

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

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CLERK  
U.S. DISTRICT COURT

Crystal Wilkes, Sharon Hollister  
and Tonya Townsend individually  
and on behalf of a class,

Plaintiffs

vs.

MICHAEL SHEAHAN,  
SHERIFF OF COOK COUNTY,  
in his official capacity,

Defendant

01C 1592

No.

JUDGE  
MAGISTRATE

JUDGE JOHN W DARRAH

MAGISTRATE JUDGE ASHMAN

DOCKETED

MAR 08 2001

COMPLAINT

Now comes the Plaintiffs, by and through their attorney,  
Thomas G. Morrissey, Ltd., and Robert H. Farley, Jr. Ltd., and  
complain of the Defendant as follows:

INTRODUCTION

1. The plaintiffs in this case are currently pretrial  
detainees at the Cook County Department of Corrections ("Jail").  
Each plaintiff is also a member of the class in *Gary v. Sheahan*,  
No. 96 C 7294, (Coar J.) where the Court found the Sheriff's policy  
and practice of strip searching female inmates upon returning to  
the Jail from Court after there was a judicial determination that  
there was no longer a basis for their detention, other than to be  
processed for release was unconstitutional.

2. As pretrial detainees at the Jail, plaintiffs were  
initially strip searched upon admission to the Jail, and have been  
and in the future will be strip searched after returning from

court appearances and during random strip searches pursuant to the policies and practices at the Jail.

3. Plaintiffs, as representatives of a class seeking injunctive relief, are not challenging the need to conduct strip searches at the Jail but rather maintain that the strip searches are unreasonable because the strip searches are conducted in an abusive fashion by the Sheriff, are highly intrusive due to the manner and locations of the searches, and afford no privacy to the women being searched.

#### **JURISDICTION**

4. This is a Civil Action for injunctive relief to redress deprivations under color of law of rights, privileges, and immunities secured under the Fourth, Eighth, and Fourteenth Amendments to the United States Constitution, and Title 42 U.S.C. Sections 1983 and 1988.

#### **CLASS ACTION ALLEGATIONS**

5.(a) Plaintiffs bring this action as a class action pursuant to Rule 23(b)(2) of the Federal Rules of Civil Procedure.

(b) The Class consist of all female persons who have been and in the future will be strip searched upon admission to the Jail, after returning from court appearances and during random strip searches pursuant to the policies and practices at the Jail.

© The class is so numerous that joinder of all persons is impracticable. The practice and policy at the Jail is to strip search all female inmates when admitted to the Jail, upon their return to the Jail from Court and during random strip searches.

Plaintiffs believe that the class probably numbers well over 1,000 female inmates.

(d) Plaintiffs will fairly and adequately protect the interest of all class members as they are members of the class and their claims are typical of the claims of all class members. Each of the plaintiffs is incensed at the treatment accorded the class members and will aggressively pursue the interests of the entire class. Plaintiffs' interest in obtaining injunctive relief for the violations of constitutional rights and privileges are consistent with and not antagonistic to those of any person within the class.

(e) The prosecution of separate actions by individual members of the class would create a risk of inconsistent or varying adjudications with respect to individual members of the class which would establish incompatible standards of conduct for the party opposing the class.

#### FACTS AND PARTIES

6. Plaintiff Crystal Wilkes is a citizen of the United States and resident of the State of Illinois. Since October 17,2000, Ms. Wilkes has been an inmate at the Cook County Department of Corrections, awaiting trial on a felony charge. Her next court date is set for March 23,2001.

7. Plaintiff Sharon Davis Hollister is a citizen of the United States and a resident of the State of Illinois. Since October 19,2000, Ms. Hollister has been an inmate at the Cook County Department of Corrections, awaiting trial on a felony charge. Her next court date is March 20,2001.

8. Plaintiff Tonya Townsend is a citizen of the United States and a resident of the State of Illinois. Since February 15, 2001, Ms. Townsend has been an inmate at the Cook County Department of Corrections, awaiting trial on a felony charge. Her next court date is March 15, 2001.

