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IN THE COURT OF CLAIMS OF
THE STATE OF ILLINOIS

JEFFERY CHRISTIAN, CALVIN)
MCDOWELL, STEPHEN LUCAS, A.B., E.C.,)
L.D., B.P., D.T., J.L., N.A., D.N., K.J., D.J.,)
K.W., I.S., S.V., A.C., J.C., J.R., J.B., J.J., G.S.,)
J.L. 2, K.W. 2, M.S., E.F., L.J., A.G., C.P.,)
E.H., D.R., L.C., J.B. 2, W.H., R.M., V.G., J.F.,)
~~C.G., S.T., G.C., C.S., J.S., J.A., A.S., M.J.,~~)
N.H., J.L. 3, R.B., F.M., T.K., Q.G., J.P., B.P.)
2, T.L., R.T., M.T., S.W., J.P. 2, C.E., I.S. 2,)
L.R., M.H., S.F., K.M., T.B., S.H., T.P., C.J.,)
K.T., J.D., E.J., A.L., C.G. 2, S.S., R.W., J.H.,)
H.K., P.K., M.R., W.M., O.S., R.W. 2, C.Z.,)
K.C., D.W., J.B. 3, K.J. 2, A.S. 2, E.G., M.W.,)
D.S., D.B., I.W., K.R., and C.C.)

No. _____

\$ Not to exceed \$2,000,000.00 per individual, adjusted according to law

Claimants

vs.

The STATE OF ILLINOIS
Acting by and through its agencies,
ILLINOIS DEPARTMENT OF
CORRECTIONS, and/or ILLINOIS
DEPARTMENT OF JUVENILE JUSTICE

Respondent

COMPLAINT

Claimants Jeffery Christian, Calvin McDowell, Stephen Lucas, A.B., E.C., L.D., B.P.,
D.T., J.L., N.A., D.N., K.J., D.J., K.W., I.S., S.V., A.C., J.C., J.R., J.B., J.J., G.S., J.L. 2, K.W. 2,
M.S., E.F., L.J., A.G., C.P., E.H., D.R., L.C., J.B. 2, W.H., R.M., V.G., J.F., C.G., S.T., G.C., C.S.,
J.S., J.A., A.S., M.J., N.H., J.L. 3, R.B., F.M., T.K., Q.G., J.P., B.P. 2, T.L., R.T., M.T., S.W., J.P.
2, C.E., I.S. 2, L.R., M.H., S.F., K.M., T.B., S.H., T.P., C.J., K.T., J.D., E.J., A.L., C.G. 2, S.S.,

R.W., J.H., H.K., P.K., M.R., W.M., O.S., R.W. 2, C.Z., K.C., D.W., J.B. 3, K.J. 2, A.S. 2, E.G., M.W., D.S., D.B., I.W., K.R., and C.C. (“Claimants”) by their attorneys, Levy Konigsberg LLP, Bailey Glasser LLP, and DiCello Levitt LLP bring this action against the State of Illinois by and through its agencies the Illinois Department of Corrections and the Illinois Department of Juvenile Justice, and based upon the best information and belief allege the following:

NATURE OF THE CLAIM

1. For decades, the State of Illinois through the Illinois Department of Corrections and the Illinois Department of Juvenile Justice has assumed the custody of children through the Juvenile Justice Court system and confined them in Illinois Youth Centers (“IYC”) across the state, where multiple State of Illinois employees sexually abused them. The State of Illinois 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. Moreover, after passage of the Prison Rape Elimination Act (“PREA”) in 2003, the State of Illinois routinely failed to ensure compliance with the prophylactic protections and requirements of the PREA, which was designed to eliminate sexual abuse of inmates.

2. 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. Employees of the Illinois Department of Corrections and the Illinois Department of Juvenile Justice sexually abused Claimants and or negligently allowed or failed to prevent sexual abuse of Claimants while they were children in the legal and physical custody of the State of Illinois and confined at Illinois Youth Centers in Chicago, Joliet (now closed), Harrisburg, Kewanee (now closed), Murphysboro (now closed), Pere Marquette, St. Charles, Warrenville, and Valley View (now closed).

3. 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

4. This Court has jurisdiction pursuant to the Court of Claims Act codified at 705 ILCS 505/8(a) and (d) as Claimant brings this action for damages against the State founded upon the laws of the State of Illinois and sounding in tort.

PARTIES

5. Claimants are adults who were resident adolescent citizens of the State of Illinois at the time the acts described herein occurred, all of whom were born on or after July 24, 1983. Claimants 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, Claimants' sexual abuse occurred while in the custody of the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, and 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 Claimants' identities as victims of childhood sexual abuse would subject Claimants and their families to compounded humiliation, embarrassment, and emotional distress. Accordingly, filed concurrently herewith is a request for Claimants 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.

6. Claimants join their claims in this action pursuant to 74 Ill. Admin Code 790.40(a) and the Illinois Code of Civil Procedure 735 ILCS 5 *et seq.* as Claimants' 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 claimants against the State of Illinois any common question of law or fact would arise.

7. Jeffery Christian is an adult resident citizen of Maywood, Illinois.
8. Calvin McDowell is an adult resident citizen of Elmwood Park, Illinois.
9. Stephen Lucas is an adult resident citizen of Danville, Illinois.
10. Claimant A.B. is an adult resident citizen of Chicago, Illinois.
11. Claimant E.C. is an adult resident citizen of Lansing, Illinois.
12. Claimant L.D. is an adult resident citizen of Kankakee, Illinois.
13. Claimant B.P. is an adult resident citizen of Bridgeview, Illinois.
14. Claimant D.T. is an adult resident citizen of Maywood, Illinois.
15. Claimant J.L. is an adult resident citizen of Chicago, Illinois.
16. Claimant N.A. is an adult resident citizen of Des Moines, Iowa.
17. Claimant D.N. is an adult resident citizen of Joliet, Illinois.
18. Claimant K.J. is an adult resident citizen of Normal, Illinois.
19. Claimant D.J. is an adult resident citizen of Rockford, Illinois.
20. Claimant K.W. is an adult resident citizen of Greenup, Illinois.
21. Claimant I.S. is an adult resident citizen of Elgin, Illinois.
22. Claimant S.V. is an adult resident citizen of Chicago, Illinois.
23. Claimant A.C. is an adult resident citizen of Belleville, Illinois.
24. Claimant J.C. is an adult resident citizen of La Harpe, Illinois.

25. Claimant J.R. is an adult resident citizen of Chicago, Illinois.
26. Claimant J.B. is an adult resident citizen of Grand Prairie, Texas.
27. Claimant J.J. is an adult resident citizen of Effingham, Illinois.
28. Claimant G.S. is an adult resident citizen of Chicago, Illinois.
29. Claimant J.L. 2 is an adult resident citizen of Chicago, Illinois.
30. Claimant K.W. 2 is an adult resident citizen of Antioch, Illinois.
31. Claimant M.S. is an adult resident citizen of Chicago, Illinois.
32. Claimant E.F. is an adult resident citizen of Chicago, Illinois.
33. Claimant L.J. is an adult resident citizen of Chicago, Illinois.
34. Claimant A.G. is an adult resident citizen of Chicago, Illinois.
35. Claimant C.P. is an adult resident citizen of Henry, Illinois.
36. Claimant E.H. is an adult resident citizen of Chicago, Illinois.
37. Claimant D.R. is an adult resident citizen of Chicago, Illinois.
38. Claimant L.C. is an adult resident citizen of Elyria, Ohio
39. Claimant J.B. 2 is an adult resident citizen of Chicago, Illinois.
40. Claimant W.H. is an adult resident citizen of Kokomo, Indiana.
41. Claimant R.M. is an adult resident citizen of Paris, Illinois.
42. Claimant V.G. is an adult resident citizen of Skokie, Illinois.
43. Claimant J.F. is an adult resident citizen of DeKalb, Illinois.
44. Claimant C.G. is an adult resident citizen of Kewanee, Illinois.
45. Claimant S.T. is an adult resident citizen of Griffith, Indiana.
46. Claimant G.C. is an adult resident citizen of Tilton, Illinois.
47. Claimant C.S. is an adult resident citizen of Vincennes, Indiana.

48. Claimant J.S. is an adult resident citizen of Cahokia, Illinois.
49. Claimant J.A. is an adult resident citizen of Anna, Illinois.
50. Claimant A.S. is an adult resident citizen of Chicago, Illinois.
51. Claimant M.J. is an adult resident citizen of Dunfermline, Illinois
52. Claimant N.H. is an adult resident citizen of Chicago, Illinois.
53. Claimant J.L. 3 is an adult resident citizen of Litchfield, Illinois.
54. Claimant R.B. is an adult resident citizen of East Moline, Illinois.
55. Claimant F.M. is an adult resident citizen of Chicago, Illinois.
56. Claimant T.K. is an adult resident citizen of Kenosha, Wisconsin.
57. Claimant Q.G. is an adult resident citizen of Springfield, Illinois.
58. Claimant J.P. is an adult resident citizen of Centralia, Illinois.
59. Claimant B.P. 2 is an adult resident citizen of Springfield, Illinois.
60. Claimant T.L. is an adult resident citizen of Chicago, Illinois.
61. Claimant R.T. is an adult resident citizen of Danville, Illinois.
62. Claimant M.T. is an adult resident citizen of Chicago, Illinois.
63. Claimant S.W. is an adult resident citizen of Hillsboro, Missouri.
64. Claimant J.P. 2 is an adult resident citizen of Danville, Illinois.
65. Claimant C.E. is an adult resident citizen of Chicago, Illinois.
66. Claimant I.S. 2 is an adult resident citizen of Chicago, Illinois.
67. Claimant L.R. is an adult resident citizen of Chicago, Illinois.
68. Claimant M.H. is an adult resident citizen of Peoria, Illinois.
69. Claimant S.F. is an adult resident citizen of Urbana, Illinois.
70. Claimant K.M. is an adult resident citizen of Calumet City, Illinois.

71. Claimant T.B. is an adult resident citizen of Peoria Heights, Illinois.
72. Claimant S.H. is an adult resident citizen of Alton, Illinois.
73. Claimant T.P. is an adult resident citizen of Maywood, Illinois.
74. Claimant C.J. is an adult resident citizen of Chicago, Illinois.
75. Claimant K.T. is an adult resident citizen of Chicago Heights, Illinois.
76. Claimant J.D. is an adult resident citizen of Champaign, Illinois.
77. Claimant E.J. is an adult resident citizen of Chicago Heights, Illinois.
78. Claimant A.L. is an adult resident citizen of Chicago, Illinois.
79. Claimant C.G. 2 is an adult resident citizen of Clinton, Iowa.
80. Claimant S.S. is an adult resident citizen of Peoria, Illinois.
81. Claimant R.W. is an adult resident citizen of Chicago, Illinois.
82. Claimant J.H. is an adult resident citizen of Peoria, Illinois.
83. Claimant H.K. is an adult resident citizen of Campbell Hill, Illinois.
84. Claimant P.K. is an adult resident citizen of Champaign, Illinois.
85. Claimant M.R. is an adult resident citizen of Chicago, Illinois.
86. Claimant W.M. is an adult resident citizen of Chicago, Illinois.
87. Claimant O.S. is an adult resident citizen of Chicago, Illinois.
88. Claimant R.W. 2 is an adult resident citizen of Chicago, Illinois.
89. Claimant C.Z. is an adult resident citizen of Elgin, Illinois.
90. Claimant K.C. is an adult resident citizen of Grayville, Illinois.
91. Claimant D.W. is an adult resident citizen of Sheldon, Illinois.
92. Claimant J.B. 3 is an adult resident citizen of Chicago, Illinois.
93. Claimant K.J. 2 is an adult resident citizen of Rockford, Illinois.

94. Claimant A.S. 2 is an adult resident citizen of Moline, Illinois.
95. Claimant E.G. is an adult resident citizen of East Moline, Illinois.
96. Claimant M.W. is an adult resident citizen of Decatur, Illinois.
97. Claimant D.S. is an adult resident citizen of Ferguson, Missouri.
98. Claimant D.B. is an adult resident citizen of Decatur, Illinois.
99. Claimant I.W. is an adult resident citizen of Chicago, Illinois.
100. Claimant K.R. is an adult resident citizen of Davenport, Iowa.
101. Claimant C.C. is an adult resident citizen of Pekin, Illinois.
102. The Defendant is the State of Illinois, acting by and through its agencies, Illinois Department of Corrections and/or Illinois Department of Juvenile Justice (“the State” or “Defendant”), which confined minors, including all claimants herein, at Illinois Youth Centers across the state under the Division of the Department of Corrections until 2006, at which time such confinement occurred under the purview of the Illinois Department of Juvenile Justice. *See* 730 ILCS 5/3-2.5-5. 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 Claimants. The facilities at issue include the following:
 - Illinois Youth Center – Chicago, which was designed as a maximum-security facility in anticipation of juvenile “super-predators”. However, this prediction of an explosion of “super-predators” proved to be inaccurate, and IYC-Chicago now serves a minimum-security all-male offender population. There is no foliage at the facility, and the only outdoor recreation is a sally port with a basketball goal. The residents housed there live in cells resembling prison cells,

despite the minimum-security designation of its confined youth. The facility has at times housed female youth.

- Illinois Youth Center – Harrisburg, an all-male, medium-security detention facility located near the southern tip of Illinois, which is far from the majority of juvenile residents’ homes in central Illinois.
- Illinois Youth Center – Pere Marquette, an all-male, minimum-security detention facility located in Pere Marquette, Illinois. The facility has at times housed female youth.
- Illinois Youth Center – St. Charles, an all-male, medium-security detention facility located in St. Charles, Illinois, which, despite boasting a 12-to-1 staff-to-youth ratio, has suffered from a shortage of security staff until as recently as 2023.
- Illinois Youth Center – Warrenville, Illinois’ only co-ed juvenile detention facility.
- Illinois Youth Center – Kewanee was a mixed medium/maximum all-male juvenile detention facility that closed in 2016. IYC – Kewanee suffered chronic understaffing for high-risk, high-need youth who most needed treatment and programming, which was particularly dangerous for the large portion of Kewanee’s population suffering from acute mental illness. Kewanee’s physical location posed a frequent barrier to contacts with families and counsel.
- Illinois Youth Center – Joliet was the only all-male maximum-security facility in the Illinois Department of Juvenile Justice that housed three distinct populations, maximum-security-classified youth, juvenile technical parole

violators, and juvenile parolees charged with adult crimes in Cook County. The physical facility at Joliet was stark, institutional, framed by razor wire, and this semblance of an adult prison conflicted with the IDJJ's mandated mission to move away from an adult correctional model and to embrace a more rehabilitative, youth-centered approach to treatment. The facility closed in 2013 due to accommodate state budgetary concerns.

- Illinois Youth Center – Murphysboro, formerly known as Southern Illinois' Minimum Facility for Boys, was a minimum-security juvenile detention center that until 2010 operated under a boot camp model, and ultimately closed in 2013.
- Illinois Youth Center – Valley View was an all-male, minimum-security juvenile detention center located in a suburban residential area west of Chicago. The facility housed the state's experimental Sex Offender Treatment Program from 1991 until its closure in 2002.

FACTUAL ALLEGATIONS

103. Claimants reallege and incorporate by reference each and every previous allegation above as if fully stated herein.

104. Illinois' problematic history of sexual and physical abuse within juvenile detention facilities has been documented by high-profile legal filings, criminal indictments, and sweeping investigations. This includes a federal investigation conducted by the DOJ's Bureau of Justice Statistics into sexual abuse at seven Illinois youth detention facilities, including Illinois Youth Centers in Chicago, Harrisburg, Joliet, Kewanee, St. Charles, Warrenville, and Pere Marquette.

105. In June 2013, the DOJ's National Survey of Youth in Custody reported that Illinois was among the four worst states in the nation for sexual abuse in juvenile detention facilities. The DOJ report, which prompted emergency hearings in the state Legislature, showed that across all the state's juvenile detention facilities, 15% of youth inmate respondents reported that they experienced some form of sexual victimization, due primarily to high rates of staff sexual misconduct, a figure roughly 35% higher than the national average. At one such facility, the now-closed Illinois Youth Center in Joliet, 21% (more than twice the national average) reported having sexual contact with staff members, including contact by force.¹

106. The State of Illinois has allowed a culture of abuse at IYC's to flourish unabated. In fact, between April, 2009 and 2012, rates of reported sexual victimization by staff sexual misconduct drastically increased at IYC facilities in Harrisburg (11.8% to 14.7%), Joliet (13.9% to 20%), and Kewanee, where the rate more than doubled (5.7% to 12%).²

107. Overall, in 2013, the State of Illinois had a sexual victimization rate that was 35% higher than the national average, due primarily to high rates of staff sexual misconduct. Sexual abuse of children at Illinois' juvenile detention facilities, continues to this day.

108. In addition to these damning DOJ reports, other high-profile cases involving staff-on-inmate abuse have shown that Illinois has failed to confront its systemic abuse problem for decades. Evidence supplied by public filings and payouts have also shown that the Illinois Department of Juvenile Justice (IDJJ) and various State-run juvenile detention facilities

¹ U.S. Dep't of Just., Bureau of Justice Statistics, *Sexual Victimization in Juvenile Facilities Reported by Youth, 2012* (June 2013), <https://bjs.ojp.gov/content/pub/pdf/svjfry12.pdf>

² *Compare U.S. Dep't of Just., supra note 1, Appendix Table 4 with U.S. Dep't of Just., Bureau of Justice Statistics, Sexual Victimization in Juvenile Facilities Reported by Youth, 2008-09* (Jan. 2010), <https://files.eric.ed.gov/fulltext/ED508530.pdf>, Appendix Table 4.

overwhelmingly failed to investigate complaints, report abusive staff, and protect youth inmates.

Some examples include:

- In June 2021, Antoinette Perkins pleaded guilty to felony official misconduct after it was discovered that she engaged in sexual misconduct with a minor housed at the Illinois Youth Detention Center in St. Charles. Prosecutors say the incident occurred in October 2020 while Perkins was employed as a juvenile justice specialist at the center.³
- In 2011, a male guard at the Illinois Youth Center in Joliet was sentenced to six years in prison for sexually assaulting a 17-year-old in 2008.⁴
- In 2006, Barnett Gill, a 28-year veteran of the Illinois Department of Corrections, was convicted of having sexual contact with a 16-year-old female inmate at IYC - Warrenville, where Gill was a supervisor.⁵
- In 2003, an employee of at the Illinois Youth Center - Murphysboro was arrested on multiple felony counts for sexual abuse.⁶ According to the state, the defendant was a kitchen supervisor at the facility who used his position of

³ See Kane County Chronicle Staff Report, *IYC-St. Charles employee pleads guilty to felony official misconduct of sex with young inmate*, Kane County Chronicle, January 29, 2024, <https://www.shawlocal.com/kane-county-chronicle/news/crime-and-courts/2021/07/26/iyc-st-charles-employee-pleads-guilty-to-felony-official-misconduct-of-sex-with-young-inmate/>.

⁴ See Andy Grimm, *Feds: State youth prison had high rate of sex assault*, Chicago Tribune, June 6, 2013, <https://www.chicagotribune.com/suburbs/chi-feds-state-youth-prison-had-high-rate-of-sex-assault-20130606-story.html>.

⁵ See Chicago Tribune, *Ex-juvenile supervisor convicted*, The Chicago Tribune, August 3, 2006, <https://www.chicagotribune.com/2006/08/03/ex-juvenile-supervisor-convicted/>.

⁶ See Andrea Hahn, *Sexual abuse, assault case testimony begins*, The Southern Illinoisan, February 3, 2007, https://thesouthern.com/news/local/sexual-abuse-assault-case-testimony-begins/article_b4af59bb-fdc8-5df1-8aa8-4ec73669fbd3.html.

authority to take advantage sexually of several of the cadets who worked with him in the kitchen.⁷

- In 2000, a former teacher at the Illinois Youth Center - Warrenville was charged with criminal sexual abuse for alleged sexual contact with two teenage residents of the facility. He pleaded guilty and was sentenced to misdemeanor criminal sexual abuse in 2002.⁸

109. Multiple claimants herein have independently alleged severe abuse by the same abuser. Such common abusers include: (1) an IYC – Harrisburg supervisor and current mayor of Eldorado, Illinois named Rocky James; (2) an IYC – St. Charles correctional officer by the name of Mr. Williams, aka “Cat Daddy”; (3) a corrections officer at IYC – Harrisburg named Ms. Idaho (later, Mrs. Curd by marriage); (4) the chaplain at IYC – St. Charles, Chaplain Jones; (5) an IYC – St. Charles correctional officer named Ms. Montoya; (6) and IYC St. Charles correctional officer named Mr. Bacon.

110. The State of Illinois also perpetrated sexual abuse upon minors in its custody by systematic and unconstitutional strip searches of juvenile inmates. In addition to violating the constitution of the United States, these pervasive patterns and practices within the various IYC facilities have provided the opportunity for sexual penetration and fondling of minors. While this conduct is criminal and unconstitutional, it is also violative of the administrative regulations

⁷ See Andrea Hahn, *Sexual abuse from 2003 ready for trial*, The Southern Illinoisan, January 26, 2007, <https://www.newspapers.com/image/83598168/?match=1>

⁸ See Christy Gutowski, *Teacher at juvenile center accused of molesting pair of teenagers*, The Daily Herald, February 10, 2000, <https://www.newspapers.com/image/19990920/?terms=%22John%20plagakis%22%20and%20%22plead%22&match=1>; and Art Barnum, *Ex-teacher pleads guilty to abuse*, The Chicago Tribune, January 29, 2002, <https://www.newspapers.com/image/390064633/?terms=%22John%20plagakis%22%20and%20%22plead%22&match=1>.

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 perpetrated a policy and practice of strip-searching juveniles in an unlawful manner that caused widespread sexual abuse of juveniles in its custody.

111. The State of Illinois has caused and permitted a culture of sexual abuse to flourish unabated in its IYC facilities. Upon information and belief, the State of Illinois is aware (and has for decades been aware) that the conditions identified above as connected to sexual abuse and conditions of juvenile detention facilities were and are endemic to all IYC facilities.

112. At all times relevant to the wrongful conduct complained of herein, Claimants were children under the age of eighteen years in the legal and physical custody, direct and exclusive control, and supervision of Defendant and their agents and officers, who were responsible for Claimants' care and safety.

113. Claimants did not factually or legally consent to the abuse or conduct described herein. Claimants 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 the State of Illinois. Moreover, the 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. As such, the sexual conduct complained of herein lacked consent.

114. At all relevant times herein, Claimants' abusers were 17 years of age or older and held a position of trust, authority, or supervision in relation to Claimants.

115. The sexual abuse and conduct described herein was perpetrated by employees and officers of the State of Illinois for the purpose of sexual gratification or arousal of the perpetrator(s) and/or the victim.

Sexual Abuse of Jeffery Christian

116. When Christian was approximately 13 or 14 years old and housed at the IYC – Pere Marquette a correctional officer named Ms. Brown, who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused Christian in 2001 or 2002.

117. Ms. Brown was at all relevant times a black, tall, female, believed to have been in her 30s, with a mole and short hair. Christian expects to learn the full name and identity of his abuser through the course of discovery.

118. On Christian's first day in confinement, Brown entered Christian's cell during the evening, brought him snacks, and sat and talked with Christian about his life while repeatedly complimenting Christian's appearance in a flirtatious manner and squeezing his buttocks. The next day, Brown returned with snacks and asked Christian more about his life, and the conversation turned sexual as Brown asked Christian if he had ever had sex, about the size of his genitals, and other inappropriate topics. On his third or fourth day of confinement, Brown entered Christian's cell and forcibly masturbated him.

119. Brown ultimately masturbated Christian forcibly nine to ten times.

120. When Christian returned to his regular housing unit, other female correctional officers approached Christian and said that they heard about what Brown did to him, and they laughed and made sexual jokes about Christian's genitals and sex abuse.

121. Christian's mother reported the abuse to the Warden. No one followed up with Christian about the abuse.

122. When claimant Christian was approximately 15 or 16 years old and housed at the IYC – Chicago, a counselor who was at all relevant times an employee of the State of Illinois via the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused Christian in 2003 or 2004.

123. Christian's counselor abuser (hereinafter "Christian Abuser 2" unless otherwise indicated) was at all relevant times a white female, believed to have been in her 20s, approximately 5'4 to 5'5 in height with sandy blonde hair and a medium build.

124. Christian attended sessions with his counselor roughly once a week, and during their sessions Christian Abuser 2 was very flirtatious and made sexual comments towards Christian. After a few weeks of this conduct, Christian Abuser 2 regularly wrote letters to him, in which she wrote about missing him, being in love with him, and wanting to have sex with him.

125. During their subsequent counseling sessions, Christian Abuser 2 regularly groped and fondled Christian's genitals and buttocks over the clothes.

