

Taylor v. Crot, No. 13-cv-1930 (N.D. Ill)

Pro se Section 1983 complaint filed by former county jail detainee alleging that jail officials provided him with inadequate medical care and failed to protect him from harm.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THOMAS G BRUTON
CLERK, U.S. DISTRICT COURT

Kennada K TAYLOR

13 C 1930
Judge John Z. Lee
Magistrate Judge Sidney I. Schenkier

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

Case No: _____
(To be supplied by the Clerk of this Court)

officer CROT and his is A Correctional officer and Sued in his individual CAPACITY
officer Kelly and his is A Correctional officer and Sued in his individual CAPACITY
DANIEL MORECI IS SUE and his individual CAPACITY / CADORA HARRIS IS SUE and
her individual CAPACITY / THE John Doe's on known ~~as~~ or SUE and DAK
individual CAPACITY / THOMAS J DART and his officer CAPACITY FOR authorizing
and accepting an unconstitutional Policy custom or practice that Allowed

(Enter above the full name of ALL THE Defendants to violate Plaintiff Rights)
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

- COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)
- COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)
- OTHER (cite statute, if known)

BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.

I. Plaintiff(s):

- A. Name: Kennado K TAYLOR
- B. List all aliases: Kennado Boyd Taylor
- C. Prisoner identification number: M25370
- D. Place of present confinement: PONTIAC CORRECTIONAL CENTER
- E. Address: PO Box 99 PONTIAC IL 61764

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Kelly
Title: officer ~~list~~ name unknown
Place of Employment: Cook County JAIL
- B. Defendant: CROT
Title: officer ~~list~~
Place of Employment: COOK COUNTY JAIL
- C. Defendant: DANIEL MOREEL
Title: officer
Place of Employment: Cook County

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

A Name Kennada K TAYLOR

B List all Aliases Kennada Boyd TAYLOR

C Prisoner identification Number M25370

D Place of present Confinement PONTIAC CORRECTIONAL CENTER

E PO Box 99 PONTIAC IL 61764

(If there is more than one plaintiff, then each plaintiff must list his or her name aliases I.D. Number Place of Confinement, and current Address according to THE Above format on A Separate sheet of paper.)

II Defendant(s)

In A below, Place THE Full name of THE First defendant in THE First blank Blank his or her Official Position in THE Second blank and his or her place of employment in THE third blank. SPACE for two Additional ~~def~~ defendants is provided in B and C.)

A defendant John DOE unknown OPR

B title Officer OPR

C place of Employment Cook County OPR

A defendant CADORA HARRIS

B title Officer

C place of Employment Cook County JAIL

A defendant Cook County

B title Officer of Cook County JAIL

C place of Employment COOK County

A THOMAS J DART Defendant

B Sheriff of Cook County JAIL title

C COOK County JAIL Place of Employment

If you have more than three defendants then All Additional defendants must be listed according to THE Above format on separate sheet of paper.)

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

A. Name of case and docket number: N/A

B. Approximate date of filing lawsuit: N/A

C. List all plaintiffs (if you had co-plaintiffs), including any aliases: N/A

D. List all defendants: N/A

E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): _____

F. Name of judge to whom case was assigned: N/A

G. Basic claim made: N/A

H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): N/A

I. Approximate date of disposition: N/A

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

On THE Above DATE April 9 2011 time 4:30 I was coming Back From 2N A Psych Unit THE John Doe Sgt officer come and got me From 2N A Psych Unit and Cook County JAIL Div 15 and was taking me Back to Div 9 wear I had told DANIEL MORECI and LADORA HARAIS that my life was and danger By officer CROT was harass me and Putting thing and my food and had come and my CAC and handcuff me to THE Door and this is not A Party At All of Cook County JAIL other C/A CROT and Kelly had Sexually Assault me on APRIL 13 2011 THE John Doe Sgt that come and got me from Div 15 and took me Back to Div 9 THEY motivated was evil motive and intent involved Reckless and Callous indifference and THE officials had either was to hurt me on purpose and I was injury very Bad on APRIL 13 2011 and officer CROT and officers Kelly Sexually Assault me and Div 9 Holding and it is A TAPE RECORD Show that I was Being move By THE John Doe Sgt and He put me and THE Holding and Div 9 and I New THEY was going to Kill me or dump on me and on THE video RECORD of me coming Back to Div 9 I ASK THE John Doe