9. Defendant MICHAEL SHEAHAN (Sheahan) is an elected county official whose duties include implementing and executing policies concerning the operation of the Cook County Jail (Jail) pursuant to 55 ILCS 5/3-15003. At all times relevant hereto, Sheahan was acting under color of law.

10. On February 15, 2001, plaintiff Townsend was taken into custody of the Sheriff's Office at the Jail and placed in a bullpen in the Receiving Area of the Jail with approximately 38 other women.

11. During the time period the plaintiff was in this bullpen, the canine unit entered the bullpen and the handlers for the dogs informed the women that the dogs would attack and bite the women if they detected any contraband. The dogs were then unleashed by the guards and proceeded to sniff and search each female inmate.

12. Plaintiff and the other women in the bullpen were then escorted by three or four female guards to a gymnasium area where the strip search was conducted. The gym is an open area with a balcony. It is not uncommon for male guards to enter the gym unannounced during strip searches.

13. Upon entering the gym, the plaintiff and the other women were ordered to forms lines and rows with four inmates to a line.

Pursuant to the standard policy and practice of the Sheriff, the plaintiff was required to submit to the following strip search:

(A) The plaintiff was ordered to remove all her clothing;

(B) After removing all her clothing, she was required to open her mouth, lift her breast, and to run her hands through her hair;

(C) While naked, the plaintiff was required to spread her buttock and bend and squat three times while coughing. Due to the fact that some of the women were unable to "properly" perform this task, the plaintiff was required to repeat the process nine times.

14. At the time of the strip search, Ms. Townsend was on her menstrual cycle. Regardless of this fact, she was required to remove her pad and perform the above stated strip search with no protection. At least two other women in the group were also on their menstrual cycle, and as a result the plaintiff saw blood running down their legs on to the floor of the gym. When the strip searches were completed, these women were yelled at the by the guards to clean up their blood.

15. The strip searches were conducted under conditions which were unhealthy and unsanitary. Two of the women were sick and vomiting, presumable from withdrawal symptoms. There was a strong, nauseous odor in the gym during the strip search which was extremely unpleasant. The guards made frequent derogatory remarks about the lack of hygiene of the women and called them whores and bitches.

16. Plaintiff saw one of the guards violently kick and pull

up one of the women who was sick and lying on the floor of gym.

17. Since entering the Jail, Plaintiff Townsend has been subjected to one other strip search in the day area of the tier under circumstances similar to the situations described in paragraphs 13-16.

18. On October 17, 2000, Plaintiff Crystal Wilkes was taken into custody of the Sheriff's Office at the Jail and placed in a bullpen in the Receiving Area of the Jail with approximately 40 other women.

19. Subsequently, Plaintiff Wilkes was moved into another bullpen room with other female inmates. One of the walls in this room was made of glass which provided no privacy. This room is situated in an area with other similar rooms and there are cameras which are positioned to observe the inmates. The glass wall of the room looks out onto a hallway. This hallway is frequently traversed by male guards and male inmates.

20. The bullpen area used to strip search Plaintiff Wilkes was filthy. The toilet was overflowing, there was urine, human excrement, food particles and paper on the floor. The smell of the bullpen was so bad it made the plaintiff nauseous.

21. During the strip search, the guards called the women derogatory names such as bitches and whores. Women who were overweight or had large breast were singled out by the guards and required to lift the folds of their stomachs and breasts.

22. While the plaintiff was being strip searched, she observed a male guard enter the area where the women were being

searched.

23. One of the women being strip searched was vomiting during the strip search process. Afterwards she laid on the floor of the bullpen until a guard kicked her and told her to get her "ass" up.

24. During her period of incarceration, Plaintiff Wilkes has been strip searched approximately ten times. These searches have been conducted in a manner similar to what has been described in paragraphs 21 through 23 when she has returned to the Jail after a court appearance or during random strip searches on her tier. The locations of the searches include the gym, clothing room and day area of her tier.