126. Christian Abuser 2 gave Christian extra snacks and put money into Christian's commissary account. Approximately two to four months later, the Warden approached Christian and said that she intercepted one of Christian Abuser 2's letters to Christian and subsequently searched Christian's cell, where they found all the letters Christian Abuser 1 sent him. The Warden sent Christian to confinement, and when he returned to regular housing, he had a new counselor.

127. The State of Illinois and its employees knew or should have known that Brown and Christian Abuser 2 were sexually abusing him, among others.

128. At the time of the above-described sexual abuse of Christian, his abusers and other employees were not adequately supervised, monitored, or surveilled by the State of Illinois and its respective departments. Upon information and belief, the State's failure to supervise, discipline, remove, and/or otherwise investigate Christian's abusers and staff members who knew or should have known about the abuse directly enabled the above-described sexual abuse.

129. The State is vicariously liable for the sexual abuse of Christian as well as other employees' failure to prevent and report the said abuse.

130. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, claimant Christian was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

Sexual Abuse of Calvin McDowell

131. When Calvin McDowell was approximately 17 years of age in 2004 and housed at IYC – St. Charles, Chaplain Jones, who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused McDowell.

132. Chaplain Jones was at all relevant times herein a tall, white male with grey hair believed to have been in his 60s.

133. Jones often allowed McDowell and other youths to congregate in the chapel at St. Charles. McDowell visited the church within the first few weeks of his sentence and met Jones. Jones then asked McDowell to step aside into a secluded area inside the church and complimented his body.

134. Jones caressed McDowell over the clothes, then placed McDowell's hand on his (Jones's) penis and told McDowell to touch it. McDowell was uncomfortable and upset, but Jones

told him that “this is what goes on” in the church. Jones then forced the claimant to receive oral sex. After the abuse, McDowell ran out of the church and refused to go back.

135. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant McDowell was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

136. The State of Illinois and its employees knew or should have known that this staff member was sexually abusing children at IYC – St. Charles before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

137. At the time of the above-described sexual abuse of McDowell, staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

138. The State is vicariously liable for the abuser’s sexual abuse as well as its employees’ failure to prevent and report said abuse.

Sexual Abuse of Stephen Lucas

139. When Stephen Lucas was 13 years old and housed at IYC – Harrisburg, a “white shirt” authority figure named Rocky James, who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused Lucas in 2002.

140. Rocky James was at all relevant times a white male, of athletic build, approximately 5’7 in height, and estimated to be in his late 30s to early 40s. He had a short haircut and well-kept facial hair.

141. A few months into Lucas's stay at IYC – Harrisburg, he was sent to the confinement unit where James worked. Whenever James saw him around the unit, he groped his buttocks over the clothes and made sexual comments about his body.

142. On one occasion, James approached Lucas's cell door while he was asleep and made a sexual comment about his buttocks, then put his hands through the cell door and made a masturbatory gesture in the air.

143. A few times during Lucas's stay in the confinement unit, all of the mattresses were revoked from the confinement cells. During these occasions, James told Lucas that he would give him his mattress back if he masturbated him or administered oral copulation on him. Lucas did not comply with James's coercion.

144. About halfway through his stay at IYC – Harrisburg, Lucas was sent to Unit 6, also known as D Wing, the disciplinary unit within the facility where James also worked. James escorted Lucas from the confinement unit to D Wing, during which time he groped Lucas's buttocks over the clothes and said that he could get Lucas out of D Wing if he administered oral copulation on him through the "chuck hole" of his cell that evening. Lucas refused to comply with this coercion, but Rocky James continued to harass and/or abuse Lucas every time he saw him, which was multiple times a week.

145. On one occasion, Lucas was showering by himself while on D Wing and saw James standing on the other side of the glass, watching him shower. James made a masturbatory gesture in the air and continued to watch Lucas shower through the glass. Lucas became incredibly fearful of James from this point forward and would not leave his cell if he knew James was working.

146. During the period of abuse, Lucas verbally told a lieutenant named Humble about Rocky James's sexually abusive behavior. Humble laughed and said James was "just playing

around.” A few days later, James told Lucas that he heard about his report from Lieutenant Humble; he said that it was pointless to try and report his sexually abusive behavior because the correctional officers at IYC – Harrisburg “stick together,” and that Lucas would get in trouble if he ever disclosed the abuse again.

147. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual. At the relevant times herein, Lucas was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

148. The State of Illinois and its employees knew or should have known that this staff member was sexually abusing children at IYC – Harrisburg before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

149. At the time of the above-described sexual abuse of Lucas, staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

150. The State is vicariously liable for the abuser’s sexual abuse as well as its employees’ failure to prevent and report said abuse.

Sexual Abuse of A.B.

151. When Claimant A.B. was approximately 14 years old and housed at IYC – St. Charles, two correctional officers (hereinafter Mr. Rodgers and “A.B. Abuser 2” unless otherwise indicated), who were at all relevant times employees of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused A.B. in approximately 1998 and 1999.

152. Mr. Rodgers was at all relevant times a bald, black, male, of medium height, and estimated to be in his 30s.

153. A.B. Abuser 2 was at all relevant times a white male, estimated to be in his 30s, and approximately 5'10 in height. He had short, blonde hair.

154. Claimant A.B. expects to learn the full names and identities of his abusers through the course of discovery.

155. Within the first several months of A.B.'s confinement at St. Charles, Rodgers entered the claimant's cell when he was alone. He forced A.B. to administer oral sex and receive anal penetration. The abuse occurred consistently throughout A.B.'s 20 months of confinement, but some months were worse than others in terms of the frequency, ranging from daily abuse to abuse once every few days. During the brief period that A.B. had a cellmate, no abuse occurred.

156. Rodgers revoked A.B.'s yard time and phone privileges if the claimant ever tried to protest his sexual abuse, and he forced A.B. to stay in his cell for multiple hours if he refused to comply with the abuse. By the same token, he gave A.B. extra recreation time and better jobs around the facility when he succumbed to the sexual abuse.

157. A.B. Abuser 2 abused A.B. in a similar manner by entering claimant's cell when he was alone and forced him to give oral sex and penetrate A.B. anally. A.B. Abuser 2 perpetrated abuse less often than Rodgers because A.B. was often working during A.B. Abuser 2's shifts. A.B. Abuser 2 perpetrated sexual abuse upon A.B. a few times a month, roughly once or twice every other week. A.B. Abuser 2 took away the claimant's phone privileges and search or "shake down" his room for no reason if he did not succumb to the abuse. He also gave A.B. extra recreational time when he did comply. Upon information and belief, Rodgers and A.B. Abuser 2 communicated about the abuse.

158. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant A.B. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

159. The State of Illinois and its employees knew or should have known that these correctional officers were sexually abusing children at IYC – St. Charles before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

160. At the time of the above-described sexual abuse of Claimant A.B., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

161. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of E.C.

162. When Claimant E.C. was approximately 16 years old and housed at IYC – St. Charles, a counselor (hereinafter "E.C. Abuser 1" unless otherwise indicated), who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused E.C. between approximately October and December of 2006.

163. E.C. Abuser 1 at all relevant times was a tall, white, female, estimated to be in her 20s or 30s. She had brown hair. Claimant E.C. expects to learn the full name and identity of his abuser through the course of discovery.

164. E.C. Abuser 1 made E.C. feel comfortable enough for him to confide in her. E.C. and other residents had “group” therapy sessions, and E.C. was reluctant to divulge family issues at the session because he was upset. He was unable to make frequent calls to family, but E.C. Abuser 1 asked him to go to her office to talk and asked why he would not share in “group” and offered to help him make a call to his aunt to cheer him up. He did not want to, so she offered to “make him feel better,” and began performing oral sex on him.

165. E.C. Abuser 1 performed oral sex on E.C. six to seven times. On more than one occasion, a correctional officer or officers approached E.C. in his cell to report that the drug counselor needed to see him. The correctional officer then sent E.C. to E.C. Abuser 1’s office, where she performed oral sex on E.C.

166. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant E.C. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

167. The State of Illinois and its employees knew or should have known that this counselor was sexually abusing children at IYC – St. Charles, before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

168. At the time of the above-described sexual abuse of Claimant E.C., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

169. The State is vicariously liable for the abuser’s sexual abuse as well as its employees’ failure to prevent and report said abuse.

Sexual Abuse of L.D.

170. When Claimant L.D. was approximately 15 years old and housed at IYC – St. Charles, a correctional officer named Mr. Williams, who was at all relevant times an employee of the State of Illinois via the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused L.D. in approximately 2005.

171. Mr. Williams was at all relevant times tall, light-skinned, heavy-set, black or biracial male with a tattoo sleeve on one of his arms. He wore glasses. L.D. expects to learn the full name and identity of his abuser through the course of discovery.

172. During late night routine checks, Williams groped and fondled claimant over and under the clothes and masturbated the claimant. Williams sexually abused L.D. in this manner approximately three to four times total. The abuse ceased when L.D. received a cellmate approximately after five to six months of this abuse.

173. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant L.D. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

174. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – St. Charles before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

175. At the time of the above-described sexual abuse of Claimant L.D., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

176. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of B.P.

177. When Claimant B.P. was approximately 14 years old and housed at IYC – St. Charles, several correctional officers (hereinafter “B.P. Abusers” unless otherwise indicated), who were at all relevant times employees of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused B.P. starting in 2004.

178. B.P. Abusers included two correctional officers named Mr. Bacon and Mr. Williams.

179. Bacon was at all relevant times herein a tall, black, male, estimated to be in his early 40s. He had a stocky build and a mustache.

180. Williams was at all relevant times a tall, black, male, estimated to be in his 40s. He had tattoos on his arm. B.P. also knew him by the nickname “Cat Daddy.”

181. B.P. expects to learn the full names and identities of all B.P. Abusers through the course of discovery.

182. B.P. Abusers strip searched B.P. approximately more than 100 times without suspicion as a false guise for sexual abuse over the course of B.P.'s confinement. Approximately five different correctional officers at IYC – St. Charles, including Bacon and Williams, conducted the strip searches by pulling B.P. into his cell and forcing him to strip (sometimes forcibly removing his clothing) and follow convoluted orders. B.P. Abusers lifted, squeezed, and fondled B.P.'s genitals and rubbed his buttocks with a finger.

183. Along with the regular strip searches performed by other B.P. Abusers, Bacon and Williams made sexual comments to B.P. and slapped his butt whenever they saw him around the facility.

184. This abuse occurred at IYC – St. Charles in approximately 2004 and/or 2005, and 2007 prior to B.P.’s eighteenth birthday.

185. When B.P. was approximately 15 years old and housed at IYC – Kewanee, a correctional officer named Officer Ens, who was at all times herein an employee of the State of Illinois via a vis the Department of Corrections, sexually abused B.P. starting when he was transferred to the facility in approximately 2005.

186. Ens was at all relevant times a bald, heavy-set, white, male, estimated to be in his late 30s to early 40s, and approximately 5’8 in height.

187. Ens slapped B.P. on his butt, called him “fresh meat” and other uncomfortable names, and blew the claimant kisses whenever he saw him. Whenever Ens saw B.P. approaching, he told the other correctional officers that he’ll “take care of him” and took him to the shower area. There, he ordered him to undress, then grabbed his genitals for 30 to 90 seconds at a time, groped his body, and ordered him to bend over so he could inspect the claimant’s anus with a flashlight. He threatened to send B.P. to segregation and keep him there longer if the claimant did not comply with these baseless strip searches.

188. This abuse took place nearly every day whenever the claimant was at Kewanee throughout 2005 to 2007, between the ages of 15 and 17.

189. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant B.P. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

190. The State of Illinois and its employees knew or should have known that these correctional officers were sexually abusing children at IYC – St. Charles and IYC – Kewanee before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

191. At the time of the above-described sexual abuse of Claimant B.P., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

192. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of D.T.

193. When Claimant D.T. was approximately 16 years old and housed at IYC – St. Charles, three correctional officers named Ms. Shaw, Ms. Montoya, and Mr. Williams, who were at all relevant times employees of the State of Illinois via the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused D.T. in 2010.

194. Ms. Shaw was at all relevant times a white female, estimated to be in her late 20s, and approximately 5'9 in height. She had freckles and reddish-brown hair.

195. Shaw approached the claimant while he was showering, usually before or after mealtime, and forced D.T. to touch her under the clothes and receive oral sex. Whenever D.T. refused such abuse, Shaw threatened to write him up and send him to segregation. She also threatened to revoke his phone and recreation time. After a few months of such abuse, Shaw rewarded D.T. with a job as a porter, which allowed him to leave his cell while other inmates were

locked in their cells. Shaw told him that he could keep his job as porter as long as he continued to comply with her abuse. She also gave him outside food and candy.

196. This abuse occurred approximately three times a week in the showers for approximately two years prior to D.T.'s eighteenth birthday.

197. Ms. Montoya was at all relevant times herein a Hispanic female correctional officer with blonde hair. She was approximately 5'4 to 5'5 and believed to have been in her early 30s.

198. Montoya forced claimant to have sex with her and receive oral sex while he showered. Montoya incentivized and threatened D.T. in the same manner as Shaw. This abuse occurred approximately four or more times a week, beginning approximately three months into his sentence.

199. Mr. Williams was at all relevant times herein a black male correctional officer believed to have been in his 30s or 40s. He was tall and broad-shouldered.

200. Approximately six to nine months D.T.'s sentence, Williams entered his cell and put his hands down his clothes and gripped D.T.'s buttocks and genitals and tried to digitally penetrate him and administer oral sex. D.T. yelled out to an inmate in the neighboring cell, and the inmate came into the cell. Williams immediately stopped and left the cell, until a few weeks later, he attempted the abuse again.

201. Multiple times throughout his confinement, D.T. attempted to verbally report this abuse to two other correctional officers. Both correctional officers told D.T. that they would talk to someone about the abuse, but no one ever followed up with him regarding his report and his abuse continued until he left the facility.

202. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant D.T. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

203. The State of Illinois and its employees knew or should have known that these correctional officers were sexually abusing children at IYC – St. Charles before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

204. At the time of the above-described sexual abuse of Claimant D.T., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

205. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of J.L.

206. When Claimant J.L. was approximately 14 years of age and housed at IYC – St. Charles, two correctional officers (hereinafter "J.L. Abuser 1" and "J.L. Abuser 2" unless otherwise indicated), who were at all relevant times employees of the State of Illinois vis a vis the Illinois Department of Corrections, sexually abused J.L. in 2005.

207. J.L. Abuser 1 was at all relevant times a tall, muscular, black male estimated to be in his late 20s. He had tattoos on his arms.

208. J.L. Abuser 2 was at all relevant times a white, stocky, female, estimated to be in her 30s, and approximately 5'6 to 5'8 in height. She had dirty blonde hair.

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

210. After his initial intake, J.L. Abusers 1 and 2 approached J.L. while he was in the shower. Upon information and belief, J.L. Abuser 2 was at all relevant times J.L. Abuser 1's girlfriend. J.L. Abuser 2 told J.L. that he had very large genitals and forced J.L. to show his genitals to her. Abuser 1 grabbed J.L.'s genitals and rubbed him until he was erect, then J.L. Abuser 2 ordered J.L. to masturbate, at which point J.L. Abuser 2 masturbated J.L.

211. This abuse occurred approximately three times a week for six weeks in the shower or in J.L.'s cell while he was alone. Abuser 1 watched the abuse and ordered J.L. to comply with the abuse of J.L. Abuser 2, who masturbated and administered oral sex to the claimant. J.L. Abuser 1 sometimes masturbated himself during the abuse. J.L. Abusers 1 and 2 sexually abused J.L. in this manner approximately three times a week for six weeks.

212. J.L. Abusers 1 and 2 gave J.L. cigarettes and extra food and allowed him extra free time in the chapel. They threatened J.L. with six more months on his sentence if he ever reported them. They also warned J.L. that the gang members within the facility would physically beat the claimant if he ever disclosed the abuse or did not comply with their abuse.

213. When J.L. was approximately 15 years of age and housed at the IYC – Chicago, a counselor (hereinafter “J.L. Abuser 3” unless otherwise indicated), who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused J.L. in 2006 or 2007.

214. J.L. Abuser 3 was at all relevant times a white female, approximately 5'9 in height, and estimated to be in her late 20s or early 30s. She had blonde hair. J.L. expects to learn the full name and identity of his abusers through the course of discovery.

215. During regular visits with J.L., J.L. Abuser 3 complimented his appearance, body, and genitals. She repeatedly rubbed his genitals over his clothing. She sometimes gave him outside food.

216. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant J.L. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

217. The State of Illinois and its employees knew or should have known that these staff members were sexually abusing children at IYC – St. Charles and IYC – Chicago before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

218. At the time of the above-described sexual abuse of Claimant J.L., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

219. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of N.A.

220. When Claimant N.A. was 16 years old and housed at IYC – St. Charles, a correctional officer (hereinafter "N.A. Abuser 1" unless otherwise indicated), who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused N.A. from 2003 to 2004.

221. N.A. Abuser 1 at all relevant times a tall, heavy-set, white male in his 30s, with reddish hair (including a beard) and a bald spot. He wore glasses. He was promoted to the rank of

sergeant at some point during the period of abuse. N.A. expects to learn the full name and identity of his N.A. Abuser 1 through the course of discovery.

222. N.A. Abuser 1 worked on claimant N.A.'s housing unit (called the Hardy Unit), and within the chow hall as a correctional officer. N.A. Abuser 1 notoriously conducted random, frequent, and invasive strip searches of youth without individualized, reasonable suspicion, nor compliance with the constitutions of the United States and the State of Illinois, nor the administrative rules governing strip searches.

223. N.A. Abuser 1 strip searched N.A. four times, during which he was instructed to bend over and cough while the correctional officer fondled his naked body several minutes at a time. The search included grabbing and fondling of the genitals for extended periods of time (60-90 seconds), and he searched around (but not penetrate) his anus area for 30-60 seconds.

224. N.A. Abuser 1 ignored and/or laughed at any objections to the strip search or expressions of discomfort, and he struck N.A. on more than one occasion when he did not comply with the abuse.

225. During one specific instance of abuse, N.A. Abuser 1 took N.A. to the chow hall's back kitchen for a strip search. After the invasive strip search, N.A. re-entered the chow hall and approached a black female lieutenant who witnessed N.A. Abuser 1 escort N.A. to and from the back kitchen. N.A. reported to the lieutenant that he was just invasively strip searched by N.A. Abuser 1 in the back kitchen, and that he felt very uncomfortable around N.A. Abuser 1. Several other inmates heard this interaction and voiced their similar experiences of abuse with N.A. Abuser 1. The lieutenant got angry at N.A. and scolded him for trying to cause trouble or make a joke. The lieutenant dismissed his claims and told him to file a written report "if you're really serious about it." N.A. expects to learn the full identity of the lieutenant through the course of discovery.

226. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant N.A. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

227. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – St. Charles before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

228. At the time of the above-described sexual abuse of Claimant N.A., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

229. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of D.N.

230. When D.N. was 17 years of age and housed at IYC – St. Charles, a correctional officer named Christine Baird, who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused D.N. in 2009.

231. Christine Baird was at all relevant times a white female with either black or dark blonde hair. She was approximately 5'5 to 5'6 in height and estimated to be in her early 20s. She had a pitchy voice and often had multi-colored fingernails.

232. Baird was very talkative and friendly with D.N. when he first entered the facility. Early in his confinement, she approached and blocked his cell door and asked to see his genitals.

She then put her hands down his pants and masturbated him. After this incident, Baird regularly watched claimant while using the bathroom and made sexual comments towards him.

233. When Claimant D.N. was 17 years old and housed at IYC – Murphysboro, a teacher named Lori Zimmerman, who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused D.N. in 2009.

234. Lori Zimmerman was at all relevant times a tall white female with red-blonde hair. She was heavy set and estimated to be in her mid 30s.

235. D.N. attended “boot camp” during which Zimmerman taught him multiple classes. She allowed D.N. to use the computer, and she provided him extra snacks from a cabinet in her classroom. In one class, Zimmerman asked D.N. to sit next to her desk during class. She handed claimant a graphing calculator that contained inappropriate sexual requests. She rubbed D.N.’s genitals over the clothes during class. On another occasion, Zimmerman approached D.N. in the gym while he was playing cards with other inmates and sat with claimant. She rubbed her leg against claimant’s leg and placed D.N.’s hand under her underwear.

236. Upon information and belief, Zimmerman was fired from IYC – Murphysboro for sexual relationships with other inmates.

237. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant D.N. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

238. The State of Illinois and its employees knew or should have known that these staff members were sexually abusing children at IYC – St. Charles and IYC – Murphysboro before and

after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

239. At the time of the above-described sexual abuse of Claimant D.N., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

240. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of K.J.

241. Between the ages of 13 and 17, K.J. experienced horrific sexual abuse at the hands of dozens of correctional officers and sergeants (hereinafter "K.J. Abusers" unless otherwise indicated), who were at all relevant times herein employees of the State of Illinois vis a vis the Illinois Department of Corrections, while he was confined at multiple facilities between 2000 and 2004, including IYC – Chicago, IYC – Harrisburg, IYC – St. Charles, IYC – Kewanee, and IYC - Joliet.

242. Claimant K.J. expects to learn the full name and identity of his abusers through discovery.

243. At IYC – St. Charles, K.J. endured regular and baseless strip searches during which K.J. Abusers squeezed and fondled his genitals and digitally penetrated his anus for extended periods of time that could last up to 20 minutes.

244. Approximately four times a week, K.J. Abusers entered K.J.'s cell in the segregation unit and force him and his cellmate to give and receive oral sex and anal penetration.

245. At IYC – Harrisburg multiple IYC-Harrisburg correctional officers approached K.J. and forced him to give and receive oral sex. K.J. was subjected to penetrative strip searches approximately 50-60 times in IYC – Harrisburg.

246. At IYC – Chicago, he experienced penetrative sexual abuse under the pretext of strips searches daily. On multiple occasions, K.J. was pulled aside from a lineup of residents and taken to the observation room (known among the residents as the “naked room” because the residents were required to strip in the room) where his abusers forced him to give and receive oral sex.

247. At IYC – Kewanee, K.J. was strip searched daily without suspicion, which provided a false guise under which K.J. abusers then sexually abused him and his cellmate. This sex abuse happened under the threat of physical beatings.

248. At IYC – Joliet during the third shift, K.J. abusers entered his cell almost every night and forced K.J. to masturbate them, administer oral sex, and receive anal penetration. Once, three COs and one sergeant entered claimant’s cell and gang raped him, then forced K.J. to give oral sex to the sergeant.

249. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant K.J. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

250. The State of Illinois and its employees knew or should have known that these staff members were sexually abusing children at these facilities before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

251. At the time of the above-described sexual abuse of Claimant K.J., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

252. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of D.J.

253. Between the ages of 13 and 17 and starting in 2003, D.J. experienced sexual abuse at the hands of three staff members (hereinafter Mrs. Jackson, Mr. Jackson, and "D.J. Abuser 3," collectively "D.J. Abusers," unless otherwise indicated), who were at all relevant times herein employees of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Department of Juvenile Justice, while he was confined at IYC – Kewanee.

254. Mrs. Jackson was at all relevant times a female correctional officer of black or of mixed origin. She is believed to have been in her early 30s and approximately 5'4. She was heavy-set and pregnant at certain times during D.J.'s confinement.

255. Mr. Jackson was at all relevant times herein a tall, muscular, black, male correctional officer approximately in his 30s. He was married to Mrs. Jackson.

256. D.J. Abuser 3 was at all relevant times herein a tall, white male who was bald with a beard. He is believed to have been in his 30s.

257. D.J. expects to learn the full name and identity of D.J. Abusers through the course of discovery.

258. D.J. Abusers regularly pulled D.J. aside at random times throughout the day. They took D.J. to the shower area or his cell and ordered him to submit to sexual abuse under the

baseless, false guise of a strip search. D.J. Abusers varyingly allowed him stand up on his own, pushed him against the wall, or threw him to the ground and got on top of him. D.J. Abusers then patted down D.J.'s nude body, pinched his nipples, and made sexual comments about his body and appearance.

259. D.J. Abusers squeezed, fondled, stroked, and slapped his genitals. One of the Abusers performed the strip search while the other two watched, laughed, pointed, and made sexual comments. Each Abuser alternated between watching and committing the abuse. Sometimes, the abuse happened with only one Abuser at a time.

260. An older female supervisor watched these strip searches and made sexual comments, but she never performed a search herself.

261. This abuse occurred approximately two to three times a week for D.J.'s entire stay at Kewanee. At one point in his sentence, Mr. Jackson brought him into the shower room for a baseless strip search. He stated that he had to "make sure there's nothing up there" and digitally penetrated D.J. for 30 to 60 seconds.

262. On another occasion, Mrs. Jackson dragged him to the shower area, ripped off his clothes, and forcefully abused him under the false guise of a strip search without suspicion. She painfully squeezed and roughly "slapped around" D.J.'s genitals.