Sejwy is He putting me and this Holding of Div 9 and
 SAs for your officer to come get you I said I am to be more
 with A seg or A Lt At All time with A video recorder BECAUSE
 OF THE officer jump on me THE RECORD will show that I was
 move from 2N Div 15 and THE RECORD will show THE time My ID
 was put and of me coming and Div 9 Holding and I life out and
 THE TAPE will show of Div 9 camera A device for taking photographs.
 of officer CROT coming to Holding and officer Kelly was working
 Holding when officer Crot got to Div 9 Holding wear I Kennado K Taylor
 was At c/o Kelly open THE Holding CELL wear I was AT CROT and
 officer Kelly and Div 9 try making me sick DAIN Dick and try
 put in DAIN Dick and my ASS and FACE and officer Kelly and officer
 CROT jump on me and did not get me Any medical care and THE
 John Doe got let them do this to me and set up to happen to me
 At All time BECAUSE I file other JAW suit on them that was settle out
 with proof I CALL OPR on THE phone and told them About what
 what happen to me THE John Doe OPR officer try to cover up THE officer
 BECAUSE I cut my self to get to 2N Div 15 out of Div 9 wear this happen
 to me BECAUSE THE officer and Div 9 was cover every thing up so when
 I cut my self 2 day's letter I was sent to 2N Div 15 I CALL OPR
 and A John Doe and JAEN DOE officer from OPR was A wear that I was
 sexually assault By officer's CROT and of Kelly and THE OPR officer come
 to 2N Div 15 and did not do Any thing At All and I told them THEY do not

me out to THE OUTSIDE HOSPITAL FOR MY INJURY and to give me medical care
 FOR THE SEXUAL ASSAULT and I CALL OPR over and over about this SEXUAL ASSAULT
 and officer CRAT was putting stuff and my food and was coming and my CELL and jump
 on me with other officer and handcuff me to THE DOOR and Div 9 and this was not
 PULLY IF I WAS DOING ANY THING wrong of ANY TAPE He told me THE SER told him to
 handcuff me to THE DOOR and come and my cell and take ALL my thing FOR NO
 REASON AT ALL and THE OPR officer negligent me By not doing THEY JOB of sending
 me to THE out side hospital THE DAY I told them when I cut my ~~SELF~~ SELF and
 was took BACK to 2N Div IS other CRAT and C/O Kelly had SEXUAL ASSAULT me and
 THE John Doe and Jane Doe officer DO not DO ANY thing and told me to sign my name to
 some paper work so I CAN go to THE out side hospital and saw that I had injured
 and was sexually ASSAULT by THE officer CRAT and Kelly and I told THE NURSES and
 two North of Div IS and THE next DAY I was Sect BACK to Div 9 From Div IS of 2N
 and Sect me BACK to Div 9 wear THE of had SEXUAL ASSAULT me and I CALL OPR over
 and over and THE RECORD will show with proof I DO not RECALL How many DAY it was
 that THE John Doe officer From OPR come with A Video TAPE trying to COVER UP THE
 OFFICER THAT had SEXUAL ASSAULT me and dump me will Bad so when THEY come I
 told them on TAPE that this happen DAY ago and this is not THE some clowning Dan
 wearing AT ALL and THEY try to Act like this had just happen but THE TAPE that
 OPR had THE John Doe officer when THE come it was three of them one of them
 was one of THE officer that come to 2N Div IS and talk to me so He will know How
 to cover it up AT ALL time so THEY come to THE some Holding wear I was sexually
 ASSAULT by officer CRAT and officer Kelly so THE John Doe OPR officer motive was evil
 involved by officer CRAT and officer Kelly so THE John Doe OPR officer motive was evil
 Sect me to THE out side Hospital wear I told THE medical doctor that this happen
 3 DAYs ago and this is A cover up on THE officer that had sexual ASSAULT me and THE
 did not get THEY Dick and my ASS they was try and they why putting DARK Dick on my
 Ass and was trying to make me sick it and THE officer made me set and THE Shower
 before I come and three DAYs ago THE officer made me set and THE Shower three DAYs
 before I come to this Hospital How THEY trying to cover every thing up and THE doctor
 said ok Mr Taylor and THE officer left out with THE ~~doctor~~ doctor and I was took
 back to Cook County Jail wear officer CRAT was still jump on me and put thing and put
 food I ate so many GRIEVANCE about officer CRAT jump on me and try to KILL me to cover
 up him and officer Kelly I CAN prove that with RECORD and GRIEVANCE and out
 Side Hospital RECORD and proof I CAN not Read or Write to good and CAN not spell
 AT ALL THE following Act of officer CRAT and officer Kelly CAUSE me more significant Pain
 and suffering and my grievance and medical RECORD and my testimony will support this
 claim and I suffered physical and emotional injuries as a result of THE sexual ASSAULT
 and THE beatings and days with out Pain medications and THE officer and THE John Doe
 and Jane Doe officer and DANIEL MORECI is over THE Div 9 officer and CADORA HARRIS is
 THE next Hower up officer to make THE CALL and Div 9 and I told them over and over