25. On October 19,2000, Plaintiff Sharon Hollister was taken into custody of the Sheriff's Office at the Jail and placed in a bullpen in the Receiving Area of the Jail.

26. Plaintiff Hollister and the other women in the bullpen were then escorted by three or four female guards to a gymnasium area where the strip search was conducted.

27. Ms. Hollister was then strip searched under the same conditions as previously described in paragraphs 13 through 23.

28. During her period of incarceration, Plaintiff Hollister has been strip searched approximately nine times. These searches have been conducted in a manner similar to what has been described in paragraphs 13 through 24 when she returned to the Jail after a court appearance or during random strip searches on her tier. The locations of the searches include the gym, clothing room and day area of her tier.

**COUNT ONE**

1-28. Plaintiffs reallege paragraphs 1-28 above as paragraphs 1-28 of Count I.

29. At all times relevant to this complaint, the defendant, as Sheriff of Cook County has the duty to establish procedures and policies and to train deputy sheriffs and C.C.D.O.C. employees to prevent unreasonable body searches of individuals and to prevent strip searches of female inmates from being performed in an abusive fashion, under conditions which are unsanitary and provide no protection of privacy to the women during the searches.

30. Defendant SHEAHAN knew or should have known that female inmates are subjected to highly intrusive strip searches which afford no privacy to female inmates and which are conducted under unsanitary, filthy conditions, and are carried out by his deputies in an abusive manner.

31. Defendant SHEAHAN instituted, sanctioned, and approved the following policies, practices, customs, and procedures regarding the strip searching of female individuals who are in the custody of the Cook County Department of Corrections;

- A. Female inmates are routinely strip searched upon entry to the Jail, after returning from court appearances and during random strip searches in the housing divisions.
- B. The canine unit at the Jail makes random inspections of the newly admitted inmates to the Jail prior to and at



the time while women are in the process of being strip searched. The guard dogs enter the bullpens where the female inmates are held without restraints and proceed to sniff and search female inmates for contraband, after the Sheriff deputies inform the women that the dogs will attack and bite the women if drugs are detected.

- C. The strip searches are conducted in groups of between 15 and 40 inmates which affords no privacy to the women.
- D. The areas in which the strip searches are administered by the Sheriff are dirty, foul smelling and subject to viewing by male guards and male inmates. At times the strip searches are conducted in bullpens located in the Receiving area of the Jail. The walls of these bullpens are made of glass and provide no privacy. The glass wall of the room looks out onto a hallway. The hallway is frequently traversed by male and female C.C.D.O.C. employees. (Exhibit A, p.18)
- E. The foul smell and odor in the areas where the women are strip searched is so retched and putrid that even the guards conducting the searches admit that it makes them nauseous and has caused one to almost vomit. (Exhibit A. p. 15; Exhibit B. p.17)
- F. The physical conditions under which the women are strip searched are unclean and unsanitary. In the bullpen areas, the toilets are frequently overflowing, there is urine, human excrement, blood, food and paper on the

floors.

G. Pursuant to the standard policy and practice of the Sheriff, the plaintiff was required to submit to the following strip search under the above conditions:

- (1) The women are order to get in lines containing three or four inmates arms length apart;
- (2) The women are then ordered to remove all of their clothing;
- (3) After removing all their clothing, the women are required to open their mouths, lift their breasts, and to run their hands through their hair.

H. Regardless of whether women are on their menstrual cycle, they are required to remove their sanitary napkin and perform the strip search without any protection. Frequently women on their menstrual cycle are exposed to the embarrassment of having blood running down their legs and onto the floor. (Exhibit A.p.16). In addition, the other women in the group are subjected to potential infection from these bodily fluids.

I. During the strip searches of the female inmates, the guards frequently call the women derogatory names and single out women that are overweight or who have large breasts to lift the folds of their stomachs and breasts.