263. D.J. filed six grievances to the older female supervisor that occasionally watched his abuse. No one at the facility ever followed up with D.J. about his grievances, which led him to believe that the supervisor threw them away. After D.J. filed each grievance, the supervisor locked the claimant in his cell for three to four days at a time. Eventually D.J. stopped filing grievances because he kept getting punished for filing them.

264. D.J. Abusers threw away D.J.'s mail to his family after these grievances were filed and claimed it was because they did not want him spreading lies to anyone on the outside.

265. D.J. was transferred to IYC – Harrisburg for a two or three-month confinement in 2006 before his transfer back to Kewanee. A few weeks into his confinement at Harrisburg, the “Orange Crush” riot team came into his unit. They ordered all inmates in the unit to strip down and kneel face-down on the floor so they could all be searched. A member of the team approached D.J. from behind and used his baton to spread open D.J.'s buttocks, and then used the tip of the baton to rub the outside of D.J.'s anus and came very close to penetrating D.J.'s anus. After this incident, D.J. spent most of his time in Harrisburg inside his cell for fear of more abuse.

266. A few days later, D.J. wrote a letter to the Warden of the facility regarding the incident with Orange Crush, which he then put in the facility's mailbox. No one ever followed up with D.J. regarding this letter.

267. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant D.J. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

268. The State of Illinois and its employees knew or should have known that these correctional officers were sexually abusing children at IYC – Kewanee before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

269. At the time of the above-described sexual abuse of Claimant D.J., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

270. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of K.W.

271. K.W. was approximately 16 years old and housed at IYC – St. Charles when a correctional officer named Phibbs, who was at all relevant times herein an employee of the State of Illinois via a vis the Illinois Department of Juvenile Justice, sexually abused K.W. in 2009.

272. Phibbs was at all relevant times a tall, muscular black male with yellowed eyes, believed to have been in his 30s. He had a scar on his face under one of his eyes. K.W. expects to learn the full name and identity of his abuser through the course of discovery.

273. Phibbs earned the trust of K.W. by giving him extra food, cigarettes, and batteries. He offered ecstasy to K.W. and forced him to take it while he was showering. He began touching K.W.'s body and fondled his genitals, butt, and back.

274. A few weeks later, Phibbs approached K.W. while he was showering alone and ordered K.W. to give him oral sex in exchange for ecstasy.

275. The claimant disclosed these two abuse incidents to a fellow inmate.

276. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant K.W. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

277. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – St. Charles before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

278. At the time of the above-described sexual abuse of Claimant K.W., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

279. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of I.S.

280. When Claimant I.S. was 15 and 16 years old and housed at the IYC - Harrisburg, two correctional officers (hereinafter "I.S. Abuser 1" and "I.S. Abuser 2," collectively "I.S. Abusers," unless otherwise indicated), who were at all relevant times employees of the State of Illinois via the Illinois Department of Juvenile Justice, sexually abused I.S. in 2015.

281. I.S. Abuser 1 was at all relevant times a white, brunette, female correctional officer of average weight and height, approximately in her 30s.

282. I.S. Abuser 2 was at all relevant times a white male approximately in his late 40s, approximately 5'6 in height, with gray hair and a skinny build.

283. I.S. expects to learn the full name and identity of his abusers through the course of discovery.

284. Approximately five months into his confinement at IYC – Harrisburg, I.S. Abuser 1 woke I.S. up in the morning and removed the blanket from I.S. She then rubbed his upper/inner thigh near his genitals. I.S. ran out of the room and went to class. I.S. Abuser 1 repeated this conduct multiple times in the morning while others were sleeping. I.S. Abuser 1 ultimately masturbated and performed oral sex on I.S. in exchange for more time out of his room and more

phone time. I.S. Abuser 1 repeated this conduct four times until I.S. requested transfer to another unit to avoid the abuse.

285. I.S. Abuser 2 approached I.S. when he was returning to his cell from the day room after a movie night and began rubbing on his lower back and buttocks over the clothes. I.S. Abuser 2 walked back to the cell with I.S. and asked to come in, but I.S. refused. The next day, I.S. Abuser 2 sent claimant to segregation and took away his privileges for three months.

286. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant I.S. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

287. The State of Illinois and its employees knew or should have known that these correctional officers were sexually abusing children at IYC – Harrisburg before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

288. At the time of the above-described sexual abuse of Claimant I.S., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

289. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of S.V.

290. S.V. was 16 to 17 years old and housed at the IYC - Harrisburg, when a correctional officer named Officer Davis, who was at all relevant times an employee of the State of Illinois vis

a vis the Illinois Department of Juvenile Justice, sexually abused S.V. two to three times a week between 2003 and S.V.'s birthday in 2005.

291. Officer Davis was at all relevant times a tall, heavy set, white male, with short blonde hair, believed to be in his 30s. S.V. expects to learn the full name and identity of his abuser through the course of discovery.

292. Davis was the officer on duty in the kitchen when S.V. was employed with kitchen duties. When S.V. stayed behind to clean up after everyone finished dinner a few times per week, Davis also lingered and was initially very friendly with the claimant. Davis gave him cigarettes and cassette tapes.

293. After a few weeks, Davis coerced S.V. into having sexual intercourse and had S.V. reciprocate. This conduct continued multiple times per week until S.V. was released.

294. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant S.V. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

295. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – Harrisburg before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

296. At the time of the above-described sexual abuse of Claimant S.V., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

297. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of A.C.

298. Claimant A.C. was approximately 15 years old and confined at the IYC – Harrisburg, when a nurse (hereinafter “A.C. Abuser 1” unless otherwise indicated), who was at all relevant times an employee of the State of Illinois vis a vis the Department of Juvenile Justice, sexually abused A.C. in 2015.

299. A.C. Abuser 1 was at all relevant times a blonde, white female believed to be in her 50s. She was heavy set, approximately 5'5 in height, and wore glasses. A.C. expects to learn the full name and identity of this abuser through the course of discovery.

300. A.C. was not feeling well and visited the medical unit where A.C. Abuser 1 worked. A.C. Abuser 1 pulled down A.C.'s pants and masturbated A.C. until he was erect, at which point the nurse called for a correctional officer to return A.C. to his cell.

301. Claimant A.C. was approximately 16 years old and confined at the IYC – Pere Marquette, when a correctional officer named Ms. Johnson, who was at all relevant times an employee of the State of Illinois vis a vis the Department of Juvenile Justice, sexually abused A.C. twice in 2017.

302. Ms. Johnson was at all relevant times a black female correctional officer with a skinny build, believed to have been in her late 20s and approximately 5'7 in height. A.C. expects to learn the full name and identity of his abuser through the course of discovery.

303. The first time Johnson abused A.C. occurred when A.C. was transported in an ambulance after he fell and knocked out one of his teeth. During transport, Johnson rubbed his thigh and genitals over his clothes.

304. The second episode of abuse occurred when A.C. was assigned to perform lawn work. Johnson took A.C. to the tool shed, pulled his pants down, and performed oral sex on him.

305. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant A.C. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

306. The State of Illinois and its employees knew or should have known that these staff members were sexually abusing children at IYC – Harrisburg and Pere Marquette before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

307. At the time of the above-described sexual abuse of Claimant A.C., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

308. The State is vicariously liable for the abusers’ sexual abuse as well as its employees’ failure to prevent and report said abuse.

Sexual Abuse of J.C.

309. J.C. was approximately 13 to 14 years old and housed at the IYC - Harrisburg, when a counselor (hereinafter “J.C. Abuser 1” unless otherwise indicated), who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections, sexually abused J.C. three to five times in approximately 2003 and 2004.

310. J.C. Abuser 1 was at all relevant times a white, heavy set male counselor estimated to be in his late 40s or early 50s, with salt and pepper hair and a short beard. J.C. expects to learn the full name and identity of his abuser through the course of discovery.

311. During counseling sessions, J.C. Abuser 1 sat facing J.C. During the discussion, J.C. Abuser 1 reached over and began rubbing J.C.'s leg and crotch above his clothes. J.C. told the counselor that he did not like what he was doing, and J.C. Abuser 1 threatened to take away his privileges. This abuse occurred three or more times.

312. J.C. was approximately 15 to 16 years old and housed at the IYC - Joliet, when a doctor ("J.C. Abuser 2"), who was at all relevant times an employee of the State of Illinois via a vis the Illinois Department of Corrections, sexually abused J.C. three to five times in approximately 2005 or 2006.

313. J.C. Abuser 2 was at all relevant times a doctor in his early 40s believed to be of Indian descent with a long grey beard, and grey balding hair. He wore a bindi or tilaka and sometimes a turban on his head. He was approximately 5'5 in height. Claimant expects to learn the full name and identity of his abuser through the course of discovery.

314. Approximately three days into J.C.'s confinement at IYC – Joliet, he was called in for a physical. While conducting the "physical," J.C. Abuser 2 grabbed and cradled J.C.'s testicles and stroked J.C.'s penis as one would while masturbating another person. Once J.C. was dressed, J.C. Abuser 2 squeezed J.C.'s butt above the clothes. J.C. Abuser 2 repeated such a "physical" even when J.C. only needed an inhaler refill.

315. This conduct occurred at least three times, and the same unknown correctional officer escorted J.C. to the doctor on every occasion.

316. Multiple other residents at IYC – Joliet knew of or had experienced the abuse J.C. Abuser 2 committed during these "physicals".

317. The State of Illinois and its employees knew or should have known that J.C. Abusers 1 and 2 were sexually abusing J.C., among others.

318. At the time of the above-described sexual abuse of Claimant J.C., his abusers and other employees were not adequately supervised, monitored, or surveilled by the State of Illinois and its respective departments. Upon information and belief, the State's failure to supervise, discipline, remove, and/or otherwise investigate this abuser and staff members who knew or should have known about the abuse directly enabled the above-described sexual abuse.

319. The State is vicariously liable for the sexual abuse of J.C. as well other employees' failure to prevent and report said abuse.

320. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual. At the relevant times herein, Claimant J.C. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

321. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant J.C. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

322. The State of Illinois and its employees knew or should have known that these staff members were sexually abusing children at IYC – Harrisburg and IYC – Joliet before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

323. At the time of the above-described sexual abuse of Claimant J.C., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

324. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of J.R.

325. J.R. was approximately 16 or 17 years and housed at the IYC - Harrisburg, when a correctional officer named Ms. Idaho, who was at all relevant times an employee of the State of Illinois via the Illinois Department of Corrections, sexually abused J.C. approximately 20 times between 2003 and 2006.

326. Ms. Idaho was at all relevant times a white female with a skinny build, approximately 5'3 to 5'4 in height, in her late 20s or early 30s. She had dirty blonde or red hair, wore heavy makeup, and smoked cigarettes. J.R. also knew her by her married name, Mrs. Curd, which she changed to in approximately 2005. J.R. expects to learn the full name and identity of his abuser through the course of discovery.

327. A couple years into J.R.'s confinement, Idaho watched J.R. shower from the bathroom doorway and make inappropriate comments about his body and the size of his genitals.

328. Idaho approached the claimant's cell and said she needed him to help clean the unit. J.R. complied, and as he was changing the mop water, she approached him from behind and fondled his genitals over his clothes. She continued this pattern of behavior for months, requesting help around the facility, and when alone, grabbed his genitals over and under the clothes. This conduct occurred approximately 20 times.

329. Idaho brought J.R. cigarettes and outside food.

330. On one occasion, Idaho pulled him into a custodial closet and fondled his body, took his clothes off, and administered oral sex.

331. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant J.R. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

332. The State of Illinois and its employees knew or should have known that this staff member was sexually abusing children at IYC – Harrisburg before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

333. At the time of the above-described sexual abuse of Claimant J.R., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

334. The State is vicariously liable for the abuser’s sexual abuse as well as its employees’ failure to prevent and report said abuse.

Sexual Abuse of J.B.

335. J.B. was approximately 15 or 16 years old and housed at the IYC – Harrisburg, when a correctional officer (hereinafter “J.B. Abuser 1” unless otherwise indicated), who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections, repeatedly sexually abused J.B. in 2008.

336. J.B. Abuser 1 was at all relevant times a white, heavy-set male, approximately 5’9 to 5’10 height, estimated to be in his 30s, and with short dirty blonde hair. J.B. expects to learn the full name and identity of his abuser through the course of discovery.

337. J.B. Abuser 1 was at all relevant times herein over the age of 17 years and held a position of trust, authority, or supervision in relation to J.B.

338. In approximately May 2008, a few months into J.B.’s sentence, J.B. Abuser 1 repeatedly touched the claimant’s back, thighs, buttocks, and genitals over the clothes, sometimes

within view of other inmates and correctional officers, and did so in a way to appear as though he was playing games with claimant.

339. After a few months of this conduct, J.B. Abuser 1 approached J.B. while he was showering by himself in the unit's bathroom. J.B. Abuser 1 entered the shower area and groped J.B.'s naked body and forcibly masturbated J.B. This conduct occurred on three separate occasions.

340. On one other occasion, J.B. Abuser 1 came to his cell and attempted to force J.B. to give him oral sex. J.B. ran away and did not return to his cell until J.B. Abuser 1's shift was over. J.B. was released shortly thereafter and did not interact with him again.

341. During his confinement, J.B. Abuser 1 threatened J.B. with time in segregation if he ever refused to comply with the abuse in the showers. J.B. Abuser 1 often brought him extra commissary items (M&M's, Snickers), extra phone time, and cigarettes when he did comply.

342. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant J.B. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

343. The State of Illinois and its employees knew or should have known that this staff member was sexually abusing children at IYC – Harrisburg before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

344. At the time of the above-described sexual abuse of Claimant J.B., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

345. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of J.J.

346. J.J. was approximately 16 or 17 years old when he was sexually abused while confined at IYC – Harrisburg by four correctional officers (hereinafter “J.J. Abuser 1,” “J.J. Abuser 2,” “J.J. Abuser 3,” and “J.J. Abuser 4,” collectively “J.J. Abusers,” unless otherwise indicated) who were at all relevant times employees of the State of Illinois vis a vis the Illinois Department of Corrections between 2001 and 2003.

347. J.J. Abuser 1 was at all relevant times a tall, muscular white male in his early 30s.

348. J.J. Abuser 2 was at all relevant times a white male with short dark hair in his late 20s or early 30s. He was muscular and approximately 5'8 to 6'0 in height.

349. J.J. Abuser 3 was at all relevant times a light-skinned female who may have been of mixed descent. She was approximately 5'8 with dark hair with a red tint. She is believed to have been in her 20s.

350. J.J. Abuser 4 was a white female with dark curly hair who was heavy set and primarily wore glasses, but sometimes used contacts.

351. J.J. expects to learn the full identity of his abusers through the course of discovery.

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

353. J.J. Abusers 1 and 2 individually pulled J.J. aside during random hours and forced him to do strip searches while they made sexual comments. These strip searches started before and after visitation but eventually progressed to other locations around the facility. The searches escalated to penetrative cavity searches, then fondling under the clothes, manual masturbation, oral

sex, and penetrative sex. J.J. Abuser 1 and 2 often gave him sleeping pills and then sexually and physically abused him while he was conscious and unconscious.

354. J.J. Abuser 1 and 2 abused J.J. independently.

355. This abuse occurred multiple times a month during his confinement at IYC – Harrisburg.

356. J.J. Abusers 3 and 4 were two female correctional officers who aggressively pursued J.J. by grabbing his genitals over and under the clothes and physically beating him when he did not comply with the sex abuse.

357. This abuse occurred multiple times a week. J.J. Abusers 3 and 4 gave him pills, drugs, extra time out of his cell, better jobs (such as kitchen duty), and time in the gym as a reward for enduring the abuse.

358. J.J. reported the abuse to the IYC – Harrisburg facility doctor, who was of Indian descent and multiple counselors. A few “higher ups” came to speak with J.J., and he reported these episodes of abuse to them.

359. J.J. never heard from anyone again regarding his reports of abuse and his abuse did not end.

360. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant J.J. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

361. The State of Illinois and its employees knew or should have known that these staff members were sexually abusing children at IYC – Harrisburg before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

362. At the time of the above-described sexual abuse of Claimant J.J., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

363. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of G.S.

364. G.S. was 17 years old and housed at IYC - Murphysboro when a correctional officer (hereinafter "G.S. Abuser 1" unless otherwise indicated), who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Juvenile Justice, sexually abused G.S. in 2007.

365. G.S. Abuser 1 was at all relevant times herein a short white male estimated to be in his 40s. He was skinny and muscular with a reddened face, a squeaky voice, and red or blonde hair.

366. G.S. expects to learn the full name and identity of his abuser through the course of discovery.

367. Near the end of G.S.'s confinement at Murphysboro, he resided in Unit 5 where bootcamp inmates were placed when they were close to graduating out of the facility. G.S. woke up early in the morning before any of the other inmates were awake and went to the sink to brush his teeth. The sink, which was in a row of sinks, was close to G.S. Abuser 1's desk. G.S. Abuser 1 approached him from behind and began rubbing his ear and neck, then put his hand down G.S.'s pants and grabbed his genitals under his clothing.

368. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant G.S. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

369. The State of Illinois and its employees knew or should have known that this staff member was sexually abusing children at IYC – Murphysboro before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

370. At the time of the above-described sexual abuse of Claimant G.S., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

371. The State is vicariously liable for the abuser’s sexual abuse as well as its employees’ failure to prevent and report said abuse.

Sexual Abuse of J.L. 2

372. J.L. 2 was 16 and 17 years old and housed at the now-closed IYC – Kewanee, when multiple correctional officers (hereinafter “J.L. 2 Abusers” unless otherwise indicated), who were at all relevant times employees of the State of Illinois vis a vis the Illinois Department of Corrections and or the Illinois Department of Juvenile Justice, sexually abused J.L. 2 from 2005 to 2008.

373. J.L. 2 Abusers were at all relevant times four white, male, heavy-set correctional officers estimated to be in their 30s. One of them had tattoos on his arms. J.L. 2 expects to learn the full name and identity of his abusers through the course of discovery.

374. Each of J.L. 2 Abusers worked visitation and escorted inmates to and from the visitation room. Upon information and belief, they were required by the State of Illinois to strip search the inmates before and after visitation in an unconstitutional manner. Each time J.L. 2 entered and left visitation, J.L. 2 Abusers took him to the “strip search room” near the visitation area and ordered him to undress. They instructed J.L. 2 to bend and cough, at which point J.L. 2 Abusers laughed and made sexual comments about his body and genitals. J.L. 2 Abusers then patted down the claimant’s naked body and grabbed, lifted, squeezed, and fondled his genitals for 10-30 seconds at a time.

375. Usually, one Abuser performed the search while one to two other Abusers were present. These searches occurred without suspicion and violated the constitutions of the United States of America and the State of Illinois as well as the laws of the State of Illinois.

376. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant J.L. 2 was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

377. The State of Illinois and its employees knew or should have known that these staff members were sexually abusing children at IYC – Kewanee before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

378. At the time of the above-described sexual abuse of Claimant J.L., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

379. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of K.W. 2

380. K.W. 2 was 13 and 14 years of age and housed at the now-closed IYC – Kewanee when a correctional named Mr. Attaberry, who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections, sexually abused K.W. 2 in approximately 2003 or 2004.

381. Mr. Attaberry was at all relevant times a white male, with short hair, approximately 5'7 in height, and estimated to be in his 20s. K.W. 2 expects to learn the full name and identity of his abuser through the course of discovery.

382. Early on into K.W.'s stay at IYC – Kewanee, Attaberry brought K.W. 2 pens so he could draw and make art inside the facility. Attaberry often escorted K.W. 2 to the shower, where he watched him shower and grab his buttocks. Ultimately, Attaberry forced K.W. 2 to give him oral sex three to four times and to have penetrative sex one time. This abuse occurred in the claimant's cell, in the utility closet, and in the shower. Once this abuse began, Attaberry brought K.W. 2 extra food and gave him more phone time.

383. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant K.W. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

384. The State of Illinois and its employees knew or should have known that this staff member was sexually abusing children at IYC – Kewanee before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

385. At the time of the above-described sexual abuse of Claimant K.W., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

386. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of M.S.

387. M.S. was 17 years old and confined at IYC – Joliet when a correctional officer named Mr. Bridges, who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused M.S. in approximately 2006.

388. Mr. Bridges was at all relevant times a black male believed to have been in his 30s and approximately 5'8 in height. He was bald, of muscular build, and hunched over in posture. M.S. expects to learn the full name and identity of his abuser through the course of discovery.

389. Early on in claimant's stay at IYC – Joliet, Bridges passed by M.S.'s cell at all hours, watching him and physically intimidating him. One day, while M.S. was in his cell alone, Bridges blocked M.S.'s cell doorway, exposed his penis, and ordered M.S. to masturbate him under threat of falsely writing up M.S. for physically fighting with a correctional officer. M.S. complied with Bridges' coercion.

390. After this initial incident, Bridges brought extra snacks and candy to M.S. Bridges repeated this abuse on one other occasion.

391. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant M.S. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

392. The State of Illinois and its employees knew or should have known that this staff member was sexually abusing children at IYC – Joliet before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

393. At the time of the above-described sexual abuse of Claimant M.S., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

394. The State is vicariously liable for the abuser’s sexual abuse as well as its employees’ failure to prevent and report said abuse.

Sexual Abuse of E.F.

395. Claimant E.F. was 16 years old and confined at the now-closed IYC – Joliet when two female correctional officers (hereinafter “E.F. Abuser 1” and “E.F. Abuser 2,” collectively “E.F. Abusers,” unless otherwise indicated), who were at all relevant times employees of the State of Illinois vis a vis the Illinois Department of Corrections, repeatedly sexually abused him in 2004 and 2005.

396. E.F. Abuser 1 was at all relevant times herein a black female correctional officer with loose braids who worked in the property building. She was approximately 5’8 in height.

397. E.F. Abuser 2 was at all relevant times herein a black female correctional officer with tight braids. She was approximately 5’6 in height.

398. E.F. Abusers were at all relevant times estimated to be in their 20s or 30s.

399. Claimant expects to learn the full name and identity of his abusers through the course of discovery.

400. E.F. Abusers held a position of trust, authority, or supervision in relation to E.F.

401. Approximately two times per week, E.F. Abuser 1 entered E.F.'s cell with food from outside the facility and coerced him into fondling his genitals both over and underneath his clothing.

402. In 2005, E.F. earned his GED and moved into the honors dorm at IYC – Joliet. He was allowed to work and take classes and frequently worked laundry and plumbing. He was required to go into the “property building” nearly every morning around 7:15-8am, before anyone else was awake to gather dirty uniforms and bring them to the laundry facility. E.F. Abuser 2 ran the property building. She coerced E.F. to give and receive oral sex. This happened approximately four times per week. She gave him shoes, gifts, and cassette tapes for complying with the abuse.

403. E.F. Abusers 1 and 2 both threatened E.F. in association with the sexual abuse described herein.

404. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant E.F. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

405. The State of Illinois and its employees knew or should have known that these staff members were sexually abusing children at IYC – Joliet before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

406. At the time of the above-described sexual abuse of Claimant E.F., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

407. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of L.J.

408. Claimant L.J. was between the ages of 15 and 17 years old and confined at the IYC – Chicago when two correctional officers (hereinafter “L.J. Abuser 1” and “L.J. Abuser 2” unless otherwise indicated), who were at all relevant times employees of the State of Illinois vis a vis the Illinois Department of Corrections, sexually abused him in 2005 and 2006.

409. L.J. Abuser 1 was at all relevant times herein a black female correctional officer believed to have been in her late 30s or early 40s. She sometimes wore sew-in hair weaves.

410. L.J. Abuser 2 was at all relevant times herein a tall, black, male correctional officer believed to have been in his 30s. He wore glasses and had a fade haircut.

411. Claimant expects to learn the full name and identity of his abusers through the course of discovery.

412. Early in L.J.'s sentence, L.J. Abuser 1 gave claimant the job of trustee and started approaching L.J. while he was working to make jokes that were innocent, at first. These jokes became sexual in short course, and L.J. Abuser 1 started following L.J. to the shower, where she groped his naked body and performed oral sex on him. This abuse occurred approximately twice a week for roughly six weeks. L.J. Abuser 1 gave L.J. extra food and cigarettes as rewards. On a few occasions, she revoked his phone privileges if he refused to comply with the abuse and on one

occasion locked him in his cell for about 40 hours until her next shift. Claimant was released from the facility sometime in 2006 and the abuse ended.

413. A few weeks into the claimant's 2006 sentence, L.J. was in his cell late at night when Abuser 2 entered his room, exposed his genitals to L.J., and said that he would give claimant anything he asked for if the claimant "took care of him." L.J. got very upset and refused, but L.J. Abuser 2 threatened L.J. with a longer sentence if he did not comply. L.J. Abuser 2 successfully coerced L.J. to perform oral sex on him. L.J. Abuser 2 gave the claimant a DVD player, cigarettes, and weed in return for receiving oral sex. This quid pro quo sexual abuse occurred approximately three more times. On one occasion, L.J. Abuser 2 approached the claimant late at night and ordered him into the shower, where L.J. Abuser 2 forced him to perform oral sex and anally penetrated L.J.

414. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant L.J. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

415. The State of Illinois and its employees knew or should have known that these staff members were sexually abusing children at IYC – Chicago before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

416. At the time of the above-described sexual abuse of Claimant L.J., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

417. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of A.G.

418. A.G. was approximately 15 or 16 years old and confined at both IYC – St. Charles and IYC – Chicago, when a medical staff member (hereinafter “A.G. Abuser 1” unless otherwise indicated) and a correctional officer named Mrs. Williams, who were at all relevant times employees of the State of Illinois vis a vis the Illinois Department of Corrections, sexually abused him in 2003 and/or 2004.

419. A.G. Abuser 1 was at all relevant times a white female nurse or other member of the medical staff at IYC – St. Charles. She was at all relevant times believed to have been in her late 30s or early 40s. She was brunette, heavy-set, wore glasses, and was approximately 5’5 in height.

420. Mrs. Williams was a black female correctional officer at IYC – Chicago.

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

422. While confined at IYC – St. Charles, A.G. Abuser 1 called claimant into medical and led him to the examination room. She ordered him to lay down, then groped his body and masturbated him. This abuse occurred once shortly before his confinement at IYC – St. Charles concluded.

423. While confined at IYC – Chicago, Williams came into the bathroom while A.G. was showering before bed. Williams groped his body and masturbated him. Williams allowed him to stay out of his cell and take longer showers when everyone else was locked up as long as he provided her sexual favors. This abuse occurred approximately 3 times.

424. The State of Illinois and its employees knew or should have known that A.G. Abuser 1 and Williams were sexually abusing him.

425. At the time of the above-described sexual abuse of Claimant, his abusers and other employees were not adequately supervised, monitored, or surveilled by the State of Illinois and its respective departments. Upon information and belief, the State's failure to supervise, discipline, remove, and/or otherwise investigate these abusers and other staff members who knew or should have known about the abuse directly enabled the above-described sexual abuse.

426. The State is vicariously liable for the sexual abuse of A.G. as well as other employees' failure to prevent and report said abuse.

427. The above-described sexual abuse and/or acts perpetrated by these staff members was non-consensual. At the relevant times herein, Claimant A.G. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

428. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant A.G. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

429. The State of Illinois and its employees knew or should have known that these staff members were sexually abusing children at IYC – St. Charles and IYC – Chicago before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

430. At the time of the above-described sexual abuse of Claimant A.G., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

431. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of C.P.

432. Claimant C.P. was approximately 15 to 16 years old when three correctional officers (hereinafter Mr. Williams, Ms. Montoya, and “C.P. Abuser 3” unless otherwise indicated) and a chaplain named Chaplain Jones, who were at all relevant times employees of the State of Illinois sexually abused C.P. during his confinement at IYC – St. Charles in approximately 2008-2009.

433. Mr. Williams was at all relevant times a black male of average height who was in his 30s, with a muscular build and a mole on his face C.P. also knew Williams by the nickname “Cat Daddy.”

434. Ms. Montoya was at all relevant times a white female in her 20’s with blonde hair, approximately 5’3” in height.

435. C.P. Abuser 3 was at all relevant times a black male in his 30’s, approximately 6’3” with a skinny build.

436. Chaplain Jones was a white male estimated to be in his 60s of medium height and build with gray/white hair.

437. Claimant C.P. expects to learn the full names and identities of his abusers through the course of discovery.

438. From the outset of confinement at St. Charles, C.P. was penetrated numerous times by C.P. Abuser 3, with ungloved fingers, causing visible arousal of C.P. Abuser 3. This happened every time C.P. was transported by C.P. Abuser 3 from intake to the end of confinement. This occurred on at least 16 occasions.

439. On at least six occasions, Montoya forced C.P. to perform oral sex on her and she forced oral sex from herself upon him. All 6 times occurred while C.P. was in the shower.

440. Williams forced C.P. to perform oral sex on him on two separate occasions while C.P. was confined to his cell. This abuse took place while other youth offenders were coming and going from the cell.

441. Chaplain Jones forced C.P. to perform oral sex on him 8-12 times in his office and in the weight room closet. Chaplain Jones told C.P. he could help him leave the facility early if he performed the sex act. After each abuse, Chaplain Jones allowed C.P. to play video games and put money in C.P.'s commissary account for use inside the facility.

442. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant C.P. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

443. The State of Illinois and its employees knew or should have known that this staff member was sexually abusing children at IYC – St. Charles before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

444. At the time of the above-described sexual abuse of Claimant C.P., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

445. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of E.H.

446. Claimant E.H. was approximately 15 years old when correctional officer named Mr. Williams and a sergeant (hereinafter "E.H. Abuser 2" unless otherwise indicated), who were

at all relevant times employees of the State of Illinois sexually abused E.H. during his confinement at IYC – St. Charles in approximately 2007 to 2008.

447. Mr. Williams was at all relevant times a black male sergeant, approximately 6’2” in height, estimated to be in his 40s, with a muscular build and a mole on his face near his lips.

448. E.H. Abuser 2 was at all relevant times a black, female corrections officer, believed to have been in her 20’s and approximately 5’8” in height. E.H. expects to learn the full names and identities of his abusers through the course of discovery.

449. On five separate occasions, Williams entered E.H.’s cell and forced E.H. to perform oral sex on him. He threatened to take away privileges and prevent E.H. from seeing his family if he refused to perform the sex act.

450. On at least seven occasions, E.H. Abuser 2 forced her hand into E.H.’s pants and masturbated him while he was at his cell door. If E.H. attempted to back away from the cell door, E.H. Abuser 2 forcefully grabbed him by his testicles to prevent him from backing away.

451. At all relevant times herein, Claimant E.H.’s abusers were a sergeant and correctional officer at IYC – St. Charles and employees of the State of Illinois vis a vis the Illinois Department of Corrections and/or Juvenile Justice and served as employees/agents of the Defendant.

452. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant E.H. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

453. The State of Illinois and its employees knew or should have known that these staff members were sexually abusing children at IYC – St. Charles before and after the abuse occurred,

and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

454. At the time of the above-described sexual abuse of Claimant E.H., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

455. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of D.R.

456. Claimant D.R. was approximately 17 years old when a correctional officer named Mr. Jones, who was at all relevant times an employee of the State of Illinois sexually abused D.R. during his confinement at IYC – St. Charles in approximately 2013.

457. Mr. Jones was at all relevant times a tall, slim, black male who was estimated to be in his mid 40s to early 50s. He was bald with a grey full beard. D.R. expects to learn the full name and identity of his abuser through the course of discovery.

458. During the time of D.R.'s confinement at St. Charles, Jones fondled and groped claimant's privates and digitally penetrated claimant's anus.

459. Jones threatened D.R. with extended time in the facility if he did not comply with the abuse.

460. At all relevant times herein, Jones was a guard at IYC – St. Charles and an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Department of Juvenile Justice and served as an employee/agent of the Defendant.

461. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant D.R. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

462. The State of Illinois knew or should have known that this officer was sexually abusing children at IYC – St. Charles. Moreover, various employees of the State of Illinois knew or should have known of the abuse before and after it happened, and they breached their duty to prevent the abuse and to report it.

463. At the time of the above-described sexual abuse of Claimant D.R., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse. Moreover, this Abuser negligently and willfully breached their duty to make timely and reasonable efforts to stop the sexual abuse.

464. The State is vicariously liable for the abuser’s sexual abuse as well as the failure of other employees and officials to prevent and report said abuse.

Sexual Abuse of L.C.

465. Claimant L.C. was approximately 17 years old when a correctional officer named Mr. Williams, who was at all relevant times an employee of the State of Illinois sexually abused L.C. during his confinement at IYC – St. Charles in approximately 2005.

466. Mr. Williams was at all relevant times a large, stocky, black male of medium height who was 45-50 years old. He had grey hair and tattoos all over his arms. L.C. also knew Williams by the nicknames “Cat Williams” and “Cat Daddy.” L.C. expects to learn the full name and identity of his abuser through the course of discovery.

467. During the time of L.C.'s confinement at St. Charles, Williams held L.C in his cell, covered his mouth, forced him to receive digital anal penetration, and attempted oral copulation.

468. Williams threatened the claimant with extended time in his cell as well as physical harm if he did not comply with the abuse.

469. At all relevant times herein, Williams was an officer at IYC – St. Charles and employee of the State of Illinois vis a vis the Illinois Department of Corrections and served as an employee/agent of the Defendant.

470. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant L.C. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

471. The State of Illinois and its employees knew or should have known that this staff member was sexually abusing children at IYC – St. Charles before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

472. At the time of the above-described sexual abuse of Claimant L.C., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

473. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of J.B. 2

474. Claimant J.B. 2 was approximately 16 years old when a correctional officer named Mr. Williams, who was at all relevant times an employee of the State of Illinois, sexually abused J.B. 2 during his confinement at IYC – St. Charles in approximately 2006.

475. Mr. Williams was at all relevant times a black male of muscular build, medium height, approximately 35-45 years old and had short black hair at the time of the abuse. He had a tattoo on his arm. J.B. 2 also knew him by the nickname of “Cat Daddy”. J.B. 2 expects to learn the full names and identities of his abuser through the course of discovery.

476. During J.B. 2’s confinement at St. Charles, Williams approached the J.B. from behind, reached under J.B. 2’s garments and forcefully groped and squeezed J.B.’s testicles and penis.

477. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant J.B. 2 was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

478. The State of Illinois and its employees knew or should have known that this staff member was sexually abusing children at IYC – St. Charles before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

479. At the time of the above-described sexual abuse of Claimant J.B. 2, staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

480. The State is vicariously liable for the abuser’s sexual abuse as well as its employees’ failure to prevent and report said abuse.

Sexual Abuse of W.H.

481. When Claimant W.H. was 14 and 15 years old and housed at IYC – Joliet, two correctional officers named Luna and Kar, who were at all relevant times employees of the State of Illinois vis a vis the Department of Corrections and/or the Department of Juvenile Justice, sexually abused W.H. in 2002.

482. Luma was at all relevant times herein a black, Hispanic, petite, female, believed to have been in her 40s or 50s.

483. Kar was at all relevant times herein a tall, muscular, black male, believed to have been in his 30s.

484. W.H. expects to learn the full identity of his abusers through the course of discovery.

485. Luna flirted with W.H. for approximately a month before she started bringing him late night snacks and unnecessarily entering his cell to do so. Her flirtations escalated to performing oral sex on him, coercing him to perform oral sex on her, and eventual sexual intercourse. The abuse always occurred at night in his cell. This abuse occurred approximately two to three times a week for approximately 10 months.

486. Kar brushed up against W.H. and groped his genitals over the clothes and coerced him to grab Kar's genitals over the clothes while W.H. was lined up with other inmates to move from one place to another. This abuse occurred approximately three to four times in different areas of the facility.

487. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant W.H. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

488. The State of Illinois and its employees knew or should have known that these staff members were sexually abusing children at IYC – Joliet before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

489. At the time of the above-described sexual abuse of Claimant W.H., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

490. The State is vicariously liable for the abusers’ sexual abuse as well as its employees’ failure to prevent and report said abuse.

Sexual Abuse of R.M.

491. Claimant R.M. was approximately 17 years old and under the age of 18 when he was confined in IYC - Harrisburg. There, a correctional officer named Ryley, who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or Illinois Department of Juvenile Justice, sexually abused him beginning in approximately 2002.

492. Ryley was at all relevant times herein a petite, bald, black male corrections officer believed to have been in his 30s or 40s. R.M. expects to learn the full name and identity of his abuser through the course of discovery.

493. A few days into R.M.’s confinement, Ryley stopped by R.M.’s cell during late night head count and gave him some extra snacks. He sat and talked with R.M., earning R.M.’s trust by empathizing with his concern over his father, who was near death due to emphysema. Ryley repeated this manipulative tactic during two more late night head counts.

494. The fourth time Ryley stopped by his cell occurred one or two weeks before R.M.'s court evaluation. Ryley told him that he could write a bad report for him and extend his sentence. R.M. exhibited frustration and concern, and Ryley thereupon advised him that could avoid a bad report if R.M. masturbated for Ryley. He forced R.M. to masturbate in front of him, and when R.M. began to ejaculate, Ryley put his mouth on R.M.'s genitals and forced him to ejaculate into his mouth.

495. Ryley repeated this conduct on another occasion shortly before R.M.'s transfer to IYC – Murphysboro.

496. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant R.M. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

497. The State of Illinois and its employees knew or should have known that this staff member was sexually abusing children at IYC – Harrisburg before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

498. At the time of the above-described sexual abuse of Claimant R.M., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

499. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of V.G.

500. V.G. was 14 and 15 years old and housed at the now-closed IYC – Kewanee, when multiple correctional officers (collectively “V.G. Abusers” unless otherwise indicated), who were at all relevant times employees of the State of Illinois vis a vis the Illinois Department of Corrections and or the Illinois Department of Juvenile Justice, sexually abused V.G. between 2003 to 2005.

501. V.G. Abusers were at all relevant times approximately eight or more correctional officers, including a correctional officer named Mr. Schafer and fraternal twin correctional officers both named Mr. Flagg. V.G. expects to learn the full names and identities of his abusers through the course of discovery.

502. One or more V.G. Abusers strip searched V.G. daily, often in concert and in the presence of other V.G. Abusers. The strip searches were often accompanied by coerced masturbation and touching V.G. Abusers’ genitalia. One or more V.G. Abusers also touched his genitalia for minutes at a time.

503. These searches occurred without suspicion and violated the constitutions of the United States of America and the State of Illinois as well as the laws of the State of Illinois.

504. Many V.G. Abusers slapped V.G.’s buttocks and grabbed his genitals over and under his clothing separate and apart from strip searches.

505. V.G. was abused in this manner daily.

506. On one occasion, a specific V.G. Abuser, who can be identified by last name and description, approached V.G. in a group of inmates and exposed himself. This V.G. Abuser instructed the other inmates to expose themselves. None of them complied.

507. When V.G. did not comply with the abuse detailed herein, V.G. Abusers turned the power and/or water off in their cells, sent him to confinement, and took away his phone, visitation, or yard time.

508. V.G. reported the abuse detailed herein to a male counselor, specifically identifying one such abuser by name. The counselor told V.G. that it would be V.G.'s word against the abuser's and that the facility would be unable to follow up on his report since there was no proof of abuse. The next day, V.G. was abruptly removed from his job as a cleaner and his counselor later told him that he was removed from his job "for his own safety" following his report of the abuse.

509. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant V.G. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

510. The State of Illinois and its employees knew or should have known that these staff members were sexually abusing children at IYC – Kewanee before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

511. At the time of the above-described sexual abuse of Claimant V.G., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

512. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of J.F.

513. Claimant J.F. was approximately 14 years old and confined at IYC – St. Charles, when two corrections officers sexually abused repeatedly beginning in approximately 1998. J.F.’s abusers (hereinafter “J.F. Abuser 1” and “J.F. Abuser 2,” collectively “J.F. Abusers,” unless otherwise indicated) were two correctional officers who were at all relevant times herein an employee of the State of Illinois vis a vis the Department of Corrections and/or the Department of Juvenile Justice.

514. J.F. Abuser 1 was at all relevant times herein a dark-skinned, skinny, tall, male correctional officers believed to have been in his 30s, approximately. J.F. Abuser 2 was at all relevant times herein a heavysset, white female with red hair believed to have been in her late 20s or early 30s. J.F. expects to learn the full identity of each J.F. Abuser through the course of discovery.

515. J.F. Abuser 1 entered J.F.’s room and coerced him into masturbating while J.F. Abuser 1 watched. This abuse occurred approximately 4-5 times in the dorms located in Cleveland cottage.

516. J.F. Abuser 2 came into his room at night, where she watched J.F. masturbate and used her hands to masturbate him. This abuse occurred approximately every other night during J.F.’s confinement.

517. Both Abusers offered J.F. cigarettes and food.

518. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant J.F. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

519. The State of Illinois and its employees knew or should have known that this staff member was sexually abusing children at IYC – St. Charles before and after the abuse occurred,

and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

520. At the time of the above-described sexual abuse of Claimant J.F., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

521. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of C.G.

522. Claimant C.G. was approximately 14 years old when a correctional officer named Ms. Idaho, who was at all relevant times an employee of the State of Illinois, sexually abused C.G. during his confinement at IYC – Harrisburg in approximately 1999.

523. Ms. Idaho was at all relevant times a white female of thin build, above average height, estimated to be 30-40 years old and long blonde hair at the time of the abuse. She had blue eyes and tattoos and piercings. C.G. expects to learn the full name and identity of his abuser through the course of discovery.

524. During C.G.'s confinement at Harrisburg, Idaho lured C.G. into a closet and engaged in sexual intercourse with C.G.

525. At all relevant times herein, Claimant C.G.'s abuser was a guard at IYC – Harrisburg and employee of the State of Illinois vis a vis the Illinois Department of Corrections and served as an employee/agent of the Defendant.

526. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant C.G. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

527. The State of Illinois and its employees knew or should have known that this staff member was sexually abusing children at IYC – Harrisburg before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

528. At the time of the above-described sexual abuse of Claimant C.G., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

529. The State is vicariously liable for the abusers’ sexual abuse as well as its employees’ failure to prevent and report said abuse.

Sexual Abuse of S.T.

530. Claimant S.T. was approximately 15 years old when an officer and a counselor (hereinafter “S.T. Abuser 1” and “S.T. Abuser 2,” respectively) who were at all relevant times employees of the State of Illinois, sexually abused S.T. during his confinement at IYC – Chicago in approximately 2001.

531. S.T. Abuser 1 was at all relevant times a white male of muscular build, above average height, 30-40 years old and short hair at the time of the abuse. He has tattoos on his arms. S.T. Abuser 2 was a black female of heavy build, average height, 40 years old, light brown eyes and black hair. Some additional identifying information is known to S.T. but intentionally withheld

at the time of filing for anonymity purposes. Claimant S.T. expects to learn the full names and identities of his abusers through the course of discovery.

532. During S.T.'s confinement at Chicago, S.T. Abuser 1 groped and fondled S.T.'s penis. S.T. Abuser 2 forced S.T. to grope and fondle S.T. Abuser 2's breasts and digitally penetrate S.T. Abuser 2.

533. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant S.T. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

534. The State of Illinois and its employees knew or should have known that this staff member was sexually abusing children at IYC – Chicago before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

535. At the time of the above-described sexual abuse of Claimant S.T., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

536. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of G.C.

537. Claimant G.C. was approximately 15 years old when a correctional officer (hereinafter "G.C. Abuser 1" unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused G.C. during his confinement at IYC – Harrisburg in approximately 2003.

538. G.C. Abuser 1 was at all relevant times a white male of heavy build, average height, approximately 30 to 40 years old and bald at the time of the abuse. Some additional identifying information is known to G.C. but intentionally withheld at the time of filing for anonymity purposes. Claimant G.C. expects to learn the full name and identity of his abuser through the course of discovery.

539. During G.C.'s confinement at Harrisburg, G.C. Abuser 1 forced G.C. to perform oral copulation on a homemade dildo in order for G.C. to obtain his food. G.C. Abuser 1 digitally penetrated the claimant G.C. Abuser 1 also forced inmates to fight one another, and if G.C. lost, G.C. Abuser 1 forcefully groped and fondled G.C.'s genitals.

540. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant G.C. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

541. The State of Illinois and its employees knew or should have known that this staff member was sexually abusing children at IYC – Harrisburg before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

542. At the time of the above-described sexual abuse of Claimant G.C., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

543. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of C.S.

544. Claimant C.S. was approximately 15 years old when a guard (hereinafter “C.S. Abuser 1” unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused C.S. during her confinement at IYC – Warrenville in approximately 2003.

545. C.S. Abuser 1 was at all relevant times a white male of average build, above average height, 20-30 years old, blue-green eyes and slicked back hair at the time of the abuse. Some additional identifying information is known to C.S. but intentionally withheld at the time of filing for anonymity purposes. Claimant C.S. expects to learn the full name and identity of her abuser through the course of discovery.

546. During C.S.’s confinement at Warrenville, C.S. Abuser 1 forced C.S. to perform oral sex on C.S. Abuser 1 and groped, fondled, and digitally penetrated C.S.’s genitals and anus. C.S. Abuser 1 also attempted to rape C.S. but was stopped when C.S. started screaming.

547. At all relevant times herein, Claimant C.S.’s abuser was a guard at IYC – Warrenville and employee of the State of Illinois vis a vis the Illinois Department of Corrections and served as an employee/agent of the Defendant.

548. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant C.S. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

549. The State of Illinois and its employees knew or should have known that this officer was sexually abusing children at IYC – Warrenville. Moreover, they breached their duty to prevent the abuse and to report it.

550. At the time of the above-described sexual abuse of Claimant C.S., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff

members directly enabled the above-described sexual abuse. Moreover, this Abuser negligently and willfully breached their duty to make timely and reasonable efforts to stop the sexual abuse.

551. The State is vicariously liable for the abuser's sexual abuse as well as the failure of State of Illinois employees to prevent and report said abuse.

Sexual Abuse of J.S.

552. Claimant J.S. was approximately 14 years old when an officer (hereinafter "J.S. Abuser 1" unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused J.S. during his confinement at IYC – Harrisburg in approximately 2001. J.S. Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to J.S.

553. J.S. Abuser 1 was at all relevant times a white male of extremely heavy build, average height, 35-40 years old and balding with short brown hair at the time of the abuse. Some additional identifying information is known to J.S. but intentionally withheld at the time of filing for anonymity purposes. Claimant J.S. expects to learn the full name and identity of his abuser through the course of discovery.

554. During J.S.'s confinement at Harrisburg, J.S. Abuser 1 confined J.S., sometimes alone and sometimes along with other inmates, then stripped them down and raped them.

555. At all relevant times herein, Claimant J.S.'s abuser was an officer at IYC – Harrisburg and employee of the State of Illinois vis a vis the Illinois Department of Corrections and served as an employee/agent of the Defendant.

556. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant J.S. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

557. The State of Illinois and its employees knew or should have known that this officer was sexually abusing children at IYC – Harrisburg. They breached their duty to prevent the abuse and to report it.

558. At the time of the above-described sexual abuse of Claimant J.S., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse. Moreover, this Abuser negligently and willfully breached their duty to make timely and reasonable efforts to stop the sexual abuse.

559. The State is vicariously liable for the abuser’s sexual abuse as well as the failure of State of Illinois employees to prevent and report said abuse.

Sexual Abuse of J.A.

560. Claimant J.A. was approximately 14 years old when an officer (hereinafter “J.A. Abuser 1” unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused J.A. during his confinement at IYC – Murphysboro in approximately 2010. J.A. Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to J.A.

561. Claimant J.A. was approximately 15 years old when an officer (hereinafter “J.A. Abuser 2” unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused J.A. during his confinement at IYC – Harrisburg in approximately 2011. J.A. Abuser 2 was 17 years of age or older and held a position of trust, authority, or supervision in relation to J.A.

562. J.A. Abuser 1 was at all relevant times a white male of average build, average height, and around 50 years old. J.A. Abuser 2 was at all relevant times a white male, average

build, above average height, dark brown hair, and 30-40 years old. Some additional identifying information is known to J.A. but intentionally withheld at the time of filing for anonymity purposes. Claimant J.A. expects to learn the full name and identity of his abusers through the course of discovery.

563. During J.A.'s confinement at Murphysboro, J.A. Abuser 1 often approached J.A. in the shower while in confinement. J.A. Abuser 1 groped and fondled J.A. genitals and raped him on multiple occasions.

564. During J.A.'s confinement at Harrisburg, J.A. Abuser 2 regularly came into Claimant J.A.'s cell and forcefully raped J.A on multiple occasions.

565. At all relevant times herein, Claimant J.A. Abuser 1 was an officer at IYC – Murphysboro and Claimant J.A. Abuser 2 was an officer at IYC - Harrisburg and employees of the State of Illinois vis a vis the Illinois Department of Corrections and served as employees/agents of the Defendant.

566. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual. At the relevant times herein, Claimant J.A. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

567. The State of Illinois and its employees knew or should have known that these officers were sexually abusing children at IYC – Murphysboro and IYC – Harrisburg. They breached their duty to prevent the abuse and to report it.

568. At the time of the above-described sexual abuse of Claimant J.A., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff

members directly enabled the above-described sexual abuse. Moreover, this Abusers negligently and willfully breached their duty to make timely and reasonable efforts to stop the sexual abuse.

569. The State is vicariously liable for the abusers' sexual abuse as well as the failure of State of Illinois employees to prevent and report said abuse.

Sexual Abuse of A.S.

570. Claimant A.S. was approximately 15 years old when a guard (hereinafter "A.S. Abuser 1" unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused A.S. during his confinement at IYC – Harrisburg in approximately 2002. A.S. Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to A.S.

