E.L. in E.L.'s cell. E.L. Abuser would make the inmates put the chairs in a circle, if this wasn't done E.L. Abuser 1 would

put the facility into an administrative lockdown. E.L. Abuser 1 entered E.L.'s cell and told E.L. that he was hard-headed and did not listen. E.L. Abuser 1 then reached inside E.L.'s pants and grabbed E.L.'s genitals. E.L. Abuser 1 masturbated E.L.'s penis for over one minute, and E.L. Abuser 1 was not wearing gloves at the time.

305. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

306. At the relevant times herein, Plaintiff E.L. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

307. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

308. At the time of the above-described sexual abuse of Plaintiff E.L., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

309. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of E.M.

310. When Plaintiff E.M. was 17 years old and housed at JTDC, staff members (hereinafter "E.M. Abuser 1" and "E.M. Abuser 2" - collectively "E.M. Abusers" - unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County, sexually abused E.M. in 2007.

311. E.M. Abuser 1 was at all relevant times a white male, estimated to be in his mid-20s and approximately 5'11" in height. He had dirty blonde hair and greenish blue eyes.

312. E.M. Abuser 2 was at all relevant times a black male, estimated to be in his 30s and approximately 5'11" in height. He had short black hair and brown eyes. He had a full sleeve of tattoos on his arm.

313. E.M. expects to learn the full name and identity of his abusers through the course of discovery.

314. On at least four occasions, E.M. Abusers sexually abused E.M. together and separately.

315. E.M. Abusers would instruct E.M. to stand against the wall and pull E.M.'s pants down. E.M. Abusers would masturbate E.M.'s penis while cupping his buttocks for approximately four minutes.

316. On at least one occasion, one of E.M.'s abusers digitally penetrated E.M.'s anus.

317. E.M. Abusers told E.M. he would be moved to a different unit where he would be physically or sexually abused if E.M. told anyone about the sexual abuse.

318. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

319. At the relevant times herein, Plaintiff E.M. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

320. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

321. At the time of the above-described sexual abuse of Plaintiff E.M., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff

members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

322. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of E.R.

323. When Plaintiff E.R. was 15 years old and housed at JTDC, Officer Thompson, a correctional officer, while acting in the course and scope of her employment and under the control of Cook County, sexually abused E.R. in 2007.

324. Officer Thompson was at all relevant times a black female, estimated to be in her 30s and approximately 5'7" in height. She had a short blonde wig and brown eyes. E.R. expects to learn the full name and identity of his abuser through the course of discovery.

325. On at least five occasions, Officer Thompson sexually abused E.R. in E.R.'s room. Officer Thompson would enter E.R.'s room and offer E.R. extra time on the phone in exchange for sexual favors. Officer Thompson would masturbate E.R.'s penis with her bare hands. On some occasions, Officer Thompson would perform oral copulation on E.R. until he ejaculated.

326. On at least one occasion, Officer Thompson entered the bathroom while E.R. was inside. Officer Thompson forced E.R. to touch her breasts while she masturbated his penis for approximately one to three minutes.

327. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

328. At the relevant times herein, Plaintiff E.R. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

329. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

330. At the time of the above-described sexual abuse of Plaintiff E.R., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

331. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of F.S.

332. When Plaintiff F.S. was 15 years old and housed at JTDC, a guard known as "Pops", while acting in the course and scope of his employment and under the control of Cook County, sexually abused F.S. in 2005.

333. Pops was at all relevant times a black male, estimated to be in his mid-30s to early 40s and approximately 6'1" in height. He had black and gray hair with an afro hairstyle and brown eyes. F.S. expects to learn the full name and identity of his abuser through the course of discovery.

334. On at least one occasion, Pops sexually abused F.S. in F.S.'s cell. Pops entered F.S.'s cell and put his hand down F.S.'s boxers. Pops masturbated F.S.'s penis with his bare hand. Pops told F.S, "Your balls aren't big enough."

335. F.S. previously learned from other juvenile inmates that Pops would sexually abuse other juvenile inmates and make similar sexual comments.

336. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and

Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

337. At the relevant times herein, Plaintiff F.S. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

338. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

339. At the time of the above-described sexual abuse of Plaintiff F.S., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

340. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to

make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of G.C.

341. When Plaintiff G.C. was 15 years old and housed at JTDC, a guard (hereinafter “G.C. Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused G.C. in 1999.

342. G.C. Abuser 1 was at all relevant times a Hispanic male, estimated to be in his 30s or 40s and approximately 5’6” in height. He had short black hair and brown eyes. G.C. expects to learn the full name and identity of her abuser through the course of discovery.

343. On at least ten occasions, G.C. Abuser 1 sexually abused G.C. in the medical area and in G.C.’s cell.

344. While G.C. would pass out food trays to other juveniles in the medical area, G.C. Abuser 1 would approach her and put his hands in G.C.’s shirt and pants. This would occur in an area where there were no cameras. While G.C. Abuser 1 was still out of sight of the camera, he would stroke G.C.’s breasts and move into G.C.’s pants to stroke her vagina with his bare hands. G.C. Abuser 1 complimented G.C.’s looks while sexually abusing her. The sexual abuse would last approximately one to two minutes.

345. In other instances, while G.C. was in her cell, G.C. Abuser 1 would enter the cell and reach under G.C.’s clothes. G.C. Abuser 1 would touch G.C.’s breast and vagina with his bare hands. The sexual abuse would last approximately one to two minutes.

346. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and

Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

347. At the relevant times herein, Plaintiff G.C. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

348. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

349. At the time of the above-described sexual abuse of Plaintiff G.C., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

350. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to

make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of G.C. 2

351. When Plaintiff G.C. 2 was 15 years old and housed at JTDC, Mr. E, a guard, while acting in the course and scope of his employment and under the control of Cook County, sexually abused G.C. 2 in 2000.

352. Mr. E was at all relevant times black male, estimated to be in his early 40s and approximately 6'0" in height. He was bald and had brown eyes. He was approximately 180-200 pounds, and he wore earrings and a chain. G.C. 2 expects to learn the full name and identity of his abuser through the course of discovery.

353. On at least four occasions, Mr. E sexually abused G.C. 2 in G.C. 2's unit. Mr. E would pass by G.C. 2's unit and state he was performing a strip search accusing G.C. 2 of having foreign objects on him. Mr. E would then G.C. 2 to the washroom and make him remove his pants and bend over. For approximately three to four minutes, Mr. E would pull G.C. 2's buttocks apart and rub his anus. Mr. E would reach over and grab G.C. 2's penis and masturbate his penis for approximately three minutes. Mr. E was not wearing gloves when sexually abusing G.C. 2.

354. These strip searches were conducted upon G.C. 2 without individualized, reasonable suspicion, nor compliance with the constitutions, laws, and regulations of both the United States and the State of Illinois. These searches were a pretext for sexual abuse.

355. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

356. At the relevant times herein, Plaintiff G.C. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

357. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

358. At the time of the above-described sexual abuse of Plaintiff G.C. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

359. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of G.J.

360. When Plaintiff G.J. was 15 years old and housed at JTDC, Mr. C, a correctional officer, while acting in the course and scope of his employment and under the control of Cook County, sexually abused G.J. in 1999.

361. Mr. C was at all relevant times a black male, estimated to be in his 30s or 40s and approximately 6'0" in height. He had curly black hair and brown eyes. G.J. expects to learn the full name and identity of his abuser through the course of discovery.

362. On at least one occasion, Mr. C sexually abused G.J. in G.J.'s cell. While G.J. was walking back from school, Mr. C approached G.J. stating he needed to be searched. Mr. C told G.J. to shut up and go into his cell. When G.J. entered his cell, Mr. C told G.J. to take off his shirt. Mr. C touched G.J.'s chest and stomach. Mr. C then put his hands down G.J.'s pants. Mr. C masturbated G.J.'s penis for a few minutes. While masturbating G.J.'s penis, Mr. C threatened G.J. by saying, "Reach for the sky or I will knock you out. Don't you dare put your arms down."

363. The following morning, Mr. C entered G.J.'s cell and forced G.J. to rub his back to get out of solitary confinement. Mr. C attempted to force G.J. to touch his penis.

364. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

365. At the relevant times herein, Plaintiff G.J. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

366. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

367. At the time of the above-described sexual abuse of Plaintiff G.J., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

368. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of G.Q.

369. When Plaintiff G.Q. was 16 years old and housed at JTDC, a guard (hereinafter “G.Q. Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused G.Q. in 2000.

370. G.Q. Abuser 1 was at all relevant times a white male, estimated to be in his 30s or 40s and approximately 6’0” in height. He was bald and had blue eyes. G.Q. expects to learn the full name and identity of his abuser through the course of discovery.

371. On at least two occasions, G.Q. Abuser 1 sexually abused G.Q. in the unit. G.Q. asked to use the bathroom, and G.Q. Abuser 1 gave him permission to do so. G.Q. Abuser 1 said, “Did I tell you to pull down your pants?” G.Q. Abuser 1 then forced G.Q. to bend over. G.Q. Abuser 1 then sexually penetrated G.Q.’s anus.

372. G.Q. Abuser 1 threatened to keep G.Q. confined if he told anyone about the sexual abuse.

373. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

374. At the relevant times herein, Plaintiff G.Q. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

375. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of

known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

376. At the time of the above-described sexual abuse of Plaintiff G.Q., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

377. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of J.B.

378. When Plaintiff J.B. was 13 to 17 years old and housed at JTDC, staff members known as Mr. Loften, Mr. Young, and Mr. Mack, while acting in the course and scope of their employment and under the control of Cook County, sexually abused J.B. in 2001.

379. Mr. Loften was at all relevant times a heavy-set black male, estimated to be under 50 years old and approximately 6'1" in height. He had short black hair and brown eyes.

380. Mr. Young was at all relevant times a slim black male, estimated to be under 50 years old and approximately 5'6" to 5'9" in height. He had short black hair and brown eyes. He wore glasses. He sometimes went by the nickname "Ta-Dow."

381. Mr. Mack was at all relevant times a black male, estimated to be in his early to mid-40s and approximately 5'6" in height. He had black hair in an afro hairstyle.

382. J.B. expects to learn the full name and identity of his abusers through the course of discovery.

383. On at least ten occasions, Mr. Lofton sexually abused J.B. in the shower. Mr. Lofton would penetrate J.B.'s anus with his penis causing J.B.'s anus to bleed. Mr. Lofton threatened to physically harm J.B. if J.B. ever told anyone about the sexual abuse.

384. Mr. Young worked in the gym, and he would force J.B. to perform sexual acts with other juveniles in the workout room. Mr. Young would force J.B. and the other juveniles to work out naked in groups of two to three. Mr. Young would then force J.B. and the other juveniles to masturbate each other and perform oral copulation on each other while he watched. Mr. Young would threaten to demote J.B. and the other juveniles if they ever told anyone about the sexual abuse.

385. On at least ten occasions, Mr. Mack sexually abused J.B. in the shower area or in J.B.'s cell at night. Mr. Mack would force J.B. to perform oral copulation on him. Mr. Mack would also perform oral copulation on J.B. Mr. Mack bribed J.B. for his silence by providing J.B. with level incentives, extra food and snacks, and extra recreational time.

386. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and

Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

387. At the relevant times herein, Plaintiff J.B. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

388. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

389. At the time of the above-described sexual abuse of Plaintiff J.B., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

390. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to

make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of J.B. 2

391. When Plaintiff J.B. 2 was 11 years old and housed at JTDC, Randy Brown, a guard, while acting in the course and scope of his employment and under the control of Cook County, sexually abused J.B. 2 in 2005.

392. Randy Brown was at all relevant times a black male, estimated to be in his late 30s and approximately 6'0" in height. He had a short fade cut and brown eyes. He weighed approximately 200 pounds and wore a cross. J.B. 2 expects to learn the full name and identity of his abuser through the course of discovery.

393. On at least one occasion, Randy Brown sexually abused J.B. 2 in the bullpen room. Randy Brown walked into the room, pulled out his penis, and told J.B. 2 to sit down on top of his penis. J.B. 2 refused to do comply, and Randy Brown punched J.B. 2 in the forehead and side of the head approximately times while J.B. 2 was screaming. Once J.B. 2 became quiet, Randy Brown forced J.B. 2 to masturbate his penis. Randy Brown also forced J.B. 2 to perform oral copulation on him. The sexual abuse lasted approximately five minutes, and it stopped when other guards began entering the room.

394. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

395. At the relevant times herein, Plaintiff J.B. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

396. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

397. At the time of the above-described sexual abuse of Plaintiff J.B. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

398. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of J.B. 3

399. When Plaintiff J.B. 3 was 17 years old and housed at JTDC, a guard (hereinafter “J.B. 3 Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused J.B. 3 in 2007.

400. J.B. 3 Abuser 1 was at all relevant times a black male, estimated to be in his 40s and approximately 5’11” in height. He was bald and had brown eyes. J.B. 3 expects to learn the full name and identity of his abuser through the course of discovery.

401. On at least one occasion, J.B. 3 Abuser 1 sexually abused J.B. 3 in J.B. 3’s cell. One evening, J.B. 3 Abuser 1 entered J.B. 3’s cell and began masturbating J.B. 3’s penis. J.B. 3 Abuser 1 exposed his penis and masturbated his own penis at the same time. J.B. 3 told J.B. 3 Abuser 1 to stop.

402. After the sexual abuse, J.B. 3 Abuser 1 stopped giving J.B. 3 extra privileges such as snacks and extra food that he was previously providing.

403. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

404. At the relevant times herein, Plaintiff J.B. 3 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

405. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached

various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

406. At the time of the above-described sexual abuse of Plaintiff J.B. 3, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

407. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of J.C.

408. When Plaintiff J.C. was 17 years old and housed at JTDC, a guard (hereinafter "J.C. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and control of Cook County, sexually abused J.C. in 2005.

409. J.C. Abuser 1 was at all relevant times a black male, estimated to be in his late 20s to early 30s and approximately 6'0" in height. He had messy black hair and black eyes. J.C. expects to learn the full name and identity of his abuser through the course of discovery.

410. On at least five occasions, J.C. Abuser 1 sexually abused J.C. in the shower area. When J.C. Abuser 1 sexually abused J.C. in the shower area, J.C. Abuser 1 rubbed soap all over J.C. including his bare genitals. J.C. Abuser 1 would masturbate J.C.'s penis and his own penis to the point of ejaculation. J.C. Abuser 1 also forced J.C. to touch his penis. J.C. Abuser 1 would digitally penetrate J.C.'s anus without gloves.

411. On at least five occasions, J.C. Abuser 1 sexually abused J.C. in the janitor's close. Once inside and alone in the janitor's closet, J.C. Abuser 1 masturbated J.C.'s penis and his own penis to the point of ejaculation. J.C. Abuser 1 also forced J.C. to touch J.C. Abuser 1's penis. J.C. Abuser 1 digitally penetrated J.C.'s anus without gloves.

412. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

413. At the relevant times herein, Plaintiff J.C. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

414. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of

known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

415. At the time of the above-described sexual abuse of Plaintiff J.C., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

416. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of J.F.

417. When Plaintiff J.F. was 16 years old and housed at JTDC, Officer Issacs and Officer Dave, while acting in the course and scope of their employment and under the control of Cook County, sexually abused J.F. in 1999.

418. Officer Issacs was at all relevant times a black male, estimated to be in his mid-30s and approximately 6'2" in height. He was bald and had brown eyes. He weighed approximately 220 pounds and had rough skin.

419. Officer Dave was at all relevant times a white male, estimated to be in his 30s and approximately 6'0" in height. He had light brown hair and brown eyes. He weighed approximately 215 pounds and had a mustache.

420. J.F. expects to learn the full name and identity of his abusers through the course of discovery.

421. On at least one occasion, Officer Issacs and Officer Dave sexually abused J.F. On the date of the incident, J.F. wrote "help" on the ground because he was going through a mental illness. Officer Issacs got mad and told J.F. to remove his clothes and put a gown on. When J.F. did not comply, Officer Issacs peppered sprayed him. Officer Dave was also present, and he digitally penetrated J.F.'s anus repeatedly. Officer Dave said, "since you want to be a little rapist; you're a tough guy; how does it feel?"

422. J.F. suffered from hemorrhoids due to the anal penetration, and he received treatment at the infirmary.

423. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

424. At the relevant times herein, Plaintiff J.F. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

425. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently

breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

426. At the time of the above-described sexual abuse of Plaintiff J.F., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

427. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of J.F. 2

428. When Plaintiff J.F. 2 was 16 years old and housed at JTDC, Ms. Williams, a guard, while acting in the course and scope of her employment and under the control of Cook County, sexually abused J.F. 2 in 2003.

429. Ms. Williams was at all relevant times a black female, estimated to be in her late 20s to mid-30s and approximately 5'8" to 5'11" in height. She had short blackish-brown hair and

dark colored eyes. J.F. 2 expects to learn the full name and identity of his abuser through the course of discovery.

430. On at least four occasions, Ms. Williams sexually abused J.F. 2 in J.F. 2's cell. Ms. Williams approached J.F. 2 and told him that he was in trouble and forced him to strip. Ms. Williams then proceeded to masturbate J.F. 2's penis until he ejaculated onto the floor. Ms. Williams was not wearing gloves when masturbating J.F. 2's penis.

431. Ms. Williams bribed J.F. 2 for his silence with extra snacks. Ms. Williams also told J.F. 2 not to tell anyone about the sexual abuse.

432. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

433. At the relevant times herein, Plaintiff J.F. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

434. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

435. At the time of the above-described sexual abuse of Plaintiff J.F. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

436. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of J.F. 3

437. When Plaintiff J.F. 3 was 14 years old and housed at JTDC, Brother J and Mr. H, while acting in the course and scope of their employment and under the control of Cook County, sexually abused J.F. 3 in 2001.

438. Brother J was at all relevant times a black male, estimated to be in his 30s and approximately 6'0" in height. He was bald and had brown eyes.

439. Mr. H was at all relevant times a black male, estimated to be in his mid-30s and approximately 5'11" in height. He had black hair and brown eyes.

440. J.F. 3 expects to learn the full name and identity of his abusers through the course of discovery.

441. On at least four occasions, Brother J and Mr. H sexually abused J.F. 3 in the shower area. J.F. 3 and four other residents were in the locker room area before they started to take showers. Brother J and Mr. H approached J.F. 3 accusing J.F. 3 of smoking and hiding tobacco products and proceeded to perform a search on J.F. 3. Brother J and Mr. H ordered all of the other residents to exit the room but instructed J.F. 3 to stay in the shower room. Once all the other residents exited, Brother J and Mr. H restrained J.F. 3 on the floor. Brother J and Mr. H proceeded to fondle and masturbate J.F. 3's penis. Brother J and Mr. H digitally penetrated J.F. 3's buttocks. Brother J and Mr. H were not wearing gloves when sexually abusing J.F. 3.

442. Brother J and Mr. H threatened to extend J.F. 3's time at the facility if he told anyone about the sexual abuse.

443. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

444. At the relevant times herein, Plaintiff J.F. 3 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

445. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for

reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

446. At the time of the above-described sexual abuse of Plaintiff J.F. 3, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

447. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of J.G.

448. When Plaintiff J.G. was 14 years old and housed at JTDC, Officer Chavez, while acting in the course and scope of his employment and under the control of Cook County, sexually abused J.G. in 1997.

449. Officer Chavez was at all relevant times a Hispanic male, estimated to in his mid-30s and approximately 5'6" in height. He had black slicked back hair, brown eyes, and a mustache. He had tattoos on his neck and arms, and he drove motorcycles. J.G. expects to learn the full name and identity of his abuser through the course of discovery.

450. On at least six occasions, Officer Chavez sexually abused J.G. On at least two occasions, Officer Chavez entered the bathroom when J.G. was alone. Officer Chavez grabbed J.G.'s penis and masturbated J.G.'s penis. J.G. would ejaculate into the toilet.

451. On at least one occasion, Officer Chavez would perform oral copulation on J.G. in J.G.'s cell. J.G. ejaculated into Officer Chavez's mouth.

452. On at least two occasions, Officer Chavez forced J.G. to masturbate his penis and perform oral copulation on him. Officer Chavez would ejaculate into G.J.'s mouth, onto G.J.'s face, and into J.G.'s hand.

453. On at least one occasion, Officer Chavez licked his fingers and then digitally penetrated J.G.'s anus.

454. Officer Chavez would bribe J.G. for his silence by giving J.G. extra privileges, extra food and snacks, and extra recreational time outside of his cell.

455. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

456. At the relevant times herein, Plaintiff J.G. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

457. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of

known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

458. At the time of the above-described sexual abuse of Plaintiff J.G., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

459. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of J.H.

460. When Plaintiff J.H. was 14 years old and housed at JTDC, a guard (hereinafter "J.H. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused J.H. in 2000.

461. J.H. Abuser 1 was at all relevant times a black male, estimated to be in his early 20s and approximately 5'9" in height. He had short black hair with an afro hairstyle and brown eyes. J.H. expects to learn the full name and identity of her abuser through the course of discovery.

462. On at least one occasion, J.H. Abuser 1 sexually abused J.H. in J.H.'s cell. During the first week of J.H.'s stay, a fight broke out. The correctional officers pulled all of the fighters to the side. J.H. Abuser 1 asked J.H. where his room was located and followed J.H. back to his room. J.H. Abuser 1 put his hands down J.H.'s pants and masturbated J.H.'s penis for approximately five minutes.

463. J.H. Abuser 1 left J.H.'s room, but then returned. J.H. was crying, and J.H. Abuser 1 instructed him to stop crying. J.H. Abuser 1 then attempted to digitally penetrate J.H.'s anus. J.H. started screaming, causing J.H. Abuser 1 to stop and leave the room.

464. Later in the day, J.H. Abuser 1 came back to J.H.'s cell and threatened to kill J.H. if he ever told anyone about the sexual abuse.

465. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

466. At the relevant times herein, Plaintiff J.H. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

467. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the

abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

468. At the time of the above-described sexual abuse of Plaintiff J.H., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

469. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of J.J.

470. When Plaintiff J.J. was 16 years old and housed at JTDC, a security officer (hereinafter "J.J. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused J.J. in 2001.

471. J.J. Abuser 1 was at all relevant times a white male, estimated to be in his 40s or 50s and approximately 6'1" in height. He had brown hair and dark brown eyes. He had a tattoo sleeve on his arm and a low-cut fade haircut. J.J. expects to learn the full name and identity of his abuser through the course of discovery.

472. On at least three occasions, J.J. Abuser 1 sexually abused J.J. in J.J.'s unit. J.J. Abuser 1 would forcefully enter J.J.'s cell during routine resident welfare checks. J.J./ Abuser 1 would then violently digitally penetrate J.J.'s anus. J.J. Abuser 1 would aggressively slam J.J. onto the ground and restrain him to the floor, causing severe injuries to J.J.'s neck and back. When J.J. tried to stop J.J. Abuser 1 from sexually abusing him, J.J. Abuser 1 would become more aggressive and threatening.

473. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

474. At the relevant times herein, Plaintiff J.J. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

475. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

476. At the time of the above-described sexual abuse of Plaintiff J.J., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members

directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

477. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of J.J. 2

478. When Plaintiff J.J. 2 was 14 years old and housed at JTDC, guards (hereinafter "J.J. 2 Abuser 1" and "J.J. 2 Abuser 2" unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County, sexually abused J.J. 2 in 2003.

479. J.J. 2 Abuser 1 was at all relevant times a black female, estimated to be in her 40s and approximately 5'6" in height. She had brown braids and brown eyes.

480. J.J. 2 Abuser 2 was at all relevant times a Hispanic male, estimated to be in his mid-20s and approximately 6'1" in height. He had black hair and brown eyes.

481. J.J. 2 expects to learn the full name and identity of his abusers through the course of discovery.

482. J.J. 2 Abuser 1 had a reputation for being sexual with juvenile inmates. On at least five occasions, J.J. 2 Abuser 1 sexually abused J.J. 2 throughout the facility. J.J. 2 Abuser 1 would pull J.J.2 out of line and take him to the hallway in a backroom. J.J. 2 Abuser 1 would force J.J. 2

to strip out of his clothing, and then she would masturbate J.J. 2's penis. J.J. 2 Abuser 1 forced J.J. 2 to touch her breasts and vagina underneath her clothes. J.J. 2 Abuser 1 also attempted to perform oral copulation on J.J. 2.

483. On at least one occasion, J.J. 2 Abuser 2 sexually abused J.J. 2. J.J. 2 Abuser 2 accused J.J. 2 of having drugs on the unit. J.J. 2 Abuser 2 digitally penetrated J.J. 2's anus. J.J. 2 Abuser 2 threatened to extend J.J. 2's sentence if he ever told anyone about the sexual abuse.

484. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

485. At the relevant times herein, Plaintiff J.J. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

486. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

487. At the time of the above-described sexual abuse of Plaintiff J.J. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff

members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

488. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of J.M. 2

489. When Plaintiff J.M. 2 was 14 years old and housed at JTDC, Ronald, a guard, while acting in the course and scope of his employment and under the control of Cook County, sexually abused J.M. 2 in 2000.

490. Ronald was at all relevant times a black male, estimated to be in his 30s and approximately 5'10" in height. He was bald and had brown eyes. He weighed approximately 250 pounds and had a beard. J.M. 2 expects to learn the full name and identity of his abuser through the course of discovery.

491. On one occasion, J.M. 2 witnessed Ronald putting his hands on another juvenile inmate when walking by the juvenile's cell. J.M. 2 yelled at Ronald when he witnessed this.