32. The Sheriff failed to establish appropriate procedures and practices to ensure that female inmates are not subjected to unreasonable body searches.

33. The Sheriff failed to properly train and supervise the deputy sheriffs and C.C.D.O.C. employees responsible for conducting body searches of inmates to prevent unreasonable body searches.

34. The strip search of plaintiffs under the above describe abusive conditions constitutes deliberate indifference to the rights of the plaintiffs in violation of the Fourth, Eighth and Fourteenth Amendments to the U.S. Constitution.

36. As a direct and proximate result of the Sheriff's policies, practices and procedures, in his official capacity, the defendant subjected the Plaintiffs and members of the class to unreasonable body searches which were demeaning, dehumanizing, undignified, humiliating, terrifying, unpleasant, embarrassing, repulsive, signifying degradation and submission.

37. Unless immediately, preliminarily and permanently enjoined from continuing to subject females inmates from abusive strip searches defendant will continue to engage in the willful, wanton and deliberate violation of the constitutional rights of females, and plaintiffs and members of the class will continue to suffer gross violations of their constitutional rights and gross indignities, each of which constitutes irreparable injury for which plaintiffs have no adequate remedy at law.

WHEREFORE, plaintiffs PRAY that this Court enter an order:

1. Finding that this action should proceed as a class action pursuant to Rule 23(b)(2), of the Federal Rules of Civil Procedure;

2. Preliminarily and permanently restraining, enjoining and

prohibiting defendant from undertaking, enforcing, maintaining or adopting any policies, procedures, practices or acts by which any female inmate is subjected to an abusive strip search without consideration for the privacy interest of the female and the conditions under which the strip search is conducted.

3. Awarding plaintiffs and the class their costs and attorney's fees under Title 42 U.S.C. Sect. 1988.

  
Plaintiffs' Attorneys

Thomas G. Morrissey, Ltd.  
Robert H. Farley, Jr., Ltd.  
10249 S. Western Ave.  
Chicago, Il. 60643  
(773)-233-7900

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

KENYA GARY and TANIA HAYES,	)
Individually and on behalf	)
of a class,	)
	)
Plaintiffs,	)
	)
vs.	) No. 96 C 7294
	)
MICHAEL SHEAHAN, Sheriff	)
of Cook County, in his	)
individual official	)
capacity,	)
	)
Defendant.	)

The Discovery Deposition of PATSY  
MOODY, taken before SHERLENE BRANSCOMB, a Certified  
Shorthand Reporter and Notary Public, pursuant to the  
Federal Rules of Civil Procedure for the United  
States District Courts, pertaining to the taking of  
discovery depositions, at 2700 South California,  
Division 4, Chicago, Illinois, at the hour of 9:00  
a.m., on the 10th day of April, A.D., 1998.

1 did you hear any female court return make sexual,  
2 suggestive comments in the nature of you're pretty or  
3 I want you to be my girlfriend or one inmate to  
4 another?

5 MR. BEIRNE: Objection to the form of the  
6 question as compound, vague, and ambiguous.

7 THE WITNESS: No.

8 BY MR. FARLEY:

9 Q Have you been given the job or  
10 responsibility for cleaning the bull pen area in the  
11 female receiving room?

12 A No.

13 Q When you go over to pick up the female  
14 court returns, how does the female receiving bull pen  
15 area smell?

16 MR. BEIRNE: Objection. Vague.

17 MR. FARLEY: You can answer.

18 THE WITNESS: Smelly.

19 BY MR. FARLEY:

20 Q Does the smell ever reach a point of making  
21 you nauseous?

22 A Yes.

23 Q And during those times when the smell made  
24 you nauseous, what was the physical condition or

1 appearance of the bull pen?

2 MR. BEIRNE: Objection to the question as  
3 vague and ambiguous. You can answer.

4 THE WITNESS: Dirty.

5 BY MR. FARLEY:

6 Q As to dirty, what do you mean by dirty?

7 A Toilet paper being on the floor.

8 Q And with respect to toilet paper on the  
9 floor, did you observe what appeared to be blood on  
10 the toilet paper or human waste?