571. Claimant A.S. was approximately 16 years old when an officer (hereinafter "A.S. Abuser 2" unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused A.S. during his confinement at IYC – Kewanee in approximately 2002. A.S. Abuser 2 was 17 years of age or older and held a position of trust, authority, or supervision in relation to A.S.

572. A.S. Abuser 1 was at all relevant times a Hispanic male of thin build, average height, and 45-50 years old. He had a large mustache and small beard. A.S. Abuser 2 was at all relevant times a white male, muscular build, average height, red hair, blue eyes and 30-40 years old. Some additional identifying information is known to A.S. but intentionally withheld at the time of filing for anonymity purposes. Claimant A.S. expects to learn the full name and identity of his abusers through the course of discovery.

573. During A.S.'s confinement at Harrisburg, A.S. Abuser 1 isolated A.S. in a separate cell and anally penetrated A.S. with a baton.

574. During A.S.'s confinement at Kewanee, A.S. Abuser 2 bribed A.S. to perform oral sex in return for additional food or snacks.

575. At all relevant times herein, Claimant A.S. Abuser 1 was a guard at IYC – Harrisburg and Claimant A.S. Abuser 2 was an officer at IYC - Kewanee and employees of the State of Illinois vis a vis the Illinois Department of Corrections and served as employees/agents of the Defendant.

576. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual. At the relevant times herein, Claimant A.S. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

577. The State of Illinois and its employees knew or should have known that these officers were sexually abusing children at IYC – Harrisburg and IYC – Kewanee, and they breached their duty to prevent the abuse and to report it.

578. At the time of the above-described sexual abuse of Claimant A.S., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse. Moreover, this Abusers negligently and willfully breached their duty to make timely and reasonable efforts to stop the sexual abuse.

579. The State is vicariously liable for the abusers' sexual abuse as well as the failure of State of Illinois employees to prevent and report said abuse.

Sexual Abuse of M.J.

580. Claimant M.J. was approximately 16 years old when an officer named Officer Bacon, who was at all relevant times an employee of the State of Illinois, sexually abused M.J. during his confinement at IYC – St. Charles in approximately 2001.

581. Officer Bacon was at all relevant times a black male of average build, above average height, in his 30s or 40s, brown eyes and fade haircut with rat tail in back at the time of the abuse. M.J. expects to learn the full name and identity of his abuser through the course of discovery.

582. During M.J.'s confinement at St. Charles, Bacon often entered M.J.'s cell and groped, fondled, and masturbated M.J.'s genitals. Bacon also digitally penetrated M.J.'s anus.

583. At all relevant times herein, Claimant M.J.'s abuser was a guard at IYC – St. Charles and employee of the State of Illinois vis a vis the Illinois Department of Corrections and served as an employee/agent of the Defendant.

584. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant M.J. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

585. The State of Illinois and its employees knew or should have known that this officer was sexually abusing children at IYC – St. Charles, and they breached their duty to prevent the abuse and to report it.

586. At the time of the above-described sexual abuse of Claimant M.J., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse. Moreover, this Abuser negligently and willfully breached their duty to make timely and reasonable efforts to stop the sexual abuse.

587. The State is vicariously liable for the abuser's sexual abuse as well as the failure of State of Illinois employees to prevent and report said abuse.

Sexual Abuse of N.H.

588. Claimant N.H. was approximately 14 years old when an officer (hereinafter “N.H. Abuser 1” unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused N.H. during her confinement at IYC – Chicago in approximately 1998. N.H. Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to N.H.

589. N.H. Abuser 1 was at all relevant times a black male of average build, average height, 50-60 years old, brown eyes and small afro at the time of the abuse. Some additional identifying information is known to N.H. but intentionally withheld at the time of filing for anonymity purposes. Claimant N.H. expects to learn the full name and identity of her abuser through the course of discovery.

590. During N.H.’s confinement at Chicago, N.H. Abuser 1 forced N.H to perform oral sex by promising to keep her out of trouble.

591. At all relevant times herein, Claimant N.H.’s abuser was an officer at IYC – Chicago and employee of the State of Illinois vis a vis the Illinois Department of Corrections and served as an employee/agent of the Defendant.

592. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant N.H. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

593. The State of Illinois and its employees knew or should have known that this officer was sexually abusing children at IYC – Chicago, and they breached their duty to prevent the abuse and to report it.

594. At the time of the above-described sexual abuse of Claimant N.H., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information

and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse. Moreover, this Abuser negligently and willfully breached their duty to make timely and reasonable efforts to stop the sexual abuse.

595. The State is vicariously liable for the abuser's sexual abuse as well as the failure of State of Illinois employees to prevent and report said abuse.

Sexual Abuse of J.L. 3

596. Claimant J.L. 3 was approximately 14 years old when a guard (hereinafter "J.L. 3 Abuser 1" unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused J.L. 3 during his confinement at IYC – Murphysboro in approximately 2001. J.L. 3 Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to J.L. 3.

597. J.L. 3 Abuser 1 was at all relevant times a white male of average build, average height, 45-50 years old, blue eyes and grey hair at the time of the abuse. Some additional identifying information is known to J.L. but intentionally withheld at the time of filing for anonymity purposes. Claimant J.L. 3 expects to learn the full name and identity of his abuser through the course of discovery.

598. During J.L. 3's confinement at Murphysboro, J.L. 3 Abuser 1 forced J.L. 3 to perform and receive oral sex and masturbation. J.L. 3 Abuser 1 threatened physical harm and withheld meals if Claimant J.L. 3 refused to comply with the abuse.

599. At all relevant times herein, Claimant J.L. 3's abuser was a guard at IYC – Murphysboro and employee of the State of Illinois via a vis the Illinois Department of Corrections and served as an employee/agent of the Defendant.

600. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant J.L. 3 was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

601. The State of Illinois and its employees knew or should have known that this guard was sexually abusing children at IYC – Murphysboro, and they breached their duty to prevent the abuse and to report it.

602. At the time of the above-described sexual abuse of Claimant J.L. 3, staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse. Moreover, this Abuser negligently and willfully breached their duty to make timely and reasonable efforts to stop the sexual abuse.

603. The State is vicariously liable for the abuser’s sexual abuse as well as the failure of State of Illinois employees to prevent and report said abuse.

Sexual Abuse of R.B.

604. Claimant R.B. was approximately 13 years old when a guard (hereinafter “R.B. Abuser 1” unless otherwise indicated) who was at all relevant times an employee of the State of Illinois sexually abused R.B. during his confinement at IYC – Pere Marquette in approximately 2001. R.B. Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to R.B.

605. R.B. Abuser 1 was at all relevant times a white female of slim build, shorter height, 20-30 years old, and brown long hair at the time of the abuse. Some additional identifying information is known to R.B. but intentionally withheld at the time of filing for anonymity

purposes. Claimant R.B. expects to learn the full name and identity of his abuser through the course of discovery.

606. During R.B.'s confinement at Pere Marquette, R.B. Abuser 1 forced R.B. to receive oral sex and perform sexual intercourse.

607. At all relevant times herein, Claimant R.B.'s abuser was a guard at IYC – Pere Marquette and employee of the State of Illinois via a vis the Illinois Department of Corrections and served as an employee/agent of the Defendant.

608. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant R.B. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

609. The State of Illinois and its employees knew or should have known that this guard was sexually abusing children at IYC – Pere Marquette. They breached their duty to prevent the abuse and to report it.

610. At the time of the above-described sexual abuse of Claimant R.B., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse. Moreover, this Abuser negligently and willfully breached their duty to make timely and reasonable efforts to stop the sexual abuse.

611. The State is vicariously liable for the abuser's sexual abuse as well as the failure of State of Illinois employees to prevent and report said abuse.

Sexual Abuse of F.M.

612. Claimant F.M. was approximately 15 years old when a guard (hereinafter "F.M. Abuser 1" unless otherwise indicated) who was at all relevant times an employee of the State of

Illinois, sexually abused F.M. during her confinement at IYC – Chicago in approximately 1998. F.M. Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to F.M.

613. F.M. Abuser 1 was at all relevant times a black male of athletic build, above average height, 30-40 years old and brown eyes and short hair at the time of the abuse. Some additional identifying information is known to F.M. but intentionally withheld at the time of filing for anonymity purposes. Claimant F.M. expects to learn the full name and identity of her abuser through the course of discovery.

614. During F.M.'s confinement at Chicago, F.M. Abuser 1 forced F.M. to strip naked in her cell, then digitally penetrated F.M. and forced her to perform oral sex. F.M. Abuser 1 also attempted to perform oral sex and have sexual intercourse with F.M., but always stopped for fear of being discovered.

615. At all relevant times herein, Claimant F.M.'s abuser was a guard at IYC – Chicago and employee of the State of Illinois vis a vis the Illinois Department of Corrections and served as an employee/agent of the Defendant.

616. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant F.M. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

617. The State of Illinois and its employees knew or should have known that this guard was sexually abusing children at IYC – Chicago. They breached their duty to prevent the abuse and to report it.

618. At the time of the above-described sexual abuse of Claimant F.M., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information

and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse. Moreover, this Abuser negligently and willfully breached their duty to make timely and reasonable efforts to stop the sexual abuse.

619. The State is vicariously liable for the abuser's sexual abuse as well as the failure of State of Illinois employees to prevent and report said abuse.

Sexual Abuse of T.K.

620. Claimant T.K. was approximately 16 years old when officers (hereinafter "T.K. Abuser 1" and "T.K. Abuser 2" unless otherwise indicated) who were at all relevant times employees of the State of Illinois, sexually abused T.K. during his confinement at IYC – Joliet in approximately 1999. T.K. Abuser 1 and 2 were 17 years of age or older and held positions of trust, authority, or supervision in relation to T.K.

621. T.K. Abuser 1 was at all relevant times a black female of slim build, above average height, 30-40 years old and long black hair at the time of the abuse. T.K. Abuser 2 was a white male of athletic build, average height, grey-blue eyes and salt and pepper hair. Some additional identifying information is known to T.K. but intentionally withheld at the time of filing for anonymity purposes. Claimant T.K. expects to learn the full names and identities of his abusers through the course of discovery.

622. During T.K.'s confinement at IYC – Joliet, T.K. Abuser 1 performed oral sex and on T.K. and forced T.K. to engage in sexual intercourse. T.K. Abuser 1 threatened T.K. with physical harm if T.K. did not comply. T.K. Abuser 2 physically assaulted T.K. and forcefully groped and fondled T.K.'s genitals.

623. At all relevant times herein, Claimant T.K.'s Abuser 1 and Abuser 2 were officers at IYC – Joliet and employees of the State of Illinois vis a vis the Illinois Department of Corrections and served as employees/agents of the Defendant.

624. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual. At the relevant times herein, Claimant T.K. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

625. The State of Illinois and its employees knew or should have known that these officers were sexually abusing children at IYC – Joliet. They breached their duty to prevent the abuse and to report it.

626. At the time of the above-described sexual abuse of Claimant T.K., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse. Moreover, these Abusers negligently and willfully breached their duty to make timely and reasonable efforts to stop the sexual abuse.

627. The State is vicariously liable for the abusers' sexual abuse as well as the failure of State of Illinois employees to prevent and report said abuse.

Sexual Abuse of Q.G.

628. When Claimant Q.G. was 14 to 15 years old and housed at the IYC – St. Charles, a correctional officer who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused Q.G. in 2000.

629. Q.G.'s abuser (hereinafter "Q.G. Abuser 1" unless otherwise indicated) was a correctional officer who at all relevant times was a white male with long red hair and a long beard.

He was approximately 6'0 in height and estimated to be in his mid 40s. He was of muscular build with a "beer belly," and worked on the Kimber Cottage housing unit at the time of the abuse. Q.G. expects to learn the full name and identity of his abuser through the course of discovery.

630. In approximately March or April of 2000, Q.G. Abuser 1 approached Q.G. in his cell around dinnertime. Q.G. Abuser 1 opened Q.G.'s cell door and entered the cell, then sat on Q.G.'s bed and asked Q.G. to talk with him. When Q.G. refused, Q.G. Abuser 1 grabbed Q.G. by his neck and put him in a chokehold, then choked Q.G. to the point of unconsciousness. Q.G. woke up in his cell a few hours later with severe pain and heavy bleeding from his anus; this pain was so bad that Q.G. could not sit down for a week. Q.G. Abuser 1 returned to the cell a few days after this incident and told Q.G. to hide his injuries and keep the abuse a secret, or else Q.G. Abuser 1 would kill Q.G.

631. About two months after this incident in approximately May or June of 2000, Q.G. Abuser 1 again entered Q.G.'s cell around dinner time and asked to sit and talk with him. Q.G. was upset and believed Q.G. Abuser 1 was going to hurt him again, so he yelled for help from nearby inmates or correctional officers, at which point Q.G. Abuser 1 punched Q.G.'s chest and put him in a chokehold, again to the point of unconsciousness. As Q.G. was semi-conscious, he felt Q.G. Abuser 1 forcefully penetrate his anus. Q.G. experienced severe pain in his chest and heavy bleeding from his anus. Q.G. Abuser 1 again told Q.G. to hide his injuries and the sex abuse under the threat of bodily harm, but other correctional officers noticed Q.G.'s pain and took him to an off-site hospital in St. Charles, Illinois due to the extent of his injuries. Q.G. Abuser 1 was one of the correctional officers that escorted Q.G. off-site, and he stayed with Q.G. in the hospital until he was discharged. Q.G. was diagnosed with a broken sternum, but he refused to let the

hospital staff look at or around his anus because Q.G. Abuser 1 was always nearby in the hospital, and he was afraid that Q.G. Abuser 1 would kill him.

632. When Claimant Q.G. was 17 years of age and housed at IYC – Joliet, a correctional officer (hereinafter “Q.G. Abuser 2” unless otherwise indicated) who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused Q.G. in the fall or winter of 2003.

633. Q.G. Abuser 2 was at all relevant times a black male estimated to be in his mid 30s. He was approximately 5’7 to 5’8 in height and wore a skull cap during the period of abuse due to the colder weather.

634. A few months into Q.G.’s six month stay at IYC – Joliet, Q.G. was sent to the “plastic room,” a padded room for certain inmates, for yelling at a group of correctional officers. Three correctional officers placed Q.G. in the “plastic room,” stripped him naked, and left him handcuffed inside. About 30 minutes later, one of these COs (Q.G. Abuser 2) entered the “plastic room” by himself and began touching Q.G.’s legs and behind while making sexual and demeaning comments about Q.G. and stating how he planned to have sexual intercourse with the claimant. Q.G. began yelling and kicking to get away from Q.G. Abuser 2, and after a few moments some other correctional officers came to investigate, at which time Q.G. Abuser 2 quickly exited the room.

635. In the weeks following the incident, Q.G. filed multiple grievances against Q.G. Abuser 2 and told many correctional officers about the incident. Q.G. was eventually moved to a different housing unit away from Q.G. Abuser 2, but he still saw Q.G. Abuser 2 around the facility and felt very uncomfortable knowing he still worked in the facility.

636. Q.G. Abusers were at all relevant times over the age of 17 years and held a position of trust, authority, or supervision in relation to Q.G.

637. The State of Illinois and its employees knew or should have known that Q.G. Abusers were sexually abusing him, among others.

638. At the time of the above-described sexual abuse of Q.G., his abusers and other employees were not adequately supervised, monitored, or surveilled by the State of Illinois and its respective departments. Upon information and belief, the State's failure to supervise, discipline, remove, and/or otherwise investigate Q.G.'s abusers and staff members who knew or should have known about the abuse directly enabled the above-described sexual abuse.

639. The State is vicariously liable for the sexual abuse of Q.G. as well as other employees' failure to prevent and report the said abuse.

640. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual. At the relevant times herein, Claimant Q.G. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

Sexual Abuse of J.P.

641. When claimant J.P. was approximately 15 and 17 years old and housed at IYC – Harrisburg, a correctional officer who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused J.P. between late 2005 and mid-2008.

642. J.P.'s abuser (hereinafter "J.P. Abuser 1" unless otherwise indicated) was a correctional officer who J.P. knew by the nickname "Sparky." He was at all relevant times a red-headed white male of average height and slim build estimated to have been in his 50s. He had a significantly faded military tattoo on his upper arm, and he worked on the receiving unit within

IYC – Harrisburg at the time of the abuse. J.P. expects to learn the full name and identity of his abuser through the course of discovery.

643. In late 2005 or early 2006, J.P. was housed on the receiving unit where inmates were locked inside their cells for 23 hours a day and only let out to shower or exercise. J.P. Abuser 1 frequently told J.P. and his cellmate that he could give them more freedom around the unit by making them porters, but only if J.P. or his cellmate gave J.P. Abuser 1 sexual favors.

644. A few weeks later, J.P. Abuser 1 approached J.P.'s cell and dismissed his cellmate to the showers. J.P. Abuser 1 sat on J.P.'s bed and stated that there was a porter position open, and that J.P. Abuser 1 would make him a porter if he masturbated J.P. Abuser 1 and did not tell anyone else. J.P. got very upset and refused to comply, so J.P. Abuser 1 left the cell.

645. Approximately four days later, J.P. Abuser 1 returned to J.P.'s cell, again dismissed J.P.'s cellmate to the showers and told J.P. to stay behind. J.P. was wearing a towel and objected to J.P. Abuser 1's presence in the cell. J.P. Abuser 1 closed the cell door and stated that he would make J.P. a porter and additionally give him chewing tobacco and extra food trays if J.P. masturbated J.P. Abuser 1. J.P. complied and began masturbating J.P. Abuser 1 on his bed. After a few minutes, J.P.'s cellmate returned from the shower and found J.P. masturbating J.P. Abuser 1. J.P. Abuser 1 quickly left the cell. J.P. Abuser 1 later came back to J.P.'s cell and said that if anyone ever found out about the abuse, J.P. Abuser 1 would send J.P. to segregation and never let J.P. leave the facility. J.P. left to boot camp at IYC – Murphysboro a few weeks after this incident.

646. In mid-2008 when J.P. was 17 years old, he returned to IYC – Harrisburg and was again housed within the receiving unit of the facility. Approximately two days after J.P.'s arrival to the receiving unit, J.P. 2.'s new cellmate was sent to the general population unit, leaving J.P. alone in his cell. About two hours after J.P.'s cellmate was transferred out, J.P. Abuser 1 entered

J.P.'s cell and said he wanted J.P. to "finish what he started last time." J.P. Abuser 1 then forced J.P. to masturbate him to completion. Once this abuse finished, J.P. Abuser 1 told J.P. that this was "our little secret" and again stated that he would send J.P. to segregation if anyone ever discovered the abuse.

647. J.P. Abuser 1 was at all relevant times over the age of 17 years and held a position of trust, authority, or supervision in relation to J.P.

648. The State of Illinois and its employees knew or should have known that J.P. Abuser 1 was sexually abusing him, among others.

649. At the time of the above-described sexual abuse of J.P., his abuser and other employees were not adequately supervised, monitored, or surveilled by the State of Illinois and its respective departments. Upon information and belief, the State's failure to supervise, discipline, remove, and/or otherwise investigate J.P.'s abusers and staff members who knew or should have known about the abuse directly enabled the above-described sexual abuse.

650. The State is vicariously liable for the sexual abuse of J.P. as well as other employees' failure to prevent and report the said abuse.

651. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual. At the relevant times herein, Claimant J.P. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

Sexual Abuse of B.P. 2

652. When claimant B.P. 2 was 13 years old and housed at IYC – Harrisburg, a correctional officer named D.A. Anderson, who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused B.P. in 2003.

653. D.A. Anderson was at all relevant times a black male of medium build, estimated to have been in his early 30s and approximately 5'4 to 5'5 in height. He had a low fade haircut and a mole above his upper lip. B.P. 2 expects to learn the full name and identity of his abuser through the course of discovery.

654. About two months into B.P. 2's stay at IYC – Harrisburg, Anderson frequently approached B.P. 2 in a friendly manner. He gained B.P. 2's trust by giving him snacks and soda and allowing him to stay outside of his cell for longer periods. After a few weeks of this friendly behavior, Anderson suddenly became more aggressive. He regularly entered B.P. 2's cell under the false and baseless pretense of searching for contraband. During these searches, Anderson ordered B.P. 2 to undress and grabbed and fondled B.P. 2's genitals for extended periods, ranging from 30 seconds to two minutes. He also digitally penetrated B.P. 2 for 10-30 seconds under the false guise of a cavity search. Anderson only performed these strip searches when he was the only correctional officer present on the housing unit. These unconstitutional, unlawful strip searches occurred approximately four times a month over the course of six months.

655. On one occasion after approximately five months of these regular strip searches, Anderson entered B.P. 2's cell and ordered B.P. 2 to give him oral sex, or else he would keep B.P. 2 inside the facility "forever" and never let him leave. B.P. 2 complied, and Anderson forced B.P. 2 to give him oral sex inside of B.P. 2's cell. A few days after this incident, Anderson returned to the cell and again forced B.P. 2 to give him oral sex under the same threat of an extended sentence. B.P. 2 was discharged from the facility two to three weeks after this second incident.

656. Throughout these six months of abuse, B.P. 2 wrote and sent six to eight letters addressed to his mother which detailed the abusive strip searches, cavity searches, and eventual

oral sex. Once B.P. 2 was released, he learned that his mother never received any of his letters about the sex abuse.

657. The State of Illinois and its employees knew or should have known that Anderson was sexually abusing him, among others.

658. At the time of the above-described sexual abuse of B.P. 2, his abuser and other employees were not adequately supervised, monitored, or surveilled by the State of Illinois and its respective departments. Upon information and belief, the State's failure to supervise, discipline, remove, and/or otherwise investigate B.P. 2's abuser and staff members who knew or should have known about the abuse directly enabled the above-described sexual abuse.

659. The State is vicariously liable for the sexual abuse of B.P. 2 as well as other employees' failure to prevent and report the said abuse.

660. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant B.P. 2 was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

Sexual Abuse of T.L.

661. When claimant T.L. was 15 and 16 years old and housed at IYC – Harrisburg, a correctional officer named Ms. Idaho, a kitchen staff member (hereinafter “T.L. Abuser 2” unless otherwise indicated), a sergeant named Rocky James, and a correctional officer named Peckinpugh, who were at all relevant times employees of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused T.L. in 2002 and 2003.

662. Ms. Idaho was at all relevant times a skinny, white, blonde, female correctional officer believed to have been in her twenties.

663. Idaho came in T.L.'s cell one night and, after passing out snacks, started groping him and his cellmate. She masturbated them, took her clothes off, pulled off T.L.'s clothes, and demanded that he sit up, at which point she sat on him and engaged him in coerced intercourse.

664. This abuse occurred approximately once a week during T.L.'s stay at IYC – Harrisburg from August 2002 for several months.

665. T.L. Abuser 2 was at all relevant times a tall, female kitchen staff worker with red hair, believed to have been in her 50s.

666. A few months into T.L.'s confinement, he was given a kitchen job. T.L. Abuser 2 followed him into the walk-in freezer one afternoon and made sexual comments. T.L. Abuser 2 put ice cream on her genitals and told T.L. to “come get it” and grabbed the back of T.L.'s head, forcing him to perform oral sex on her inside the freezer. After this incident, T.L. Abuser 2 forced T.L. to give her oral sex inside the freezer every time he worked in the kitchen, which was almost every day, for approximately 4 months until he left the facility.

667. T.L. Abuser 2 gave T.L. extra food when he complied with the abuse.

668. Rocky James was at all relevant times a white sergeant with salt and pepper hair, a mustache, and medium build.

669. Peckinpaugh was a correctional officer who worked under James. He was at all relevant times a white, heavy set, tall, male with a dark beard and he always wore a cap.

670. Whenever T.L. was confined in the segregation unit, James and Peckinpaugh frequently entered his cell (separately from each other) and physically intimidated T.L., ostensibly in an attempt to “break” him, which involved physical beatings as well as multiple occasions where James and Peckinpaugh forcefully grabbed T.L.'s head and forced their genitals in T.L.'s mouth. Sometimes they forced T.L. to give oral sex, and sometimes they pushed T.L.'s mouth/head onto

their genitals before leaving. James and Peckinpaugh often forcefully grabbed and smacked T.L.'s buttocks and attempted to digitally penetrate him in the hallway between the cell and the bathroom.

671. James regularly and physically coerced T.L. to have sexual intercourse inside his cell and the bathroom.

672. If T.L. did not comply with the oral sex or intercourse, James and Peckinpaugh handcuffed T.L. and sexually abuse him while restrained. James and Peckinpaugh generally abused T.L. separately from each other, but in the same manner.

673. When Claimant T.L. was 16 years old and housed at IYC – Murphysboro, several employees of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice (hereinafter “T.L. Murphysboro Abusers” unless otherwise indicated), sexually abused T.L. in 2003.