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above THE officer and me being sexual assault by THE officer CROT and Kelly and THE
All THE defendants who wear and have a blue eye as THE supervisor directly participated
officer DANIEL MOREL and officer CADORA HARRIS violation as supervisor learned of failed to
do anything to fix THE situation officer MOREL and officer HARRIS or supervisor ~~learned~~ created
A policy or custom that allowing ~~and~~ encouraging THE illegal acts ~~and~~ supervisor that grossly
negligent in managing THE supervisor he and she was supposed to supervise AT ALL time
of Div 9 ~~and~~ THE supervisor are not and Div 9 that I am a wear of but still work
FOR Cook County Jail some wear AT ALL time officer DANIEL MOREL and CADORA HARRIS or
under supervisor liability Read Meriwether v Coughlin 879 F.2d 1037 (2d Cir 1990) I was
A pre-trial detainee confined in THE Cook County Jail in Chicago Illinois when officer
CROT and officer Kelly sexually assault me and use excessive force upon plaintiff during
my detention and THE defendants systematic, repeated and collective failure to prevent
THE use of excessive force that THE defendant's CROT and Kelly and All defendant's
collective failure to ~~properly~~ properly and timely address plaintiff injury
that ~~plaintiff~~ plaintiff sustained AT THE hands of certain defendants during plaintiff detention
and defendant failure to provide medical care for plaintiff other ~~than~~ officer CROT and
Kelly sexual assault me and beat me with excessive force my I was A pretrial detainee
AT Cook County Jail and All defendants denied me medical care and deny my medical care
of officer CROT and Kelly sexually assault me and use excessive force this was without justification
and did not ~~report~~ report THE issue AT ALL time and THE John Doe ~~Sgt~~ Sgt did not report and
thing hoping I will be kill AT ALL time but my family who wear and they new it defendant's
CROT and Kelly was deliberate indifference to my medical need and common LAW ASSAULT and
battery and plaintiff can prove THE excessive use of force based on evidence OF THE RECORDS
other THE indicating that THE OTHER defendants despite about officer CROT and officer Kelly
sexually assault plaintiff and used excessive force THE kick me and beating me with their hands
to my body and FACE four more they do on THE suffered of officer unnecessary and excessive force
on plaintiff AT ALL time and THE hospital ~~visit~~ visit will prove that it was A cover of THE evidence
OF THE GRIEVANCE and THE RECORD of ALL RECORD that will be prove AT ALL time AT trial
and it was negligent by All defendants AT ALL time BECAUSE supervisor DANIEL MOREL and supervisor
CADORA HARRIS responded to THE GRIEVANCE AT ALL time and life me and THE some Div 9 with THE defendant
and failed to do anything to fix it and OFF John Doe and JANE DOE defendant's grossly negligent
BECAUSE they knew I got sexually assault and deny me medical care and cover up THE defendant's
at ALL time and THE RECORD will show All THE defendant's ~~was~~ report of their denial of access to
medical care to plaintiff and All defendant's was repeated willful and intentional violations
OF plaintiff rights and All defendant's or under constituted under STATE LAW and defendant CROT and
Kelly All ~~so~~ violated plaintiff rights under THE United States Constitution and STATE LAW OF THE use of
force and excessive force that they did when they sexually assault me and jump on me kick me
and beating plaintiff and All THE defendant's failed to give adequate medical care for plaintiff
being sexually assault and being beating by officer CROT and officer Kelly of THE physical injuries
from defendant's officer CROT and officer Kelly sustained beating pushed and kick me AT ALL
time and cover it up and to some of my injury cell I was A pre trial detainee AT Cook County
Jail when this happening and AT that time under THE Control Care and Custody of Cook County
Department of Corrections defendant's Thomas Dart is Sheriff of Cook County Jail and oversees
THE operations of THE Cook County Jail officer and opa and All defendant's defendant's
Dart is sued in his official capacity Defendant Cook County is A County OF THE STATE OF
Illinois Cook County through THE Cook County Sheriff Office and THE Department of Corrections
over ~~the~~ THE Cook County ~~is~~ Cook County operates THE Cook County Jail and THE plaintiff
as A pre trial detainee and Cook County is THE employer of THE individual defendant's