11 A No.

12 Q When a woman is on her menstrual cycle and  
13 she is required to bend and squat three times, were  
14 there occasions where you observed blood running down  
15 her legs?

16 A Yes.

17 Q And did you also observe blood on the tile  
18 floor?

19 A Yes.

20 Q And do you know what happens to that blood  
21 on the tile floor after the strip search procedure?

22 A We give them toilet paper so that they can  
23 clean it up.

24 Q Is the female given anything else besides

1 toilet paper to clean up the blood off the floor?

2 A No.

3 Q During the strip search procedures, has a  
4 female court return -- have you heard a female court  
5 return voice concerns about other inmates being HIV  
6 positive or having AIDS?

7 A Yes.

8 Q And when you observed the blood on the  
9 floor running down the inmate's legs, they were --  
10 the inmate was completely naked, correct?

11 A Yes.

12 Q And with respect to the female court return  
13 voicing concerns about other females being HIV  
14 positive or AIDS, was that during a strip search  
15 procedure?

16 A Yes.

17 Q I apologize if I asked this question, but  
18 things flow together.

19 Are there -- do you have any knowledge  
20 as to whether there is cameras or monitors in the  
21 female receiving area, the bull pen area, where the  
22 strip search procedures take place?

23 A No.

24 Q So no as to you have no knowledge?



1 A Right. I have no knowledge.

2 Q Now, in the female receiving area there is  
3 a -- is it correct to say that there is a door that  
4 separates four bull pens from another four bull pens  
5 in the female receiving area?

6 A Yes.

7 Q And on occasions when you have been present  
8 during the strip searching of the female court  
9 returns, have there been occasions when some male or  
10 males inadvertently walked through that door during a  
11 strip search procedure?

12 A Yes.

13 Q And how often would that occur?

14 MR. BEIRNE: Objection to the form of the  
15 question as vague. You can answer if you know.

16 BY MR. FARLEY:

17 Q How often would that occur with respect to  
18 men inadvertently walking through that door during a  
19 strip search?

20 MR. BEIRNE: Same objection.

21 MR. FARLEY: You can answer.

22 THE WITNESS: Not that often.

23 BY MR. FARLEY:

24 Q In the bull pen where the women are strip

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF Illinois  
EASTERN DIVISION

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KENYA GARY and TANIA HAYES,	)	
Individually and on behalf	)	
of a class,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	No. 96 C 7294
	)	
MICHAEL SHEAHAN, Sheriff	)	
of Cook County, in his	)	
individual official	)	
capacity,	)	
	)	
Defendant.	)	

The Discovery Deposition of WANDA SPARKS, taken before SHERLENE BRANSCOMB, a Certified Shorthand Reporter and Notary Public, pursuant to the Federal Rules of Civil Procedure for the United States District Courts, pertaining to the taking of discovery depositions, at 2700 South California, Division 4, Chicago, Illinois, at the hour of 9:00 a.m., on the 10th day of April, A.D., 1998.

1 A It's awful.

2 Q And by awful, what type of smell?

3 A I'm sure it would be the odor that's left  
4 there from the strip search normally. Once we get  
5 there, it's not -- where the women are in the one  
6 bull pen you have the stench coming from. We usually  
7 move them to an empty bull pen maybe 20 at a time,  
8 depending on how many we have to do the search.  
9 Once we are done with that 20, the stench is there  
10 now. So it's a really awful odor at time. So bad I  
11 have almost vomited.

12 Q Have there been occasions when you have  
13 gone to the female receiving area in RCDC where the  
14 floors appear to have dry blood on it?

15 A I haven't seen any.

16 Q When you would arrive down to RCDC to pick  
17 up the female court returns, would they generally be  
18 in one bull pen?

19 A Sometimes.

20 Q You indicated that some of the inmates are  
21 brought out of a single bull pen to another bull pen  
22 to be strip searched?