674. T.L. Murphysboro Abusers were approximately 8-12 corrections officers who regularly forced T.L. and other inmates to strip and stand at attention outside of their cells for extended periods of time. They forced T.L. to bend over and expose his anus to a group of inmates and officers, performing baseless strip searches and penetrative cavity searches on T.L. in front of the group, and forcefully groping/squeezing/fondling T.L.'s genitals in front of the group. T.L. Murphysboro Abusers performed this forceful group humiliation almost every day for T.L.'s entire stay at the facility, approximately two months.

675. These strip searches were conducted upon the youth of IYC – Murphysboro without individualized, reasonable suspicion, nor compliance with the constitutions of the United States and the State of Illinois, nor the administrative rules governing strip searches. These searches were a pretext for sexual abuse.

676. When claimant T.L. was 16 to 17 years old and housed at IYC – Joliet, a correctional officer named Ms. Eckles, a correctional officer named Ms. Swoles, a correctional officer named Ms. Ware, a counselor named Ms. Han, a kitchen staff member (hereinafter “T.L. Abuser 9” unless otherwise indicated), and a correctional officer named Ms. Fields, who were at all relevant times employees of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile, sexually abused T.L. beginning in 2003 until late 2004.

677. Ms. Eckles regularly entered T.L.’s cell under the pretext that she needed his help cleaning the gym. She brought T.L. to a small room inside the gym and masturbated him, administered oral sex, and had sexual intercourse with him. She told T.L. that they would both get in trouble if he ever disclosed the abuse, and she gave him snacks when he complied with her abuse. She sexually abused T.L. inside the gym approximately twice a week for almost his entire year and a half stay at Joliet.

678. Ms. Swoles and Ms. Ware separately approached T.L. while he was in a segregation cell or in the shower and took T.L. to a secluded area near the showers, where they gave him oral sex and had sexual intercourse with him.

679. Swoles and Ware sexually abused T.L. separately from each other. T.L. often these abusers discussing the sexual abuse of T.L. and other inmates amongst each other.

680. Ms. Han regularly came to T.L.’s cell and took him to an isolated room within the facility and forced him to perform oral sex on her. She gave T.L. food from Burger King and gave him extra time outside of his cell when he complied with the abuse. When T.L. did not comply with the abuse, she wrote up T.L. for random infractions and told the other COs to take away his privileges as punishment. Han sexually abused T.L. in this manner approximately two times a week for almost his entire year and a half stay at Joliet.

681. T.L. Abuser 9 was at all relevant times a kitchen staff member in her early 40s. She was dark skinned, heavy set, approximately 5'6 in height with black shoulder-length hair. T.L. expects to learn the full identity of T.L. Abuser 9 during discovery.

682. Whenever T.L. was working as a dishwasher in the kitchen, T.L. Abuser 9 pulled T.L. into an isolated area within the kitchen and forced him to give her oral sex. T.L. Abuser 9 allowed T.L. to relax and do less chores during his job as dishwasher as long as he complied with the abuse. This sexual abuse occurred once or twice a week for approximately one year.

683. Ms. Fields frequently stopped by T.L.'s cell to flirt with him and make sexual comments. After about two months of this behavior, she entered his cell and forced him to receive oral sex and sexual intercourse. She gave T.L. cigarettes and extra food when he complied with the sexual abuse. This abuse occurred every time she was on shift, around 3-5 times a week.

684. T.L. expects to learn the full name and identity of his abusers through the course of discovery.

685. The State of Illinois and its employees knew or should have known that T.L.'s abusers were sexually abusing him, among others.

686. At the time of the above-described sexual abuse of T.L., his abusers and other employees were not adequately supervised, monitored, or surveilled by the State of Illinois and its respective departments. Upon information and belief, the State's failure to supervise, discipline, remove, and/or otherwise investigate T.L.'s abusers and staff members who knew or should have known about the abuse directly enabled the above-described sexual abuse.

687. The State is vicariously liable for the sexual abuse of T.L. as well as other employees' failure to prevent and report the said abuse.

688. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual. At the relevant times herein, Claimant T.L. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

Sexual Abuse of R.T.

689. When claimant R.T. was approximately 14 to 16 years old and housed at IYC – St. Charles, a chaplain named Chaplain Jones, who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused R.T. between 2000 and 2002.

690. Chaplain Jones was at all relevant times a male estimated to have been in his 50s with gray hair and slim build. R.T. expects to learn the full name and identity of his abuser through the course of discovery.

691. Jones frequently arranged meetings with R.T. and encouraged him to share details about his life. On one occasion, Jones asked R.T. to take a pill in front of him. R.T. complied, and soon after started to feel light-headed and eventually fell unconscious. When R.T. woke up a short time later, Jones had undressed R.T. and was administering oral sex to him. Jones said that if R.T. did not reciprocate with oral sex, he would send him to segregation and increase his sentence. Jones also said that he would ask the correctional officers to administer a drug test on R.T., which he would fail because of the drugs that Jones told him to take. Jones sexually abused R.T. multiple times after this incident.

692. Jones gave cigarettes and pills to R.T. when he did comply with the abuse.

693. The State of Illinois and its employees knew or should have known that Jones was sexually abusing him, among others.

694. At the time of the above-described sexual abuse of R.T., his abuser and other employees were not adequately supervised, monitored, or surveilled by the State of Illinois and its respective departments. Upon information and belief, the State's failure to supervise, discipline, remove, and/or otherwise investigate R.T.'s abuser and staff members who knew or should have known about the abuse directly enabled the above-described sexual abuse.

695. The State is vicariously liable for the sexual abuse of R.T. as well as other employees' failure to prevent and report the said abuse.

696. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant R.T. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

Sexual Abuse of M.T.

697. When Claimant M.T. was approximately 16 or 17 years old and housed at IYC – Harrisburg, a correctional officer named Ms. Idaho, who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused M.T. in approximately 2009.

698. Ms. Idaho was at all relevant times a brunette female with a medium build believed to have been in her 30s and 5'6 to 5'8 in height. M.T. also knew her by her married name, Mrs. Curd. M.T. expects to learn the full name and identity of his abuser through the course of discovery.

699. Approximately three months into his sentence, M.T. was in the bathroom area with several other inmates after a shower when Idaho called out M.T. and one other inmate by name and asked the two to stay. Idaho told M.T. and the other inmate to give her their boxers so she could bring them new ones. M.T. felt uncomfortable but complied. Idaho then complimented

M.T.'s genitals and began administering oral sex to M.T. Idaho then gave oral sex to the other inmate in the bathroom. After the abuse, she told M.T. and the other inmate to go back to their cells.

700. In the days following this incident, Idaho stopped by M.T.'s cell and gave him extra items from the commissary and implied that she could pay the other inmates in cigarettes to "jump" M.T. if the abuse was ever disclosed. She also told M.T. that the police union was very strong and that the correctional officers at Harrisburg stuck together, so no one would ever believe M.T. if he disclosed the abuse and that he would probably be the one to get in trouble instead of the correctional officers.

701. Idaho repeated this abuse a few weeks later. A male correctional officer saw the abuse from outside the bathroom. Upon making eye contact with M.T., the male officer came around, leaned against the door to the bathroom, and continued to watch the abuse for several minutes.

702. A few days after this second incident, this male officer stopped by M.T.'s cell and gave him cigarettes.

703. The State of Illinois and its employees knew or should have known that Idaho was sexually abusing him, among others.

704. At the time of the above-described sexual abuse of M.T., his abuser and other employees were not adequately supervised, monitored, or surveilled by the State of Illinois and its respective departments. Upon information and belief, the State's failure to supervise, discipline, remove, and/or otherwise investigate M.T.'s abusers and staff members who knew or should have known about the abuse directly enabled the above-described sexual abuse.

705. The State is vicariously liable for the sexual abuse of M.T. as well as other employees' failure to prevent and report the said abuse.

706. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual. At the relevant times herein, Claimant M.T. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

Sexual Abuse of S.W.

707. When claimant S.W. was 13 years old and housed at the IYC – Warrenville, a teacher named Mr. Love, who was at all relevant times an employee of the State of Illinois via a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused S.W. in 1999 or 2000.

708. Mr. Love was at all relevant times a black male estimated to be in his 40s or 50s with a heavy-set build. He wore glasses. S.W. expects to learn the full name and identity of his abuser through the course of discovery.

709. For the duration of S.W.'s 45-day sentence at IYC – Warrenville, S.W. attended classes taught by Love on weekdays. On the second or third day of class, Love asked S.W. to stay behind after the other students left. Once S.W. and Love were alone in the classroom, Love locked the classroom door and made sexual comments towards S.W., then kissed her lips, neck, and ear and groped her breasts over the clothes. S.W. felt very scared and uncomfortable and eventually pulled away from Love and exited the room. Love repeated this behavior 8-9 more times over the course of several weeks, always after class inside his locked classroom. During the last three incidents of abuse, Love digitally penetrated S.W. in addition to the kissing and over-the-clothes groping. Whenever S.W. attempted to resist the abuse, Love said that he would report S.W. to her counselor and ensure that her sentence was extended beyond 45 days.

710. Love gave S.W. Milky Way candy bars when she complied with the abuse.

711. The State of Illinois and its employees knew or should have known that Love was sexually abusing her, among others.

712. At the time of the above-described sexual abuse of S.W., her abuser and other employees were not adequately supervised, monitored, or surveilled by the State of Illinois and its respective departments. Upon information and belief, the State's failure to supervise, discipline, remove, and/or otherwise investigate S.W.'s abuser and staff members who knew or should have known about the abuse directly enabled the above-described sexual abuse.

713. The State is vicariously liable for the sexual abuse of S.W. as well as other employees' failure to prevent and report the said abuse.

714. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, claimant S.W. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

Sexual Abuse of J.P. 2

715. When Claimant J.P. 2 was 15 years old and housed at the IYC – Kewanee, a correctional officer who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused J.P. 2 in 2001.

716. J.P. 2's abuser (hereinafter "J.P. 2 Abuser 1" unless otherwise indicated) was a correctional officer who was at all relevant times a tall, white male estimated to be in his mid 30s and approximately 6'0 in height. He had short brown hair, a skinny build, and tattoos on his arm. J.P. 2 expects to learn the full name and identity of his abuser through the course of discovery.

717. A few months into J.P. 2's sentence at IYC – Kewanee around May of 2001, J.P. 2 was inside his cell late at night when J.P. 2 unlocked and entered the cell. J.P. 2 Abuser 1 told J.P. 2 to stay quiet and said that he would "take care" of J.P. 2 and give him anything he wanted if the two could "keep a little secret" together. J.P. 2 Abuser 1 then kissed J.P. 2 and fondled his nipples, butt, and genitals. J.P. 2 Abuser 1 masturbated J.P. 2, administered oral sex, and licked and rubbed the outside of J.P. 2's anus. J.P. 2 Abuser 1 also forced J.P. 2 to provide oral sex.

718. A few weeks after this first incident, J.P. 2 Abuser 1 returned to J.P. 2's cell and sexually abused him in the same manner.

719. J.P. 2 Abuser 1 said that if J.P. 2 didn't "keep quiet" about the abuse, he would physically beat J.P. 2, take away his recreational time, and write up a false report to get him in trouble. J.P. 2 Abuser 1 gave J.P. 2 Nutty Buddy bars, Marlboro Lights cigarettes, and batteries as a reward for complying with the abuse.

720. J.P. 2 Abuser 1 was at all relevant times over the age of 17 years and held a position of trust, authority, or supervision in relation to J.P. 2.

721. The State of Illinois and its employees knew or should have known that J.P. 2 Abuser 1 was sexually abusing him, among others.

722. At the time of the above-described sexual abuse of J.P. 2, his abuser and other employees were not adequately supervised, monitored, or surveilled by the State of Illinois and its respective departments. Upon information and belief, the State's failure to supervise, discipline, remove, and/or otherwise investigate J.P. 2's abuser and staff members who knew or should have known about the abuse directly enabled the above-described sexual abuse.

723. The State is vicariously liable for the sexual abuse of J.P. 2 as well as other employees' failure to prevent and report the said abuse.

724. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, claimant J.P. 2 was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

Sexual Abuse of C.E.

725. When Claimant C.E. was 17 years old and housed at the IYC – Kewanee, two correctional officers named Smith and Hoover, who were at all relevant times employees of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused C.E. in 2004.

726. Smith and Hoover were correctional officers who both worked the first and second shifts on C.E.’s housing unit.

727. Smith was at all relevant times a bald, muscular, black male who was estimated to be in his early 40s and approximately over 6 feet in height.

728. Hoover was at all relevant times a white male estimated to be in his early 30s and approximately 5’8 in height. He had short black hair that was sometimes dyed blonde, and he had tattoos on his arm.

729. C.E. expects to learn the full name and identity of his abuser through the course of discovery.

730. Whenever Smith and Hoover started their morning shifts, they individually entered C.E.’s cell and woke him up by shoving their genitals into his face, or by yelling at him to wake up while they waved their genitals in the air. Smith and Hoover would sometimes ask C.E. to take out his own genitals so they could “take a look.” These incidents occurred nearly every morning for C.E.’s entire stay, approximately 18 months.

731. About three to four times a week, Smith and Hoover individually approached C.E. while he was inside his cell or the day room and grabbed C.E. by his arms or chest, then pull his pants down and pin him to the ground or against a wall. Smith and Hoover would then call for other inmates and order them to touch C.E. while his pants were down. Smith and Hoover, often joined by groups of five or more inmates, fondled and pulled on C.E.'s genitals, smacked his behind, and digitally penetrated C.E. for extended periods of time. Smith and Hoover forcefully held down and sexually abused C.E. in this manner approximately 3-4 times a week, lasting anywhere between five minutes and 20 minutes at a time.

732. When C.E. attempted to resist the abuse, Smith and Hoover wrote tickets against him and locked him inside his cell for extended periods of time as punishment. When C.E. did comply with the abuse, Smith and Hoover gave him extra food, cigarettes, and more time outside of his cell.

733. Smith and Hoover sexually abused C.E. separately from each other, but in the same manner. Several times, C.E. overheard Smith and Hoover making sexual jokes and comments to each other about C.E.

734. C.E. reported the sex abuse to his counselor at IYC – Kewanee. The counselor told C.E. that he would “look into it,” but no one ever followed up with C.E. regarding his report.

735. A few weeks after C.E. reported the abuse, a lieutenant caught Hoover holding down and sexually touching another inmate, who was a friend of C.E. Upon information and belief, Hoover was fired for this incident.

736. The State of Illinois and its employees knew or should have known that Smith and Hoover were sexually abusing him, among others.

737. At the time of the above-described sexual abuse of C.E., his abusers and other employees were not adequately supervised, monitored, or surveilled by the State of Illinois and its respective departments. Upon information and belief, the State's failure to supervise, discipline, remove, and/or otherwise investigate C.E.'s abusers and staff members who knew or should have known about the abuse directly enabled the above-described sexual abuse.

738. The State is vicariously liable for the sexual abuse of C.E. as well as other employees' failure to prevent and report the said abuse.

739. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, claimant C.E. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

Sexual Abuse of I.S. 2

740. When claimant I.S. 2 was 13 years old and housed at the IYC – Valley View, a correctional officer named Officer Merlo, who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused I.S. 2 in 2000.

741. Officer Merlo was at all relevant times a white female estimated to be in her 20s and approximately 5'0 in height. She had shoulder-length dirty blonde hair. I.S. 2 expects to learn the full name and identity of his abuser through the course of discovery.

742. During his stay at IYC – Valley View, I.S. 2 joined the work experience program inside the facility, which allowed him and a small group of other inmates to clean around the facility under the supervision of a correctional officer. A few months into his sentence, I.S. 2 was cleaning the facility's visitation room and accidentally bumped into Merlo. I.S. 2 became very nervous and apologized to Merlo, so she told him that it was okay and gently rubbed I.S. 2 on his

shoulder and upper back area. Merlo then put her arm around him and told other inmates to leave the visitation room. Once they were alone in the visitation room Merlo pulled I.S. 2 into a hug, reached into his pants, and masturbated him.

743. In the following months, Merlo masturbated I.S. 2 inside of the visitation room two more times after this incident.

744. Merlo gave I.S. 2 extra snacks when he complied with the abuse. She told I.S. 2 that he would get in trouble and receive an extended sentence if he ever disclosed the abuse.

745. The State of Illinois and its employees knew or should have known that Merlo was sexually abusing him, among others.

746. At the time of the above-described sexual abuse of I.S. 2, his abuser and other employees were not adequately supervised, monitored, or surveilled by the State of Illinois and its respective departments. Upon information and belief, the State's failure to supervise, discipline, remove, and/or otherwise investigate I.S. 2's abuser and staff members who knew or should have known about the abuse directly enabled the above-described sexual abuse.

747. The State is vicariously liable for the sexual abuse of I.S. 2 as well as other employees' failure to prevent and report the said abuse.

748. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, claimant I.S. 2 was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

Sexual Abuse of L.R.

749. When claimant L.R. was 15 and 16 years old and housed at the IYC – Joliet, a correctional officer named Jamie Edwards, a correctional officer named Ms. Lucky, and a correctional officer named Ms. Pratt, who were at all relevant times employees of the State of

Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused L.R. in 2001 and 2002.

750. Jamie Edwards was at all relevant times a black female estimated to be in her mid to late 30s and approximately 5'5 in height. She had short hair and wore glasses. She worked first shift as a correctional officer on L.R.'s housing unit and was later promoted to sergeant overseeing the facility's Youth Scholars, Skills, and Service ("YS3") program.

751. Ms. Lucky was at all relevant times a dark-skinned black woman estimated to be in her early 20s and approximately 4'11 in height.

752. Ms. Pratt was a Puerto Rican female estimated to be in her 20s and approximately 5'5 to 5'6 in height. She had long straight hair.

753. L.R. expects to learn the full name and identity of his abusers through the course of discovery.

754. About halfway into L.R.'s stay at IYC – Joliet, Edwards frequently stopped by L.R.'s cell during head count to have flirtatious conversations with L.R. and to give him extra snacks and cigarettes. Eventually, Edwards approached L.R. multiple times a day throughout the facility to flirt with him and touch him over the clothes. During mealtimes, Edwards often sat down with L.R. and asked him to rub her legs, neck, and back; L.R. complied and massaged her in the cafeteria, often in full view of other inmates and correctional officers.

755. After a few months of this flirtatious behavior, Edwards entered L.R.'s cell during the facility's Fourth of July party. She administered oral sex to L.R. and had sexual intercourse with L.R. inside his cell.

756. A few weeks after this incident, Edwards was promoted to sergeant and transferred to the downstairs control room known to inmates as "the bubble." L.R., who had the job of porter,

was cleaning in this downstairs “bubble” area when Edwards administered oral sex and had sexual intercourse with L.R. inside of the downstairs control room. Approximately three to four months later, Edwards abused L.R. again in this manner.

757. Sometime around 2000 or 2001, Lucky worked five consecutive days on L.R.’s housing unit. On each of the five days, Lucky entered L.R.’s cell during the first shift to kiss him and fondle his genitals over the clothes. Upon information and belief, Lucky resigned from her position shortly after these incidents because she was caught sexually abusing another inmate.

758. Sometime around 2001 to 2002, Pratt regularly stopped by L.R.’s cell during second shift and made sexual comments towards him. Two times, she entered L.R.’s cell, where she kissed him and groped his genitals over the clothes. One time, Pratt entered L.R.’s cell and masturbated him on his bed. Pratt told L.R. that they would both get in trouble if he ever disclosed the abuse.

759. The State of Illinois and its employees knew or should have known that L.R.’s abusers were sexually abusing him, among others.

760. At the time of the above-described sexual abuse of L.R., his abusers and other employees were not adequately supervised, monitored, or surveilled by the State of Illinois and its respective departments. Upon information and belief, the State’s failure to supervise, discipline, remove, and/or otherwise investigate L.R.’s abusers and staff members who knew or should have known about the abuse directly enabled the above-described sexual abuse.

761. The State is vicariously liable for the sexual abuse of L.R. as well as other employees’ failure to prevent and report the said abuse.

762. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual. At the relevant times herein, claimant L.R. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

Sexual Abuse of M.H.

763. When claimant M.H. was 16 years old and housed at the IYC – Warrenville, a sergeant named Sergeant Knox, who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused M.H. in 2000.

764. Sergeant Knox was at all relevant times a black male estimated to be approximately 6’3 in height. He was heavy set, had balding gray hair, and slight facial hair. M.H. expects to learn the full name and identity of his abuser through the course of discovery.

765. Early on in M.H.’s 60 day stay at IYC – Warrenville, Knox entered the bathroom while M.H. and a few other inmates were showering and ordered M.H. to finish her shower and follow him back to her cell. Under the guise of a strip search, Knox touched and rubbed M.H.’s breast and nipples, grabbed and squeezed her buttocks, and rubbed her genitals.

766. Several times after this incident, Knox frequently approached M.H. while she was in her cell, in the bathroom, or in the church area, and forced his hands down her pants. Knox also forced M.H. to touch and grab his genitals under his clothes.

767. Knox gave M.H. candy, perfume, body wash, and cigarettes as a reward for “keeping quiet” about the abuse. He threatened M.H. with an extended sentence if she ever reported the abuse to anyone. Knox sexually abused M.H. in this manner approximately five or six times over the course of her 60-day stay at the facility.

768. The State of Illinois and its employees knew or should have known that Knox was sexually abusing her, among others.

769. At the time of the above-described sexual abuse of M.H., her abuser and other employees were not adequately supervised, monitored, or surveilled by the State of Illinois and its respective departments. Upon information and belief, the State's failure to supervise, discipline, remove, and/or otherwise investigate M.H.'s abuser and staff members who knew or should have known about the abuse directly enabled the above-described sexual abuse.

770. The State is vicariously liable for the sexual abuse of M.H. as well as other employees' failure to prevent and report the said abuse.

771. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, claimant M.H. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

Sexual Abuse of S.F.

772. When claimant S.F. was 15 years old and housed at the IYC – Pere Marquette, a correctional officer named Officer Rexford, who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused S.F. in 2008.

773. Officer Rexford was at all relevant times a white, skinny, male correctional officer with a belly who is believed to have been approximately 5'5 in height, in his 50s, and he had a salt-and-pepper beard and mustache. S.F. expects to learn the full name and identity of his abuser through the course of discovery.

774. Rexford gained S.F.'s trust and approximately a month or more into her confinement at Pere Marquette, Rexford started touching her over the clothes. He started giving

S.F. cigarettes and weed. One day, Rexford told her that he could report her for smoking weed and falsifying work hours (both of which she did at the prompting of Rexford), and thereby increase her sentence. Rexford told S.F. that she could avoid an extended sentence if she gave him oral sex in the freezer. S.F. complied to avoid getting in trouble. After this incident, Rexford demanded sexual favors daily from S.F., as well as two to three other girls who worked in the kitchen. Rexford regularly forced S.F. to give him oral sex inside the facility's kitchen.

775. After about three to four months of daily sexual abuse, one of the kitchen girls reported the sex abuse to a staff member. This led to an internal investigation where S.F. and the other victims of Rexford told several staff members about the sex abuse taking place. S.F. was transferred to IYC Warrenville and given extra time on her sentence since she reported the tobacco and marijuana use to the staff members.

776. The State of Illinois and its employees knew or should have known that Rexford was sexually abusing her, among others.

777. At the time of the above-described sexual abuse of S.F., her abuser and other employees were not adequately supervised, monitored, or surveilled by the State of Illinois and its respective departments. Upon information and belief, the State's failure to supervise, discipline, remove, and/or otherwise investigate S.F.'s abuser and staff members who knew or should have known about the abuse directly enabled the above-described sexual abuse.

778. The State is vicariously liable for the sexual abuse of S.F. as well as other employees' failure to prevent and report the said abuse.

779. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, claimant S.F. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

Sexual Abuse of K.M.

780. When claimant K.M. was approximately 14 and 15 years old and housed at the IYC – St. Charles, correctional officers who were at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused K.M. in 2008.

781. K.M. Abuser 1 was at all relevant times a white male correctional officer believed to have been in his late 30s or early 40s, approximately 5'10 in height, with a heavy-set build and dark hair. K.M. expects to learn the identity of K.M. Abuser 1 through discovery.

782. Within the first week of K.M.'s confinement at St. Charles, K.M. Abuser 1 regularly allowed K.M. to stay outside of his cell and clean around the facility after the other inmates had gone to bed. K.M. Abuser 1 followed K.M. around while K.M. cleaned the day room and the showers. A few times during these late-night cleaning sessions, K.M. Abuser 1 offered for K.M. to take a shower before he cleaned the bathroom. When K.M. took these showers, K.M. Abuser 1 stood in the bathroom and watched him intently while making sexual comments about K.M.'s body.

783. After a few weeks of this behavior, K.M. Abuser 1 approached K.M. while he was cleaning the day room and said that he would write up K.M. for staying out late and get his sentence increased unless he allowed K.M. Abuser 1 to touch him sexually. K.M. Abuser 1 then forcibly shoved his hands down K.M.'s pants and masturbated him.

784. K.M. Abuser 1 forcibly masturbated K.M. three to four more times in the day room and in the shower. K.M. Abuser 1 gave K.M. cigarettes when he complied with the abuse.