492. On at least five occasions, Ronald sexually abused J.M. 2 in J.M. 2's cell. A few days after J.M. 2 witnessed Ronald touching another juvenile inmate, Ronald saw J.M. 2 writing on his windows with soap inside his cell. Ronald entered J.M. 2's cell, put his hands on J.M. 2's

shoulder, and told J.M. 2 there was a way for him to not get in trouble. Ronald forced J.M. 2 to masturbate Ronald's penis. Ronald got angry because he did not ejaculate when J.M. 2 was masturbating his penis.

493. On the third instance of sexual abuse, Ronald forced J.M. 2 to perform oral copulation on him. Ronald got angry again because he did not ejaculate when J.M. 2 performed oral copulation on him.

494. Ronald threatened to plant drugs in J.M. 2's cell to extend his stay if J.M. 2 ever told anyone about the sexual abuse.

495. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

496. At the relevant times herein, Plaintiff J.M. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

497. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

498. At the time of the above-described sexual abuse of Plaintiff J.M. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

499. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of J.N.

500. When Plaintiff J.N. was 14 years old and housed at JTDC, a guard (hereinafter "J.N. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused J.N. in 2005.

501. J.N. Abuser 1 was at all relevant times a black male, estimated to be in his 30s and approximately 6'0" in height. He had short dark hair and brown eyes. He weighed approximately 250 pounds and had a tattoo on his forearms. J.N. expects to learn the full name and identity of her abuser through the course of discovery.

502. On at least two occasions, J.N. Abuser 1 sexually abused J.N. in the entertainment room. On both occasions, J.N. was going into rehearsal when J.N. Abuser 1 pulled J.N. to the side

and told her to follow him into the dressing room. J.N. Abuser 1 threw J.N. against the wall and put his hands underneath J.N.'s clothes. J.N. Abuser 1 started to search and touch different parts of J.N.'s body including her breasts and vagina. J.N. Abuser 1 digitally penetrated J.N.'s vagina with his bare hands. The sexual abuse would last approximately five minutes each time.

503. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

504. At the relevant times herein, Plaintiff J.N. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

505. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

506. At the time of the above-described sexual abuse of Plaintiff J.N., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

507. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of J.R.

508. When Plaintiff J.R. was 15 years old and housed at JTDC, Mr. Williams, a correctional officer, while acting in the course and scope of his employment and under the control of Cook County, sexually abused J.R. in 2000.

509. Mr. Williams, also known as "Pops," was at all relevant times a black male, estimated to be in his 40s or 50s and approximately 5'9" in height. He had salt and pepper hair and a mustache. J.R. expects to learn the full name and identity of her abuser through the course of discovery.

510. On at least six occasions, Mr. Williams sexually abused J.R. in J.R.'s cell. J.R. would be in his cell when Mr. Williams would approach J.R. and ask J.R. to do a "Thug Dance." Mr. Williams would touch J.R. from behind over his clothes. Mr. Williams would move his hands down and touch J.R.'s penis with his bare hands. Mr. Williams would masturbate J.R.'s penis until J.R. ejaculated. Mr. Williams would masturbate J.R.'s penis for approximately four to five minutes.

511. On some occasions, when someone entered the cell, Mr. Williams would act as if he was disciplining J.R. and begin yelling at J.R. stating he was in trouble.

512. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

513. At the relevant times herein, Plaintiff J.R. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

514. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

515. At the time of the above-described sexual abuse of Plaintiff J.R., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

516. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting

Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of J.R. 2

517. When Plaintiff J.R. 2 was 15 years old and housed at JTDC, Mr. Garnett, while acting in the course and scope of his employment and under the control of Cook County, sexually abused J.R. 2 in 2006.

518. Mr. Garnett was at all relevant times a black male, estimated to be 45 to 50 years old and approximately 5'10" in height. He had black hair and brown eyes. Mr. Garnett weighed approximately 270 pounds. J.R. 2 expects to learn the full name and identity of his abuser through the course of discovery.

519. On at least one occasion, Mr. Garnett sexually abused J.R. 2 in the medical wing. Mr. Garnett was known for handing out free commissary and playing chess with the juveniles. One day, Mr. Garnett accompanied J.R. 2 to medical. Mr. Garnett entered the holding cell J.R. 2 was waiting in after being seen by the doctor. Mr. Garnett started touching J.R. 2. Mr. Garnett masturbated J.R.2's penis, and J.R. 2 tried to tell Mr. Garnett no.

520. Mr. Garnett told J.R. 2 not to tell anyone about the sexual abuse.

521. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and

Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

522. At the relevant times herein, Plaintiff J.R. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

523. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

524. At the time of the above-described sexual abuse of Plaintiff J.R. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

525. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to

make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of K.B.

526. When Plaintiff K.B. was 17 years old and housed at JTDC, a guard (hereinafter “K.B. Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused K.B. in 2005.

527. K.B. Abuser 1 was at all relevant times a black male and approximately 6’0” in height. He had dark hair and dark eyes. K.B. expects to learn the full name and identity of her abuser through the course of discovery.

528. On at least one occasion, K.B. Abuser 1 sexually abused K.B. in the isolation area. K.B. Abuser 1 told K.B that if she wanted out of the facility soon, she would have to perform oral copulation on K.B Abuser 1. K.B Abuser 1 then forced K.B to perform oral copulation on him.

529. K.B. Abuser 1 told K.B. that nobody would believe her if she disclosed the sexual abuse as it was her word against his.

530. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

531. At the relevant times herein, Plaintiff K.B. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

532. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred,

and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

533. At the time of the above-described sexual abuse of Plaintiff K.B., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

534. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of K.G.

535. When Plaintiff K.G. was 12 years old and housed at JTDC, Mr. Williams, while acting in the course and scope of his employment and under the control of Cook County, sexually abused K.G. in 2003.

536. Mr. Williams was at all relevant times a white male, estimated to be in his 30s and approximately 5'9" in height. He had sandy brown hair and brown eyes. Mr. Williams had a mustache and wore glasses. K.G. expects to learn the full name and identity of her abuser through the course of discovery.

537. On at least three occasions, Mr. Williams sexually abused K.G. throughout the cell. At night K.G. was tasked with cleaning the regular pod area. K.G. was directed to go back and clean the bathroom area. On the first occasion, Mr. Williams followed K.G. to the bathroom area, and then reached his hands into K.G.'s pants. Mr. Williams would begin rubbing K.G.'s buttocks to her genitals. Mr. Williams then digitally penetrated K.G.'s vagina for several minutes.

538. On the second and third occasions, Mr. Williams again found K.G. cleaning the bathroom area. Mr. Williams pulled out his penis and forced K.G. to masturbate his penis with her bare hand. Mr. Williams then digitally penetrated K.G.'s vagina. Mr. Williams was not wearing gloves when he digitally penetrated her vagina.

539. While Mr. Williams was sexually abusing K.G., he would laugh and say, "This is between you and me."

540. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

541. At the relevant times herein, Plaintiff K.G. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

542. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

543. At the time of the above-described sexual abuse of Plaintiff K.G., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

544. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of K.H.

545. When Plaintiff K.H was 15 years old and housed at JTDC, Mr. Toby, a guard, while acting in the course and scope of his employment and under the control of Cook County, sexually abused K.H. in 2001.

546. Mr. Toby was at all relevant times a black male, estimated to be in his 30s and approximately 6'1" to 6'2" in height. He was bald and had brown eyes. He weighed approximately 280 pounds. K.H. expects to learn the full name and identity of his abuser through the course of discovery.

547. On at least three occasions, Mr. Toby sexually abused K.H. in K.H. Mr. Toby supervised the residents at night. On evening, K.H. woke up in his bed to find Mr. Toby groping him over his underwear. Mr. Toby heard someone walking down the hallway, so he jumped up and left.

548. On the second occasion, Mr. Toby masturbated K.H.'s penis for approximately 10 minutes.

549. On the third occasion, K.H. was moved to an isolation room by the shower after he got into a fight. Mr. Toby grabbed K.H.'s penis and masturbated K.H.'s penis for approximately five minutes. Mr. Toby grabbed K.H.'s hand to force K.H. to touch his penis, but K.H. kept his hands balled up in fists.

550. Mr. Toby told K.H. nobody would believe him if he disclosed the sexual abuse as it was K.H.'s word against his word.

551. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

552. At the relevant times herein, Plaintiff K.H. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

553. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

554. At the time of the above-described sexual abuse of Plaintiff K.H., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

555. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of K.H. 2

556. When Plaintiff K.H. 2 was 14 years old and housed at JTDC, a guard (hereinafter “K.H. 2 Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused K.H. 2 in 2003.

557. K.H. 2 Abuser 1 was at all relevant times a black male, estimated to be 35 to 40 years old and approximately 6’2” in height. He had smooth curly black hair and brown eyes. K.H. 2 Abuser 1 wore black pants and shoes with a blue shirt. He also had facial hair and tattoos on his arms. K.H. 2 expects to learn the full name and identity of her abuser through the course of discovery.

558. On at least one occasion, K.H. 2 Abuser 1 sexually abused K.H. 2 in K.H. 2’s cell. K.H. 2 Abuser 1 entered K.H. 2’s cell. K.H. 2 Abuser 1 took his penis out and forced K.H. 2 to perform oral copulation on him. K.H. 2 Abuser 1 then performed oral copulation on K.H. 2 and digitally penetrated K.H. 2’s vagina. K.H. 2 Abuser 1 would kiss K.H. 2 and suck on her breasts. K.H. 2 Abuser 1 then penetrated K.H. 2’s vagina with his penis until he ejaculated onto the bed.

559. This sexual abuse was K.H. 2’s first sexual experience. K.H. 2 Abuser 1 threaten to physical abuse and/or kill K.H. 2 if she told anybody about the sexual abuse.

560. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

561. At the relevant times herein, Plaintiff K.H. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

562. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

563. At the time of the above-described sexual abuse of Plaintiff K.H. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

564. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of K.H. 3

565. When Plaintiff K.H. 3 was 16 years old and housed at JTDC, a guard (hereinafter “K.H. 3 Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused K.H. 3 in 2003.

566. K.H. 3 Abuser 1 was at all relevant times a black male, estimated to be in his mid-30s and approximately 5’10” in height. He had short black hair with an afro hairstyle and brown eyes. K.H. 3 expects to learn the full name and identity of his abuser through the course of discovery.

567. On at least five occasions, K.H. 3 Abuser 1 sexually abused K.H. 3 in K.H. 3’s cell. K.H. 3 Abuser 1 would enter K.H. 3’s room when he was asleep after the night count. K.H. 3 Abuser 1 would begin choking K.H. 3 and would threaten to kill K.H. 3 if he screamed. K.H. 3 Abuser 1 would force himself on top of K.H. 3 and penetrate K.H. 3’s anus with his penis.

568. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

569. At the relevant times herein, Plaintiff K.H. 3 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

570. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the

abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

571. At the time of the above-described sexual abuse of Plaintiff K.H. 3, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

572. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of K.R.

573. When Plaintiff K.R. was 13 years old and housed at JTDC, a guard (hereinafter "K.R. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused K.R. in 1997.

574. K.R. Abuser 1 was at all relevant times a black male, estimated to be in his 30s to 40s and approximately 6'0" in height. He had short black hair and dark brown eyes. He weighed approximately 210 pounds and had a mustache. K.R. expects to learn the full name and identity of his abuser through the course of discovery.

575. On at least one occasion, K.R. Abuser 1 sexually abused K.R. in K.R.'s cell during lock-up time. K.R. was in his cell when K.R. Abuser 1 came in and told K.R. to take his pants and shoes off. K.R. Abuser 1 instructed K.R. to put his pants and shoes by the door of the cell and patted K.R. down like he was doing a search. K.R. Abuser 1 then groped K.R.'s penis and digitally penetrated K.R.'s anus with his bare hands. When sexually abusing K.R., K.R. Abuser 1 asked K.R. if he liked it.

576. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

577. At the relevant times herein, Plaintiff K.R. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

578. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

579. At the time of the above-described sexual abuse of Plaintiff K.R., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff

members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

580. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of K.W.

581. When Plaintiff K.W. was 15 years old and housed at JTDC, a guard named Ms. Johnny, while acting in the course and scope of her employment and under the control of Cook County, sexually abused K.W. in 2005.

582. Ms. Johnny was at all relevant times a black female, estimated to be in her mid-20's and approximately 5'6" in height. She wore different wigs and had brown eyes. K.W. expects to learn the full name and identity of his abuser through the course of discovery.

583. On at least five occasions, Ms. Johnny sexually abused K.W. in K.W.'s cell on the third floor. Ms. Johnny would enter K.W.'s cell and grope his penis. Ms. Johnny would force K.W. to perform oral copulation until she reached orgasm. Ms. Johnny also forced K.W. to penetrate her vagina with his fingers.

584. Ms. Johnny bribed K.W. for his silence by providing him with marijuana and a lighter, food, and snacks. Ms. Johnny threatened to transfer K.W. into solitary confinement if he told anyone about the sexual abuse.

585. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

586. At the relevant times herein, Plaintiff K.W. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

587. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

588. At the time of the above-described sexual abuse of Plaintiff K.W., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

589. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of L.M.

590. When Plaintiff L.M. was 13 years old and housed at JTDC, Mr. Jeffery, while acting in the course and scope of his employment and under the control of Cook County, sexually abused L.M. in 2002.

591. Mr. Jeffery was at all relevant times a black male, estimated to be 35 to 45 years old and approximately 6'3" in height. He had black hair with an afro hairstyle and brown eyes. L.M. expects to learn the full name and identity of his abuser through the course of discovery.

592. On at least six occasions, Mr. Jeffery sexually abused L.M. in an office during the daytime. Mr. Jeffery typically escorted L.M. around the facility. Mr. Jeffery would take L.M. to an office and perform oral copulation on L.M. Mr. Jeffery would pull his pants down and force L.M. to masturbate his penis. The sexual abuse would last approximately 20 minutes.

593. When Mr. Jeffery was in the elevator with L.M, he would bribe L.M. for his silence by promising to reduce his sentence. Additionally, Mr. Jeffery threatened L.M. by stating L.M. would never be released from the facility if he told anyone about the sexual abuse.

594. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

595. At the relevant times herein, Plaintiff L.M. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

596. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

597. At the time of the above-described sexual abuse of Plaintiff L.M., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

598. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County

employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of L.P.

599. When Plaintiff L.P. was 13 years old and housed at JTDC, Officer James, while acting in the course and scope of his employment and under the control of Cook County, sexually abused L.P. in 1997.

600. Officer James was at all relevant times a black male, estimated to be in his late 40s and approximately 6'3" in height. He was bald and had brown eyes. He wore glasses and had tattoos. L.P. expects to learn the full name and identity of his abuser through the course of discovery.

601. On at least four occasions, Officer James sexually abused L.P. in the bathroom by the showers. Officer James would initially engage in causal touching with L.P. When L.P. got out of the shower, Officer James told L.P. that he must allow Officer James to perform oral copulation on him or he would be sent to the hold. Officer James then performed oral copulation on L.P. until L.P. ejaculated.

602. Officer James would bribe L.P. for his silence by giving him chicken and allowing L.P. to stay out later than the other juveniles.

603. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

604. At the relevant times herein, Plaintiff L.P. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

605. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

606. At the time of the above-described sexual abuse of Plaintiff L.P., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

607. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of L.S.

608. When Plaintiff L.S. was 13 years old and housed at JTDC, three guards (hereinafter “L.S. Abuser 1,” “L.S. Abuser 2,” and L.S. Abuser 3” unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County, sexually abused L.S. in 1998.

609. L.S. Abuser 1 was at all relevant times a black male, estimated to be in his mid-20s to 30s and approximately 6’3” in height. He had short black hair and tattoos all over his body and neck.

610. L.S. Abuser 2 was at all relevant times a muscular black male, estimated to be in his 30s and approximately 6’2” in height. He had black hair with a fade haircut.

611. L.S. Abuser 3 was at all relevant times a black male, estimated to be in his mid-20s to early 30s and approximately 5’10” in height. He was bald.

612. L.S. expects to learn the full name and identity of his abusers through the course of discovery.

613. On at least ten occasions, L.S. Abuser 1, L.S. Abuser 2 and L.S. Abuser 3 sexually abused L.S. all over the facility. The incidents of abuse would always occur in the middle of the night when L.S. was locked in his cell.

614. L.S. Abuser 1 would enter L.S.’s cell and take him to the bathroom. L.S. Abuser 2 and L.S. Abuser 3 would be waiting in the bathroom. L.S. Abuser 1 would hold L.S. down while L.S. Abuser 2 and L.S. Abuser 3 pulled his pants down. L.S. Abuser 1, L.S. Abuser 2 and L.S. Abuser 3 would masturbate L.S.’s penis. L.S. Abuser 1 tried to force his penis into L.S.’s mouth and anus, but L.S. would fight back. When L.S. didn’t cooperate, he would be physically assaulted. On at least one occasion, L.S. Abuser 1 masturbated himself and ejaculated onto L.S.’s body.

615. L.S. Abuser 1, L.S. Abuser 2, and L.S. Abuser 3 threatened to kill L.S. if he ever told anyone about the sexual abuse. They would also bribe L.S. for his silence by providing him with cigarettes.

616. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

617. At the relevant times herein, Plaintiff L.S. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

618. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

619. At the time of the above-described sexual abuse of Plaintiff L.S., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

620. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of L.T.

621. When Plaintiff L.T was 13 years old and housed at JTDC, Officer Martinez and a guard (hereinafter "L.T. Abuser 2" unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County, sexually abused L.T. in 2001.

622. Officer Martinez was at all relevant times a Hispanic male, estimated to be approximately 35 years old and approximately 6'0" in height. He had short black hair and brown eyes. He weighed approximately 240 to 260 pounds, and he had a goatee.

623. L.T. Abuser 2 was at all relevant times a white female, estimated to be in her 30s to 40s and approximately 6'2" in height. She had short blonde hair and brown eyes.

624. L.T expects to learn the full name and identity of his abusers through the course of discovery.

625. On at least five occasions, Officer Martinez sexually abused L.T. in the bathroom, hallway, and gym when they were alone together. Officer Martinez would instruct L.T. to get naked and would digitally penetrate L.T.'s anus. Officer Martinez would also penetrate L.T.'s anus with foreign objects such as mops and sticks. Martinez would also grab L.T.'s penis.

626. On at least five occasions, L.T. Abuser 2 sexually abused L.T. at the facility. L.T. Abuser 2 would digitally penetrate L.T.'s anus.

627. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

628. At the relevant times herein, Plaintiff L.T. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

629. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

630. At the time of the above-described sexual abuse of Plaintiff L.T., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

631. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting

Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of L.W.

632. When Plaintiff L.W. was 16 years old and housed at JTDC, Patricia Arthur, a teacher, while acting in the course and scope of her employment and under the control of Cook County, sexually abused L.W. in 2001.

633. Patricia Arthur was at all relevant times a black female, estimated to be in her mid-40s to 50s and approximately 5'3" in height. She had black hair that was styled in a ponytail or French braids. She wore glasses and had her ears pierced. L.W. expects to learn the full name and identity of his abuser through the course of discovery.

634. On at least five occasions, Patricia Arthur sexually abused L.W. in a bathroom inside the classroom. When L.W. entered the classroom, Patricia Arthur would pull L.W into the bathroom and manually stimulate L.W.'s penis with her hands. While Patricia Arthur was masturbating L.W.'s penis, she would force L.W. to suck on her breasts.

635. Patricia Arthur would threaten to extend L.W.'s sentence if he told anyone about the sexual abuse.

636. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and

Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

637. At the relevant times herein, Plaintiff L.W. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

638. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

639. At the time of the above-described sexual abuse of Plaintiff L.W., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

640. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to

make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of L.W. 2

641. When Plaintiff L.W. 2 was 14 years old and housed at JTDC, Officer Thomas and Officer Gamble, while acting in the course and scope of their employment and under the control of Cook County, sexually abused L.W. 2 in 2006.

642. Officer Thomas was at all relevant times a black female, estimated to be 25 to 30 years old and approximately 5'7" in height. She had short black hair and brown eyes. She weighed approximately 150 pounds and wore jewelry.

643. Officer Gamble was at all relevant times a black female, estimated to be in her mid-30s to 40s and approximately 5'7" in height. She had short black hair and hazel eyes. She weighed approximately 180 pounds and wore jewelry.

644. L.W. 2 expects to learn the full name and identity of his abusers through the course of discovery.

645. On at least one occasion, Officer Thomas sexually abused L.W. 2 in the shower area. While L.W. 2 was naked in the shower, Officer Thomas would masturbate L.W. 2's penis with her bare hands.

646. On at least four occasions, Officer Gamble sexually abused L.W. 2. Officer Gamble would tell L.W. 2 to get against the wall where there were no cameras. Officer Gamble forced L.W. 2 to take his penis out of his pants. Officer Gamble would then masturbate L.W. 2's penis with her bare hands.

647. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and

Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

648. At the relevant times herein, Plaintiff L.W. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

649. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

650. At the time of the above-described sexual abuse of Plaintiff L.W. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

651. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to

make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of M.A. 2

652. When Plaintiff M.A. 2 was 14 years old and housed at JTDC, a correctional officer (hereinafter “M.A. 2 Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused M.A. 2 in 1999.

653. M.A. 2 Abuser 1 was at all relevant times a black male, estimated to be in his mid-30s to 40s and approximately 5’7” to 5’9” in height. He was bald and had brown eyes. M.A. 2 expects to learn the full name and identity of his abuser through the course of discovery.

654. On at least four occasions, M.A. 2 Abuser 1 sexually abused M.A. 2 in M.A. 2’s cell. M.A. 2 Abuser 1 would instruct M.A. 2 to get naked. Once M.A. 2 was naked, M.A. 2 Abuser 1 would masturbate M.A. 2’s penis with his bare hand for over one minute.

655. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

656. At the relevant times herein, Plaintiff M.A. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

657. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of

known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

658. At the time of the above-described sexual abuse of Plaintiff M.A. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

659. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of M.B.

660. When Plaintiff M.B. was 12 years old and housed at JTDC, staff members (hereinafter "M.B. Abuser 1" and "M.B. Abuser 2" - collectively "M.B. Abusers" - unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County, sexually abused M.B. in 2000.

661. M.B. Abuser 1 was at all relevant times a black male, estimated to be in his mid-30s and approximately 5'10" in height. He had black hair and brown eyes. He typically wore baseball caps.

662. M.B. Abuser 2 was at all relevant times a white male, estimated to be in his 50s and approximately 6'0" in height. He was heavier set, weighing approximately 220 pounds.

663. M.B. expects to learn the full name and identity of his abusers through the course of discovery.

664. M.B. Abuser 1 sexually abused M.B. in his cell at night. M.B. was sleeping naked when M.B. Abuser 1 entered his cell. M.B. Abuser 1 masturbated M.B.'s penis. M.B. Abuser 1 then digitally penetrated M.B.'s anus.

665. M.B. Abuser 2 sexually abused M.B. in his cell at night, similarly to M.B. Abuser 1. M.B. was sleeping naked when M.B. Abuser 2 entered his cell. M.B. Abuser 2 masturbated M.B.'s penis. M.B. Abuser 2 then digitally penetrated M.B.'s anus.

666. M.B. experienced anal pain and anal tearing after M.B. Abusers sexually abused him. He sought medical attention, and he was treated with antibiotics and pain pills.

667. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

668. At the relevant times herein, Plaintiff M.B. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

669. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

670. At the time of the above-described sexual abuse of Plaintiff M.B., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

671. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of M.B. 2

672. When Plaintiff M.B. 2 was 15 years old and housed at JTDC, a guard (hereinafter “M.B. 2 Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused M.B. 2 in 2001.

673. M.B. 2 Abuser 1 was at all relevant times a black male, estimated to be in his 30s and approximately 5’7” in height. He had a receding hair line, black hair, and brown eyes. M.B. 2 expects to learn the full name and identity of his abuser through the course of discovery.

674. On at least two occasions, M.B. 2 Abuser 1 sexually abused M.B. 2 in the shower area. M.B. 2 Abuser 1 would wait for M.B. 2 in the shower. M.B. 2 Abuser 1 would then masturbate M.B. 2’s penis until his penis became erect. M.B. 2 would try to push M.B. 2 Abuser 1 away from him.

675. When M.B. 2 would push M.B. 2 Abuser 1 away, M.B. 2 Abuser 1 would tell M.B. 2 that he would not get his snack and he would be put back in his cell early.

676. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

677. At the relevant times herein, Plaintiff M.B. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

678. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of

known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

679. At the time of the above-described sexual abuse of Plaintiff M.B. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

680. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of M.F.

681. When Plaintiff M.F. was 13 years old and housed at JTDC, a guard (hereinafter "M.F. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused M.F. in 1998.

682. M.F. Abuser 1 was at all relevant times a black male, estimated to be in his 50s and approximately 6'3" in height. He had short salt and pepper hair and brown eyes. M.F. expects to learn the full name and identity of his abuser through the course of discovery.

683. On at least one occasion, M.F. Abuser 1 sexually abused M.F. in the facility at night. One evening, M.F. Abuser 1 selected M.F. to be the resident to help clean. M.F. Abuser 1 took M.F. to a place in the facility where there were no cameras. M.F. Abuser 1 forced M.F. to perform oral copulation on him. M.F. Abuser 1 then penetrated M.F.'s anus with his penis. M.F. Abuser 1 ejaculated into M.F.'s mouth.

684. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

685. At the relevant times herein, Plaintiff M.F. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

686. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

687. At the time of the above-described sexual abuse of Plaintiff M.F., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff

members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

688. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of M.N.