23 A Yes, over in receiving.

24 Q How many would be brought out at one time?

JS 44 (Rev. 12/96)

# CIVIL COVER SHEET

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

### I. (a) PLAINTIFFS

*Crystal Wilkes, Shakow Hollister  
And Tonya Townsend*

### DEFENDANTS

*Michael Sheehan in his official  
Capacity as Sheriff of Cook County*

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF COOK  
(EXCEPT IN U.S. PLAINTIFF CASES)

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT COOK  
(IN U.S. PLAINTIFF CASES ONLY)

**DOCKETED**

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

*Thomas G. MURRESSEY LTD.  
10244 S. WESTERN AVE  
Chicago, IL 60643*

MAR 08 2001

ATTORNEYS (IF KNOWN)

**01C 1592**

**JUDGE JOHN W DARRAH**

**MAGISTRATE JUDGE ASHMA**

### II. BASIS OF JURISDICTION (PLACE AN "X" IN ONE BOX ONLY)

- 1 U.S. Government Plaintiff
- 3 Federal Question (U.S. Government Not a Party)
- 2 U.S. Government Defendant
- 4 Diversity (Indicate Citizenship of Parties in Item III)

### III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

- |   |                            |                            |   |                            |                            |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
|   | PTF                        | DEF                        |   | PTF                        | DEF                        |
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

### IV. ORIGIN (PLACE AN "X" IN ONE BOX ONLY)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from another district (specify)
- 6 Multidistrict Litigation
- 7 Appeal to District Judge from Magistrate Judgment

### V. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 881 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice Act <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input checked="" type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>HABEAS CORPUS:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	
		<b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	
			<b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609	

### VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY.)

*4th Amendment UNREASONABLE SEARCH*

### VII. REQUESTED IN COMPLAINT

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES ONLY if demanded in complaint

JURY DEMAND:  YES  NO

VIII. This case  is not a refiling of a previously dismissed action.

is a refiling of case number \_\_\_\_\_, previously dismissed by Judge \_\_\_\_\_

DATE

SIGNATURE OF ATTORNEY OF RECORD

*3-7-01*

*Thomas G. Murresey*

U.S. DISTRICT COURT  
FILED  
MAR 7 2001  
11:53

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

MAGISTRATE JUDGE ASHMAN

In the Matter of *Crystal Wilkes et al,*  
*Michael Sherman,*  
*Sherriff of Cook County,*

Case Number: **01C 1592**

JUDGE JOHN W DARRAH

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

*CRYSTAL WILKES, SHARON HULLISTER and  
TONYA TOWNSEND*

**DOCKETED**  
MAR 08 2001

(A)	(B)
SIGNATURE <i>Thomas G. Morrissey</i>	SIGNATURE <i>Robert H. Parley, Jr.</i>
NAME <i>THOMAS G. MORRISSEY</i>	NAME <i>ROBERT H. PARLEY, JR.</i>
FIRM <i>THOMAS G. MORRISSEY LTD.</i>	FIRM <i>ROBERT H. PARLEY, JR., LTD.</i>
STREET ADDRESS <i>10244 S. Western Ave</i>	STREET ADDRESS <i>1155 S Washington</i>
CITY/STATE/ZIP <i>Chicago, IL 60643</i>	CITY/STATE/ZIP <i>WAPER WILLE, IL 60540</i>
TELEPHONE NUMBER <i>773-233-7900</i>	TELEPHONE NUMBER <i>630-369-0103</i>
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) <i>12450</i>	IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) <i>2124293</i>
MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
	DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>
(C)	(D)
SIGNATURE	SIGNATURE
NAME	NAME
FIRM	FIRM
STREET ADDRESS	STREET ADDRESS
CITY/STATE/ZIP	CITY/STATE/ZIP
TELEPHONE NUMBER	TELEPHONE NUMBER
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DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>

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U.S. DISTRICT COURT