785. During this period of abuse, K.M. verbally reported K.M. Abuser 1's sexual abuse to a white, female correctional officer, who did not react to K.M.'s report of abuse, and she told K.M. that he would be sent to segregation if he told anyone else about the abuse.

786. K.M. filed a grievance reporting the abuse and additionally filed multiple request slips to the facility's mental health office telling them about the abuse and asking to be transferred. No one ever followed up with K.M. after any of these reports.

787. K.M. Abuser 2 was at all relevant times a male correctional officer believed to have been in his late 20s or 30s, 5'8 in height, skinny, with black hair. K.M. anticipates learning the full identity of K.M. Abuser 2 through discovery.

788. On one occasion, K.M. Abuser 2 approached K.M. while he was in the day room and said he had to search K.M. for contraband. This request for a search was a false guise for sexual abuse. He took K.M. to his cell and ordered him to undress.

789. K.M. Abuser 2 then groped K.M.'s genitals and behind for an extended period, roughly one to three minutes.

790. When claimant K.M. was approximately 16 years old and housed at the IYC – Joliet, a correctional officer ("K.M. Abuser 3") who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused K.M. in 2008.

791. K.M. Abuser 3 was at all relevant times a tall, stocky male correctional officer believed to have been in his 30s or 40s with dark hair.

792. Prior to transport to court from IYC – Joliet, K.M. Abuser 3 escorted him to the bathroom. K.M. Abuser 3 removed K.M.'s shackles and pants and made a sexual comment about K.M.'s genitals. K.M. Abuser 3 then grabbed K.M.'s genitals and fondled them for 30-60 seconds.

793. K.M. Abusers (1, 2, and 3) were at all relevant times over the age of 17 years and held a position of trust, authority, or supervision in relation to K.M.

794. The State of Illinois and its employees knew or should have known that K.M. Abusers were sexually abusing him, among others.

795. At the time of the above-described sexual abuse of K.M., his abusers and other employees were not adequately supervised, monitored, or surveilled by the State of Illinois and its respective departments. Upon information and belief, the State's failure to supervise, discipline, remove, and/or otherwise investigate K.M.'s abuser and staff members who knew or should have known about the abuse directly enabled the above-described sexual abuse.

796. The State is vicariously liable for the sexual abuse of K.M. as well as other employees' failure to prevent and report the said abuse.

797. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual. At the relevant times herein, claimant K.M. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

Sexual Abuse of T.B.

798. When claimant T.B. was 15 to 16 years old and housed at the IYC – Chicago, a correctional officer who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused T.B. in 1999-2000.

799. T.B.'s abuser (hereinafter "T.B. Abuser 1" unless otherwise indicated) was at all relevant times a short, brown-skinned, male correctional officer, estimated to have been approximately 5'8 in height, stocky in build, and in his thirties. T.B. expects to learn the full name and identity of his abuser through the course of discovery.

800. T.B. Abuser 1 opened the door to T.B.'s cell and entered at night after all inmates were locked in their cell. T.B. awoke to T.B. Abuser 1 opening the door and demanding that he come to the door. T.B. Abuser 1 then masturbated T.B. and told him if he didn't comply, T.B. would lose his privileges.

801. His abuse occurred approximately three to four times a week during T.B.'s confinement, lasting approximately 8 to 12 months.

802. T.B. Abuser 1 was at all relevant times over the age of 17 years and held a position of trust, authority, or supervision in relation to T.B.

803. The State of Illinois and its employees knew or should have known that T.B. Abuser 1 was sexually abusing him, among others.

804. At the time of the above-described sexual abuse of T.B., his abuser and other employees were not adequately supervised, monitored, or surveilled by the State of Illinois and its respective departments. Upon information and belief, the State's failure to supervise, discipline, remove, and/or otherwise investigate T.B.'s abuser and staff members who knew or should have known about the abuse directly enabled the above-described sexual abuse.

805. The State is vicariously liable for the sexual abuse of T.B. as well as other employees' failure to prevent and report the said abuse.

806. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, claimant T.B. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

Sexual Abuse of S.H.

807. Claimant S.H. was approximately 12 years old when a correctional officer (hereinafter "S.H. Abuser 1" unless otherwise indicated) who was at all relevant times an employee

of the State of Illinois, sexually abused S.H. during his confinement at IYC – Harrisburg in approximately 1996. S.H. Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to S.H.

808. S.H. Abuser 1 was a tall, black male with a muscular build and brown eyes, believed to be approximately 30 years old at the time of abuse. Additional identifying information is known to S.H. but intentionally withheld at the time of filing for anonymity purposes. Claimant S.H. expects to learn the full name and identity of his abuser through the course of discovery.

809. During S.H.'s confinement at IYC-Harrisburg, S.H. Abuser 1 forced S.H. to perform oral copulation both in the shower and in S.H.'s cell on multiple occasions.

810. At all relevant times herein, Claimant S.H.'s abuser was a guard at IYC – Harrisburg and employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice and served as an employee/agent of the Defendant.

811. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant S.H. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

812. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – St. Charles before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

813. At the time of the above-described sexual abuse of Claimant S.H., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information

and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

814. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of T.P.

815. Claimant T.P. was approximately 16 years old when a correctional officer (hereinafter "T.P. Abuser 1" unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused T.P. during her confinement at IYC – Warrenville in approximately 2001. T.P. Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to T.P.

816. T.P. Abuser 1 was at all relevant times a black female of athletic build, roughly between 5'8 and 5'9 in height and believed to have been in her mid 20s with short black hair and brown eyes at the time of the abuse. Additional identifying information is known to T.P. but intentionally withheld at the time of filing for anonymity purposes. Claimant T.P. expects to learn the full name and identity of her abuser through the course of discovery.

817. During T.P.'s confinement at IYC – Warrenville, T.P. Abuser 1 would go into T.P.'s cell and force her naked vagina onto T.P.'s naked vagina. This happened on multiple occasions.

818. At all relevant times herein, Claimant T.P.'s abuser was a guard at IYC – Warrenville and an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice and served as an employee/agent of the Defendant.

819. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant T.P. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

820. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – Warrenville before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

821. At the time of the above-described sexual abuse of Claimant T.P., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

822. The State is vicariously liable for the abuser’s sexual abuse as well as its employees’ failure to prevent and report said abuse.

Sexual Abuse of C.J.

823. Claimant C.J. was approximately 13 years old when a correctional officer (hereinafter “C.J. Abuser 1” unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused C.J. during his confinement at IYC – Joliet in approximately 1997. C.J. Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to C.J.

824. C.J. Abuser 1 was a white male of thin build, roughly 5’9”, age in his 30s, with red hair at the time of the abuse. He had red freckles and wore glasses. Some additional identifying information is known to C.J. but intentionally withheld at the time of filing for anonymity

purposes. Claimant C.J. expects to learn the full name and identity of his abuser through the course of discovery.

825. During C.J.'s confinement at IYC – Joliet, C.J. Abuser 1 grabbed C.J.'s bare buttock with his bare hands, C.J. Abuser 1 would forcefully kiss C.J., and C.J. Abuser 1 put his bare hands in C.J.'s pants and performed oral copulation on C.J. All took place in the cafeteria on multiple occasions.

826. At all relevant times herein, Claimant C.J.'s abuser was a guard at IYC – Joliet and employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice and served as an employee/agent of the Defendant.

827. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant C.J. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

828. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – Joliet before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

829. At the time of the above-described sexual abuse of Claimant C.J., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

830. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of K.T.

831. Claimant K.T. was approximately 12 years old when a correctional officer (hereinafter “K.T. Abuser 1” unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused K.T. during his confinement at IYC – St. Charles in approximately 1996. K.T. Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to K.T.

832. K.T. Abuser 1 was a Hispanic, African American male of chubby build, approximately 5’8”in height, roughly 38 years old, with black, low cut, curly hair, and brown eyes at the time of the abuse. He wore bracelets, earrings and occasionally glasses. Some additional identifying information is known to K.T. but intentionally withheld at the time of filing for anonymity purposes. Claimant K.T. expects to learn the full name and identity of his abuser through the course of discovery.

833. During K.T.’s confinement at IYC – St. Charles, K.T. Abuser 1 would come into K.T.’s cell with other inmates and make the other inmates pin down K.T., remove his clothes and physically abuse him. K.T. Abuser 1 would sodomize K.T. with his fingers and allow the other inmates to sodomize K.T. with objects such as a toothbrush and a broom handle. This happened on multiple occasions.

834. At all relevant times herein, Claimant K.T.’s abuser was a corrections officer at IYC – St. Charles and employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice and served as an employee/agent of the Defendant.

835. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant K.T. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

836. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – St. Charles before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

837. At the time of the above-described sexual abuse of Claimant K.T., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

838. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of J.D.

839. Claimant J.D. was approximately 14 years old when a correctional officer (hereinafter "J.D. Abuser 1" unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused J.D. during his confinement at IYC – St. Charles in approximately 2000. J.D. Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to J.D.

840. J.D. Abuser 1 was a white female of athletic build, height of 5'6", 20-25 years of age, with short, pixie bob cut blond hair and light-colored eyes at the time of the abuse. She had a tattoo, freckles, and occasionally wore glasses. Additional identifying information is known to J.D. but intentionally withheld at the time of filing for anonymity purposes. Claimant J.D. expects to learn the full name and identity of his abuser through the course of discovery.

841. During J.D.'s confinement at IYC – St. Charles, J.D. Abuser 1 seduced J.D. and had sexual intercourse with him in the back of the transport van. J.D. Abuser 1 would transport

J.D. between cottages at night and take the long way to have sexual intercourse with him. J.D. Abuser 1 also seduced J.D. and had sexual intercourse with him in the gym weight room at night. J.D. Abuser 1 got on top of J.D. while he was lying down on the bench press and had sexual intercourse with him. This happened on multiple occasions.

842. At all relevant times herein, Claimant J.D.'s abuser was a corrections officer at IYC – St. Charles and employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice and served as an employee/agent of the Defendant.

843. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant J.D. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

844. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – St. Charles before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

845. At the time of the above-described sexual abuse of Claimant J.D., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

846. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of E.J.

847. Claimant E.J. was approximately 16 years old when a correctional officer (hereinafter “E.J. Abuser 1” unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused E.J. during his confinement at IYC – St. Charles in approximately 2002. E.J. Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to E.J.

848. E.J. Abuser 1 was a tall, black male of heavy-set build, believed to have been in his 30s, with low-cut wavy, sandy-brown colored hair, and hazel green eyes at the time of the abuse. Additional identifying information is known to E.J. but intentionally withheld at the time of filing for anonymity purposes. Claimant E.J. expects to learn the full name and identity of his abuser through the course of discovery.

849. During E.J.’s confinement at IYC – St. Charles, E.J. Abuser 1 would come into E.J.’s cell late at night stating that he had to clean. E.J. Abuser 1 would then force E.J. to touch him and stimulate his penis until ejaculation. This would happen in the blind spot of the dayroom as well. This happened on multiple occasions.

850. At all relevant times herein, Claimant E.J.’s abuser was a guard at IYC – St. Charles and employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice and served as an employee/agent of the Defendant.

851. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant E.J. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

852. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – St. Charles before and after the abuse

occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

853. At the time of the above-described sexual abuse of Claimant E.J., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

854. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of A.L.

855. Claimant A.L. was approximately 13 years old when a correctional officer (hereinafter "A.L. Abuser 1" unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused A.L. during his confinement at IYC – Chicago in approximately 1998.

856. A.L. Abuser 1 was a black male of heavy-set build, approximately 5'8" in height, 29 years of age. He was bald with black eyes at the time of the abuse. A.L. Abuser 1 had tattoos and wore a small chain. Some additional identifying information is known to A.L. but intentionally withheld at the time of filing for anonymity purposes. Claimant A.L. expects to learn the full name and identity of his abuser through the course of discovery.

857. During A.L.'s confinement at IYC – Chicago, A.L. Abuser 1 would pull A.L. out of his cell and force him into a stall in the bathroom. While in the stall, A.L. Abuser 1 would force A.L. to perform oral copulation on him. A.L. Abuser 1 would say to A.L. "Don't tell anyone, keep it quiet, I know where you live, and I will kill you." During one incident, A.L. refused to perform

oral copulation on A.L. Abuser 1 and tried to fight him off, resulting in A.L. Abuser 1 breaking both of A.L.'s wrists. This happened on multiple occasions.

858. At all relevant times herein, Claimant A.L.'s abuser was a guard at IYC – Chicago and employee of the State of Illinois via a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice and served as an employee/agent of the Defendant.

859. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant A.L. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

860. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – Chicago before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

861. At the time of the above-described sexual abuse of Claimant A.L., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

862. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of C.G. 2

863. Claimant C.G. 2 was approximately 14 years old when a correctional officer (hereinafter "C.G. 2 Abuser 1" unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused C.G. 2 during her confinement at IYC –

Warrenville in approximately 2000. C.G. 2 Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to C.G. 2.

864. C.G. 2 Abuser 1 was at all relevant times a black male of heavy-set build, approximate height of 5'10", and in his 40s. He was bald with light-colored eyes at the time of the abuse. C.G. 2 Abuser 1 had big facial features. Additional identifying information is known to C.G. 2 but intentionally withheld at the time of filing for anonymity purposes. Claimant C.G. 2 expects to learn the full name and identity of her abuser through the course of discovery.

865. During C.G. 2's confinement at IYC – Warrenville, C.G. 2 Abuser 1 reached under C.G. 2's gown and penetrated her with his fingers on multiple occasions while C.G. 2 was in the confinement unit and also in C.G. 2's housing unit.

866. At all relevant times herein, Claimant C.G. 2's abuser was a corrections officer at IYC – Warrenville and employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice and served as an employee/agent of the Defendant.

867. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant C.G. 2 was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

868. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – Warrenville before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

869. At the time of the above-described sexual abuse of Claimant C.G. 2, staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information

and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

870. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of S.S.

871. Claimant S.S. was approximately 16 years old when a correctional (hereinafter "S.S. Abuser 1" unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused S.S. during her confinement at IYC – Warrenville in approximately 2002. S.S. Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to S.S.

872. S.S. Abuser 1 was a black male of average build, approximately 6'0" in height, in his late 20s, with black hair and brown eyes at the time of the abuse. S.S. Abuser 1 had a big nose and smooth skin of a darker complexion. Additional identifying information is known to S.S. but intentionally withheld at the time of filing for anonymity purposes. Claimant S.S. expects to learn the full name and identity of her abuser through the course of discovery.

873. During S.S.'s confinement at IYC – Warrenville, S.S. Abuser 1 would wait until everyone was locked in their cells for the night, then he would walk by S.S.'s cell and tap on the cell window. This was the signal for S.S. to take off her clothes. S.S. Abuser 1 would enter S.S.'s cell with Hershey's chocolate cake. S.S. Abuser 1 would use his bare fingers to penetrate S.S.'s vagina. This happened on multiple occasions.

874. At all relevant times herein, Claimant S.S.'s abuser was a guard at IYC – Warrenville and employee of the State of Illinois vis a vis the Illinois Department of Corrections

and/or the Illinois Department of Juvenile Justice and served as an employee/agent of the Defendant.

875. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant S.S. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

876. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – Warrenville before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

877. At the time of the above-described sexual abuse of Claimant S.S., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

878. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of R.W.

879. Claimant R.W. was approximately 16 years old when a correctional officer (hereinafter "R.W. Abuser 1" unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused R.W. during his confinement at IYC – Harrisburg in approximately 2001. R.W. Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to R.W.

880. R.W. Abuser 1 was a Caucasian male of stocky build, 6'2" in height, in his 40s, with brown hair and blue eyes at the time of the abuse. S.S. Abuser 1 had a tattoo on his forearm.

Some additional identifying information is known to R.W. but intentionally withheld at the time of filing for anonymity purposes. Claimant R.W. expects to learn the full name and identity of his abuser through the course of discovery.

881. During R.W.'s confinement at IYC – Harrisburg, R.W. Abuser 1 would come into R.W.'s cell at night and tell R.W. to show him his penis. R.W. Abuser 1 would rub and stroke R.W.'s penis for about 15-20 minutes at a time. R.W. Abuser 1 would then force R.W. to do the same. R.W. Abuser 1 would use his bare hands and masturbate R.W. until he ejaculated. R.W. Abuser 1 would threaten R.W. by saying, "If you say anything I will lock you in the room or not give you food." This happened on multiple occasions.

882. At all relevant times herein, Claimant R.W.'s abuser was a guard at IYC – Harrisburg and employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice and served as an employee/agent of the Defendant.

883. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant R.W. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

884. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – Harrisburg before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

885. At the time of the above-described sexual abuse of Claimant R.W., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information

and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

886. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of J.H.

887. Claimant J.H. was approximately 14 years old when a correctional officer (hereinafter "J.H. Abuser 1" unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused J.H. during her confinement at IYC – Warrenville in approximately 2000. J.H. Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to J.H.

888. J.H. Abuser 1 was a Caucasian male of heavy-set build, approximately 5'8 to 5'9 in height, estimated to be in his 20s or 30s, with brown hair that was a buzz cut on the sides and longer on the top at the time of the abuse. J.H. Abuser 1 had a tattoo on his arm. Additional identifying information is known to J.H. but intentionally withheld at the time of filing for anonymity purposes. Claimant J.H. expects to learn the full name and identity of her abuser through the course of discovery.

889. During J.H.'s confinement at IYC – Warrenville, J.H. Abuser 1 would come into J.H.'s cell at night and wake her by rubbing her arm and then force her to perform sexual favors on him. He would threaten her by telling her that he would tell the facility that she abused him so she would get more time. J.H. Abuser 1 would also tell J.H. "I'll come after you." J.H. Abuser 1 would force J.H. to perform oral copulation on him. J.H. Abuser 1 would rape J.H. and would ejaculate. J.H. Abuser 1 would force J.H. to masturbate his penis until he would ejaculate. When

J.H. Abuser 1 was finished, he would pull his pants up and tell J.H. not to tell or she would be the one in trouble. This happened on multiple occasions.

890. At all relevant times herein, Claimant J.H.'s abuser was a guard at IYC – Warrenville and employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice and served as an employee/agent of the Defendant.

891. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant J.H. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

892. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – Warrenville before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

893. At the time of the above-described sexual abuse of Claimant J.H., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

894. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of H.K.

895. Claimant H.K. was approximately 15 years old when a correctional officer (hereinafter "H.K. Abuser 1" unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused H.K. during her confinement at IYC –

Warrenville in approximately 2003. H.K. Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to H.K.

896. H.K. Abuser 1 was a Hispanic male of muscular build, approximately 5'9", in his 20s or 30s, with short black hair at the time of the abuse. H.K. Abuser 1 had tattoos on his right forearm. Some additional identifying information is known to H.K. but intentionally withheld at the time of filing for anonymity purposes. Claimant H.K. expects to learn the full name and identity of her abuser through the course of discovery.

897. During H.K.'s confinement at IYC – Warrenville, H.K. Abuser 1 would come into the supply room where H.K. was working during the day, shut the door and force H.K.'s pants down and rape her from behind. H.K. Abuser 1 would threaten H.K. to keep her mouth shut or she would find out what would happen. He told her that no one would believe her.

898. At all relevant times herein, Claimant H.K.'s abuser was a guard at IYC – Warrenville and employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice and served as an employee/agent of the Defendant.

899. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant H.K. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

900. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – Warrenville before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

901. At the time of the above-described sexual abuse of Claimant H.K., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

902. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of P.K.

903. Claimant P.K. was approximately 13 years old when a correctional officer (hereinafter "P.K. Abuser 1" unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused P.K. during his confinement at IYC – Harrisburg in approximately 2000. P.K. Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to P.K.

904. P.K. Abuser 1 was a Caucasian male of muscular build, approximately 6'1", 35-40 years old, with sandy blonde, military buzz-cut hair, a mustache, and green eyes at the time of the abuse. P.K. Abuser 1 had a tattoo on his left bicep. Some additional identifying information is known to P.K. but intentionally withheld at the time of filing for anonymity purposes. Claimant P.K. expects to learn the full name and identity of his abuser through the course of discovery.

905. During P.K.'s confinement at IYC – Harrisburg, P.K. Abuser 1 would come by when P.K. was getting undressed to get into the shower and grope his naked buttock with his bare hands. When P.K. would be getting out of the shower, P.K. Abuser 1 would grope P.K.'s genitals under his towel with his bare hands. P.K. Abuser 1 would tell P.K. that he would go to "The Hole" (solitary confinement) if he didn't comply. This happened on multiple occasions.

906. At all relevant times herein, Claimant P.K.'s abuser was a guard at IYC – Harrisburg and employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice and served as an employee/agent of the Defendant.

907. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant P.K. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

908. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – Harrisburg before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

909. At the time of the above-described sexual abuse of Claimant P.K., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

910. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of M.R.

911. Claimant M.R. was approximately 17 years old when a correctional officer (hereinafter "M.R. Abuser 1" unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused M.R. during his confinement at IYC – St. Charles in approximately 2004. M.R. Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to M.R.

912. M.R. Abuser 1 was a Caucasian female of heavy-set build, approximately 5'7" and 40 years old, with straight blonde hair and blue eyes at the time of the abuse. M.R. Abuser 1 had a tattoo on her neck. Some additional identifying information is known to M.R. but intentionally withheld at the time of filing for anonymity purposes. Claimant M.R. expects to learn the full name and identity of his abuser through the course of discovery.

913. During M.R.'s confinement at IYC – St. Charles, M.R. Abuser 1 would come into M.R.'s cell and threaten him if he did not have sexual intercourse with her. She would tell him that she would give him more time by telling the warden that he raped her. M.R. was forced to penetrate M.R. Abuser 1 daily and multiple times a day on occasion.

914. At all relevant times herein, Claimant M.R.'s abuser was a correctional officer at IYC – St. Charles and employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice and served as an employee/agent of the Defendant.

915. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant M.R. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

916. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – St. Charles before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

917. At the time of the above-described sexual abuse of Claimant M.R., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information

and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

918. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of W.M.

919. Claimant W.M. was approximately 15 years old when a correctional officer (hereinafter "W.M. Abuser 1" unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused W.M. during his confinement at IYC – Chicago in approximately 2002. W.M. Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to W.M.

920. W.M. Abuser 1 was a Caucasian male of a fit build, roughly 6'0" and in his 30s, with short blondish-brown hair at the time of the abuse. Some additional identifying information is known to W.M. but intentionally withheld at the time of filing for anonymity purposes. Claimant W.M. expects to learn the full name and identity of his abuser through the course of discovery.

921. During W.M.'s confinement at IYC – Chicago, when he would go to the restroom in the middle of the night, W.M. Abuser 1 would tell W.M. to go to a dark isolated area. W.M. Abuser 1 would force W.M. to take off his clothes and when he refused, W.M. Abuser 1 would beat him up. W.M. Abuser 1 would forcefully pull down W.M.'s pants and would squeeze his penis for multiple seconds. W.M. Abuser 1 would then swipe his hand between W.M.'s buttocks and would penetrate his anus digitally. Abuser W.M. 1 would tell W.M. "I am going to make you listen to me." This happened on multiple occasions.

922. At all relevant times herein, Claimant W.M.'s abuser was a guard at IYC – Chicago and employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice and served as an employee/agent of the Defendant.

923. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant W.M. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

924. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – Chicago before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

925. At the time of the above-described sexual abuse of Claimant W.M., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

926. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of O.S.

927. Claimant O.S. was approximately 15 years old when two correctional officers ("O.S. Abuser 1" and "O.S. Abuser 2" unless otherwise indicated) who were at all relevant times employees of the State of Illinois, sexually abused O.S. during his confinement at IYC – St. Charles in approximately 2006. O.S. Abuser 1 and 2 were 17 years of age or older and held a position of trust, authority, or supervision in relation to O.S.

928. O.S. Abuser 1 was a Caucasian male of a muscular build, approximately 6'0" and 30-40 years of age, with short gray hair and a gray goatee at the time of the abuse. O.S. Abuser 1 occasionally had a gray beard. O.S. Abuser 2 was a black male of heavy-set build, with brown eyes and a bald head. Some additional identifying information is known to O.S. but intentionally withheld at the time of filing for anonymity purposes. Claimant O.S. expects to learn the full name and identity of his abusers through the course of discovery.

929. During O.S.'s confinement at IYC – St. Charles, O.S. Abuser 1 would come into O.S.'s cell at night and instruct him to pull down his pants. O.S. Abuser 1 would tell O.S. to enjoy this while he was there. O.S. Abuser 1 would then stroke his penis to full ejaculation. O.S. Abuser 1 would perform oral intercourse on O.S. and force him to perform oral intercourse on him and then to masturbate O.S. Abuser 1. This happened on multiple occasions.