689. When Plaintiff M.N. was 11 years old and housed at JTDC, a guard (hereinafter "M.N. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused M.N. in 2004.

690. M.N. Abuser 1 was at all relevant times a black male, estimated to be in his early 40s and approximately 5'11" in height. He had short black hair and brown eyes. He weighed approximately 200 pounds and had a beard. M.N. expects to learn the full name and identity of his abuser through the course of discovery.

691. On at least one occasion, M.N. Abuser 1 sexually abused M.N. During the intake process M.N. Abuser 1 took M.N. into an unoccupied cell where it was dark. M.N. Abuser 1 told M.N. to get undressed. M.N. Abuser 1 then masturbated M.N.'s penis and digitally penetrated M.N.'s anus. M.N. Abuser 1 instructed M.N. to stand still and to not say anything.

692. M.N. Abuser 1 told M.N. that nobody would believe him if he told anyone about the sexual abuse.

693. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

694. At the relevant times herein, Plaintiff M.N. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

695. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

696. At the time of the above-described sexual abuse of Plaintiff M.N., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

697. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting

Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of M.T.

698. When Plaintiff M.T. was 16 years old and housed at JTDC, a guard (hereinafter “M.T. Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused M.T. in 2007.

699. M.T. Abuser 1 was at all relevant times a black male, estimated to be 45 to 55 years old and approximately 5’10” in height. He had grayish black hair and brown eyes. M.T. expects to learn the full name and identity of his abuser through the course of discovery.

700. On at least seven occasions, M.T. Abuser 1 sexually abused M.T. in the shower area. While M.T. was in the shower, M.T. Abuser 1 watched M.T. shower as M.T. Abuser 1 stroked his own penis. A couple days after this incident when M.T. was in the shower again, M.T. Abuser 1 walked in and grabbed M.T.’s penis. M.T. Abuser 1 masturbated M.T.’s penis for approximately two to three minutes. M.T. Abuser 1 masturbated M.T.’s penis on at least two occasions.

701. On at least five occasions, M.T. Abuser 1 entered the shower area with his pants unbuckled. M.T. Abuser 1 would grab M.T.’s hand and force M.T. to masturbate his penis until he ejaculated.

702. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

703. At the relevant times herein, Plaintiff M.T. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

704. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

705. At the time of the above-described sexual abuse of Plaintiff M.T., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

706. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County

employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of N.W.

707. When Plaintiff N.W. was 16 years old and housed at JTDC, a guard (hereinafter “N.W. Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused N.W. in 2002.

708. N.W. Abuser 1 was at all relevant times a white male, estimated to be in his 40s and approximately 6’0” in height. He had medium-length brown hair and brown eyes. N.W. expects to learn the full name and identity of his abuser through the course of discovery.

709. On at least one occasion, N.W. Abuser 1 sexually abused N.W. throughout the facility. N.W. Abuser 1 escorted N.W. to an isolated area in the facility where there were no cameras. N.W. Abuser 1 tried to kiss N.W. and forced N.W. to remove his clothes. N.W. Abuser 1 masturbated N.W.’s penis. N.W. Abuser 1 took out his own penis attempting to force N.W. to touch him. N.W. Abuser began masturbating his own penis while attempting to force N.W. to perform oral copulation on him. N.W. Abuser 1 also fondled N.W.’s buttocks attempted to digitally penetrate N.W.’s anus. The sexual abuse lasted approximately 30 to 40 minutes.

710. N.W. attempted to fight back as N.W. Abuser 1 was sexually abusing him. N.W. Abuser 1 put N.W. in a chokehold and pinned him against the wall.

711. N.W. Abuser 1 threatened to increase N.W.’s time at the facility and kill N.W. if N.W. told anyone about the sexual abuse.

712. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

713. At the relevant times herein, Plaintiff N.W. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

714. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

715. At the time of the above-described sexual abuse of Plaintiff N.W., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

716. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County

employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of P.B.

717. When Plaintiff P.B. was 13 years old and housed at JTDC, Ms. Grayson, a guard, while acting in the course and scope of her employment and under the control of Cook County, sexually abused P.B. in 2002.

718. Ms. Grayson was at all relevant times a black female, estimated to be in her early to mid-30s and approximately 5'5" in height. She changed her hair a lot, and she had brown eyes. P.B. expects to learn the full name and identity of her abuser through the course of discovery.

719. On at least two occasions, Ms. Grayson sexually abused P.B. in the bathroom. Ms. Grayson would enter the shower and masturbated P.B.'s penis. Ms. Grayson forced P.B. to fondle her breasts buttock and vagina. Ms. Grayson performed oral copulation on P.B.

720. Ms. Grayson would bribe P.B. for his silence by providing him with outside food and cigarettes.

721. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

722. At the relevant times herein, Plaintiff P.B. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

723. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

724. At the time of the above-described sexual abuse of Plaintiff L.S., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

725. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of P.C.

726. When Plaintiff P.C. was 16 years old and housed at JTDC, a floor manager (hereinafter “P.C. Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused P.C. in 2004.

727. P.C. Abuser 1 was at all relevant times a black male, estimated to be in his mid-20s to early 30s and approximately 5’9” in height. He had short black hair and brown eyes. P.C. expects to learn the full name and identity of his abuser through the course of discovery.

728. On at least two occasions, P.C. Abuser 1 sexually abused P.C. throughout the facility.

729. On one occasion, P.C. was locked in a back room when P.C. Abuser 1 came in and told P.C. to take off all his clothes. P.C. Abuser 1 digitally penetrated P.C.’s anus and fondled P.C.’s genitals. P.C. Abuser 1 then masturbated P.C.’s penis.

730. On the second occasion, P.C. was in the TV room and got into a fight. P.C. Abuser 1 took P.C. into a back room and took all the sheets and blankets. P.C Abuser 1 then performed oral copulation on P.C.

731. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

732. At the relevant times herein, Plaintiff P.C. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

733. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred,

and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

734. At the time of the above-described sexual abuse of Plaintiff P.C., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

735. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of P.S.

736. When Plaintiff P.S. was 16 years old and housed at JTDC, an officer known as "Mr. Big Stew," while acting in the course and scope of his employment and under the control of Cook County, sexually abused P.S. in 2005.

737. Mr. Big Stew was at all relevant times a black male, estimated to be in his 30s to 40s and approximately 6'3" to 6'4" in height. He was bald and had dark brown eyes. He weighed approximately 280 pounds and had a tattoo on his forearm. P.S. expects to learn the full name and identity of his abuser through the course of discovery.

738. On at least two occasions, Mr. Big Stew sexually abused P.S. in the shower area. Officer Big Stew would watch P.S. and approach P.S. while he was showering. Officer Big Stew would touch P.S.'s buttocks and digitally penetrate P.S.'s anus. Officer Big Stew would then grab P.S.'s penis and masturbate P.S.'s penis for approximately two to three minutes.

739. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

740. At the relevant times herein, Plaintiff P.S. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

741. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

742. At the time of the above-described sexual abuse of Plaintiff P.S., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

743. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of R.C.

744. When Plaintiff R.C was 14 years old and housed at JTDC, a guard (hereinafter "R.C. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and in the control of Cook County, sexually abused R.C. in 2005.

745. R.C. Abuser 1 was at all relevant times a white male, estimated to be in his 40s to 50s and approximately 5'10" to 6'2" in height. He had short black wavy hair and blue-green eyes. He had tribal tattoos on his right arm. R.C. expects to learn the full name and identity of his abuser through the course of discovery.

746. On at least six occasions, R.C. Abuser 1 sexually abused R.C. at the facility. During searches, R.C. Abuser 1 would begin touching R.C.'s genitals. R.C. Abuser 1 would masturbate R.C.'s penis. R.C. Abuser 1 would also digitally penetrate P.C.'s anus.

747. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

748. At the relevant times herein, Plaintiff R.C. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

749. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

750. At the time of the above-described sexual abuse of Plaintiff R.C., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

751. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of R.D.

752. When Plaintiff R.D. was 12 years old and housed at JTDC, an intake officer (hereinafter "R.D. Abuser 1" unless otherwise indicated), while acting in the course and scope of her employment and in the control of Cook County, sexually abused R.D. in 2007.

753. R.D. Abuser 1 was at all relevant times a Hispanic female, estimated to be in her early 30s and approximately 5'8" in height. She had long black curly hair and brown eyes. R.D. expects to learn the full name and identity of his abuser through the course of discovery.

754. On at least one occasion, R.D. Abuser 1 sexually abused R.D. in the receiving area. R.D. took a shower after passing admissions. When R.D. got out of the shower, R.D. Abuser 1 pulled R.D. aside. R.D. Abuser 1 then masturbated R.D.'s penis with her bare hands.

755. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

756. At the relevant times herein, Plaintiff R.D. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

757. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

758. At the time of the above-described sexual abuse of Plaintiff R.D., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

759. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of R.H.

760. When Plaintiff R.H. was 15 years old and housed at JTDC, a guard (hereinafter “R.H. Abuser 1” unless otherwise indicated), while acting in the course and scope of her employment and in the control of Cook County, sexually abused R.H. in 2003.

761. R.H. Abuser 1 was at all relevant times a black female, estimated to be in her late 40s and approximately 5’9” in height. She had black hair and brown eyes. R.H. expects to learn the full name and identity of her abuser through the course of discovery.

762. On at least three occasions, R.H. Abuser 1 sexually abused R.H. While the inmates were locked up, R.H. Abuser 1 would keep R.H. out and take him to the phone area. R.H. Abuser 1 would masturbate R.H.’s penis. R.H. Abuser 1 would then perform oral copulation on R.H. until he ejaculated into a towel. R.H. Abuser 1 forced R.H. to suck on her nipples.

763. R.H. Abuser 1 bribed R.H. for his silence by providing R.H. with outside snacks and food.

764. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

765. At the relevant times herein, Plaintiff R.H. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

766. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached

various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

767. At the time of the above-described sexual abuse of Plaintiff R.H., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

768. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of R.J.

769. When Plaintiff R.J. was 15 years old and housed at JTDC, a guard known as "Pops," while acting in the course and scope of his employment and in the control of Cook County, sexually abused R.J. in 1999.

770. Pops was at all relevant times a black male, estimated to be in his 50s and approximately 5'10" in height. He had grey hair and brown eyes. R.J. expects to learn the full name and identity of his abuser through the course of discovery.

771. On at least two occasions, R.J. Abuser 1 sexually abused R.J. in R.J.'s cell. Pops would enter R.J.'s cell and insert his bare hands into R.J.'s pants. Pops would masturbate R.J.'s penis with his bare hand.

772. Pops threatened to extend R.J.'s time at the facility if he told anyone about the sexual abuse. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Plaintiff R.J. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

773. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

774. At the relevant times herein, Plaintiff R.J. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

775. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the

abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

776. At the time of the above-described sexual abuse of Plaintiff R.J., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

777. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of R.M.

778. When Plaintiff R.M. was 17 years old and housed at JTDC, Ms. Cook, while acting in the course and scope of her employment and in the control of Cook County, sexually abused R.M. in 2003.

779. Ms. Cook was at all relevant times a black female, estimated to be in her 20s or 30s and approximately 6'2" in height. She was bald and had brown eyes. She weighed approximately 300 pounds. R.M. expects to learn the full name and identity of her abuser through the course of discovery.

780. On at least two occasions, Ms. Cook sexually abused R.M. in the shower. Ms. Cook would drag R.M. out of the shower. Ms. Cook fondled R.M.'s breasts and vagina with her bare hands.

781. R.M. was pregnant during the times Ms. Cook sexually abused her.

782. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

783. At the relevant times herein, Plaintiff R.M. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

784. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

785. At the time of the above-described sexual abuse of Plaintiff R.M., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

786. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of R.M. 2

787. When Plaintiff R.M. 2 was 16 years old and housed at JTDC, Guard Akadu, while acting in the course and scope of her employment and in the control of Cook County, sexually abused R.M. 2 in 2007.

788. Guard Akadu was at all relevant times a black female, estimated to be in her mid 20s to early 30s and approximately 5'8" in height. She had brown hair that she changed often. R.M. 2 expects to learn the full name and identity of his abuser through the course of discovery.

789. On at least three occasions, Guard Akadu sexually abused R.M. 2 in the showers. The juvenile inmates would go downstairs to attend school. When R.M. 2 would get into trouble, Guard Akadu would take R.M. 2 back upstairs into the shower area. Guard Akadu would pull R.M. 2 into the shower room. Guard Akadu would then force R.M. 2 to penetrate her vagina with his penis to have sexual intercourse.

790. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and

Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

791. At the relevant times herein, Plaintiff R.M. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

792. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

793. At the time of the above-described sexual abuse of Plaintiff R.M. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

794. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to

make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of R.R.

795. When Plaintiff R.R. was 13 years old and housed at JTDC, a guard named Mr. Brown, while acting in the course and scope of his employment and in the control of Cook County, sexually abused R.R. in 2004.

796. Mr. Brown was at all relevant times a black male, estimated to be in his late 40s and approximately 6'0" in height. He had a fade haircut and brown eyes. R.R. expects to learn the full name and identity of his abuser through the course of discovery.

797. On at least five occasions, Mr. Brown sexually abused R.R. in the classroom area. Mr. Brown would walk R.R. to the classroom area where they could be alone. While alone, Mr. Brown would fondle R.R.'s penis. Mr. Brown would tell R.R. that it was "procedure" when fondling R.R.'s penis.

798. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

799. At the relevant times herein, Plaintiff R.R. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

800. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached

various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

801. At the time of the above-described sexual abuse of Plaintiff R.R., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

802. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of S.G.

803. When Plaintiff S.G. was 14 years old and housed at JTDC, a security officer (hereinafter "S.G. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and in the control of Cook County, sexually abused S.G. in 2002.

804. S.G. Abuser 1 was at all relevant times a black male, estimated to be in his 40s and approximately 6'0" in height. He had black hair and brown eyes. S.G. expects to learn the full name and identity of his abuser through the course of discovery.

805. On at least two occasions, S.G. Abuser 1 sexually abused S.G. in S.G.'s cell. S.G. Abuser 1 would enter S.G.'s cell and force S.G. to remove all his clothing for a strip search. S.G. Abuser 1 would then fondle S.G.'s penis and buttocks.

806. These strip searches were conducted upon S.G. without individualized, reasonable suspicion, nor compliance with the constitutions, laws, and regulations of both the United States and the State of Illinois. These searches were a pretext for sexual abuse.

807. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

808. At the relevant times herein, Plaintiff S.G. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

809. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

810. At the time of the above-described sexual abuse of Plaintiff S.G., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

811. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of S.K.

812. When Plaintiff S.K. was 13 years old and housed at JTDC, guards (hereinafter "S.K. Abuser 1", "S.K. Abuser 2", and "S.K. Abuser 3" unless otherwise indicated), while acting in the course and scope of their employment and in the control of Cook County, sexually abused S.K. in 1997.

813. S.K. Abuser 1 was at all relevant times a black male, estimated to be in his late 40s and approximately 5'7" in height. He had long braids and brown eyes. He weighed approximately 290 pounds, and he had a beard and mustache.

814. S.K. Abuser 2 was at all relevant times a black male, estimated to be in his late 20s and approximately 6'0" in height. He had short brown-red curly hair and hazel brown eyes.

815. S.K. Abuser 3 was at all relevant times a white male, estimated to be in his late 50s to early 60s and approximately 5'0" in height. He had a receding hairline with white and grey hair.

816. S.K. expects to learn the full name and identity of her abusers through the course of discovery.

817. On at least one occasion, S.K. Abuser 1 sexually abused S.K. S.K. Abuser 1 was taking S.K. to another wing at the facility for a phone call. S.K. Abuser 1 then told S.K. he could cut her time short if she provided sexual favors. S.K. Abuser 1 pulled out his penis and began to masturbate himself until he ejaculated on S.K.'s skin and clothing. S.K. Abuser 1 then forced S.K. to masturbate his penis. S.K. Abuser 1 tried forcing S.K. to perform oral copulation on him, but S.K. kicked him in the stomach. S.K. Abuser 1 locked S.K. up in solitary confinement and threatened to kill S.K. if she told anyone about the sexual abuse.

818. On at least one occasion, S.K. Abuser 2 sexually abused S.K. S.K. was sitting against a wall in a dark room when S.K. Abuser 2 started making sexual remarks towards S.K. and the other juvenile inmates in the area. S.K. Abuser 2 then forced S.K. and three other juvenile inmates to perform sexual acts on each other. S.K. Abuser 2 then penetrated S.K.'s vagina without a condom. S.K. became pregnant from the sexual abuse. Abuser 2, and she was forced to have an abortion approximately seven to nine weeks after being sexually abused. S.K. Abuser 1 threatened to hurt S.K.'s family and loved ones if she ever told anyone about the sexual abuse.

819. On at least one occasion, S.K. Abuser 3 sexually abused S.K. while she was undergoing a routine check-up for her pregnancy. S.K. Abuser 3 inserted his fingers into S.K.'s vagina with gloves. S.K. Abuser 3 then removed his gloves, put gel on his bare hand and re-inserted his finger into S.K.'s vagina. S.K. Abuser 3 digitally penetrated S.K.'s vagina for approximately ten minutes.

820. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

821. At the relevant times herein, Plaintiff S.K. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

822. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

823. At the time of the above-described sexual abuse of Plaintiff S.K., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

824. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County

employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of S.M. 2

825. When Plaintiff S.M. 2 was 14 years old and housed at JTDC, a guard (hereinafter “S.M. 2 Abuser 1” unless otherwise indicated), while acting in the course and scope of her employment and in the control of Cook County, sexually abused S.M. 2 in 2005.

826. S.M. 2 Abuser 1 was at all relevant times a black female, estimated to be 35 years old and approximately 5’8” in height. She had black hair and brown eyes. S.M. 2 expects to learn the full name and identity of her abuser through the course of discovery.

827. On at least two occasions, S.M. 2 Abuser 1 sexually abused S.M. 2 in S.M. 2’s cell. S.M. 2 Abuser 1 entered S.M. 2’s cell and put her hands inside S.M. 2’s underwear. S.M. 2 Abuser 1 would then fondle S.M.’s vagina before digitally penetrating S.M. 2’s vagina for approximately five to ten minutes.

828. S.M. 2 Abuser 1 threatened to take S.M. 2’s life if she ever told anyone about the sexual abuse. S.M. 2 Abuser 1 also told S.M. 2, “You listen to me and only me.”

829. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

830. At the relevant times herein, Plaintiff S.M. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

831. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

832. At the time of the above-described sexual abuse of Plaintiff S.M. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

833. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of S.M. 3

834. When Plaintiff S.M. 3 was 15 years old and housed at JTDC, Stacy McDaniel, while acting in the course and scope of her employment and in the control of Cook County, sexually abused S.M. 2 in 2003.

835. Stacy McDaniel was at all relevant times a black female, estimated to be in her mid-30s to 40s and approximately 5'9" in height. She had long black hair that she wore in braids and brown eyes. She weighed approximately 190 pounds and had a tattoo. S.M. 3 expects to learn the full name and identity of his abuser through the course of discovery.

836. While at the facility, Stacy McDaniel told S.M. 2 that she wanted S.M. 3 to perform oral copulation on her. S.M. 3 caught Ms. McDaniel looking at his body multiple times when he was showering in the unit. One day, Stacy McDaniel walked by S.M. 3 and instructed him to smell her hand after she touched her vagina.

837. On at least ten occasions, sexually abused S.M. 3. Stacy McDaniel would force S.M. 3 to perform oral copulation on her. Stacy McDaniel would also perform oral copulation on S.M. 3. On at least one occasion, Stacy McDaniel forced S.M. 3 to penetrate her vagina with his penis. The sexual intercourse did not last long as it became too loud.

838. Stacy McDaniel's would bribe S.M. 3 for his silence by providing him with outside food and clothing. Stacy McDaniel also gave S.M. 3 access to her phone. Stacy McDaniel told S.M. 3 not to tell anyone about the sexual abuse.

839. Stacy McDaniel would write letters to S.M. 3. When the letters were found by a warden at IYC – Chicago, S.M. 3 denied anything occurred between him and Stacy McDaniel because he was scared he would get into trouble.

840. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

841. At the relevant times herein, Plaintiff S.M. 3 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

842. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

843. At the time of the above-described sexual abuse of Plaintiff S.M. 3, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

844. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County

employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of S.R.

845. When Plaintiff S.R. was 13 years old and housed at JTDC, Guard Anthony, while acting in the course and scope of his employment and under the control of Cook County, sexually abused S.R. in 2001.

846. Guard Anthony was at all relevant times a black male, estimated to be in his 40s and approximately 6'0" in height. He was bald and had brown eyes. He had a goatee that was salt and pepper in color. S.R. expects to learn the full name and identity of his abuser through the course of discovery.

847. On at least three occasions, Guard Anthony sexually abused S.R. in the holding cell. Mr. Anthony would push S.R. against the wall, tear his jumpsuit off and force S.R. to get on his knees. Mr. Anthony would then force S.R. to perform oral copulation on him. On at least two occasions, Mr. Anthony penetrated S.R.'s anus with his penis.

848. After Mr. Anthony penetrated S.R.'s anus with his penis, S.R. could not eat anything for the day because he was extremely traumatized. S.R. experienced bleeding from his anus from the sexual abuse. and his anus was bleeding.

849. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

850. At the relevant times herein, Plaintiff S.R. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

851. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

852. At the time of the above-described sexual abuse of Plaintiff S.R., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

853. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of S.R. 2

854. When Plaintiff S.R. 2 was 13 years old and housed at JTDC, a guard (hereinafter “S.R. 2 Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused S.R. 2 in 1998.

855. S.R. 2 Abuser 1 was at all relevant times a black male, estimated to be in his 40s to 50s and approximately 5’9” in height. He had black curly hair and dark brown eyes. He weighed approximately 190 pounds and wore glasses. S.R. 2 expects to learn the full name and identity of her abuser through the course of discovery.

856. On at least four occasions, S.R. 2 Abuser 1 sexually abused S.R. 2 in S.R. 2’s unit. While S.R. 2 was in the bathroom, S.R. 2 Abuser 1 would enter and lift up S.R. 2’s shirt. S.R. 2 Abuser 1 would then rub and fondle S.R. 2’s bare breasts with his bare hands. S.R. Abuser 1 would lick S.R. 2’s neck while rubbing and fondling S.R. 2’s breasts.

857. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

858. At the relevant times herein, Plaintiff S.R. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

859. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of

known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

860. At the time of the above-described sexual abuse of Plaintiff S.R. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

861. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of S.W.

862. When Plaintiff S.W. was 11 years old and housed at JTDC, a staff member (hereinafter "S.W. Abuser 1" unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County, sexually abused S.W. in 1992.

863. S.W. Abuser 1 was at all relevant times a black female, estimated to be in her early to mid-40s and approximately 6'0" in height. She wore a wig at all times and had dark brown eyes. S.W. expects to learn the full name and identity of her abuser through the course of discovery.

864. On at least three occasions, S.W. Abuser 1 sexually abused S.W. in the bathroom. S.W. Abuser 1 would accuse S.W. of having contraband in her vagina to perform a strip search. S.W. Abuser 1 would then digitally penetrate S.W.'s vagina for approximately one minute. This occurred three times at night in the bathroom.

865. These strip searches were conducted upon S.W. without individualized, reasonable suspicion, nor compliance with the constitutions, laws, and regulations of both the United States and the State of Illinois. These searches were a pretext for sexual abuse.

866. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

867. At the relevant times herein, Plaintiff S.W. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

868. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

869. At the time of the above-described sexual abuse of Plaintiff S.W., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and

belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

870. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of T.D. 2

871. When Plaintiff T.D. 2 was 14 years old and housed at JTDC, a guard (hereinafter "T.D. 2 Abuser 1" unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County, sexually abused T.D. 2 in 2003.

872. T.D. 2 Abuser 1 was at all relevant times a black female, estimated to be in her late 20s and approximately 5'8" in height. She had black hair that she wore in dreadlocks and brown eyes. T.D. 2 expects to learn the full name and identity of her abuser through the course of discovery.

873. On at least seventy-five occasions, T.D. 2 Abuser 1 sexually abused T.D. 2 at the facility during T.D. 2's three stays. T.D. 2 would shower approximately two to three times per week. T.D. 2 Abuser 1 would corner T.D. 2 in the shower or wherever T.D. 2 was alone. T.D. 2

Abuser 1 would then digitally penetrate T.D. 2's vagina and fondle T.D. 2's breasts for approximately five to ten minutes.

874. T.D. 2 Abuser 1 would threaten T.D. 2 by saying if T.D. 2 everyone told anyone about the abuse, T.D. 2 would not be able to go to church, school, or the outside. T.D. 2 Abuser 1 also threatened to extend T.D. 2's stay at the facility if she ever told anyone about the sexual abuse.

875. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

876. At the relevant times herein, Plaintiff T.D. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

877. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

878. At the time of the above-described sexual abuse of Plaintiff T.D. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff

members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

879. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of T.F.

880. When Plaintiff T.F. was 14 years old and housed at JTDC, a guard (hereinafter "T.F. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused T.F. in 1997.

881. T.F. Abuser 1 was at all relevant times a Hispanic male, estimated to be approximately 35 years old and approximately 5'5" in height. He had short black hair and brown eyes. He had tattoos. T.F. expects to learn the full name and identity of his abuser through the course of discovery.