Count 1 Under Section 11830 Document For Encompass 2/18/90 of Defendant Crot and Kelly used Force Against Plaintiff Kennado K TAYLOR that was unnecessary unreason- able and excessive defendant's conduct violated Plaintiff Kennado K TAYLOR Rights Under THE Fourteenth Amendment THE use of excessive Force by defendant's CROT and Kelly and some unknown Correctional officers, and defendant Dart was A Result of THE Sheriff's Office and Cook County's systematic failure to train monitor, supervise investigate and discipline Cook County Department of Corrections personnel inadequate Policies and systematic failure to enforce those Policies. THE persistent and widespread use of excessive Force by Cook County Department of Corrections personnel constitutes A custom and practice, of which Defendant Dart has Actual and constructive notice on Plaintiff belief defendant Dart has been deliberately indifferent in failing to remedy THE Problem through their indifference and failure to Act Cook County and THE Sheriff's Office Policy makers and officials have condoned and encouraged THE continued use of excessive levels of force in THE Cook County JAIL Defendant's conduct was willful, wanton, malicious and in reckless disregard of Plaintiff Kennado K TAYLOR. Kennado K TAYLOR Plaintiff has been injured by THE Above named Defendant's use of excessive Force and THE Custom Policy and practice of Defendant Dart of condoning or encouraging THE use of excessive Force. Count two under Section 11830 Claim For Inadequate Access to Medical Care of All Defendant CROT and ~~Kelly~~ Kelly and DANIEL MORECI and CADORA HARRIS and THE John Doe's unknown corrections officer and THOMAS J DART Defendant's and THE County of Cook deprived Plaintiff of Access to Adequate medical care in violation of Plaintiff Right of THE Fourteenth Amendment Rights Defendant displayed A deliberate indifference towards THE Serious medical needs of Plaintiff pro ximately CAUSE, Plaintiff suffer damages and Pain and suffer Plaintiff belief Cook County Department of Corrections and Cook County personnel have A custom Policy or practice of failing to provide Adequate medical care to detainees, At THE Cook County JAIL including Plaintiff Kennado K TAYLOR on information and belief Cook County Department of Corrections and Cook County personnel have A custom Policy or practice of failing to provide adequate medical care to detainees At THE Cook County JAIL including Plaintiff TAYLOR Defendant Dart on information and belief, has Actual and constructive notice of this custom Policy or practice, and has been ~~deliberately~~ deliberately indifferent in failing to remedy THE Problem and THE County of Cook conduct was willful, wanton, malicious and in Reckless disregard of Plaintiff Kennado K TAYLOR and Plaintiff suffered injury as A Result of THE Actions and omissions of Defendant's Court three ~~sexually~~ sexually Assault of defendant's THE unknown Correctional officers intentionally and unlawfully offered to Commit Commit corporal injury of plaintiff by Force was Force unlawfully directed under such circumstances as to create A well founded Fear of imminent peril defendant's and unknown Correctional officers had THE Apparent present Ability to effectuate THE Attempt if not prevented. Defendant's conduct was willful, wanton, malicious and in reckless disregard of Plaintiff Right of their denial of Access to medical care to Plaintiff ~~As a~~ defendant Dart For failure to supervise his agents to curb Prisoner Abuse and Such other and further Compensatory damages as this Court or THE trier of Facts my deem to be Just and proper this punitive damages be Awarded to Mr TAYLOR in an Amount to be determined at Trial Against All Defendant's for repeated, willful and intentional violations of Plaintiff Rights Pursuant to Rule 38 of THE Federal Rules of Civil Procedure Plaintiff Kennado K TAYLOR hereby demands A trial by Jury in this matter