882. On at least one occasion, T.F. Abuser 1 sexually abused T.F. in T.F.'s cell. One evening, T.F. Abuser 1 entered T.F.'s cell to provide him with toilet paper. T.F. Abuser 1 started groping T.F.'s penis and then masturbate T.F.'s penis. T.F. ejaculated onto his pants and onto T.F. Abuser 1's hands. T.F. Abuser 1 then forced T.F. to masturbate his penis.

883. T.F. Abuser 1 threatened to extend T.F.'s sentence if he told anyone about the sexual abuse.

884. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

885. At the relevant times herein, Plaintiff T.F. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

886. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

887. At the time of the above-described sexual abuse of Plaintiff T.F, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

888. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting

Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of T.M.

889. When Plaintiff T.M. was 16 years old and housed at JTDC, a guard (hereinafter “T.M. Abuser 1” unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County, sexually abused T.M. in 2007.

890. T.M. Abuser 1 was at all relevant times a white female, estimated to be in her 30s and approximately 5’6” in height. She had dark wavy hair. T.M. expects to learn the full name and identity of her abuser through the course of discovery.

891. On at least one occasion, T.M. Abuser 1 sexually abused T.M. in the day room. T.M. Abuser 1 called T.M. out of her room and took T.M. to a closet for a strip search. While alone in the closet, T.M. Abuser 1 fondled T.M.’s buttocks and vagina with his bare hands. T.M. Abuser 1 spread T.M.’s labia with a flashlight and digitally penetrated T.M.’s vagina for approximately five minutes. T.M. told T.M. Abuser 1 that the way T.M. Abuser 1 was touching her did not feel right.

892. These strip searches were conducted upon T.M. without individualized, reasonable suspicion, nor compliance with the constitutions, laws, and regulations of both the United States and the State of Illinois. These searches were a pretext for sexual abuse.

893. T.M. Abuser 1 threatened to extend T.M.'s stay at the facility if she told anyone about the sexual abuse.

894. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

895. At the relevant times herein, Plaintiff T.M. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

896. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

897. At the time of the above-described sexual abuse of Plaintiff T.M., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

898. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting

Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of T.N

899. When Plaintiff T.N was 16 years old and housed at JTDC, Jaquelyn, while acting in the course and scope of her employment and under the control of Cook County, sexually abused T.N. in 2005.

900. Jaquelyn was at all relevant times a black female, estimated to be in her mid-40s and approximately 5'9" in height. She had long black hair and wore colored contacts. She had an eyebrow piercing and wore a lot of makeup. T.N. expects to learn the full name and identity of his abuser through the course of discovery.

901. On at least eleven occasions, Jaquelyn sexually abused T.N. throughout the facility. Jaquelyn would come into the room, close the doors, and perform oral copulation on T.N for approximately two to three minutes. T.N. would ejaculate into Jaquelyn's mouth. Jaquelyn would also perform oral copulation on T.N. in her office.

902. Jaquelyn would also force T.N. to penetrate her vagina with his penis when they were in the bathroom or shower area.

903. On at least one occasion, Jaquelyn was transporting T.N. in the van. While Jaquelyn was driving, she forced T.N. to digitally penetrate her vagina. Jaquelyn also forced T.N. to penetrate her vagina with his penis while they were in the van.

904. Jaquelyn bribed T.N. for his silence by providing him with extra food, snacks and cigarettes. Jaquelyn also took T.N. on extra outings outside the facility

905. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

906. At the relevant times herein, Plaintiff T.N. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

907. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

908. At the time of the above-described sexual abuse of Plaintiff T.N., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

909. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting

Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of T.W. 3

910. When Plaintiff T.W. 3 was 14 years old and housed at JTDC, a guard (hereinafter “T.W. 3 Abuser 1” unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County, sexually abused T.W. 3 in 2002.

911. T.W. 3 Abuser 1 was at all relevant times a Hispanic female, estimated to be in her late 30s to early 40s and approximately 5’6” in height. She had long dark red hair and blue eyes. T.W. 3 expects to learn the full name and identity of his abuser through the course of discovery.

912. On at least four occasions, T.W. 3 Abuser 1 sexually abused T.W. 3 while they were alone. T.W. 3 Abuser 1 would touch T.W. 3’s penis with her bare hand while choking T.W. 3 with her other hand. T.W. 3 Abuser 1 would masturbate T.W. 3’s penis. Three instances of sexual abuse occurred in the shower, and one instance of sexual abuse occurred in T.W. 3’s cell.

913. T.W. 3 Abuser 1 would threaten T.W. 3 stating that bad things would happen if he told anyone about the sexual abuse.

914. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

915. At the relevant times herein, Plaintiff T.W. 3 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

916. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

917. At the time of the above-described sexual abuse of Plaintiff T.W. 3, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

918. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of T.W. 4

919. When Plaintiff T.W. 4 was 14 years old and housed at JTDC, Officer Kelly, while acting in the course and scope of her employment and under the control of Cook County, sexually abused T.W. 4 in 2007.

920. Officer Kelly was at all relevant times a white female, estimated to be in her early to mid-20s and approximately 5'7" in height. She had dirty blonde hair that she wore in a ponytail and blue eyes. T.W. 4 expects to learn the full name and identity of his abuser through the course of discovery.

921. On at least one occasion, Officer Kelly sexually abused T.W. 4 in the shower. T.W. 4 was in the shower and asked Officer Kelly if she could get him a towel. When Officer Kelly brought T.W. 4 a towel, she started masturbating T.W. 4's penis for approximately 30 seconds. Officer Kelly then performed oral copulation on T.W. 4. Officer Kelly also forced T.W. 4 to digitally penetrate her vagina.

922. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

923. At the relevant times herein, Plaintiff T.W. 4 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

924. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached

various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

925. At the time of the above-described sexual abuse of Plaintiff T.W. 4, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

926. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of W.K.

927. When Plaintiff W.K. was 16 years old and housed at JTDC, Mr. Wesley and Mr. Collier, while acting in the course and scope of their employment and under the control of Cook County, sexually abused W.K. in 2003.

928. Mr. Wesley was at all relevant times a black male, estimated to be in his mid-30s to 40s and approximately 5'5" in height. He had short black hair with waves and brown eyes. He had a mustache and goatee.

929. Mr. Collier was at all relevant times a black male, estimated to be in his mid-20s to 30s and approximately 6'3" to 6'6" in height. He was bald and had brown eyes. He had a goatee.

930. W.K. expects to learn the full name and identity of his abusers through the course of discovery.

931. On at least one occasion, Mr. Wesley sexually abused W.K. in unit 5G. Mr. Wesley entered W.K.'s cell and performed oral copulation on W.K. for approximately five minutes. After sexually abusing W.K., Mr. Wesley bribed W.K. for his silence by giving him extra food.

932. On at least three occasions, Mr. Collier sexually abused W.K. in unit 5G. Mr. Collier would enter W.K.'s cell, pull W.K.'s pants down, and grab W.K. by the back of the head. Mr. Collier would then force W.K. to perform oral copulation on him for approximately five minutes. Mr. Collier would give W.K. a cigarette after sexually abusing him before leaving W.K.'s cell.

933. The above-described sexual abuse and/or acts perpetrated by these staff members were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

934. At the relevant times herein, Plaintiff W.K. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

935. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

936. At the time of the above-described sexual abuse of Plaintiff W.K., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

937. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of W.M

938. When Plaintiff W.M. was 14 years old and housed at JTDC, a guard (hereinafter “W.M. Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused W.M. in 1999.

939. W.M. Abuser 1 was at all relevant times a black male, estimated to be in his mid-20s to 30s and approximately 5’5” in height. He had short black hair and brown eyes. W.M. expects to learn the full name and identity of his abuser through the course of discovery.

940. On at least four occasions, W.M. Abuser 1 sexually abused W.M. in W.M.’s cell. On one occasion, W.M. Abuser 1 entered W.M.’s cell and put his hand under W.M.’s pants to grope his penis. W.M. Abuser 1 pulled down his pants and forced W.M. to perform oral copulation on him until he ejaculated into W.M.’s mouth. On another occasion, W.M. Abuser 1 entered the cell and started masturbating W.M.’s penis and attempted to penetrate W.M.’s anus with his penis.

941. W.M. Abuser 1 bribed W.M. for his silence by giving W.M. food from outside restaurants. W.M. Abuser 1 also threatened to extend W.M.’s sentence, meaning he would never go home, if W.M. told anyone about the sexual abuse.

942. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

943. At the relevant times herein, Plaintiff W.M. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

944. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred,

and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

945. At the time of the above-described sexual abuse of Plaintiff W.M., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

946. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of R.R. 2

947. When Plaintiff R.R. 2 was 13 years old and housed at JTDC, a guard named Mr. Brown, while acting in the course and scope of his employment and under the control of Cook County, sexually abused R.R. 2 in 2004.

948. Mr. Brown was at all relevant times a black male, estimated to be in his late 40s and approximately 6'0" in height. He had a fade haircut and brown eyes. R.R. 2 expects to learn the full name and identity of his abuser through the course of discovery.

949. On at least five occasions, Mr. Brown sexually abused R.R. 2. Mr. Brown would make R.R. 2 walk to class separately from the other juvenile inmates. Mr. Brown would accuse R.R. 2 of having contraband on him. Mr. Brown would then fondle R.R. 2's penis underneath his clothing.

950. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

951. At the relevant times herein, Plaintiff R.R. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

952. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

953. At the time of the above-described sexual abuse of Plaintiff R.R. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and

belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

954. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of N.H.

955. When Plaintiff N.H. was 16 years old and housed at JTDC, Officer Funches, while acting in the course and scope of his employment and under the control of Cook County, sexually abused N.H. in 2000.

956. Officer Funches was at all relevant times a black male, estimated to be in his 40s and approximately 5'7" in height. He had black hair with a fade haircut, brown eyes, and a goatee. N.H. expects to learn the full name and identity of her abuser through the course of discovery.

957. On at least five occasions, Officer Funches sexually abused N.H.

958. On at least one occasion, Officer Funches entered N.H.'s cell when she was in solitary confinement. Officer Funches would force N.H. to perform oral copulation on him. Officer Funches would then perform oral copulation on N.H. and penetrate N.H.'s vagina with his penis.

959. On at least one other occasion, Officer Funches sexually abused N.H. during shower time at night. Officer Funches would force N.H. to perform oral copulation on him. Officer Funches would also penetrate N.H.'s vagina with his penis.

960. N.H. told a warden about Officer Funches sexually abusing her. The warden threatened to move N.H. to another facility far away from her family if N.H. did not keep quiet about the sexual abuse.

961. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

962. At the relevant times herein, Plaintiff N.H. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

963. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

964. At the time of the above-described sexual abuse of Plaintiff N.H., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff

members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

965. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of J.T.

966. When Plaintiff J.T. was 14 years old and housed at JTDC, Officer Robinson, while acting in the course and scope of his employment and under the control of Cook County, sexually abused J.T. in 2005.

967. Officer Robinson was at all relevant times a white male, estimated to be in his early 20s and approximately 5'8" in height. He had short blonde hair and hazel eyes. He had tribal tattoos on his arms. J.T. expects to learn the full name and identity of her abuser through the course of discovery.

968. On at least four occasions, Officer Robinson sexually abused J.T. When J.T. first arrived at the facility, Officer Robinson was flirtatious towards J.T. On at least two occasions, Officer Robinson called J.T. into a backroom in a classroom at night stating J.T. did something wrong. Officer Robinson locked the door, unbuckled and unzipped his pants, and told J.T. to "come suck my dick." Officer Robinson told J.T. he would make J.T.'s time at the facility easier. Officer

Robinson forced J.T. to perform oral copulation on him for approximately ten minutes. Officer Robinson ejaculated into J.T.'s mouth.

969. On at least two occasions, Officer Robinson forced J.T. to perform oral copulation on him in her cell after the lights were out.

970. Officer Robinson would tell J.T. he would take care of her if she did not tell anyone about the sexual abuse. Officer Robinson bribed J.T. for her silence by giving her chips, soda, pickles, and other snacks.

971. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

972. At the relevant times herein, Plaintiff J.T. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

973. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

974. At the time of the above-described sexual abuse of Plaintiff J.T., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and

belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

975. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of J.B. 4

976. When Plaintiff J.B. 4 was 16 years old and housed at JTDC, a guard (hereinafter "J.B. 4 Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused J.B. 4 in 2006.

977. J.B. 4 Abuser 1 was at all relevant times a black male, estimated to be in his mid-30s and approximately 6'0" in height. He had short black hair and brown eyes. J.B. 4 expects to learn the full name and identity of his abuser through the course of discovery.

978. On at least four occasions, J.B. 4 Abuser 1 sexually abused J.B. 4 in the bathroom. While in the bathroom alone, J.B. 4 Abuser 1 would remove J.B. 4's clothes. J.B. 4 Abuser 1 would pull down his own pants and expose his own penis. J.B. 4 Abuser 1 would then force J.B. 4 to masturbate his penis until he ejaculated onto the floor. While J.B. 4 was masturbating J.B. 4 Abuser

1's penis, J.B. 4 Abuser 1 would grab and grope J.B. 4's buttocks and penis. The sexual abuse in the bathroom would last approximately ten minutes.

979. On at least one other occasion, J.B. 4 Abuser 1 forced J.B. 4 to perform oral copulation on him until J.B. 4 Abuser 1 ejaculated onto the floor.

980. J.B. 4 Abuser 1 threatened to extend J.B. 4's time at the facility and to stop family visits if J.B. 4 ever told anyone about the sexual abuse. J.B. 4 Abuser 1 also bribed J.B. 4 for his silence by providing J.B. 4 with snacks and allowing J.B. 4 to have a radio in his room.

981. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

982. At the relevant times herein, Plaintiff J.B. 4 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

983. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

984. At the time of the above-described sexual abuse of Plaintiff J.B. 4, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and

belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

985. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of T.M. 2

986. When Plaintiff T.M. 2 was 16 years old and housed at JTDC, a correctional officer (hereinafter "T.M. 2 Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused T.M. 2 in 2006.

987. T.M. 2 Abuser 1 was at all relevant times a black male, estimated to be in his 40s and approximately 6'1" in height. He was bald with dark eyes. T.M. 2 expects to learn the full name and identity of her abuser through the course of discovery.

988. On at least one occasion, T.M. 2 Abuser 1 sexually abused T.M. 2 in T.M. 2's cell. While alone in T.M. 2's cell, T.M. 2 Abuser 1 grabbed T.M. 2's buttocks underneath her clothing. T.M. 2 Abuser 1 then worked his way up T.M. 2's thigh and began touching T.M. 2's vagina. T.M. 2 Abuser 1 digitally penetrated T.M. 2's vagina. T.M. 2 Abuser 1 repeatedly smacked T.M. 2 in the head when T.M. 2 refused to allow him to continue touching her.

989. After sexually abusing T.M. 2, T.M. 2 Abuser 1 told T.M. 2 not to tell anyone about the sexual abuse.

990. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

991. At the relevant times herein, Plaintiff T.M. 2 was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

992. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

993. At the time of the above-described sexual abuse of Plaintiff T.M. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

994. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting

Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

Sexual Abuse of A.M.

995. When Plaintiff A.M. was 16 years old and housed at JTDC, four Youth Development Specialists named Alphonso Ward, Timothy Williams, Michael Washington, and Ms. Sterling, while acting in the course and scope of their employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County,, sexually abused A.M. from November of 2011 to November of 2012.

996. Alphonso Ward was at all relevant times a black male estimated to be in his early to mid 50s and approximately 6'0 to 6'1 in height. He had a short afro and gray-and-black facial hair. He worked the morning shift.

997. Timothy Williams was at all relevant times a heavy-set black male estimated to be in his late 50s to early 60s and approximately 5'10 and 5'11 in height. He wore glasses, had a deep, raspy voice, and walked with a limp due to an injured right leg. He worked the morning shift.

998. Michael Washington was at all relevant times a black male of above-average height estimated to be in his mid 30s to early 40s. He was bald and had full facial hair. He worked second shift.

999. Ms. Sterling was at all relevant times a black female estimated to be in her mid 20s to early 30s and approximately 5'6 to 5'7 in height. She was very heavy-set, wore glasses, and had

a high-pitched voice. She worked second shift. A.M. expects to learn the full name and identity of his abuser through the course of discovery.

1000. A few months into A.M.'s stay at JTDC in approximately January or February of 2012, Ward brought breakfast to A.M. early and said that he was taking his shower by himself before the other youths. He escorted him to the bathroom, stared at his body while he took a shower, then escorted him back to his cell. Once they returned to the cell, Ward started to make sexual comments towards the Plaintiff. A.M. felt uncomfortable and tried to leave, but Ward blocked the cell door and forcibly pushed him onto his bed. He then masturbated A.M., digitally penetrated him, and raped him. Immediately after the abuse, he brought him outside food and said not to tell anybody about the incident. After this incident, Ward regularly made sexual comments towards A.M. and gave him extra privileges, such as extra recreational time and outside food. He frequently threatened to take away these extra privileges and send him to confinement if he ever disclosed the abuse.

1001. A few weeks after the incident with Ward, Williams brought A.M. breakfast early and waited by his cell until the other youths were let out for school. Williams pulled A.M. aside and said that he needed him to clean around the housing unit. As A.M. cleaned, Williams made sexual comments towards him, and stated that he heard about the incident of sex abuse with Ward and asked why Ward was "so special." Williams then brought A.M. back to his cell, where he forcibly digitally penetrated and raped him. Williams sexually abused A.M. in this manner two more times after this incident. He gave A.M. several gifts and special privileges, such as outside food, a radio, and a watch, and he threatened to take away these privileges if he ever disclosed the abuse.

1002. A few months after the incident with Williams, A.M. entered the bathroom within the gym and Washington followed him inside. He said that he heard about the incidents of sex abuse with Ward and Williams, and that he wanted the “same experience” with the Plaintiff. A.M. became frightened and tried to leave the bathroom, but A.M. blocked the entrance and pushed him to the ground. He demanded oral copulation, but A.M. refused, so he pulled down A.M.’s pants and forcefully digitally penetrated him. After the abuse, he frequently made sexual comments towards A.M. and gave him extra privileges, such as extra recreational time and outside food. He often threatened to take away these privileges if A.M. ever disclosed the abuse.

1003. A few months after the incident with Washington, A.M. was leaving his cell for recreational time when Sterling pulled him aside to discuss an alleged disciplinary incident. She then made sexual comments towards A.M. and implied that she heard about the incident of sex abuse with Washington. A.M. became uncomfortable and asked to return to his cell so he could nap, and Sterling responded that he could “go to sleep when you’re done with me.” She brought him to his cell, where she forced him to administer oral copulation on her. After this incident, A.M. warned other youths about Sterling’s sexually abusive behavior. When she learned of this, she revoked his recreational time and commissary items. For the remainder of his sentence, she frequently sent him to confinement for several days at a time over very minor infractions as further punishment for disclosing the sexual abuse.

1004. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1005. At the relevant times herein, Plaintiff A.M. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1006. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1007. At the time of the above-described sexual abuse of Plaintiff A.M., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1008. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of D.J.

1009. When Plaintiff D.J. was 15 or 16 years old and housed at JTDC, two staff members named Brown and Martinelli, while acting in the course and scope of their employment and under

the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused D.J. in 2013.

1010. Brown was at all relevant times a heavy-set black male estimated to be in his late 20s to early 30s and approximately 6'0 in height. He was bald and had a beard.

1011. Martinelli was at all relevant times a white male estimated to be in his 30s or 40s and approximately 5'11 in height. He had short, curly, brown hair and was previously in the military.

1012. D.J. expects to learn the full names and identities of his abusers through the course of discovery.

1013. On multiple occasions, Brown and Martinelli physically restrained D.J. and carried him back to his cell. Once inside his cell, Martinelli groped and fondled D.J.'s genitals over and under the clothes, digitally penetrated his anus, and made sexual comments about his body and genitals, all while Brown restrained D.J. and watched the abuse. Brown and Martinelli sexually abused D.J. in this manner approximately seven to eight times total.

1014. Brown and Martinelli regularly conducted pat-downs and strip searches on D.J., during which they would grab and fondle his genitals and buttocks over and under the clothes for extended periods for purposes of sexual gratification. On some occasions, Brown and Martinelli searched D.J. together, and on other occasions they searched him individually.

1015. These strip searches were conducted upon D.J. without individualized, reasonable suspicion, nor compliance with the constitutions, laws, and regulations of both the United States and the State of Illinois. These searches were a pretext for sexual abuse.

1016. Whenever Brown supervised the shower area, he regularly watched D.J. and other youths while they were showering and attempted to look at their genitals. This made D.J.

uncomfortable, as the other staff members preferred to keep their backs to the showers and avoided looking at the youths while they were naked whenever possible.

1017. When D.J. attempted to resist the above sexual abuse, Brown and Martinelli put him in confinement for 24 to 48 hours at a time and dropped him down a level on his behavioral chart, which revoked certain privileges such as phone time and time outside of his cell. They gave him contraband food (M&M's, food from the staff vending machine) as a reward for enduring the abuse.

1018. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1019. At the relevant times herein, Plaintiff D.J. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1020. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1021. At the time of the above-described sexual abuse of Plaintiff D.J., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and

belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1022. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of J.J. 3

1023. When Plaintiff J.J. 3 was between the ages of 13 and 15 and housed at JTDC, a staff member Mr. Servich, while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused J.J. 3 in 2011 and 2012.

1024. Mr. Servich was at all relevant times a light-skinned black male estimated to be in his 30s and approximately 6'1 in height. He had short hair. J.J. 3 expects to learn the full name and identity of her abuser through the course of discovery.

1025. J.J. 3 was confined in JTDC several times between 2011 and 2012, with each stay lasting a few weeks long. Once she was recognized as a "regular" at the facility, Servich started to give her special privileges such as extra phone calls and food from McDonald's. Eventually, Servich entered J.J. 3's cell late at night and told her that he would revoke her special privileges unless she allowed him to grope her. From this point forward, Servich entered J.J. 3's cell late at night and groped her thighs, breasts, and genitals over the clothes. After a few incidents of this behavior he forcefully undressed her, groped her naked body and breasts, forced her to give oral

copulation, digitally penetrated her, and raped her. Servich sexually abused J.J. 3 in this manner every time he was on shift, which was close to daily, throughout her multiple stays between 2011 and 2012. During one of her final stays at JTDC, Servich offered J.J. 3 “a better life” with him and gave her his cell phone number. J.J. 3 was scared and uncomfortable with this and never contacted him once she left the facility.

1026. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1027. At the relevant times herein, Plaintiff J.J. 3 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1028. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1029. At the time of the above-described sexual abuse of Plaintiff J.J. 3, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County’s failure to supervise, discipline, train, remove, and/or otherwise investigate

staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1030. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of R.B. 2

1031. When Plaintiff R.B. 2 was 16 years old and housed at JTDC, a staff member (hereinafter "R.B. 2 Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois via a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused R.B. 2 from approximately June to September of 2008.

1032. R.B. 2 Abuser 1 was at all relevant times a heavy-set black male estimated to be in his late 30s to early 40s and approximately 6'0 in height. He was bald, had a beard, and was part of the Black Stones gang. R.B. 2 expects to learn the full name and identity of his abuser through the course of discovery.

1033. Early in R.B. 2's three month stay at JTDC, R.B. 2 Abuser 1 frequently entered the bathroom while R.B. 2 and other youths showered before bed. On these occasions, R.B. 2 Abuser 1 made sexual comments about R.B. 2's body, "helped" him undress and dry off with a towel, and caressed his back, neck, and buttocks while he showered. Eventually, R.B. 2 Abuser 1 entered the bathroom while R.B. 2 was alone and said that he would give him marijuana and alcohol in exchange for sexual favors. R.B. 2 Abuser 1 then administered oral copulation on R.B. 2

Immediately after the abuse, R.B. 2 Abuser 1 told R.B. 2 that if he ever reported the incident, he would accuse R.B. 2 of initiating sexual advances and extend his sentence as punishment. After this incident, R.B. 2 Abuser 1 sexually abused R.B. 2 in this manner one more time.

1034. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1035. At the relevant times herein, Plaintiff R.B. 2 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1036. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1037. At the time of the above-described sexual abuse of Plaintiff R.B. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1038. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of K.R. 2

1039. When Plaintiff K.R. 2 was 15 years old and housed at JTDC, a medical staff member (hereinafter "K.R. 2 Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused K.R. 2 in 2012.

1040. K.R. 2 Abuser 1 was at all relevant times a white male estimated to be in his 40s. He was balding and wore glasses and a white coat. K.R. 2 expects to learn the full name and identity of his abuser through the course of discovery.

1041. Within the first few days of K.R. 2's arrival at JTDC, K.R. 2 was sent to the medical unit for an intake checkup. K.R. 2 Abuser 1 ordered K.R. 2 to undress and lay down on the examination table and then caressed and fondled K.R. 2's naked body under the guise of a "physical." K.R. 2 Abuser 1 then asked K.R. 2 how often he masturbated and had sex, and he made sexual comments about K.R. 2's appearance and genitals. He then started to masturbate K.R. 2 in an attempt to make him erect. K.R. 2 asked what he was doing, and K.R. 2 Abuser 1 stated that the genital groping was just "part of the procedure," and told K.R. 2 to "play with himself often" so that he would not be "overloaded." K.R. 2 Abuser 1 continued to masturbate K.R. 2 for 30 to 60 more seconds, then finished the rest of the physical and dismissed K.R. 2 from the medical unit.