Respectfully Submitted

Kennado K TAYLOR

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

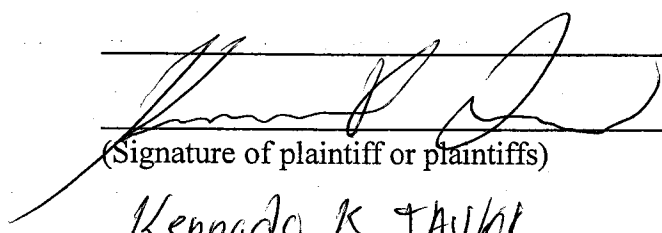
① Plaintiff is seeking \$350,000 Punitive damages
② Plaintiff is seeking \$1,000,000 Compensatory damages
③ Plaintiff is seeking to get out of IDRC BECAUSE OF THE evil motive and intent of THE CASE that was put on me At All time by Cook County Officer and THE County of Cook County

VI. The plaintiff demands that the case be tried by a jury. YES NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this MAR day of 7, 2013



(Signature of plaintiff or plaintiffs)

Kennado K TAYLOR
(Print name)

M25370
(I.D. Number)

(Address)

Part-A / Control #: X

Referred To: CRW/P.S

Processed as a request.

COOK COUNTY DEPARTMENT OF CORRECTIONS DETAINEE GRIEVANCE

Detainee Last Name: Taylor First Name: Kennado

ID #: 2010 - 1204047 Div.: 9 Living Unit: 1E Date: 10 / 31 / 11

BRIEF SUMMARY OF THE COMPLAINT: ON APRIL 13 OF 20 2011

I WAS SEX ALLY ASSAULT BY OF CROT O PR COME
TO TALK TO ME AND I NOT DID ANY THING NOT
TO HELP ME HE IS STILL COME HER ME EVER DAY
OTHER HE NEGLIGENCE ME ALL OF THE HOUR UP
OFFICER NO ABOUT IT OFFICER KELLY SEX ASSAULT
ME TO OPR HAVE NOT DID ANY THING OR TOLD ME
ANY THING HOW I WILL GO TO THE COURT ABOUT IT
ASAP