1042. Approximately one week after this incident, K.R. 2 was sent to the medical unit for a discharge checkup. K.R. 2 Abuser 1 again ordered him to undress and lay down, then masturbated K.R. 2 for 60 to 90 seconds in a similar manner as the previous incident, then continued with the rest of the physical. When he finished the physical, K.R. 2 Abuser 1 escorted K.R. 2 out of the medical unit, at which point another youth passed by them in the hallway. K.R. 2 told this youth that K.R. 2 Abuser 1 had just masturbated him and that he felt very uncomfortable with him. K.R. 2 Abuser 1 quickly pulled K.R. 2 back into the medical unit and once again said that the genital groping was “part of the procedure,” and said that he could get K.R. 2 in trouble for telling other youths about the incidents.

1043. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1044. At the relevant times herein, Plaintiff K.R. 2 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1045. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1046. At the time of the above-described sexual abuse of Plaintiff K.R. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1047. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of D.C. 3

1048. When Plaintiff D.C. 3 was 14 years old and housed at JTDC, two staff members (hereinafter "D.C. 3 Abuser 1" and "D.C. 3 Abuser 2" unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County and/or the State of Illinois via a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused D.C. 3 between 2012 and 2014.

1049. D.C. 3 Abuser 1 was at all relevant times a heavy-set white male estimated to be in his 30s and approximately 5'11 in height. He had brown hair and was balding.

1050. D.C. 3 Abuser 2 was at all relevant times a muscular black male estimated to be in his mid 30s and approximately 6'2 in height. He was bald and had tribal-style tattoos on one arm. He was a "rover," or a patrolling staff member.

1051. D.C. 3 expects to learn the full names and identities of his abusers through the course of discovery.

1052. D.C. 3 Abuser 1 was an intake officer at JTDC and strip-searched D.C. 3 approximately three to four times whenever he entered or re-entered the facility between 2012 and 2014. During these intake strip searches, D.C. 3 Abuser 1 ordered D.C. 3 to undress, patted down his naked body, grabbed and fondled his genitals for 20 to 30 seconds at a time, and made sexual comments about his body and genitals.

1053. These strip searches were conducted upon D.C. 3 without individualized, reasonable suspicion, nor compliance with the constitutions, laws, and regulations of both the United States and the State of Illinois. These searches were a pretext for sexual abuse.

1054. During one of his stays in 2012 or 2013, D.C. 3 Abuser 2 grabbed and restrained D.C. 3 after he had gotten in a fight with other youths. D.C. 3 Abuser 2 dragged D.C. 3 back to his cell, forcefully undressed him, and locked him inside his cell. After approximately three or four hours, D.C. 3 Abuser 2 returned to the cell and quickly approached D.C. 3, grabbed his genitals and buttocks, and began to masturbate him. He then attempted to digitally penetrate D.C. 3, at which point D.C. 3 pulled away and said that he was uncomfortable and upset. D.C. 3 Abuser 2 reached towards D.C. 3's genitals and attempted to continue masturbating him, but D.C. 3 pulled away and loudly told him to stop, at which point D.C. 3 Abuser 2 exited the cell. D.C. 3 was discharged from the facility two days after this incident, and he did not see D.C. 3 Abuser 2 again.

1055. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1056. At the relevant times herein, Plaintiff D.C. 3 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1057. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1058. At the time of the above-described sexual abuse of Plaintiff D.C., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1059. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of C.C.

1060. When Plaintiff C.C. was approximately 14 or 15 years old and housed at JTDC, a staff member (hereinafter "C.C. Abuser 1" unless otherwise indicated), while acting in the course

and scope of his employment and under the control of Cook County and/or the State of Illinois via a visit to the Office of the Chief Judge of the Circuit Court of Cook County, sexually abused C.C. in July of 2014 or 2015.

1061. C.C. Abuser 1 was at all relevant times a slightly heavy-set black male estimated to be in his mid to late 50s and approximately 6'1 to 6'2 in height. He had a fade haircut and slight facial hair. C.C. expects to learn the full name and identity of his abuser through the course of discovery.

1062. C.C. stayed at JTDC from July 2 to July 5 of 2014 or 2015. On the morning of July 3, C.C. Abuser 1 approached C.C. in his cell and asked if he wanted to take an early shower. He agreed and C.C. Abuser 1 escorted him to the bathroom. When C.C. entered the shower area, C.C. Abuser 1 followed him in and offered extra food and cigarettes in exchange for sexual favors. He also said that he would "punish" him by extending his stay at the facility and threatened him with a physical beating if he refused the abuse. C.C. Abuser 1 coerced him into receiving oral copulation inside the shower. After the abuse, C.C. Abuser 1 again said that he would physically beat him if anyone found out about the abuse, then escorted him back to his cell. One day later on July 4, C.C. and another youth were getting ready to shower when C.C. Abuser 1 entered the bathroom and ordered the other youth to leave the bathroom so he could be alone with C.C. The other youth refused, and when two other staff members approached the bathroom, C.C. Abuser 1 quickly left the area. C.C. was discharged from the facility a day later and did not see C.C. Abuser 1 again.

1063. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1064. At the relevant times herein, Plaintiff C.C. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1065. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1066. At the time of the above-described sexual abuse of Plaintiff C.C., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1067. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of D.E. 2

1068. When Plaintiff D.E. 2 was 14 years old and under house arrest, a parole officer named Ms. Kathy, while acting in the course and scope of her employment and under the control

of Cook County and/or the State of Illinois via a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused D.E. 2 from 2011 to 2015.

1069. Kathy was at all relevant times a slightly heavy-set blonde white female, estimated to be in her 30s and approximately 5'8 in height. D.E. 2 expects to learn the full name and identity of his abuser through the course of discovery.

1070. In 2011 when D.E. 2 was 14 years old, he was placed on house arrest and assigned Kathy as a parole officer. Over the course of his two months of house arrest, Kathy visited D.E. 2 at his home and his school, even when she was not required to for the program, approximately three to five times a week. She regularly groped D.E. 2's genitals and buttocks, both over and under the clothes, every time she saw him. On one occasion, she masturbated him inside of his home.

1071. She gave him many gifts throughout his house arrest, including new shoes, athletic clothes, and \$500 in cash. Even when D.E.'s house arrest period ended, Kathy continued to see him weekly at his home and school, and she groped him over and under the clothes during every visit. She visited him all throughout high school, starting from his freshman year and continuing to his senior year in 2015 at the age of 17.

1072. Throughout the period of abuse, Kathy frequently told D.E. 2 that he could not tell anyone about the sexual abuse or else she would stop giving him gifts. D.E. 2 went to college in another state after high school, and Kathy was unable to continue sexually abusing him.

1073. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1074. At the relevant times herein, Plaintiff D.E. 2 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1075. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1076. At the time of the above-described sexual abuse of Plaintiff D.E. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1077. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of R.F.

1078. When Plaintiff R.F. was 16 or 17 years old and housed at JTDC, a staff member (hereinafter "R.F. Abuser 1" unless otherwise indicated), while acting in the course and scope of

his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused R.F. in 2014.

1079. R.F. Abuser 1 was at all relevant times a tall, blond, heavy-set, middle-aged white male. He had blue eyes. R.F. expects to learn the full name and identity of his abuser through the course of discovery.

1080. During R.F.'s initial intake in the winter of 2014, R.F. Abuser 1 ordered R.F. to undress and bend over. He then groped R.F.'s genitals for an extended period and digitally penetrated him. He ordered R.F. to cough more, and penetrated R.F. harder and more painfully as he coughed. R.F. attempted to report this incident to another staff member, but the staff member dismissed his claim and no one else followed up with him regarding this report. One or two days after this incident, R.F. Abuser 1 sexually abused R.F. in the same manner during his discharge process.

1081. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1082. At the relevant times herein, Plaintiff R.F. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1083. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to

warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1084. At the time of the above-described sexual abuse of Plaintiff R.F., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1085. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of L.L.

1086. When Plaintiff L.L. was 16 or 17 years old and housed at JTDC, a staff member (hereinafter "L.L. Abuser 1" unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused L.L. in 2015.

1087. L.L. Abuser 1 was at all relevant times a slim white female estimated to be in her late 20s to early 30s and approximately 5'8 in height. She had long black hair and worked the second shift. L.L. expects to learn the full name and identity of his abuser through the course of discovery.

1088. Within the first week of L.L.'s stay at JTDC in early 2015, L.L. Abuser 1 frequently flirted with him. When he showered, L.L. Abuser 1 stood in the front of the bathroom and made sexual jokes and comments towards him. On one occasion, L.L. entered the bathroom and L.L. Abuser 1 followed him inside shortly after. She told L.L. that she could make him "feel better" and groped his genitals over the clothes and under the clothes. She then administered oral copulation on him. L.L. left the facility approximately one week after this incident.

1089. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1090. At the relevant times herein, Plaintiff L.L. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1091. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1092. At the time of the above-described sexual abuse of Plaintiff L.L., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate

staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1093. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of D.S. 2

1094. When Plaintiff D.S. 2 was 14 or 15 years old and housed at JTDC, a staff member (hereinafter "D.S. 2 Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused D.S. 2 in 2014.

1095. D.S. 2 Abuser 1 was at all relevant times a dark-skinned black male estimated to be in his mid 30s to early 40s and approximately 5'11 and 6'2 in height. He wore glasses. D.S. 2 expects to learn the full name and identity of his abuser through the course of discovery.

1096. During D.S. 2's intake into JTDC, D.S. 2 Abuser 1 brought D.S. 2 into the bathroom of the intake area and ordered him to undress. He patted down D.S. 2's naked body, then grabbed and held his genitals for approximately 30 seconds. He then ordered him to squat a cough, and as he was squatting D.S. 2 Abuser 1 digitally penetrated him for 10 to 30 seconds. D.S. 2 was very uncomfortable and asked if the cavity search was required, but D.S. 2 Abuser 1 did not respond. A day or two after this incident, D.S. 2 verbally reported D.S. 2 Abuser 1's sexually abusive behavior to several other staff members on his housing pod, but the staff members dismissed his report and said that they did not believe him. He also verbally reported the sex abuse to Mr. Dixon, the

superintendent of the facility. Dixon said he would “look into” the incident, but he nor anyone else at the facility followed up with D.S. 2 regarding his report.

1097. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1098. At the relevant times herein, Plaintiff D.S. 2 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1099. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1100. At the time of the above-described sexual abuse of Plaintiff D.S. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County’s failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1101. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser’s acts constituting

Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of X.R.

1102. When Plaintiff X.R. was approximately 14 years old and housed at JTDC, a staff member named James Brown, while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused X.R. in 2014.

1103. James Brown was at all relevant times a black male estimated to be in his mid 30s and approximately 5'9 in height. He wore glasses and had a short fade haircut.

1104. Approximately one week into X.R.'s stay at JTDC, Brown entered the bathroom while he was showering alone, made sexual comments towards him, and ordered him to turn around so he could stare at his naked body. He then said that he would send X.R. to another unit where the youths would physically beat him unless he masturbated himself and let him watch. Brown exposed his own genitals and began masturbating to show X.R. what he wanted him to do. X.R. capitulated to his coercion and masturbated himself in the shower while Brown watched and masturbated himself. Brown sexually abused X.R. in this manner approximately three times a week over the course of six weeks. He also regularly groped X.R.'s genitals under the clothes when he handcuffed him for court visits and transfers. He gave him extra food during the mealtimes directly after these incidents of abuse as a reward for complying.

1105. X.R. verbally reported Brown's sexually abusive behavior to other staff members and also filed a written grievance regarding the abuse. The staff members did not believe X.R. and said that he was just trying to get Brown in trouble. No one followed up regarding his report.

1106. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1107. At the relevant times herein, Plaintiff X.R. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1108. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1109. At the time of the above-described sexual abuse of Plaintiff X.R., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1110. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for

the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of C.R. 2

1111. When Plaintiff C.R. 2 was 15 or 16 years old and housed at JTDC, a staff member (hereinafter “C.R. 2 Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois via a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused C.R. 2 in 2008.

1112. C.R. 2 Abuser 1 was at all relevant times a muscular black male estimated to be in his early 30s and approximately 6’2 in height. He was bald and had a full beard. C.R. 2 expects to learn the full name and identity of his abuser through the course of discovery.

1113. Within the first or second night of C.R. 2’s stay at JTDC, C.R. 2 Abuser 1 entered his cell late at night while C.R. 2 was asleep and started touching his chest over the clothes. When C.R. 2 awoke and tried to sit up, C.R. 2 Abuser 1 roughly grabbed C.R. 2’s genitals and buttocks while pushing him back down onto the bed. C.R. 2 became uncomfortable at C.R. 2 Abuser 1’s aggressive touching and told him to stop, so C.R. 2 Abuser 1 covered C.R. 2’s mouth with his hand and masturbated him. C.R. 2 then yelled loudly for help from other staff members, so C.R. 2 Abuser 1 quickly left the cell. C.R. 2 did not see C.R. 2 Abuser 1 again after this incident, and C.R. 2 left the facility a few days later.

1114. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1115. At the relevant times herein, Plaintiff C.R. 2 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1116. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1117. At the time of the above-described sexual abuse of Plaintiff C.R. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1118. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of P.G.

1119. When Plaintiff P.G. was 15 and 16 years old and housed at JTDC, two staff members (hereinafter "P.G. Abuser 1" and "P.G. Abuser 2" unless otherwise indicated), while

acting in the course and scope of their employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused P.G. in 2014 and 2015.

1120. P.G. Abuser 1 was at all relevant times a tall white male estimated to be in his 40s. He had dark hair and a beard.

1121. P.G. Abuser 2 was at all relevant times a tall, stocky black male estimated to be in his mid 30s.

1122. P.G. expects to learn the full names and identities of his abusers through the course of discovery.

1123. On P.G.'s first day at JTDC, P.G. Abuser 1 took him into the intake room and ordered him to undress while he and approximately four other male staff members watched. P.G. Abuser 1 then fondled P.G.'s genitals and buttocks for an extended period, rubbed his finger against his anus, and digitally penetrated him for several minutes while the group of staff members laughed and made sexual comments. P.G. Abuser 1 then brought P.G. to the bathroom and ordered him to shower while he and two other staff members watched and made sexual comments. P.G. Abuser 1 threatened to send P.G. to confinement if he refused the strip search or shower. P.G. did not interact with P.G. Abuser 1 after his initial intake.

1124. These strip searches were conducted upon P.G. without individualized, reasonable suspicion, nor compliance with the constitutions, laws, and regulations of both the United States and the State of Illinois. These searches were a pretext for sexual abuse.

1125. Within the first month of his stay at JTDC, P.G. Abuser 2 approached P.G. in his cell and asked to watch him while he showered or used the bathroom. He said that he would reward P.G. with video games, extra snacks, and commissary priority if he complied. P.G. capitulated with

this coercion, and from this point forward P.G. Abuser 2 regularly entered the bathroom while P.G. showered and masturbated himself. P.G. Abuser 2 sexually abused P.G. in this manner twice a week for approximately one year. P.G. Abuser 2 revoked P.G.'s phone calls and locked him in his cell for hours or days at a time when P.G. attempted to resist the abuse.

1126. During this period of abuse, P.G. verbally reported P.G. Abuser 2's sexually abusive behavior to a staff member named Ms. Macho. A few weeks after this report, two investigators interviewed P.G. about his report, during which time they blamed him for the sex abuse and said that he was just trying to get out of trouble by blaming an innocent man.

1127. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1128. At the relevant times herein, Plaintiff P.G. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1129. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1130. At the time of the above-described sexual abuse of Plaintiff P.G., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1131. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of T.C.

1132. When Plaintiff T.C. was 14 and 15 years old and housed at JTDC, a staff member named Kimberly Peachtree and a director named Stewart, while acting in the course and scope of their employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused T.C. in 2014 and 2015.

1133. Kimberly Peachtree was at all relevant times a slim Hispanic female estimated to be in her early 30s and approximately 5'11 in height. She had dark hair that she often wore in a bun or ponytail.

1134. Stewart was at all relevant times a dark-skinned, heavy-set black male estimated to be in his mid 40s, and approximately 6'0 in height. He was known as a "DED," a directorial role within the facility.

1135. Starting approximately halfway through T.C.'s stay at JTDC, Peachtree regularly approached T.C. on his housing unit and made friendly conversation with him about his home life

and interests. Eventually she started to take him out of class and let him out during lockup so they could sit and talk, during which time she groped his genitals and buttocks over the clothes while asking explicit questions about his sexuality and sexual interests. After a few months of this behavior, she began groping him over and under the clothes multiple times a week.

1136. On one occasion, she ordered T.C. to enter a nearby classroom, which was empty since it was a weekend. She then had sexual intercourse with him inside the classroom.

1137. One to two months later, she approached him in the evening and told him to go to the bathroom before nightly head count. T.C. complied, and Peachtree entered the bathroom after the other youths were locked down and had sexual intercourse with him.

1138. Throughout the period of abuse, Peachtree gave T.C. outside food, extra snacks, better chores cleaning around the facility, and extra time outside of his cell or the classroom as a reward for complying with the abuse. She also kept him at a higher level on the facility's behavioral chart system, which allowed him additional privileges within JTDC. Peachtree regularly said how they would both get in trouble and his sentence would be extended if he ever disclosed the abuse.

1139. On several occasions, a staff member named Nickerson told T.C. that he heard about his sexual relationship with Peachtree and made sexual jokes about the abuse.

1140. T.C. Abuser 1 often said that she wanted to continue their sexual relationship once he left the facility.

1141. Starting within the first month or two of T.C.'s stay at JTDC, Stewart approached T.C. and offered him a spot in his after-hours card games, where Stewart invited several different pods to play cards with him and other staff members in the evenings. When T.C. attended these card games, Stewart groped and caressed him over the clothes on his shoulders, neck, back, arms, and buttocks and made sexual jokes towards T.C.

1142. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1143. At the relevant times herein, Plaintiff T.C. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1144. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1145. At the time of the above-described sexual abuse of Plaintiff T.C., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1146. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for

the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of M.R.

1147. When Plaintiff M.R. was 14 and 15 years old and housed at JTDC, a staff member (hereinafter “M.R. Abuser 1” unless otherwise indicated) and a nurse (hereinafter “M.R. Abuser 2” unless otherwise indicated), while acting in the course and scope of his/her/their employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused M.R. in 2008.

1148. M.R. Abuser 1 was at all relevant times a blond white male estimated to be in his mid 30s to early 40s of average height. He worked the night shift.

1149. Starting during M.R.’s second stay in 2007, M.R. Abuser 1 frequently made friendly conversation with M.R. and allowed him extra time outside of his cell in the evenings. When M.R. was placed on 72 hour confinement inside of his cell, M.R. Abuser 1 visited him late at night and threatened to falsely write him up and extend his stay at JTDC unless he gave him sexual favors. He capitulated with this coercion, and M.R. Abuser 1 forced M.R. to masturbate him. M.R. Abuser 1 sexually abused M.R. four to five more times after this incident across multiple stays in 2007 and 2008, during which times he entered M.R.’s cell late at night and forcibly masturbated him. On two occasions he forcibly administered oral copulation on the Plaintiff. During the first two incidents of sexual abuse, M.R. Abuser 1 physically forced M.R. into complying. On some occasions gave M.R. snacks before or after the abuse occurred, and often threatened him with more punishment if he ever reported the sexual abuse.

1150. M.R. Abuser 2 was at all relevant times a tall white female estimated to be in her early 30s. She had shoulder-length blonde hair.

1151. During one of his stays at JTDC in 2008, M.R. contracted pinkeye and was sent to the medical unit for treatment. M.R. Abuser 2 sent him to 72-hour isolation within the medical wing while she treated his pinkeye. On the second day of his isolation, M.R. Abuser 2 entered his cell, masturbated him, and administered oral copulation on him. She sexually abused M.R. in this manner one more time after this incident.

1152. Sometime during one of his stays in 2008, M.R. verbally reported the sexual abuse of M.R. Abusers 1 and 2 to a “white shirt” authority figure. This white shirt told M.R. that he would look into the incidents, but he nor anyone else ever followed up with M.R. regarding his report.

1153. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1154. At the relevant times herein, Plaintiff M.R. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1155. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1156. At the time of the above-described sexual abuse of Plaintiff M.R., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1157. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of R.C. 2

1158. When Plaintiff R.C. 2 was 15 years old and housed at JTDC, a correctional officer (hereinafter "R.C. 2 Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County,, sexually abused R.C. 2 in 2010.

1159. R.C. 2 Abuser 1 was at all relevant times a Hispanic male, estimated to be in his 20s or 30s and approximately 5'6" in height. He had short black hair and brown eyes. R.C. 2 expects to learn the full name and identity of her abuser through the course of discovery.

1160. On at least two occasions, R.C. 2 Abuser 1 sexually abused R.C. 2 in R.C. 2's cell. R.C. 2 Abuser 1 forcefully stuck his bare hands down R.C. 2's pants and fondled R.C. 2's genitals. While his bare hands were down R.C. 2's pants, R.C. 2 Abuser 1 forcefully penetrated R.C. 2's vagina with his fingers. R.C. 2 Abuser 1 forced R.C. 2 to fondle his genitals.

1161. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1162. At the relevant times herein, Plaintiff R.C. 2 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1163. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1164. At the time of the above-described sexual abuse of Plaintiff R.C. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1165. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for

the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of J.H. 2

1166. When Plaintiff J.H. 2 was 15 years old and housed at JTDC, a correctional officer (hereinafter “J.H. 2 Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused J.H. 2 in 2009.

1167. J.H. 2 Abuser 1 was at all relevant times a black male, estimated to be in his 30s and approximately 6’0” in height. He had a dreaded mohawk hairstyle, brown eyes, tattoos on his forearms, and a piercing on his bottom chin. J.H. 2 expects to learn the full name and identity of his abuser through the course of discovery.

1168. On at least two occasions, J.H. 2 Abuser 1 sexually abused J.H. 2 at night in J.H. 2’s cell. While in J.H. 2’s cell, J.H. 2 Abuser 1 pulled out his penis and forced J.H. 2 to perform oral copulation on him. J.H. 2 Abuser 1 fondled J.H. 2’s penis underneath J.H. 2’s clothes while J.H. 2 performed oral copulation. When J.H. 2 Abuser 1’s penis became fully erect, J.H. 2 Abuser 1 penetrated J.H. 2’s anus with his penis. J.H. 2 Abuser 1 did not wear a condom, and he ejaculated on J.H. 2’s back and on the floor.

1169. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1170. At the relevant times herein, Plaintiff J.H. 2 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1171. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1172. At the time of the above-described sexual abuse of Plaintiff J.H. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1173. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of Q.J.

1174. When Plaintiff Q.J. was 15 years old and housed at JTDC, correctional officers named Officer Richardson and Officer Lambert, while acting in the course and scope of their

employment and under the control of Cook County and/or the State of Illinois via a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused Q.J. in 2015.

1175. Officer Richardson was at all relevant times a black male, estimated to be in his mid-20s and approximately 6'1" in height. He had black hair styled into a mohawk, brown eyes, and facial hair.

1176. Officer Lambert was at all relevant times a white male, estimated to be in his 30s and approximately 6'1" in height. He had reddish brown hair, and he was balding. He had facial hair, blue eyes, and a green tattoo of a tree on the back of his leg.

1177. Q.J. expects to learn the full name and identity of his abusers through the course of discovery.

1178. While transporting Q.J., Officer Richardson would tell Q.J. he needed to perform a search. Officer Richardson aggressively reached down Q.J.'s pants, masturbated Q.J.'s penis, and stroked Q.J.'s scrotum. Officer Richardson masturbated Q.J.'s penis and stroked Q.J.'s scrotum for approximately two to three minutes. Officer Richardson did not wear gloves when he masturbated Q.J.'s penis and stroked Q.J.'s scrotum.

1179. Officer Richardson sexually abused Q.J. on multiple occasions in the same manner. The sexual abuse would occur in Q.J.'s cell, pod, or in the bathroom.

1180. Officer Richardson threatened to take away Q.J.'s recreational time if Q.J. ever told anyone about the sexual abuse.

1181. On multiple occasions, Officer Lambert fondled Q.J.'s penis for several minutes. Officer Lambert fondled Q.J.'s penis in the bathroom and in Q.J.'s cell. Officer Lambert did not wear gloves when he fondled Q.J.'s penis.

1182. Q.J. was sexually abused almost daily by Officer Richardson and/or Officer Lambert throughout the year of his stay at JTDC.

1183. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1184. At the relevant times herein, Plaintiff Q.J. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1185. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1186. At the time of the above-described sexual abuse of Plaintiff Q.J., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1187. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting

Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of T.M. 3

1188. When Plaintiff T.M. 3 was 15 years old and housed at JTDC, a correctional officer (hereinafter “T.M. 3 Abuser 1” unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County and/or the State of Illinois via a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused T.M. 3 in 2009.

1189. T.M. 3 Abuser 1 was at all relevant times a Polish female, estimated to be in her 30s and approximately 5’8” in height. She had black hair that she wore in a ponytail and brown eyes. T.M. 3 expects to learn the full name and identity of his abuser through the course of discovery.

1190. On at least 40 occasions, T.M. 3 Abuser 1 masturbated T.M. 3’s penis in the day room while juveniles watched television in another area. T.M. 3 Abuser 1 masturbated T.M. 3’s penis at a desk under the table until T.M. 3 ejaculated. T.M. 3 would ejaculate onto T.M. 3 Abuser 1’s hand or in his pants. On at least 35 occasions, T.M. 3 Abuser 1 forced T.M. 3 to digitally penetrate her.