NAME OF STAFF OR DETAINEE(S) HAVING INFORMATION REGARDING THIS COMPLAINT:

OFFICER CROT OFFICER KELLY

ACTION THAT YOU ARE REQUESTING:

N/A

DETAINEE SIGNATURE: [Signature]

C.R.W.'S SIGNATURE: [Signature]

DATE C.R.W. RECEIVED: 11, 2, 11

Please note: Decisions of the "Detainee Disciplinary Hearing Board" cannot be grieved or appealed through the use of a grievance form. All appeals must be made in writing and directly submitted to the Superintendent.



Part-A / Control #: X

Referred To: Supt Olliv

Processed as a request.

COOK COUNTY DEPARTMENT OF CORRECTIONS DETAINEE GRIEVANCE

Detainee Last Name: Taylor First Name: Kennado

ID #: 2010 - 1204047 Div.: 9 Living Unit: 11 Date: 9/21/11

BRIEF SUMMARY OF THE COMPLAINT: My is officer CROT still worked
IF HE was one of THE officer SEXUAL ASSAULT ME
He told ME He is going to put A case on ME officer
CROT is putting stuff And my food I have told THE
Set on 31011 DRUZ About officer CROT Keep trying
to do some thing to ME I have SO many GRIEVANCE
on CROT ever one is over Looking what I am
Saying A bout officer CROT HE is try to put A
Case on me And HE putting thing And my food
THE Jail is putting My Life And danger win some
thing Happing to ME or THE officer I am telling THE G.
GRIEVANCE DEPARTMENT about I will suit THE

NAME OF STAFF OR DETAINEE(S) HAVING INFORMATION REGARDING THIS COMPLAINT:

Officer CROT

ACTION THAT YOU ARE REQUESTING:

FOR ME NOT TO BE ON IF WITH CROT OR CROT NOT BE
Wear I am set on IF please

DETAINEE SIGNATURE: [Signature]

C.R.W.'S SIGNATURE: [Signature]

DATE C.R.W. RECEIVED: 9/22/11

Please note: Decisions of the "Detainee Disciplinary Hearing Board" cannot be grieved or appealed through the use of a grievance form. All appeals must be made in writing and directly submitted to the Superintendent.



1226
1026

Part-A / Control # 2011X2632
Referred To: Supt Div. 9
 Processed as a request.

**COOK COUNTY DEPARTMENT OF CORRECTIONS
DETAINEE GRIEVANCE**

Detainee Last Name: Taylor First Name: Kennado

ID #: 2010-1204047 Div.: 9 Living Unit: 1E Date: 7/9/11

BRIEF SUMMARY OF THE COMPLAINT: On and About APRIL 13 2011
time 5:00 officers CROT and officers Kelly sexually assault
me and Div 9 Holding come back from 2M and Div
8 officer CROT come to hold and sexually assault me
what officer Kelly and Div 9 and take and THE
Hold CELL this is not A Request this is A GRIEVANCE
ABOUT ME BEING SEXUALLY ASSAULT BY Div 9 officers
CROT and officers Kelly and Div 9 THE OFFICERS
tryed making ME SICK HE DICK and tryed putting
his dick and my FACE and THE officers was putting
DAIR DICK on my ass and Jump on my to and Div 9
in take Holding CELL

NAME OF STAFF OR DETAINEE(S) HAVING INFORMATION REGARDING THIS COMPLAINT:

CROT officer Kelly

ACTION THAT YOU ARE REQUESTING:

I will BE Fuleing A law Suit ASAP

DETAINEE SIGNATURE: [Signature]

C.R.W.'S SIGNATURE: [Signature]

DATE C.R.W. RECEIVED: 11.9.11

Please note: Decisions of the "Detainee Disciplinary Hearing Board" cannot be grieved or appealed through the use of a grievance form. All appeals must be made in writing and directly submitted to the Superintendent.