1191. T.M. 3 Abuser 1 would bribe T.M. 3 for his silence with extra food and snacks.

1192. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1193. At the relevant times herein, Plaintiff T.M. 3 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1194. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1195. At the time of the above-described sexual abuse of Plaintiff T.M. 3, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1196. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of M.M.

1197. When Plaintiff M.M. was 16 years old and housed at JTDC, a correctional officer named Officer Moore, while acting in the course and scope of his employment and under the

control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused M.M. in 2012.

1198. Officer Moore was at all relevant times a muscular black male, estimated to be in his 30s and approximately 6'0" to 6'2" in height. He was bald, and he had tattoos. M.M. expects to learn the full name and identity of his abuser through the course of discovery.

1199. On at least two occasions, Officer Moore entered M.M.'s cell and sexually abused M.M. by penetrating M.M.'s anus with his penis.

1200. On at least four occasions, Officer Moore told M.M. he was in trouble and did not allow M.M. to shower with the group of juveniles as usual. Officer Moore would escort M.M. to a shower alone. While alone in the shower, Officer Moore would penetrate M.M.'s anus with his penis.

1201. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1202. At the relevant times herein, Plaintiff M.M. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1203. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for

reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1204. At the time of the above-described sexual abuse of Plaintiff M.M., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1205. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of R.P.

1206. When Plaintiff R.P. was 16 years old and housed at JTDC, a correctional officer (hereinafter "R.P. Abuser 1" unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused R.P. in 2008.

1207. R.P. Abuser 1 was at all relevant times a black female, estimated to be in her late-20s and approximately 5'2" to 5'3" in height. She had brownish black hair that appeared to be a wig. R.P. expects to learn the full name and identity of his abuser through the course of discovery.

1208. R.P. Abuser 1 sexually abused R.P. approximately one to two times per week at night in R.P.'s cell. R.P. Abuser 1 would enter R.P.'s cell while he was sleeping, and he would

wake up to R.P. Abuser 1 sexually abusing him. R.P. Abuser 1 did not stop sexually abusing R.P. until he left the facility.

1209. R.P. Abuser 1 masturbated R.P.'s penis and performed oral copulation on him. R.P. ejaculated in R.P. Abuser 1's mouth when she performed oral copulation on him.

1210. R.P. Abuser 1 forced R.P. to perform oral copulation on her on at least five occasions. On at least 20 occasions, R.P. Abuser 1 forced R.P. to perform sexual intercourse penetrating her vagina with his penis.

1211. R.P. Abuser 1 would bribe R.P. for his silence with extra commissary, deodorant, soaps, and food. R.P. Abuser 1 also threatened R.P. with more time at the facility if he ever told anyone about the sexual abuse.

1212. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1213. At the relevant times herein, Plaintiff R.P. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1214. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for

reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1215. At the time of the above-described sexual abuse of Plaintiff R.P., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1216. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of J.A.

1217. When Plaintiff J.A. was 17 years old and housed at JTDC, a correctional officer named Officer Bell, while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused J.A. in 2011.

1218. Officer Bell was at all relevant times a white male, estimated to be in his 30s to 40s and approximately 6'0" in height. He had short black hair and brown eyes. J.A. expects to learn the full name and identity of his abuser through the course of discovery.

1219. On at least four occasions, Officer Bell sexually abused J.A. while alone in the stairwell. Officer Bell would take J.A.'s clothes and masturbate J.A.'s penis. If J.A. would resist, Officer Bell would physically abuse J.A.

1220. J.A. reported the sexual abuse to other staff members, but nothing was ever done to address the sexual abuse.

1221. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1222. At the relevant times herein, Plaintiff J.A. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1223. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1224. At the time of the above-described sexual abuse of Plaintiff J.A., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1225. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting

Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of Z.A.

1226. When Plaintiff Z.A. was 17 years old and housed at JTDC, a correctional officer named Officer Johnathan, while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused Z.A. in 2022.

1227. Officer Johnathan was at all relevant times a black male, estimated to be in his early 30s and approximately 5'5" in height. He had black hair and brown eyes. He had tattoos on his arms. Z.A. expects to learn the full name and identity of his abuser through the course of discovery.

1228. While Z.A. was housed at JTDC, Officer Johnathan sexually abused Z.A. at least four times in Z.A.'s cell. Officer Johnathan would enter Z.A.'s cell at night, pull down Z.A.'s pants, and perform oral copulation upon Z.A. On at least one occasion, Z.A. was asleep when Officer Johnathan entered his cell to sexually abuse him.

1229. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1230. At the relevant times herein, Plaintiff Z.A. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1231. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1232. At the time of the above-described sexual abuse of Plaintiff Z.A., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1233. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of S.B.

1234. When Plaintiff S.B. was 17 years old and housed at JTDC, a correctional officer (hereinafter "S.B. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused S.B. in 2018.

1235. S.B. Abuser 1 was at all relevant times a white male, estimated to be in his mid-40s and approximately 5'10" in height. He had brown eyes and oftentimes wore a hat. S.B. expects to learn the full name and identity of his abuser through the course of discovery.

1236. On at least three occasions, S.B. Abuser 1 sexually abused S.B. in his cell. S.B. Abuser 1 would enter S.B.'s cell under the pretenses of needing to search the cell. S.B. Abuser 1 rubbed, fondled, and groped S.B.'s penis underneath S.B.'s clothes for approximately two to three minutes. S.B. Abuser 1 forced S.B. to masturbate his penis.

1237. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1238. At the relevant times herein, Plaintiff S.B. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1239. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1240. At the time of the above-described sexual abuse of Plaintiff S.B., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and

belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1241. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of L.B.

1242. When Plaintiff L.B. was 16 years old and housed at JTDC, a correctional officer named Mr. Williams, while acting in the course and scope of his/her/their employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused L.B. in 2008.

1243. Mr. Williams was at all relevant times a muscular black male, estimated to be in his 40s and approximately 5'11" in height. He had black curly hair in an afro hairstyle and brown eyes. L.B. expects to learn the full name and identity of his abuser through the course of discovery.

1244. During L.B.'s first week at JTDC, Mr. Williams entered the shower where L.B. was showering alone. Mr. Williams knocked L.B. to the ground and penetrated L.B.'s anus with his penis. Mr. Williams penetrated L.B.'s anus with his penis on at least two other occasions – one time in L.B.'s cell and another time in the shower. L.B. experienced anal pain after Mr. Williams sexually abused him. On at least one occasion, Mr. Williams choked L.B. while sexually abusing him, leaving a ring on L.B.'s neck that was visible the next morning.

1245. Mr. William's told L.B. not to tell anyone about the sexual abuse. L.B. attempted to report the sexual abuse to another staff member, but the staff member would not let him speak.

1246. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1247. At the relevant times herein, Plaintiff L.B. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1248. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1249. At the time of the above-described sexual abuse of Plaintiff L.B., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1250. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting

Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of S.B. 2

1251. When Plaintiff S.B. 2 was 16 years old and housed at JTDC, a correctional officer (hereinafter “S.B. 2 Abuser 1” unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused S.B. 2 in 2018.

1252. S.B. 2 Abuser 1 was at all relevant times a Hispanic female, estimated to be in her mid-30s and approximately 5’6” in height. She had long brown curly hair and brown eyes. She had tattoos on her arms. S.B. 2 expects to learn the full name and identity of his abuser through the course of discovery.

1253. On at least three occasions, S.B. 2 Abuser 1 entered S.B. 2’s cell at night to sexually abuse S.B. 2. While in S.B. 2’s cell, S.B. 2 Abuser 1 would first grope S.B. 2’s penis over his pants. S.B. 2 Abuser 1 would then masturbate S.B. 2’s penis underneath his clothes. On at least one occasion, S.B. 2 ejaculated in S.B. 2 Abuser 1’s hand. S.B. 2 Abuser 1 forced S.B. 2 to touch her breasts.

1254. S.B. 2 Abuser 1 would bribe S.B. 2 for his silence with outside food and snacks.

1255. The above-described sexual abuse and/or acts perpetrated by this staff member/these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1256. At the relevant times herein, Plaintiff S.B. 2 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1257. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1258. At the time of the above-described sexual abuse of Plaintiff S.B. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1259. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of K.B. 2

1260. When Plaintiff K.B. 2 was 15 years old and housed at JTDC, a correctional officer (hereinafter "K.B. 2 Abuser 1" unless otherwise indicated) and a correctional officer (hereinafter

“K.B. 2 Abuser 2” unless otherwise indicated) - collectively “K.B. 2 Abusers” unless otherwise indicated, while acting in the course and scope of their employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused K.B. 2 in 2015.

1261. K.B. 2 Abuser 1 was at all relevant times a black male, estimated to be in his 40s and approximately 6’3” in height. He had black braided hair and brown eyes. He had facial hair and a tattoo on his shoulder.

1262. K.B. 2 Abuser 2 was at all relevant times a white male, estimated to be in his 40s and approximately 6’2” in height. He had white hair with a low buzz cut hairstyle and blue eyes.

1263. K.B. 2 expects to learn the full name and identity of their abusers through the course of discovery.

1264. K.B. 2 Abusers sexually abused K.B. 2 at least 90 times while they were housed at JTDC in K.B. 2’s cell.

1265. K.B. 2 Abusers fondled K.B. 2’s chest and genitals. K.B. 2 Abusers would digitally penetrate K.B. 2’s vagina. K.B. 2 Abusers also penetrated K.B. 2’s vagina and anus with their penises. Many times, K.B. 2 would pass out from the pain when being sexually abused.

1266. K.B. 2 Abusers threatened K.B. 2 to stay silent and not disclose the sexual abuse.

1267. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1268. At the relevant times herein, Plaintiff K.B. 2 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1269. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1270. At the time of the above-described sexual abuse of Plaintiff K.B. 2 staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1271. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of F.C. 2

1272. When Plaintiff F.C. 2 was 16 years old and housed at JTDC, a correctional officer named Ms. Akadu, while acting in the course and scope of her employment and under the control

of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused F.C. 2 in 2008.

1273. Ms. Akadu was at all relevant times a black female, estimated to be in her 30s and approximately 5'4" to 5'" in height. She had brown eyes and wore a colored hair weave. F.C. 2 expects to learn the full name and identity of his abuser through the course of discovery.

1274. On at least three occasions, Ms. Akadu performed oral copulation on F.C. 2 The three instances of sexual abuse took place in the bathroom, the dayroom, and in F.C. 2's cell.

1275. On numerous occasions, Ms. Akadu also masturbated F.C. 2's penis underneath his clothes. Ms. Akadu did not wear gloves when she masturbated F.C. 2's penis.

1276. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1277. At the relevant times herein, Plaintiff F.C was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1278. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1279. At the time of the above-described sexual abuse of Plaintiff F.C. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1280. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of J.C. 2

1281. When Plaintiff J.C. 2 was 15 years old and housed at JTDC, a correctional officer (hereinafter "J.C. 2 Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused J.C. 2 in 2010.

1282. J.C. 2 Abuser 1 was at all relevant times a black male. He was approximately 6'0" in height and had brown eyes. J.C. 2 expects to learn the full name and identity of his abuser through the course of discovery.

1283. While J.C. 2 was in his cell changing into his pajamas, J.C. 2 Abuser 1 entered J.C. 2's cell and put his hands inside J.C. 2's boxers. J.C. 2 Abuser 1 fondled J.C. 2's penis with his bare hands. J.C. 2 Abuser 1 was not performing a search when fondling J.C. 2's penis with his bare hands.

1284. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1285. At the relevant times herein, Plaintiff J.C. 2 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1286. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1287. At the time of the above-described sexual abuse of Plaintiff J.C. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1288. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for

the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of J.C. 3

1289. When Plaintiff J.C. 3 was 16 years old and housed at JTDC, a correctional officer named Officer Johnson, while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois via a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused J.C. 3 in 2008.

1290. Officer Johnson was at all relevant times a black male, estimated to be in his late 30s and approximately 6'1" in height. Officer Johnson was known by the nickname "J. Dub." He had braided black hair and brown eyes. J.C. 3 expects to learn the full name and identity of his abuser through the course of discovery.

1291. After shower time one day, Officer Johnson followed J.C. 3 into J.C. 3's cell. While along in J.C. 3's cell, Officer Johnson grabbed J.C. 3's penis and masturbated J.C. 3's penis. Officer Johnson was not wearing gloves when masturbating J.C. 3's penis. Officer Johnson attempted to force J.C. 3 to perform oral copulation on him, but he stopped pushing when J.C. 3 resisted.

1292. Officer Johnson threatened to physical harm J.C. 3 and to extend J.C. 3's stay at the facility if he ever told anyone about the sexual abuse.

1293. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1294. At the relevant times herein, Plaintiff J.C. 3 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1295. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1296. At the time of the above-described sexual abuse of Plaintiff J.C. 3, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1297. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of A.D.

1298. When Plaintiff A.D. was 16 years old and housed at JTDC, a correctional officer (hereinafter "A.D. Abuser 1," unless otherwise indicated) and a correctional officer (hereinafter

“A.D. Abuser 2,” unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused A.D. in 2008.

1299. A.D. Abuser 1 was at all relevant times a black male, estimated to be in his mid-40s to early 50s and approximately 6’” in height. He had black hair and brown eyes.

1300. A.D. Abuser 2 was at all relevant times a black female, estimated to be in her mid-20s to early 30s and approximately 5’6” to 5’7” in height. She had long red hair what appeared to be dyed and brown eyes.

1301. A.D. expects to learn the full name and identity of his abusers through the course of discovery.

1302. On at least five occasions, A.D. Abuser 1 sexually abused A.D. in A.D.’s cell. A.D. Abuser 1 would instruct A.D. to set out of the cell and clean up, but then A.D. Abuser 1 would put his hands down A.D.’s pants to masturbate A.D.’s penis. A.D. Abuser 1 would masturbate A.D.’s penis for approximately one minute. While masturbating A.D.’s penis, A.D. Abuser 1 bribed A.D. for his silence by promising phone privileges.

1303. On at least three occasions, A.D. Abuser 2 entered A.D.’s cell and asked to see A.D.’s penis. A.D. Abuser 2 masturbated A.D.’s penis for approximately two minutes.

1304. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1305. At the relevant times herein, Plaintiff A.D. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1306. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1307. At the time of the above-described sexual abuse of Plaintiff A.D., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1308. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of J.D.

1309. When Plaintiff J.D. was 15 years old and housed at JTDC, a correctional officer (hereinafter "J.D. Abuser 1," unless otherwise indicated), while acting in the course and scope of

his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused J.D. in 2013.

1310. J.D. Abuser 1 was at all relevant times a black male, estimated to be in his 40s to 50s and approximately 5'11" to 6'1" in height. He had black hair with a short fade hairstyle. He had brown eyes, and he wore glasses. J.D. expects to learn the full name and identity of his abuser through the course of discovery.

1311. One afternoon, J.D. Abuser 1 entered J.D.'s cell and exposed his bare penis to J.D. While exposing his bare penis, J.D. Abuser 1 asked J.D., "Are you going to suck my dick?" J.D. Abuser 1 left J.D.'s cell after this incident.

1312. The next evening, J.D. Abuser 1 was assigned to monitor J.D. while she showered alone. While J.D. was showering alone, J.D. Abuser 1 pulled out his penis and forced J.D. to perform oral copulation on him. J.D. Abuser 1 ejaculated into J.D.'s mouth, and J.D. Abuser 1 forced J.D. to swallow his semen.

1313. J.D. Abuser 1 threatened to kill J.D. if she ever told anyone about the sexual abuse. J.D. disclosed the sexual abuse to a staff member. After disclosing the sexual abuse, J.D. was moved to another location in the facility, but she was still near J.D. Abuser 1.

1314. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1315. At the relevant times herein, Plaintiff J.D. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1316. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1317. At the time of the above-described sexual abuse of Plaintiff J.D., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1318. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of B.D. 2

1319. When Plaintiff B.D. 2 was 16 years old and housed at JTDC, a correctional officer named Mr. Brown, while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused B.D. 2 in 2011.

1320. Mr. Brown was at all relevant times a black male, estimated to be in his 30s and approximately 5'10" in height. He had short, black curly hair and brown eyes. B.D. 2 expects to learn the full name and identity of his abuser through the course of discovery.

1321. On at least three occasions, Mr. Brown sexually abused B.D. 2 in B.D. 2's cell after lockdown. Mr. Brown would enter B.D. 2's room and began masturbating B.D. 2's penis in an attempt to make B.D. 2's penis erect.

1322. On at least one occasion, Mr. Brown forced B.D. 2 to perform oral copulation on him. After a few seconds, B.D. 2 jumped up and started yelling to get away from Mr. Brown.

1323. On at least one occasion, Mr. Brown entered B.D. 2's cell while B.D. 2 was sleeping. B.D. 2 woke up to Mr. Brown pulling his pant down and attempting to perform oral copulation on him. B.D. 2 yelled and told Mr. Brown to back away. Mr. Brown then ran out of B.D. 2's cell.

1324. Mr. Brown attempted to bribe B.D. 2 for his silence by offering special privileges, but B.D. 2 refused any special privileges offered.

1325. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1326. At the relevant times herein, Plaintiff B.D. 2 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1327. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred,

and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1328. At the time of the above-described sexual abuse of Plaintiff B.D. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1329. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of J.D. 2

1330. When Plaintiff J.D. 2 was 12 years old and housed at JTDC, a correctional officer (hereinafter "J.D. 2 Abuser 1," unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused J.D. 2 in 2009.

1331. J.D. 2 Abuser 1 was at all relevant times a black male, estimated to be in his 30s to 40s and approximately 6'0" in height. He was bald with dark brown eyes. J.D. 2 expects to learn the full name and identity of his abuser through the course of discovery.

1332. On at least three occasions, J.D. 2 Abuser 1 sexually abused J.D. 2 in J.D. 2's cell. J.D. 2 Abuser 1 would enter J.D. 2's cell and instruct J.D. 2 to remove his pants. J.D. 2 Abuser 1 would reach into J.D. 2's pants and aggressively grab J.D. 2's penis. J.D. 2 Abuser 1 would force J.D. 2 to perform oral copulation on him until J.D. 2 Abuser 1 ejaculated into J.D. 2's mouth. The oral copulation lasted approximately ten minutes.

1333. On more than one occasion, J.D. 2 Abuser 1 penetrated J.D. 2's anus with his fingers and his penis. J.D. 2 experienced anal pain after J.D. 2 Abuser 1 penetrated his anus.

1334. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1335. At the relevant times herein, Plaintiff J.D. 2 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1336. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1337. At the time of the above-described sexual abuse of Plaintiff J.D. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and

belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1338. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of D.E. 3

1339. When Plaintiff D.E. 3 was 16 years old and housed at JTDC, a correctional officer (hereinafter "D.E. 3 Abuser 1" unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused D.E. 3 in 2009.

1340. D.E. 3 Abuser 1 was at all relevant times a mixed female, estimated to be in her 30s and approximately 5'8" to 5'9" in height. She was the house arrest supervisor at JTDC. D.E. 3 expects to learn the full name and identity of his abuser through the course of discovery.

1341. D.E. 3 met with D.E. 3 Abuser 1 in her office on at least two occasions to prepare for his release and electronic monitoring. While in D.E. 3 Abuser 1's office, D.E. 3 Abuser 1 rubbed D.E. 3's thighs and fondled D.E. 3's penis over his clothes. D.E. 3 Abuser 1 hinted at wanting to have sexual intercourse with D.E. 3 but he was leaving.

1342. When D.E. 3 was released from the facility but still under electronic monitoring, D.E. 3 Abuser 1 went to D.E. 3's home to perform unannounced home visits to check on him. On at least two occasions during the home visits, D.E. 3 Abuser 1 forced D.E. 3 to digitally penetrate

her vagina and fondle her breasts. D.E. 3 Abuser 1 forced D.E. 3 to penetrate her vagina with his penis. D.E. 3 Abuser 1 masturbated D.E. 3's penis and performed oral copulation on him.

1343. D.E. 3 Abuser 1 bribed D.E. 3 for his silence by not sanctioning D.E. 3 when he violated his electronic monitoring. D.E. 3 Abuser 1 also threatened to send D.E. 3 back to the facility if he told anyone about the sexual abuse.

1344. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1345. At the relevant times herein, Plaintiff D.E. 3 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1346. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1347. At the time of the above-described sexual abuse of Plaintiff D.E. 3, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate

staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1348. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of C.H. 2

1349. When Plaintiff C.H. 2 was 17 years old and housed at JTDC, a nurse (hereinafter "C.H. 2 Abuser 1" unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused C.H. 2 in 2014.

1350. C.H. 2 Abuser 1 was at all relevant times a white female, estimated to be in her 40s and approximately 5'5" in height. She had straight brown hair with blonde highlights and brown eyes, and she wore glasses. C.H. 2 expects to learn the full name and identity of his abuser through the course of discovery.

1351. When C.H. 2 visited the medical office due to an itch in his genital area, C.H. 2 Abuser 1 masturbated C.H. 2's penis for approximately two minutes. C.H. 2 Abuser 1 was not wearing gloves when masturbating C.H. 2's penis. C.H. 2 attempted to pull away while C.H. 2 Abuser 1 was masturbating his penis, but C.H. 2 Abuser 1 kept telling C.H. 2 to relax.

1352. C.H. 2 refused to visit the medical office because he felt extremely uncomfortable after C.H. 2 Abuser 1 sexually abused him.

1353. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1354. At the relevant times herein, Plaintiff C.H. 2 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1355. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1356. At the time of the above-described sexual abuse of Plaintiff C.H. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1357. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for

the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of A.H. 4

1358. When Plaintiff A.H. 4 was 14 years old and housed at JTDC, a correctional officer known as Guard Bell, while acting in the course and scope of her employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused A.H. 4 in 2009.

1359. Guard Bell was at all relevant times a black female, estimated to be in her 30s and approximately 5'3" to 5'4" in height. She had brown hair and freckles. A.H. 4 expects to learn the full name and identity of his abuser through the course of discovery.

1360. On at least four occasions, Guard Bell sexually abused A.H. 4 at night during cleaning time. Guard Bell would instruct A.H. 4 to clean a spot in the bathroom where there were no cameras. While in the bathroom, Guard Bell masturbated A.H. 4's penis until he ejaculated. Guard Bell also forced A.H. 4 to fondle her breasts with his mouth.

1361. Guard Bell bribed A.H. 4 with extra food and snacks for his silence. Guard Bell told A.H. 4 not to tell anyone about the sexual abuse.

1362. On at least one occasion, Guard Bell forced A.H. 4 to perform oral copulation on her. Guard Bell asked A.H. 4 if she "tasted good."

1363. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1364. At the relevant times herein, Plaintiff A.H. 4 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1365. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1366. At the time of the above-described sexual abuse of Plaintiff A.H staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1367. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of J.I.

1368. When Plaintiff J.I. was 16 years old and housed at JTDC, a correctional officer named Ms. Bradley, while acting in the course and scope of her employment and under the control

of Cook County and/or the State of Illinois via a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused J.I. in 2017.

1369. Ms. Bradley was at all relevant times a black female, estimated to be in her early 20s and approximately 5'1" in height. She wore wigs with different hair styles, and she had brown eyes. J.I. expects to learn the full name and identity of his abuser through the course of discovery.

1370. One morning, Ms. Bradley took J.I. into a storage closet when he was doing laundry. Ms. Bradley kissed J.I. and masturbated J.I.'s bare penis. Ms. Bradley then performed oral copulation on J.I. until he ejaculated on her face and chest.

1371. On another occasion while in the laundry room, Ms. Bradley performed oral copulation on J.I. Ms. Bradley also forced J.I. to perform oral copulation on her.

1372. On at least four occasions, Ms. Bradley forced J.I. to penetrate her vagina with his penis. Ms. Bradley and J.I. used a condom during the sexual intercourse, and J.I. ejaculated into the condom. The sexual intercourse took place in the laundry room or the storage room nearby where there were no cameras.

1373. Ms. Bradley bribed J.I. with food, snacks, and recreational drugs – specifically Xanax and ecstasy – in exchange for his silence.

1374. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1375. At the relevant times herein, Plaintiff J.I. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1376. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1377. At the time of the above-described sexual abuse of Plaintiff J.I., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1378. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of A.J. 2

1379. When Plaintiff A.J. 2 was 15 years old and housed at JTDC, a correctional officer (hereinafter "A.J. 2 Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused A.J. 2 in 2015.

1380. A.J. 2 Abuser 1 was at all relevant times a muscular black male, estimated to be in his late 30s and approximately 5'9" in height. He had short black hair and brown eyes. A.J. 2 expects to learn the full name and identity of his abuser through the course of discovery.

1381. In the mornings, A.J. 2 Abuser 1 would provide A.J. 2 with his toothbrush and toothpaste. Initially, A.J. 2 Abuser 1 would touch him on the shoulder while providing the items. Eventually, A.J. 2 Abuser 1 would grope A.J. 2's penis over his clothing.

1382. On one occasion, A.J. 2 Abuser 1 exposed his penis and asked A.J. 2 to masturbate his penis or perform oral copulation on him. A.J. 2 did not respond as he did not know what to do or say. A.J. 2 Abuser 1 forced A.J. 2 to masturbate his bare penis.

1383. On the second occasion, A.J. 2 Abuser 1 forced A.J. 2 to perform oral copulation on him.

1384. On the third occasion, A.J. 2 Abuser 1 forced A.J. 2 to masturbate himself in front of him. A.J. 2 Abuser 1 also masturbated A.J. 2's penis.

1385. A.J. 2 Abuser 1 bribed A.J. 2 for his silence with extra time out of his cell.

1386. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1387. At the relevant times herein, Plaintiff A.J. 2 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1388. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred,

and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1389. At the time of the above-described sexual abuse of Plaintiff A.J. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1390. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of D.J. 2

1391. When Plaintiff D.J. 2 was 14 years old and housed at JTDC, a correctional officer named Mr. Monet, while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused D.J. 2 in 2010.

1392. Mr. Monet was at all relevant times a white male, estimated to be in his late 20s to mid-30s and approximately 6'2" to 6'3" in height. He had blond hair and blue eyes. D.J. 2 expects to learn the full name and identity of his abuser through the course of discovery.

1393. When D.J. was in the shower with an ankle injury, Mr. Monet entered the shower and told D.J. 2 he could make D.J. 2 feel better by giving him extra food and time outside of his cell. Mr. Money then forced D.J. 2 to perform oral copulation on him. D.J. 2 was not able to fight back due to his ankle injury. The sexual abuse lasted for approximately three minutes until Mr. Monet ejaculated.

1394. Mr. Monet threatened to press charges against D.J. 2 to extend his time at the facility if D.J. 2 fought back during the sexual abuse.

1395. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1396. At the relevant times herein, Plaintiff D.J. 2 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1397. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1398. At the time of the above-described sexual abuse of Plaintiff D.J. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and

belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1399. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of T.J.

1400. When Plaintiff T.J. was 15 years old and housed at JTDC, a correctional officer (hereinafter "T.J. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused T.J. in 2009.

1401. T.J. Abuser 1 was at all relevant times a white male, estimated to be in his mid-30s and approximately 6'0" in height. He was bald with light colored eyes. T.J. expects to learn the full name and identity of his abuser through the course of discovery.

1402. During T.J.'s intake processing, T.J. Abuser 1 instructed T.J. to remove all his clothing. T.J. Abuser 1 digitally penetrated T.J.'s anus and groped T.J.'s genitals and buttocks. While sexually abusing T.J., T.J. Abuser 1 told T.J. not to "get caught alone" and instructed T.J. to "keep his butt tight."

1403. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress,

and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1404. At the relevant times herein, Plaintiff T.J. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1405. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1406. At the time of the above-described sexual abuse of Plaintiff T.J., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1407. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of M.K.

1408. When Plaintiff M.K. was 15 years old and housed at JTDC, a correctional officer named Officer Green, while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused M.K. in 2013.

1409. Officer Green was at all relevant times a black male, estimated to be in his 30s and approximately 6'2" to 6'5" in height. He had short brown hair and brown eyes. M.K. expects to learn the full name and identity of his abuser through the course of discovery.

1410. On at least two occasions, Officer Green sexually abused M.K. in the shower. While M.K. was showering, Officer Green would masturbate M.K.'s penis for approximately three minutes. Officer Green did not wear gloves when masturbating M.K.'s penis. While masturbating M.K.'s penis, Officer Green would pull down his own pants exposing his penis to masturbate himself.

1411. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1412. At the relevant times herein, Plaintiff M.K. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1413. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to

warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1414. At the time of the above-described sexual abuse of Plaintiff M.K., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1415. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of W.M. 2

1416. When Plaintiff W.M. 2 was 16 years old and housed at JTDC, a correctional officer named Officer Lopez, while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused W.M. 2 in 2010.

1417. Officer Lopez was at all relevant times a Hispanic male, estimated to be in his late 30s and approximately 5'8" in height. He had black hair and brown eyes, and he had a large tattoo on his elbow. W.M. 2 expects to learn the full name and identity of his abuser through the course of discovery.

1418. On one occasion while Officer Lopez and W.M. 2 were alone in the elevator, Officer Lopez fondled W.M. 2's penis and buttocks underneath his clothing. Officer Lopez told W.M. 2 he would keep W.M. 2 safe if W.M. 2 continued to allow the sexual abuse.

1419. Later in the same evening, Officer Lopez entered W.M. 2's room to notify him that he was being transported. Officer Lopez took W.M. 2 into a secluded room and forced W.M. 2 to perform oral copulation on him. Officer Lopez masturbated W.M. 2's penis and then penetrated W.M. 2's anus with his penis for approximately ten minutes.

1420. Officer Lopez threatened to extend W.M. 2's stay at the facility if he ever told anyone about the sexual abuse.

1421. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1422. At the relevant times herein, Plaintiff W.M. 2 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1423. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1424. At the time of the above-described sexual abuse of Plaintiff W.M. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1425. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of T.P.

1426. When Plaintiff T.P. was 16 years old and housed at JTDC, a correctional officer named Mr. Faleciano, while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused T.P. in 2008.

1427. Mr. Faleciano was at all relevant times a Hispanic male, estimated to be in his 30s and approximately 5'0" in height. He was bald with brown hair and facial hair. T.P. expects to learn the full name and identity of his abuser through the course of discovery.

1428. On at least ten occasions, Mr. Faleciano sexually abused T.P. under the disguise of performing a strip search. T.P. had been searched by multiple other correctional officers who followed protocols. When Mr. Faleciano performed searches on T.P. he pulled T.P. to the side and penetrated T.P.'s anus with his fingers. Mr. Faleciano did not wear gloves when digitally penetrating T.P.'s anus.

1429. Mr. Faleciano threatened T.P. by telling T.P. he would never go home if he ever told anyone about the sexual abuse.

1430. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1431. At the relevant times herein, Plaintiff T.P. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1432. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1433. At the time of the above-described sexual abuse of Plaintiff T.P., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1434. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting

Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of E.P.

1435. When Plaintiff E.P. was 15 years old and housed at JTDC, a correctional officer named Ms. Williams, while acting in the course and scope of her employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused E.P. in 2008.

1436. Ms. Williams was at all relevant times a white female, estimated to be in her early 30s and approximately 5'9" in height. She had blonde hair and green eyes. E.P. expects to learn the full name and identity of his abuser through the course of discovery.

1437. While housed at JTDC, Ms. Williams flirted with E.P. and told E.P. she "had a fever for him." While in the back dayroom, Ms. Williams masturbated E.P.'s penis in an area with no cameras. On at least three of the instances, Ms. Williams did not wear gloves when masturbating E.P.'s penis.

1438. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1439. At the relevant times herein, Plaintiff E.P. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1440. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1441. At the time of the above-described sexual abuse of Plaintiff E.P., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1442. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of A.R. 3

1443. When Plaintiff A.R. 3 was 15 years old and housed at JTDC, correctional officers Mr. Hunt, Mrs. Blues, and Miss Mackenzie, while acting in the course and scope of their employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused A.R. 3 in 2008.

1444. Mr. Hunt was at all relevant times a black male, estimated to be in his late 40s and approximately 6'0" in height. He was bald with brown hair, and he wore glasses.

1445. Mrs. Blues was at all relevant times a black female, estimated to be in her late 20s to early 30s and approximately 5'5" to 5'7" in height. She had black hair and dark black eyes. She typically wore her hair in a bun and wore a hat.

1446. Miss Mackenzie was at all relevant times a black female, estimated to be in her early 30s and approximately 5'6" to 5'7" in height. She had long, straight black hair and brown eyes.

1447. A.R. 3 expects to learn the full name and identity of his abusers through the course of discovery.

1448. While in the bathroom, Mr. Hunt forced A.R. 3 to touch his penis. Mr. Hunt then forced A.R. 3 to undress and masturbated A.R. 3's penis for approximately three minutes. Mr. Hunt did not wear gloves when masturbating A.R. 3's penis.

1449. Mr. Hunt bribed A.R. 3 for his silence with cigarettes. Mr. Hunt threatened to keep A.R. 3 "in the system" forever so he could not see his mother if A.R. 3 ever told anyone about the sexual abuse.

1450. While A.R. 3 was in the bathroom during the daytime, Mrs. Blue entered and began kissing A.R. 3. Mrs. Blue forced A.R. 3 to put his hands down her pants and masturbate her vagina until she climaxed. Mrs. Blue then performed oral copulation on A.R. 3 for approximately five minutes.

1451. Mrs. Blue bribed A.R. 3 for his silence with outside food.

1452. On at least three occasions around nighttime, Miss Mackenzie sexually abused A.R. 3 in the bathroom. Miss Mackenzie performed oral copulation on A.R. 3 and penetrated A.R. 3's

anus with her fingers. Miss Mackenzie did not wear gloves when digitally penetrating A.R. 3's anus.

1453. Miss Mackenzie bribed A.R. 3 for his silence with extra recreational time. Miss Mackenzie told A.R. 3 not to tell anyone about the sexual abuse.

1454. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1455. At the relevant times herein, Plaintiff A.R. 3 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1456. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1457. At the time of the above-described sexual abuse of Plaintiff A.R. 3, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1458. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of K.S. 2

1459. When Plaintiff K.S. 2 was 16 years old and housed at JTDC, a correctional officer named Mr. Smith, while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused K.S. 2 in 2014.

1460. Mr. Smith was at all relevant times a muscular black male, estimated to be in mid-30s to early 40s approximately 6'3" to 6'4" in height. He was bald with dark brown eyes. K.S. 2 expects to learn the full name and identity of his abuser through the course of discovery.

1461. While K.S. 2 was leaving the library, Mr. Smith approached K.S. 2 to tell him he was not allowed to take a book. Mr. Smith rushed into K.S. 2's cell and shoved K.S. 2 into the wall with K.S. 2's back to Mr. Smith. Mr. Smith said he was searching for a book K.S. 2 had taken from the library, and he pulled K.S. 2's pants down to search. Mr. Smith groped K.S. 2's penis roughly for approximately one minute.

1462. K.S. 2 told Mr. Smith he was hurting K.S. 2 and expressed suicidal ideations. A mental health staff member was called to discuss the incident with K.S. 2, and K.S. 2 told the mental health staff member about the sexual abuse.

1463. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress,

and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1464. At the relevant times herein, Plaintiff K.S. 2 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1465. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1466. At the time of the above-described sexual abuse of Plaintiff K.S. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1467. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of L.W. 3

1468. When Plaintiff L.W. 3 was 14 years old and housed at JTDC, a correctional officer named Mr. Bryant, while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused L.W. 3 in 2010.

1469. Mr. Bryant was at all relevant times a black male, estimated to be in his 20s to 30s and approximately 6'0" in height. He had short black hair, and he was balding. He had brown eyes and tattoos on his arms. L.W. 3 expects to learn the full name and identity of his abuser through the course of discovery.

1470. While L.W. 3 was playing basketball in the gym, Mr. Bryant approached L.W. 3 and asked L.W. 3 to go to his office. While in L.W. 3's office alone, Mr. Bryant fondled L.W. 3's penis underneath his clothing.

1471. One evening when L.W. 3 was in his cell, Mr. Bryant entered L.W. 3's cell and began putting his hands down L.W. 3's pants. Mr. Bryant grabbed L.W. 3's penis and told him, "If you don't let me taste your penis, I will give you more time and hurt your family." Mr. Bryant then performed oral copulation on L.W. 3 Mr. Bryant performed oral copulation on L.W. 3 until ejaculation while alone in L.W. 3's cell on at least one other occasion.

1472. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1473. At the relevant times herein, Plaintiff L.W. 3 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1474. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1475. At the time of the above-described sexual abuse of Plaintiff L.W. 3, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1476. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of A.W. 3

1477. When Plaintiff A.W. 3 was 15 years old and housed at JTDC, a correctional officer (hereinafter "A.W. 3 Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused A.W. 3 in 2008.

1478. A.W. 3 Abuser 1 was at all relevant times a black male, estimated to be in his 40s and approximately 6'0" in height. He had short black hair, brown eyes, and facial hair. A.W. 3 expects to learn the full name and identity of his abuser through the course of discovery.

1479. On at least three occasions, A.W. 3 Abuser 1 sexually abused A.W. 3 in A.W. 3's cell after shower time. A.W. 3 Abuser 1 would watch A.W. 3 while A.W. 3 showered and follow A.W. 3 into his cell afterwards. A.W. 3 Abuser 1 grabbed A.W. 3's penis and masturbated A.W. 3's penis. A.W. 3 Abuser 1 did not wear gloves when masturbating A.W. 3's penis.

1480. A.W. 3 Abuser 1 threatened to extend A.W. 3's stay at the facility and to physically harm A.W. 3 if A.W. 3 ever told anyone about the sexual abuse.

1481. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1482. At the relevant times herein, Plaintiff A.W. 3 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1483. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1484. At the time of the above-described sexual abuse of Plaintiff A.W. 3, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1485. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of M.W.

1486. When Plaintiff M.W. was 15 to 16 years old and housed at JTDC, correctional officers named Ms. Davis and Mrs. Williams, while acting in the course and scope of their employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused M.W. in 2009.

1487. Ms. Davis was at all relevant times a black female, estimated to be in her mid-20s to early 30s and approximately 5'6" to 5'7" in height. She had black hair and brown eyes. She typically wore a hat and wore her hair in a ponytail. She regularly wore large hoop earrings.

1488. Mrs. Williams was at all relevant times a black female, estimated to be in her 30s and approximately 5'5" to 5'6" in height. She had long, straight black hair and brown eyes. She wore glasses and had tattoos on her arms.

1489. M.W. expects to learn the full name and identity of his abusers through the course of discovery.

1490. When Ms. Davis was M.W.'s afternoon leader, she sexually abused M.W. almost daily. Initially, Ms. Davis gave M.W. packs of Juicy Fruit gum and told M.W. he had to repay her for the gum. Ms. Davis asked M.W. to come to the laundry room/shower area. While alone, Ms. Davis told M.W. to put his mouth and tongue on her breasts and nipples. Ms. Davis also instructed M.W. to put his tongue on her vagina. This instance lasted approximately five to ten minutes.

1491. The sexual abuse continued during recreational time when Ms. Davis would stop M.W. from going outside with the other juveniles. Ms. Davis masturbated M.W.'s penis. Ms. Davis forced M.W. to penetrate her vagina with two fingers and forced M.W. to perform oral copulation on her.

1492. Ms. Davis bribed M.W. for his silence with gyros and extra recreational time watching television. Ms. Davis threatened to put M.W. in isolation and to have other juveniles physically harm him if M.W. ever told anyone about the sexual abuse.

1493. Mrs. Williams approached M.W. and stated to M.W., "Ms. Davis told me about that mouth of yours, so when you come out, have it ready for me." Mrs. Williams then gave M.W. orange juice and further stated, "Have it wet and ready for me."

1494. Mrs. Williams sexually abused M.W. almost daily, and the sexual abuse sometimes occurred right before or after Ms. Davis sexually abused him. Mrs. Williams masturbated M.W.'s penis. Mrs. Williams forced M.W. to digitally penetrate her vagina and to perform oral copulation on her. While M.W. performed oral copulation on her, Mrs. Williams would make comments such as, "Keep it like that" and "I'm about to cum now."

1495. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress,

and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1496. At the relevant times herein, Plaintiff M.W. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1497. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1498. At the time of the above-described sexual abuse of Plaintiff M.W, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1499. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of R.W.

1500. When Plaintiff R.W. was 17 years old and housed at JTDC, a correctional officer (hereinafter “R.W. Abuser 1” unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused R.W. in 2008.

1501. R.W. Abuser 1 was at all relevant times a Hispanic male, estimated to be in his late 30s and approximately 6’0” in height. He had black slicked back hair and brown eyes. R.W. expects to learn the full name and identity of his abuser through the course of discovery.

1502. While R.W. was in his cell with R.W.’s roommate, R.W. Abuser 1 entered R.W.’s cell. R.W. Abuser 1 forced R.W. and R.W.’s roommate to perform oral copulation on him until R.W. Abuser 1 ejaculated on the floor.

1503. On at least two other occasions, R.W. Abuser 1 approached R.W. in the stairwell and forced R.W. to perform oral copulation on him.

1504. R.W. Abuser 1 threatened to extend R.W.’s stay at the facility or place R.W. in solitary confinement if R.W. ever told anyone about the sexual abuse.

1505. The above-described sexual abuse and/or acts perpetrated by this staff member/these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1506. At the relevant times herein, Plaintiff R.W. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1507. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1508. At the time of the above-described sexual abuse of Plaintiff R.W, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1509. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of P.B. 2

1510. When Plaintiff P.B. 2 was 16 years old and housed at JTDC, a correctional officer (hereinafter "P.B. 2 Abuser 1" unless otherwise indicated), while acting in the course and scope of her employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused P.B. 2 in 2008.

1511. P.B. 2 Abuser 1 was at all relevant times a black female, estimated to be in her 20s and approximately 5'8" in height. She had shoulder length black hair and brown eyes. P.B. 2 expects to learn the full name and identity of his abuser through the course of discovery.

1512. On at least five occasions, P.B. 2 Abuser 1 sexually abused P.B. 2 in his cell. Early in the mornings, P.B. 2 Abuser 1 would bring P.B. 2 extra food under the condition that she could masturbate P.B. 2's penis. P.B. 2 Abuser 1 would masturbate P.B. 2's penis with her bare hand for approximately two minutes.

1513. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1514. At the relevant times herein, Plaintiff P.B. 2 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1515. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1516. At the time of the above-described sexual abuse of Plaintiff P.B. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and

belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1517. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of A.R. 4

1518. When Plaintiff A.R. 4 was 15 years old and housed at JTDC, Officer Sanchez, a correctional officer, while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused A.R. 4 in 2014.

1519. Officer Sanchez was at all relevant times a Hispanic female, estimated to be in her mid-20s to early 30s and approximately 5'5" in height. She had long brown hair. A.R. 4 expects to learn the full name and identity of his abuser through the course of discovery.

1520. One evening, Officer Sanchez was locking A.R. 4 into his cell before bedtime. While alone in A.R. 4's cell, Officer Sanchez put her hands down A.R. 4's pants and masturbated his penis for approximately two minutes. Officer Sanchez was not wearing gloves when masturbating A.R. 4's penis.

1521. Officer Sanchez told A.R. 4 that nobody would believe him if he told anyone about the sexual abuse.

1522. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1523. At the relevant times herein, Plaintiff A.R. 4 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1524. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1525. At the time of the above-described sexual abuse of Plaintiff A.R. 4, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1526. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for

the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of D.D. 3

1527. When Plaintiff D.D. 3 was 16 and 17 years old and housed at JTDC, an intake staff member (hereinafter “D.D. 3 Abuser 1” unless otherwise indicated), a “rover” staff member (hereinafter “D.D. 3 Abuser 2” unless otherwise indicated), and an officer named Ms. Johnson, while acting in the course and scope of their employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused D.D. 3 in 2018 and 2019.

1528. Throughout her five stays at JTDC between 2018 and 2019, D.D. 3 was regularly sexually abused under the guise of unlawful strip searches by groups of two to three staff members, both male and female, in the intake room on the lower floor of the building. During one of these strip searches in 2018 or 2019, D.D. 3 Abuser 1 and a female staff member undressed D.D. 3 and asked her to remove her nipple piercings. D.D. 3 was unable to remove them, so D.D. 3 Abuser 1 used his bare hands to grope and fondle D.D. 3’s nipples and breasts for an extended period while the female staff member watched. He groped her under the guise of removing her nipple piercings but did not remove them.

1529. These strip searches were conducted upon D.D. 3 without individualized, reasonable suspicion, nor compliance with the constitutions, laws, and regulations of both the United States and the State of Illinois. These searches were a pretext for sexual abuse.

1530. In 2018 or 2019, D.D. 3 got into a verbal altercation with another youth. D.D. 3 Abuser 2 grabbed D.D. 3, brought her to her cell, and pushed her onto the bed face-down. He then

laid himself on top of her, causing her pain, and groped her buttocks over the clothes for an extended period.

1531. Ms. Johnson was at all relevant times a heavy-set black female estimated to be in her late 30s to early 40s and of short stature. She had short hair.

1532. Starting during one of her stays in 2018 and continuing until her final stay in 2019, Johnson regularly made vulgar and demeaning sexual comments about D.D. 3's breasts, buttocks, and imagined sex life as she undressed or showered. When D.D. 3 attempted to ignore or resist Johnson's harassment, Johnson became angry and verbally abused D.D. 3. Johnson sexually abused D.D. 3 in this manner on a near-daily basis across several stays at the facility.

1533. On one occasion, D.D. 3 reported the above incidents of sexual abuse to a visiting sexual abuse counselor. The counselor said that the sexual abuse was "unacceptable" and transferred her to an off-grounds safehouse to protect her from further sexual abuse. After a few weeks, D.D. 3 was transferred back to JTDC, where the sexual abuse continued.

1534. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1535. At the relevant times herein, Plaintiff D.D. 3 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1536. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently

breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1537. At the time of the above-described sexual abuse of Plaintiff D.D. 3, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1538. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of J.T. 2

1539. When Plaintiff J.T. 2 was 14 and 16 years old and housed at JTDC, three staff members (hereinafter "J.T. 2 Abuser 1," "J.T. 2 Abuser 2," and "J.T. 2 Abuser 3" unless otherwise indicated), while acting in the course and scope of their employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused J.T. 2 in 2010 and 2012.

1540. J.T. 2 Abuser 1 was at all relevant times a stocky, bearded black male estimated to be in his 20s and approximately 5'9 in height.

1541. J.T. 2 Abuser 2 was at all relevant times a heavy-set black male estimated to be in his 30s and approximately 6'2 in height. He had an afro.

1542. During J.T. 2's first stay at JTDC in 2010 when he was 14 years old, J.T. 2 Abusers 1 and 2 frequently entered the bathroom while J.T. 2 and other youths showered. On some occasions they entered the shower separately from each other, and on other occasions the two of them entered together. J.T. 2 Abusers 1 and 2 made sexual comments and gestures towards J.T. 2, slapped his buttocks, and asked for sexual favors from him. J.T. 2 Abusers 1 and 2 sexually abused J.T. 2 in this manner nearly every day for one month. During this period of abuse, J.T. 2 verbally reported their sexually abusive behavior to a "white shirt" authority figure, who said that he was just lying so he could be moved to a different unit and that he could get in trouble for "making up stories" about J.T. 2 Abusers 1 and 2. The next day, J.T. 2 Abusers 1 and 2 kept J.T. 2 locked in his cell for 24 hours as punishment for reporting them to the white shirt.

1543. J.T. 2 Abuser 3 was at all relevant times a heavy-set black female estimated to be in her late 20s to early 30s. She wore her hair in dreadlocks and wore glasses.

1544. J.T. 2 expects to learn the full names and identities of his abusers through the course of discovery.

1545. During his second stay at JTDC in 2012 when he was 16 years old, J.T. 2 Abuser 3 stopped by J.T. 2's cell during the nightly head count and ordered him to expose his genitals to her. He refused, and she told him not to tell anybody about the incident then walked away.

1546. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1547. At the relevant times herein, Plaintiff J.T. 2 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1548. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1549. At the time of the above-described sexual abuse of Plaintiff J.T. 2, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1550. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of D.J. 3

1551. When Plaintiff D.J. 3 was 15 years old and housed at JTDC, a "rover" staff member (hereinafter "D.J. 3 Abuser 1" unless otherwise indicated), while acting in the course and scope of

his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused D.J. 3 in 2010.

1552. D.J. 3 Abuser 1 was at all relevant times a light-skinned, heavy-set black male estimated to be in his mid 30s. He had a “buzz cut” and a goatee-mustache.

1553. A few months into D.J. 3’s stay at JTDC, D.J. 3 Abuser 1 approached D.J. 3 as he showered and ordered him to go back to his cell. D.J. 3 was confused and did not immediately comply, causing D.J. 3 Abuser 1 to grab D.J. 3 forcefully by his bare genitals with an ungloved hand, hard enough to cause pain, and ordered him again to go back to his cell. Due to D.J. 3 Abuser 1’s physical and sexual intimidation, D.J. 3 capitulated and allowed D.J. 3 Abuser 1 to escort him back to his cell. Shortly after this incident, D.J. 3 verbally reported the incident to several other staff members, but they said that the incident wasn’t a “big deal” and refused to take his report.

1554. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1555. At the relevant times herein, Plaintiff D.J. 3 was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1556. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for

reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1557. At the time of the above-described sexual abuse of Plaintiff D.J. 3, staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1558. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of J.L.

1559. When Plaintiff J.L. was 15 years old and housed at JTDC, two staff members named Mr. Servitel and Mr. Downey, while acting in the course and scope of their employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused J.L. in 2009 or 2010.

1560. Mr. Servitel was at all relevant times a slim black male estimated to be in his late 20s to early 30s and approximately 6'2 in height.

1561. Mr. Downey was at all relevant times a black male estimated to be in his mid 30s. He was of stocky build with a "beer belly," was balding with a fade haircut, and had slight facial hair.

1562. J.L. expects to learn the full names and identities of her abusers through the course of discovery.

1563. Servitel and Downey worked visitation and handcuffed and escorted J.L. to and from the visitation area on Wednesdays and Sundays. Servitel made frequent sexual gestures at J.L. and regularly asked to “taste” J.L. and receive sexual favors in exchange for special privileges. Whenever Servitel handcuffed J.L., he rubbed his genitals on her behind and groped her breasts and buttocks over the clothes. He gave J.L. coupons as a reward for complying with the abuse.

1564. Downey made frequent sexual jokes towards J.L. and regularly said that he wanted to have sex with her once she was released from JTDC. Whenever he handcuffed J.L., he rubbed his genitals on her buttocks similar to Servitel. On one occasion, Downey physically forced J.L. to bend over while she was handcuffed and forcefully thrust himself against her behind, which pushed J.L. forward and caused her to hit her head on the nearby locker. Downey told J.L. that she could not tell anybody about this incident or else he would extend her sentence and prevent her from taking visitation for the rest of her stay.

1565. Servitel and Downey sexually abused J.L. in this manner twice a week for approximately seven months until two new staff members took over visitation and the abuse ended.

1566. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1567. At the relevant times herein, Plaintiff J.L. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1568. Cook County and its employees, agents, and servants knew or should have known that these staff members were sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1569. At the time of the above-described sexual abuse of Plaintiff J.L., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1570. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abusers' acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of C.D.

1571. When Plaintiff C.D. was 14 to 16 years old and housed at JTDC, a staff member named Eric Poole, while acting in the course and scope of his employment and under the control of Cook County and/or the State of Illinois vis a vis Office of the Chief Judge of the Circuit Court of Cook County, sexually abused C.D. from 2008 to 2010.

1572. Eric Poole was at all relevant times a heavy-set black male estimated to be in his late 20s to early 30s, and of short height. He had a short haircut.

1573. Between 2008 and 2010, Poole regularly approached C.D.'s cell in the evenings and exposed his genitals, pushed his bare genitals through the cell door for her to see, and made explicit and demeaning sexual comments towards her. He occasionally groped her breasts through the cell door. Poole sexually abused C.D. in this manner on a near-daily basis over the course of three years. He regularly gave her commissary money as a reward for enduring the abuse.

1574. At one point shortly after C.D. was released from JTDC, Poole added her on Myspace, where he messaged her explicit sexual comments and asked her to meet up with him so he could further sexually abuse her. C.D. refused to meet up with Poole.

1575. On one occasion, C.D. verbally reported Poole's sexually abusive behavior to a supervisor named Ms. Parker. Parker told her to "shut the fuck up" and refused to take her report. No one else followed up with C.D. regarding her report.

1576. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of employment at the JTDC.

1577. At the relevant times herein, Plaintiff C.D. was a minor in the legal and physical custody of JTDC and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1578. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached

various duties owed to Plaintiff, including but not limited to their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1579. At the time of the above-described sexual abuse of Plaintiff C.D., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and belief, Cook County's failure to supervise, discipline, train, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1580. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to report and prevent said abuse of the Plaintiff.

Sexual Abuse of M.S.

1581. When Plaintiff M.S. was 14 years old and housed at JTDC, a staff member (hereinafter "M.S. Abuser 1" unless otherwise indicated), while acting in the course and scope of his employment and under the control of Cook County, sexually abused D.S. in 2006.

1582. M.S. Abuser 1 was at all relevant times a slim black male estimated to be approximately 6'2 in height and in his mid 20s to mid 30s. M.S. expects to learn the full name and identity of his abuser through the course of discovery.

1583. Approximately one week into his stay at JTDC, M.S. was by himself in the bathroom during the evening when M.S. Abuser 1 entered the bathroom and exposed his genitals

to M.S. Then, he ordered M.S. to masturbate him under the threat of an extended sentence. M.S. refused, so M.S. Abuser 1 physically forced M.S. to masturbate him. M.S. Abuser 1 forcibly masturbated M.S. and digitally penetrated him. After the abuse, M.S. Abuser 1 ordered M.S. to go back to his cell and threatened to write him up and extend his sentence if he ever disclosed the abuse. A few days later, M.S. Abuser 1 sexually abused M.S. again in this same manner. M.S. Abuser 1 gave M.S. extra snacks as a reward for complying with the abuse. Approximately two weeks after the abuse started, M.S. left JTDC and did not see M.S. Abuser 1 again.

1584. The above-described sexual abuse and/or acts perpetrated by this staff member were nonconsensual and constitute assault, battery, intentional infliction of emotional distress, and Childhood Sexual Abuse as defined in Illinois Compiled Statutes 735 ILCS 5/13-202.2 and 720 ILCS 5/11-0.1 and occurred in the course and scope of their employment at the JTDC.

1585. At the relevant times herein, Plaintiff M.S. was a minor in the legal and physical custody of Cook County and did not factually consent and could not legally consent to the above-described sexual abuse and/or acts.

1586. Cook County and its employees, agents, and servants knew or should have known that this staff member was sexually abusing children at JTDC before and after the abuse occurred, and they knowingly, intentionally, willfully, wantonly, recklessly, and/or negligently breached various duties owed to Plaintiff, including their duty to prevent the abuse, to warn Plaintiffs of known perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

1587. At the time of the above-described sexual abuse of Plaintiff M.S., staff members were not adequately supervised, monitored, or surveilled by Cook County. Upon information and

belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled in whole or in part the above-described sexual abuse and injuries arising therefrom.

1588. Cook County is vicariously liable in whole or in part for all wrongful acts and omissions set forth herein, including but not limited to both the abuser's acts constituting Childhood Sexual Abuse, intentional infliction of emotional distress, assault, and battery, and for the knowing, intentional, willful, wanton, reckless, and/or negligent failure of Cook County employees, agents, or servants to prevent the abuse, to warn Plaintiffs of known sexual perpetrators, to advise Plaintiffs of internal and external mechanisms for reporting the abuse, to make timely and reasonable efforts to stop the abuse, to report the abuse, and to protect the Plaintiff.

DELAYED DISCOVERY - COMMON LAW AND 735 ILCS 5/13-202.2

1589. Plaintiffs reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

1590. In addition, or in the alternative, Plaintiffs state that some or all of them, as a result of the repressed memories, passage of time and/or counseling received, learned that they suffered the injuries described herein as a direct and proximate cause of the sexual abuse committed by when they were a minor housed at JTDC, as stated more fully herein.

1591. One or more Plaintiffs had not discovered, understood or appreciated that any problems they were experiencing (i.e., emotional, psychiatric, psychological, and sexual) were caused by the Childhood Sexual Abuse described more fully herein.

1592. One or more Plaintiffs were unaware of the wrongful conduct of Defendant and its' efforts to conceal their Childhood Sexual Abuse.

1593. Plaintiffs had not discovered, understood or appreciated that any problems they were experiencing (i.e., emotional, psychiatric, psychological, and sexual) were caused in whole or in part by the failure of Defendant to prevent, report and protect them from the Childhood Sexual Abuse, as described more fully herein.

1594. Plaintiffs plead in addition to or in the alternative to the matters set forth herein, delayed discovery of the harm and delay in learning of misconduct by Defendant and thus delay in the accrual of their claims against Defendant.

CAUSES OF ACTION

COUNT I – *Negligence/Negligence per se*

1595. Plaintiffs reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

1596. Cook County, as well as its employees, agents, and officers, were required by law to take or otherwise voluntarily took the custody of minors, including Plaintiffs herein, within its jurisdiction such as to deprive them of their normal opportunities for protection. The Plaintiffs and Cook County, and its employees and agents stood in such a special relationship to one another that the law imposes on the State an obligation of reasonable conduct for the benefit of the Plaintiffs, including but not limited to an affirmative duty to aid and/or protect against and prevent an unreasonable risk of physical harm from third parties, including its own agents or employees.

1597. As such, Cook County and its officers, agents, and employees, owed various duties to those juveniles, including Plaintiffs, in its custody. They include, but are not limited to: (1) a duty to provide individualized assessments to rehabilitate and prevent further delinquent behavior through the development of educational, vocational, social, emotional and basic life skills which enable youth to grow and mature; (2) a duty to secure care and guidance as will serve the safety

and moral, emotional, mental, and physical welfare of the minor; (3) a duty to control the individuals who are the source of the sexual abuse alleged herein; (4) a duty to provide the minor with food, shelter, education, and medical care; (5) a duty to not permit an act of sexual abuse when the person has knowledge of sexual abuse; (6) a duty, when having reason to believe that sexual abuse has or will occur, to make timely and reasonable efforts to stop the sexual abuse by reporting the sexual abuse, or causing a report to be made, to medical or law enforcement authorities and the Illinois Department of Children and Family Services; (7) a duty to act as a reasonable, prudent State of Illinois employee, agent, or officer would act under the circumstances to ensure the prevention and reporting of sexual abuse; (8) a duty to provide confined youth with multiple avenues to report sexual abuse, including an avenue outside the facility, so that even if the abuser is someone directly supervising that inmate or higher up in the authority chain, or a staff person or inmate who might retaliate against that inmate, the victim still has a safe way to report the abuse, thus ensuring both increased reporting, deterrence, and prevention of abuse; (9) a duty to provide confined youth with access to emotional support services from outside the facility to help confined youth heal from trauma; (10) a duty to protect them against an unreasonable risk of physical and/or psychological harm, including sexual abuse; (11) a duty to protect children; (12) a duty to rehabilitate youth through developing the competencies of the youth in its care, including but not limited to the enhancement and development of educational, vocational, social, emotional, and basic life skills; (13) a duty to actively participate in the continuity of care of the juvenile justice system; (14) a duty to actively engage in positive youth development; (15) a duty to secure for each minor in its custody such care and guidance as will serve the safety and moral, emotional, mental, and physical welfare of the minor and the best interests of the community; and (16) a duty to preserve and strengthen the minor's family ties whenever possible.

1598. These duties are non-exhaustive and non-delegable. Given the special relationship of custodian and ward between Cook County and Plaintiffs herein, Cook County is directly liable and vicariously liable in whole or in part for the acts, omissions, and tortious conduct, whether negligent and/or intentional, of its employees and agents.

1599. Sexual abuse of children at JTDC was persistent and prevalent, and the nature of their confinement and seclusion from family, as well as prior reports of abuse, rendered the risk of sexual abuse to be foreseeable and imminent. Cook County and its officers, agents, and employees knew or should have known that it had numerous agents, officers, and employees who sexually abused children at JTDC.

1600. Cook County and its officers, agents, and employees breached each of the foregoing duties, among others.

1601. In so doing, Cook County and its officers, agents, and employees violated one or more statutes or ordinances that provide for a punishment and caused the kind of harm the statutes or ordinances were intended to prevent. The Plaintiffs were a member of the class the statutes or ordinances were intended to protect.

1602. Cook County failed to use ordinary care in determining whether JTDC was safe and/or determining whether it had sufficient information to represent their facilities and/or programs as safe. Cook County's breach of various duties include, but are not limited to: failure to protect Plaintiffs from a known/suspected danger, failure to supervise staff members and Plaintiffs, failure to implement minimally sufficient policies and procedures in place to prevent sex abuse, failure to take reasonable measures to ensure that policies and procedures to prevent sex abuse were working, failure to adequately inform children of the risks of staff-on-resident sex abuse, failure to investigate and report risks of staff-on-resident sex abuse, failure to properly train

the staff at the facilities and/or programs, failure to train children about the dangers of sex abuse by facility staff, failure to have an outside agency test their safety procedures, failure to protect the children in its facilities and/or programs from sex abuse, failure to adhere to the applicable standard of care for resident safety, failure to control and prevent its employees, officers, and agents from committing sexual abuse.

1603. Upon information and belief, Cook County, its employees, agents, and officers, additionally violated their legal duty by failing to report and/or prevent known and/or suspected sexual abuse of children by Plaintiffs' abusers and/or their other agents to law enforcement.

1604. Cook County and its employees, agents, and officers created a foreseeable risk of harm to Plaintiffs. As vulnerable children placed and participating in the facilities and/or programs Cook County offered that were overseen by poorly trained, insufficiently supervised, and inadequately vetted officers and supervisory staff, Plaintiffs were foreseeable victims. Additionally, as vulnerable children whom Plaintiffs' abusers had access to and full control of through Cook County's facilities and/or programs, Plaintiffs were foreseeable victims. Moreover, Cook County implemented an unconstitutional policy of strip-searching children without a particularized suspicion, which provided a false pretext for sexual abuse.

1605. As a direct and proximate result of the above-described conduct, Plaintiffs have suffered, and will continue to suffer, great pain of mind and body, shock, emotional distress, discomfort, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, loss of enjoyment of life, and the loss of normal life. They were prevented, and will continue to be prevented, from performing daily activities and obtaining the full enjoyment of life. They have sustained, and will continue to sustain, loss of earnings and earning

capacity. They have incurred, and will continue to incur, expenses for medical and psychological treatment, therapy, and counseling.

COUNT II – *Sexual Abuse*

1606. Plaintiffs reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

1607. Cook County, by and through its officers, agents, and employees committed childhood sexual abuse and sexual conduct as defined in Illinois Compiled Statute 735 ILCS 5/13-202.2.

1608. Sexual abuse of children and adults cause long term physical and psychological harm to the victims including but not limited to unintended pregnancy, post-traumatic stress disorder, disassociation, eating disorders, substance abuse, sexually transmitted infections, sterility, panic and other psychological disorders, inability to form parental and relationship bonds, increased risk of suicide, substance abuse, repeated victimization and other severe and profound effects that alter the course of the lives of the victims.

1609. This conduct perpetrated upon Plaintiffs directly and proximately caused, and will continue to cause, in whole or in part, Plaintiffs to suffer great pain of mind and body, shock, emotional distress, discomfort, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, loss of enjoyment of life, and the loss of normal life. They were prevented, and will continue to be prevented, from performing daily activities and obtaining the full enjoyment of life. They have sustained, and will continue to sustain, loss of earnings and earning capacity. They have incurred, and will continue to incur, expenses for medical and psychological treatment, therapy, and counseling.

1610. By virtue of the special relationship between Cook County and the Plaintiffs herein, the State of Illinois is vicariously liable for the conduct of its agents, servants, officials, and employees constituting sexual abuse and childhood sexual abuse as defined in Illinois Compiled Statute 735 ILCS 5/13-202.2.

COUNT III – Assault and Battery

1597. Plaintiffs reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

1598. Cook County, by and through its employees acting in the course and scope their employment Cook County, committed intentional, unlawful offers of corporal injury by force, or force unlawfully directed, under such circumstances as to create a well-founded fear of imminent peril or reasonable apprehension of an imminent battery, coupled with the actual and apparent present ability to effectuate that offer, to Plaintiffs. The intentional acts of the employees of Cook County resulted in an offensive contact with the Plaintiffs' person.

1599. The assaults and batteries set forth herein were committed by the employees, agents, servants, and/or officials of Cook County in the course and scope of their employment and while upon the premises in possession of the Cook County upon which the abusers were privileged to enter only as servants of Cook County.

1600. The assaults and batteries set forth herein perpetrated upon Plaintiffs directly and proximately caused and will continue to cause, in whole or in part, Plaintiffs to suffer great pain of mind and body, shock, emotional distress, discomfort, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, loss of enjoyment of life, and the loss of normal life. They were prevented, and will continue to be prevented, from performing daily activities and obtaining the full enjoyment of life. They have sustained, and will continue to

sustain, loss of earnings and earning capacity. They have incurred, and will continue to incur, expenses for medical and psychological treatment, therapy, and counseling.

1611. By virtue of the special relationship between Cook County and the Plaintiffs herein, Cook County is vicariously liable for the conduct of its agents, servants, officials, and employees constituting assault and battery.

COUNT IV – *Intentional Infliction of Emotional Distress*

1601. Cook County, by and through its employees acting in the course and scope their employment Cook County, and Cook County, by and through its official and unofficial policies, practices, and customs, engaged in outrageous conduct that was so extreme as to go beyond all possible bounds of decency and be regarded as intolerable in a civilized society.

1602. Thus, Cook County and its employees, servants, and agents either intended that their conduct should inflict severe emotional distress or knew of and recklessly disregarded a high probability that their conduct would cause severe emotional distress.

1603. The extreme and outrageous conduct of Cook County and its employees, servants, and agents actually and proximately caused in whole or in part severe emotional distress of Plaintiffs.

1604. In addition to its own acts, conduct set forth herein was committed by the employees, agents, servants, and/or officials of Cook County in the course and scope of their employment and while upon the premises in possession of the Cook County upon which the abusers were privileged to enter only as servants of Cook County.

1612. By virtue of the special relationship between Cook County and the Plaintiffs herein, Cook County is vicariously liable for the conduct of its agents, servants, officials, and employees constituting extreme and outrageous conduct.

COUNT V - *Negligent Hiring or Retention Against the State of Illinois*

1599. Plaintiffs reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

1600. Cook County knew or should have known that the Plaintiffs' abusers had a particular unfitness for their respective positions so as to create a danger of harm to the Plaintiffs.

1601. The particular unfitness of the employees rendered the Plaintiffs' injuries foreseeable to a person of ordinary prudence in Cook County's position.

1602. The particular unfitness of these abusers was known or should have been known at the time Cook County hired or retained them.

1603. Cook County breached their duties to Plaintiffs by actively maintaining and employing Plaintiffs' abusers in positions of confidence, trust, power, and authority through which they had access to children, including Plaintiffs.

1604. Cook County was negligent in its retention of Plaintiffs' abusers in that they knew, or should have known, through the exercise of ordinary care, that the conduct of Plaintiffs' abusers subjected third parties to an unreasonable risk of harm, including Plaintiffs' abusers' sexual abuse of children in its charge.

1605. In failing to timely remove Plaintiffs' abusers from working with children or terminate their employment, the Defendant failed to exercise the degree of care that a reasonably prudent person would have exercised under similar circumstances, which resulted in Plaintiffs' injuries alleged in this action.

1606. The particular unfitness of Plaintiffs' abusers and Cook County's various breaches of duties owed to the Plaintiffs directly and proximately caused in whole or in part Plaintiffs to suffer great pain of mind and body, shock, emotional distress, discomfort, physical

manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, loss of enjoyment of life, and the loss of normal life. They were prevented, and will continue to be prevented, from performing daily activities and obtaining the full enjoyment of life. They have sustained, and will continue to sustain, loss of earnings and earning capacity. They have incurred, and will continue to incur, expenses for medical and psychological treatment, therapy, and counseling.

COUNT VI – *Negligent Supervision*

1607. Plaintiffs reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

1608. At all relevant times herein, Cook County had a duty to supervise the Plaintiffs' abusers so as to ensure that those minors in its custody would not be sexually abused.

1609. Cook County breached this duty of supervision and negligently supervised the Plaintiffs' abusers.

1610. Cook County knew or should have known that both its employees who sexually abused Plaintiffs and its employees who negligently failed to prevent and/or report the sexual abuse behaved in a dangerous or otherwise incompetent manner, and Cook County, having this knowledge, failed to supervise its employees adequately, or take other action to prevent the harm to Plaintiffs.

1611. Cook County's negligence proximately caused in whole or in part the Plaintiffs to suffer great pain of mind and body, shock, emotional distress, discomfort, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, loss of enjoyment of life, and the loss of normal life. They were prevented, and will continue to be prevented, from performing daily activities and obtaining the full enjoyment of life. They have sustained, and will

continue to sustain, loss of earnings and earning capacity. They have incurred, and will continue to incur, expenses for medical and psychological treatment, therapy, and counseling.

COUNT VII – *Negligent Training*

1612. Plaintiffs reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

1613. Cook County was at all times responsible for the safety of the children in its custody. Cook County was at all relevant times responsible for creating and enforcing training that ensured the safety of the children in its custody. This duty is non-delegable, and Cook County is vicariously liable for the actions and omissions of their employees and agents in failing to train the abusers of Plaintiffs.

1614. Cook County knew or should have known its employees behaved or would behave in a dangerous or otherwise incompetent manner, and having this knowledge, failed to supervise the subject abusers adequately, or take other action to prevent the harm.

1615. At all relevant times, Plaintiffs' abusers were employees and/or agents of the Defendant. Plaintiffs' abusers and the Defendant (or Defendant's agents) were therefore in employee–employer relationships. As employees and/or agents of the Defendant, Plaintiffs' abusers were under the direct supervision, management, agency, and control of the Defendant and/or its agent(s) at all relevant times during their interactions with Plaintiffs. Plaintiffs' abusers engaged in the wrongful conduct complained of herein while acting in the course and scope of their employment with the Defendant (or Defendant's agents) and/or perpetrated the sexual abuse by virtue of their job-created authority.

1616. At all relevant times, the Defendant had a duty, arising from their (or their agents') employment Plaintiffs' abusers, to ensure that Plaintiffs' abusers did not sexually abuse children

in its custody, including training and supervising them to ensure they did not sexually abuse children in custody. Further, at all relevant times, Defendant had a duty to investigate inappropriate behavior on their part, and to discipline them appropriately, including by terminating their affiliations with the Defendant.

1617. The Defendant was negligent in its hiring, training, and supervision of Plaintiffs' abusers in that they knew, or should have known, through the exercise of ordinary care, that the conduct of Plaintiffs' abusers would subject Plaintiffs to an unreasonable risk of harm, including the propensity of Plaintiffs' abusers to sexually abuse children in its charge.

1618. Cook County gave Plaintiffs' abusers regular, direct, unsupervised, ongoing access to Plaintiffs and other residents during the course and scope of their duties, when the State knew or should have known that they presented an unreasonable risk of harm to children.

1619. Additionally, the Defendant owed a duty to train and educate employees and administrators and establish adequate and effective policies and procedures calculated to detect, prevent, and address sexual abuse of children by JTDC facility staff.

1620. The Defendant was negligent in the training and instruction of their agents and employees. The Defendant failed to timely and properly educate and train, supervise, and/or monitor their agents or employees with regard to policies and procedures that should be followed when sexual abuse of a child is suspected or observed.

1621. In negligently hiring, training, supervising, and retaining Plaintiffs' abusers, and in failing to establish such training procedures for employees and administrators, the Defendant failed to exercise the degree of care that a reasonably prudent person would have exercised under similar circumstances.

1622. It was reasonably foreseeable to the Defendant that their failure to exercise reasonable care would result in sexual abuse of children in its custody, including Plaintiffs.

1623. Plaintiffs would not have suffered the foreseeable harm complained of herein but for the Defendant's negligent hiring, training, supervision, and retention of Plaintiffs' abusers and the negligent training and instruction of their other agents and employees.

1624. At all relevant times, the Defendant's actions were negligent, willful, wanton, malicious, reckless, grossly negligent, and outrageous in its disregard for Plaintiffs' rights and safety.

1625. As a direct and proximate result of the above-described conduct, Plaintiffs have suffered, and will continue to suffer, great pain of mind and body, shock, emotional distress, discomfort, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life. They were prevented, and will continue to be prevented, from performing daily activities and obtaining the full enjoyment of life. They have sustained, and will continue to sustain, loss of earnings and earning capacity. They have incurred, and will continue to incur, expenses for medical and psychological treatment, therapy, and counseling.

COUNT VIII – *Intentional and Negligent Establishment of Policies and Procedures and/or Failure to Follow Establish Policies and Procedures*

1626. Plaintiffs reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

1627. Upon information and belief, at all relevant times, Defendant had certain policies and procedures in place to investigate concerns, allegations, or complaints regarding employee and agent conduct. Additionally or in the alternative, Defendant intentionally and/or negligently

established policies, practices, or customs that were a moving force of Plaintiffs' injuries set forth herein.

1628. Defendant, by and through their authorized agents, servants, and/or employees, officers, and directors, owed a duty to establish policies to benefit Plaintiffs and a duty to follow such policies and procedures as there were for the benefit of Plaintiffs, and breached that duty in one or more of the following ways:

- a. failing to intervene and prevent acts of sexual misconduct by employees and agents;
- b. continuing to allow employees and agents to have unsupervised contact with Plaintiffs in private and semi-private areas of the facilities;
- c. failing to adequately supervise the employees and agents;
- d. failing to protect Plaintiffs from harm;
- e. failing to warn or advise Plaintiffs that certain employees and agents posed a danger to Plaintiffs;
- f. failing to investigate the information, reports, rumors, complaints and allegations concerning certain employees and agents' sexual grooming and/or sexual abuse of Plaintiffs;
- g. attempting to conceal Plaintiffs' sexual abuse at the hands of certain employees and agents;
- h. failing to make mandated reports of suspected child abuse under the Abused and Neglected Child Reporting Act, 325 ILCS 5/3 et seq.;
- i. failing to train employees in the recognition and prevention of sexual grooming and/or sexual abuse;
- j. allowing certain employees and agents to remain employed at Defendant's facilities after learning of the sexual grooming and/or sexual abuse of Plaintiffs;
- k. failing to implement and/or to follow policies and procedures which intended to protect Plaintiffs from abuse by employees and agents of Defendant;

- l. failing to institute policies to prevent unmonitored access to juvenile detainees or instituting policies that caused unmonitored access to juvenile detainees; and/or
- m. implementing policies, such as unconstitutional strip search policies, that were a moving force of the abuse set forth herein.

1629. As a direct and proximate result of one or more of the aforementioned negligent, willful and/or wanton acts and/or omissions, Plaintiffs were subjected to sexual abuse and exploitation by employees and agents of Defendant and was caused to suffer the above injuries set forth herein.

DAMAGES AND BILL OF PARTICULARS

1631. Plaintiffs reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

1632. Each Plaintiff claims such damages as may be proven at trial, to include, but not necessarily be limited to the following:

- Past, present, and future disability and loss of a normal life;
- Past, present, and future, medical expenses, where applicable;
- Past, present, and future emotional distress;
- Past, present, and future pain and suffering;
- Past, present, and future lost wages and lost wage-earning capacity;
- Pre- and post-judgment interest; and
- All other damages permitted by law.

1633. Each Plaintiff herein individually claims and demands judgment in excess of the jurisdictional minimum of this Court.

WHEREFORE, premises considered, Plaintiffs request judgment against the state of Illinois in keeping with the foregoing and such other additional relief to which Plaintiffs may be entitled under law and which the Court deems just, fair, and appropriate under the circumstances.

It is respectfully submitted, this the 22nd, day of July, 2024.

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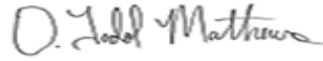
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VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and

correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

A handwritten signature in cursive script that reads "D. Todd Mathews".

D. Todd Mathews