930. O.S. Abuser 2 would come into O.S.'s cell at night and instruct him to pull down his pants. O.S. Abuser 2 told O.S. that he had been looking at him and liked him. O.S. Abuser 2 pulled O.S.'s body close to his, skin to skin, and started stroking O.S.'s penis and then performed oral intercourse on him until full ejaculation. After each incident, O.S. would be punished. This happened on multiple occasions. O.S. believes the two guards were sharing with each other what they did to him while they both worked nights.

931. At all relevant times herein, Claimant O.S.'s abusers were guards at IYC – St. Charles and employees of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice and served as employees/agents of the Defendant.

932. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual. At the relevant times herein, Claimant O.S. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

933. The State of Illinois and its employees, including but not limited to O.S. Abusers 1 and 2, knew or should have known that these correctional officers were sexually abusing children at IYC – St. Charles before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

934. At the time of the above-described sexual abuse of Claimant O.S., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

935. The State is vicariously liable for the abuser’s sexual abuse as well as its employees’ failure to prevent and report said abuse.

Sexual Abuse of R.W. 2

936. Claimant R.W. 2 was approximately 16 years old when a correctional officer (hereinafter “R.W. 2 Abuser 1” unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused R.W. 2 during his confinement at IYC – Harrisburg in approximately 2007. R.W. 2 Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to R.W. 2.

937. R.W. 2 Abuser 1 was a Caucasian male of a slim build, approximately 5’11” - 6’0” and in his 40s, with greyish and light-colored eyes at the time of the abuse. R.W. Abuser 1 had a round stomach and a damaged eye. Some additional identifying information is known to R.W. 2

but intentionally withheld at the time of filing for anonymity purposes. Claimant R.W. 2 expects to learn the full name and identity of his abuser through the course of discovery.

938. During R.W. 2's confinement at IYC – Harrisburg, when he would shower, R.W. 2 Abuser 1 would join him in the shower and begin to masturbate. R.W. 2 Abuser 1 would grab R.W. 2 and force him to masturbate R.W. 2 Abuser 1. R.W. 2 Abuser 1 would grab R.W. 2's penis. R.W. 2 Abuser 1 did not use gloves, it was always skin to skin. R.W. 2 Abuser 1 would pull out his penis in front of R.W. 2 and other inmates. These incidents happened on multiple occasions.

939. At all relevant times herein, Claimant R.W. 2's abuser was an officer at IYC – Harrisburg and employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice and served as an employee/agent of the Defendant.

940. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant R.W. 2 was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

941. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – Harrisburg before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

942. At the time of the above-described sexual abuse of Claimant R.W. 2, staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

943. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of C.Z.

944. Claimant C.Z. was approximately 17 years old when a correctional officer (hereinafter "C.Z. Abuser 1" unless otherwise indicated) who was at all relevant times an employee of the State of Illinois, sexually abused C.Z. during his confinement at IYC – St. Charles in approximately 2015. C.Z. Abuser 1 was 17 years of age or older and held a position of trust, authority, or supervision in relation to C.Z.

945. C.Z. Abuser 1 was a tall Caucasian male of a heavy-set build, approximately 35-45 years of age, with reddish orange hair and a fade haircut, brown eyes, and a reddish orange big beard at the time of the abuse. Some additional identifying information is known to C.Z. but intentionally withheld at the time of filing for anonymity purposes. Claimant C.Z. expects to learn the full name and identity of his abuser through the course of discovery.

946. Regularly throughout C.Z.'s confinement at IYC – St. Charles, C.Z. Abuser 1 entered C.Z.'s room in the morning, then undressed himself and the claimant. C.Z. Abuser 1 stroked C.Z.'s genitals with his bare hands for multiple minutes, at times manually stimulating C.Z.'s penis to the point of ejaculation. C.Z. Abuser 1 would force C.Z. to perform oral copulation on him. C.Z. Abuser 1 would say, "You already know, if you don't do what I want, you won't leave your cell." On a few occasions when C.Z. would refuse to comply, he would be left in his cell as punishment. When this happened, C.Z. Abuser 1 would say, "Ok, I guess we will try again tomorrow." C.Z. Abuser 1 would ask C.Z. daily, "What's it going to be today?"

947. At all relevant times herein, Claimant C.Z.'s abuser was a guard at IYC – St. Charles and employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice and served as an employee/agent of the Defendant.

948. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant C.Z. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

949. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – St. Charles before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

950. At the time of the above-described sexual abuse of Claimant C.Z., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

951. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of K.C.

952. When Claimant K.C. was 14 years old and housed at the IYC – St. Charles, a counselor named Laura Pahalsky, who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused K.C. from 2000 to 2002.

953. Laura Pahalsky was at all relevant times a white female, possibly of Polish descent, estimated to be in her 20s and approximately 5'10 to 5'11 in height with a slightly heavy-set build. She had long, light brown hair and a tattoo of her star sign symbol on her ankle.

954. Approximately in the year 2000 at the age of 13 before his stay at IYC – St. Charles, K.C. was housed at Maryville Academy's group home, where Pahalsky worked. Pahalsky began sexually abusing K.C. at this group home, where she administered oral sex and had sexual intercourse with the claimant. Pahalsky convinced K.C. to run away from the group home and live with her, and the two lived together in her home for several months, during which time she regularly gave oral sex and had sexual intercourse with K.C. When K.C. was arrested for running away from the group home and sentenced to St. Charles, Pahalsky told him that she would find a way to continue their sexual relationship while he was incarcerated.

955. K.C. was sent to IYC – St. Charles in 2000 at the age of 14, and by the time he entered the facility, Pahalsky, who prior to his IYC – St. Charles confinement had previously sexually abused him at Maryville Academy's group home, had been hired as a counselor at IYC – St. Charles. Pahalsky applied as a counselor at the facility for the explicit purpose of continuing her sexual abuse of the claimant.

956. Nearly every day starting from when K.C. entered the facility and ending when he left approximately 18 months later, Pahalsky had correctional officers send K.C. into her private office, where she masturbated K.C., gave him oral sex, and had sexual intercourse with him.

957. She gave him marijuana, cigarettes, food, new shoes, new clothes, money in his commissary account, and many other gifts throughout the period of abuse. She frequently threatened K.C. by saying that she could report him for non-consensually touching her, which would extend his sentence and revoke all of her special gifts.

958. In 2019 when K.C. was housed at the state-run Sheridan Correctional Center in Sheridan, Illinois, K.C. disclosed Pahalsky's sex abuse to his counselor. The counselor reported the abuse to authorities at Sheridan, and K.C. was interviewed by Internal Affairs regarding the abuse, but was told that it could not do anything about it.

959. The State of Illinois and its employees knew or should have known that Pahalsky was sexually abusing him, among others.

960. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant K.C. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

961. The State of Illinois and its employees knew or should have known that this staff member was sexually abusing children at IYC – St. Charles before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

962. At the time of the above-described sexual abuse of Claimant K.C., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

963. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of D.W.

964. When Claimant D.W. was approximately 15 or 16 years old and housed at the IYC – Kewanee, two counselors who were at all relevant times employees of the State of Illinois via a

vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused D.W. from 2004 to 2005.

965. D.W.'s abusers (hereinafter "D.W. Abuser 1" and "D.W. Abuser 2," or collectively "D.W. Abusers" unless otherwise indicated) were counselors who ran the drug counseling program at IYC – Kewanee. D.W. Abuser 1 was at all relevant times a white female of average height, estimated to be in her late 20s or early 30s, with a heavy-set build and light-colored hair. D.W. Abuser 2 was at all relevant times a tall white female estimated to be in her late 20s to early 30s, with a skinny build and blonde hair. D.W. expects to learn the full name and identity of his abusers through the course of discovery.

966. D.W. Abusers often invited D.W. into their respective offices for one-on-one private counseling sessions. During these private sessions, D.W. Abuser 1 flirted with D.W., touched his body and genitals over the clothes, and kissed him. After a few weeks of this behavior, she began touching his body and genitals under the clothes and having sexual intercourse with him. D.W. Abuser 1 had sexual intercourse with D.W. approximately five to six times, always inside her office during private counseling sessions.

967. D.W. Abuser 2 flirted with D.W., touched his body and genitals over the clothes, and often sat on his lap during sessions. D.W. Abusers held these inappropriate and sexually abusive private sessions approximately once or twice a week for the duration of the drug program. They often gave D.W. extra time outside of his cell while the other youths were locked up as a reward for complying with the abuse.

968. On one occasion, D.W. reported the sex abuse of D.W. Abusers to a male correctional officer who worked on his housing unit. The correctional officer grabbed D.W. and

pushed him against the wall of his cell, and said that D.W. could not tell anyone about the abuse or else he would physically beat D.W.

969. D.W. Abusers were at all relevant times over the age of 17 years and held a position of trust, authority, or supervision in relation to D.W.

970. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual. At the relevant times herein, Claimant D.W. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

971. The State of Illinois and its employees knew or should have known that these counselors were sexually abusing children at IYC – Kewanee before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

972. At the time of the above-described sexual abuse of Claimant D.W., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

973. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of J.B. 3

974. When Claimant J.B. 3 was 16 years old and housed at the IYC – St. Charles, a correctional officer named Jones, who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused J.B. 3 in 2004.

975. Jones was at all relevant times a white male of skinny build estimated to be in his 30s and approximately 6'0 in height. J.B. 3 expects to learn the full name and identity of his abuser through the course of discovery.

976. A few months into J.B. 3's stay at IYC – St. Charles, he was given the position of porter, which had him cleaning around the facility during the evening while the other inmates were inside their cells for the night. During these nightly cleaning duties, Jones regularly approached J.B. 3 and touched his genitals and buttocks over the clothes. This eventually progressed to the point where Jones regularly took J.B. 3 to a mop closet on his housing unit and touched J.B. 3 under the clothes, and regularly forced J.B. 3 to masturbate him. When J.B. 3 attempted to resist the abuse, Jones said that he would contact the parole board and put in a bad report to ensure that J.B. 3 never left the facility.

977. On one occasion, Jones forced J.B. 3 to give him oral sex, again under the threat of an extended sentence. As J.B. 3 was administering oral sex, he accidentally hurt Jones' genitals. This caused Jones to get very angry; he grabbed J.B. 3 by the hair and lifted him up, then slammed him against a wall and told J.B. 3 to go back to his cell and lock up.

978. Jones forced J.B. 3 to masturbate him approximately two times a week for five to seven months and forced J.B. 3 to give him oral sex once. He brought J.B. 3 cigarettes, alcohol, and extra food when he did comply with the abuse.

979. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant J.B. 3 was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

980. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – St. Charles before and after the abuse

occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

981. At the time of the above-described sexual abuse of Claimant J.B. 3, staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

982. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of K.J. 2

983. When Claimant K.J. 2 was 17 years old and housed at the IYC – Warrenville, a correctional officer named Nidorf, who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused K.J. 2 approximately from September 2004 to June 2005

984. Nidorf was at all relevant times a white male estimated to be in his 50s and of average to slightly above-average height. He had short white-gray hair and was of average build with a belly. K.J. 2 expects to learn the full name and identity of her abuser through the course of discovery.

985. When K.J. 2 entered Warrenville in approximately September of 2004, she was housed in a unit for youths with mental health issues. Nidorf worked this housing unit and regularly approached her in a friendly manner initially. Nidorf gave K.J. 2 extra food trays, cigarettes, Chinese food, and extra time out of her cell. He also made frequent sexual jokes and comments towards her.

986. After approximately a month, Nidorf told K.J. 2 that she had to give him sexual favors if she wanted to keep the gifts and privileges he had given her. From this point forward, Nidorf began flashing his flashlight during head count to signal K.J. 2 that he wanted sexual favors. He then let K.J. 2 out of her cell once the other inmates were in their cells for the night and took her to the recreational room or the showers. There, he forced K.J. 2 to masturbate him and receive digital penetration.

987. When K.J. 2 attempted to refuse the abuse, Nidorf told her that “no one would believe you since you’re on the crazy unit” and that even if she did report the abuse, he would just say that she was lying and get her sent to segregation. Nidorf sexually abused K.J. 2 almost every time he was on shift, approximately three times a week for around nine months until K.J. 2 left the facility a few months before she 18th birthday.

988. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant K.J. 2 was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

989. The State of Illinois and its employees knew or should have known that this correctional officer was sexually abusing children at IYC – Warrenville before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

990. At the time of the above-described sexual abuse of Claimant K.J. 2, staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

991. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of A.S. 2

992. When Claimant A.S. 2 was housed at IYC – Warrenville between the ages of 15 and 17, a shift supervisor named Barnett Gill and a correctional officer named Larry Johnson who were at all relevant times employees of the State of Illinois via a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused A.S. 2 between 2001 and 2003.

993. Barnett Gill was at all relevant times a short, black, male, estimated to be in his 60s. He was bald with age spots and freckles on his face.

994. Larry Johnson was at all relevant times a black male, estimated to be in his 40s, and approximately 5'5 to 5'6 in height.

995. In or around 2001 when A.S. 2 was approximately 15 years old, Barnett Gill regularly approached A.S. 2 in a friendly manner and used his position as shift supervisor to give her special privileges. He allowed her to spend time in his private office instead of class or her housing unit and gave her extra time outside of her cell during the evenings, extra phone time, and outside food. During these private times in his office, Barnett Gill held A.S. 2's hands, kissed her neck, groped her breasts over the clothing, pressed his erect genitals against her legs and back, and made sexual comments about her body and told her in explicit detail how he wished to have sex with her. He frequently told A.S. 2 about how they would both get in serious trouble if she ever disclosed his behavior, and that she could never tell anyone about their private meetings or his groping or else it would ruin his life. After about six months of this behavior, Barnett Gill began sexually abusing another youth within the facility and stopped pursuing A.S. 2.

996. Barnett Gill was ultimately fired, arrested, and found guilty of custodial sexual misconduct and criminal sexual assault for abuse he perpetrated at IYC – Warrentville.

997. In or around 2001 or 2002 when A.S. 2 was approximately 15 or 16 years old, Larry Johnson started to give A.S. 2 special privileges and gifts such as extra food, magazines, makeup, candy bars, extra time outside of her cell, and better jobs around the facility. He repeatedly made sexual comments towards her, groped her breasts and genitals over and under the clothes, and frequently exposed his erect genitals to her. He also stood outside her cell for extended periods of time and ordered her to strip, touch herself in a sexual manner, and dance nude while he watched.

998. After a few months of this behavior, Larry Johnson made A.S. 2 a trustee, which allowed her to clean around the facility at nighttime under the supervision of Larry Johnson while the other youths were in their cells for the night. While A.S. 2 was performing her trustee duties, Larry Johnson brought her into a cleaning closet and threatened to revoke all of her privileges and physically harm her if she did not have sexual intercourse with him. Larry Johnson had sexual intercourse with A.S. 2.

999. Immediately after this sexual abuse, another correctional officer saw Larry Johnson and A.S. 2 dressing themselves near the cleaning closet and asked what they were doing. Larry Johnson laughed and told the correctional officer not to worry about it, so the correctional officer left. That correctional officer, nor anyone else in the facility, ever followed up with A.S. after this incident regarding the abuse.

1000. Larry Johnson regularly threatened A.S. 2 with physical harm if she ever disclosed the abuse, and once said that if anyone ever learned of the sex abuse then “they would find you in a ditch.” He also frequently threatened to revoke her gifts and special privileges if she reported the

abuse. Larry Johnson sexually harassed A.S. 2 almost daily across multiple stays at IYC – Warrenville over the course of approximately two years.

1001. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant A.S. 2 was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

1002. The State of Illinois and its employees knew or should have known that these staff members were sexually abusing children at IYC – Warrenville before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

1003. At the time of the above-described sexual abuse of Claimant A.S. 2, staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

1004. The State is vicariously liable for the abusers’ sexual abuse as well as its employees’ failure to prevent and report said abuse.

Sexual Abuse of E.G.

1005. When Claimant E.G. was 15 or 16 years old and housed at IYC – Harrisburg, a correctional officer named Crank and a “white shirt” authority figure named Rocky James, who were at all relevant times employees of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused E.G. in 2006 or 2007.

1006. Crank was at all relevant times a white male, approximately 6'0 in height, and estimated to be in his early 30s. He was of muscular build and had tattoos on his arms. E.G. expects to learn the full name and identity of his abuser through the course of discovery.

1007. Rocky James was at all relevant times a white male of medium height and estimated to be in his 50s.

1008. Within the first month of E.G.'s stay at IYC – Harrisburg, Crank and James approached him in his cell and ordered him to follow them into Crank's office. E.G. complied, and once inside the office Crank and James said that they would write him up, send him to confinement, and extend his sentence unless he complied with their sexual abuse. E.G. was scared and uncomfortable but succumbed to their coercion. James put his hands down E.G.'s pants and masturbated him, and then Crank administered oral sex on E.G. and sodomized him while James watched and masturbated himself.

1009. About a month after this incident, Crank approached E.G. in his cell and groped his buttocks under the clothes, then ordered him to come back to his office again so he could sexually abuse him. E.G. became upset and refused to go back to the office, so Crank exited the cell. He gave E.G. extra time outside of his cell after the first incident of abuse but revoked this special privilege after E.G. refused him the second time.

1010. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual. At the relevant times herein, Claimant E.G. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

1011. The State of Illinois and its employees knew or should have known that these staff members were sexually abusing children at IYC – Harrisburg before and after the abuse occurred,

and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

1012. At the time of the above-described sexual abuse of Claimant E.G., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

1013. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of M.W.

1014. When Claimant M.W. was 16 years old and housed at IYC – Harrisburg, a facility guard named Rocky James and a corrections officer (hereinafter M.W. Abuser 2 unless otherwise indicated), who were at all relevant times employees of the State of Illinois vis a vis the Illinois Department of Juvenile Justice, sexually abused M.W. in 2006.

1015. Rocky James was at all relevant times a white male guard, of average build, with white and grey hair and blue eyes estimated to be in his 50s-60s.

1016. M.W. Abuser 2 was at all relevant times a white male with short black hair and brown eyes estimated to be 35 to 40 years old.

1017. When M.W. was housed at IYC – Harrisburg, James grabbed and slapped M.W.'s buttocks on multiple occasions. On one occasion, when M.W. was in his cell in the afternoon, James entered M.W.'s cell, exposed himself and put his penis on M.W.'s bare leg. James told M.W. to "be a good boy," and he tried coaxing M.W. to perform oral copulation on him.

1018. On one occasion, when M.W. was in the laundry room in the evening, M.W. Abuser 2 pulled down M.W.'s pants and slapped and grabbed M.W.'s buttocks. M.W. Abuser 2 attempted

to perform oral copulation on M.W. Additionally, M.W. manually stimulated M.W.'s penis and asked M.W. if "it felt good."

1019. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual. At relevant times herein, Claimant M.W. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

1020. The State of Illinois and its employees knew or should have known that these staff members were sexually abusing children at IYC – Harrisburg before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

1021. At the time of the above-described sexual abuse of Claimant M.W., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

1022. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of D.S.

1023. When Claimant D.S. was 14 to 16 years old and housed at IYC – Harrisburg, an authority figure who went by "Lieutenant James," who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Juvenile Justice, sexually abused D.S. in 1999.

1024. Lieutenant James was at all relevant times a white male guard, with shorter hair estimated to be in his mid-30s.

1025. When D.S. was housed at IYC – Harrisburg, Lieutenant James would restrain D.S. with hogties and tell D.S. to “suck this dick” if he wanted to be released from the hogties. Lieutenant James forced D.S. to perform oral copulation on him so he could be released. This happened on at least three occasions.

1026. On one occasion, while hogtied, D.S. defecated himself while being forced to give Lieutenant James oral copulation.

1027. Lieutenant James forced D.S. to sign a piece of paper confessing to sexually abusing another inmate if he wanted Lieutenant James to stop sexually abusing him. The confession Lieutenant forced D.S. to sign allowed Lieutenant James cover up that Lieutenant James sexually abused the other inmate. As a result of being forced to sign this confession, D.S. was required to stay at IYC – Harrisburg longer than his original 90 days. Specifically, D.S. was required to stay at IYC – Harrisburg until before his 18th birthday, and then was transferred to an adult prison for three additional years.

1028. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At relevant times herein, Claimant D.S. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

1029. The State of Illinois and its employees knew or should have known that this staff member was sexually abusing children at IYC – Harrisburg before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

1030. At the time of the above-described sexual abuse of Claimant D.S., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information

and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

1031. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of D.B.

1032. When Claimant D.B. was 14 to 16 years old and housed at IYC – Harrisburg, a “black shirt” sergeant named Rocky James, who was at all relevant times an employee of the State of Illinois via a vis the Illinois Department of Juvenile Justice, sexually abused D.B. in 2010.

1033. Rocky James was at all relevant times a white male guard of average build with blue eyes estimated to be in his 40s or 50s.

1034. When D.B. was housed at IYC – Harrisburg, James made sexual jokes about D.B.'s body. On one occasion, D.B. was taken into segregation in handcuffs. While handcuffed, James pulled D.B.'s pants down and attempted to put his finger in D.B.'s buttocks. While in the segregation cell, James touched D.B.'s penis and attempted to digitally penetrate D.B.'s buttocks while making sexual comments. James rubbed D.B.'s penis masturbating him for a short time while D.B. tried resisting by moving around and yelling. James told D.B. to stop yelling and that if D.B. ever told anyone, nobody would believe him.

1035. James digitally penetrated D.B. on at least three to four occasions, and James masturbated D.B. on at least three to four occasions. James stopped sexually abusing D.B. when D.B. moved out of the facility. D.B. told at least two counselors at the facility about James sexually abusing him, but nothing happened.

1036. James would provide D.B. with additional commissary items and snacks.

1037. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At relevant times herein, Claimant D.B. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

1038. The State of Illinois and its employees knew or should have known that this staff member was sexually abusing children at IYC – Harrisburg before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

1039. At the time of the above-described sexual abuse of Claimant D.B., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

1040. The State is vicariously liable for the abusers’ sexual abuse as well as its employees’ failure to prevent and report said abuse.

Sexual Abuse of I.W.

1041. When Claimant I.W. was 17 years old and housed at IYC – St. Charles, a correctional officer named Mr. Williams, who was an employee of the State of Illinois via a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused I.W. in 2004.

1042. Mr. Williams was at all relevant times a tall, stocky, black male, estimated to be in his 30s. He had a mole on his face and a gap in his tooth. I.W. also knew Williams by the nickname “Cat Daddy.”

1043. Starting within the first week of I.W.'s stay at IYC – St. Charles, Williams regularly entered the bathrooms on Cleveland Cottage while I.W. and other youths showered. He then

grabbed I.W.'s buttocks and genitals while he showered and groped the other nearby youths in a similar manner. On some occasions Williams “wrestled” with I.W. and other naked youth and fondled their buttocks and genitals for extended periods while physically holding them on the ground or against the wall. Williams sexually abused I.W. in this manner approximately four times a week for his entire stay at IYC – St. Charles, which was several months long. On multiple occasions, I.W. verbally reported Williams’s sexually abusive behavior to a “white shirt” authority figure, but this white shirt was friends with Williams and dismissed his reports. After each report, Williams told I.W. that he heard about his attempt to report his sexually abusive behavior and locked him inside his cell for one to two days at a time as punishment.

1044. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant I.W. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

1045. The State of Illinois and its employees knew or should have known that this staff member was sexually abusing children at IYC – St. Charles before and after the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

1046. At the time of the above-described sexual abuse of Claimant I.W., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant’s failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

1047. The State is vicariously liable for the abuser’s sexual abuse as well as its employees’ failure to prevent and report said abuse.

Sexual Abuse of K.R.

1048. When Claimant K.R. was 16 years old and housed at IYC – Harrisburg, a correctional officer named Ms. Idaho, who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused K.R. from late 2004 to June 2005.

1049. Ms. Idaho was at all relevant times a skinny white female, estimated to be 5’5 to 5’9 in height, and with blondish or reddish hair. K.R. expects to learn the full name and identity of his abuser through the course of discovery.

1050. Starting within the first few weeks of K.R.'s stay at IYC – Harrisburg, Idaho regularly groped K.R.'s buttocks and genitals over the clothes throughout the facility. She also frequently pulled him aside under the false guise of a pat-down and fondled his genitals both over and under the clothes while making sexual comments.

1051. After a few months of this behavior, Idaho approached K.R. in his cell and offered him cigarettes in exchange for oral sex. Accordingly, she coercively administered oral sex to K.R. inside his cell. Idaho sexually abused K.R. in this manner one more time after this incident.

1052. She gave him cigarettes, extra snacks, and extra time outside of his cell as a reward for enduring the abuse. She often threatened to take away K.R.'s commissary and send him to confinement if he ever reported the abuse.

1053. The above-described sexual abuse and/or acts perpetrated by this staff member were non-consensual. At the relevant times herein, Claimant K.R. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

1054. The State of Illinois and its employees knew or should have known that this staff member was sexually abusing children at IYC – St. Charles before and after the abuse occurred,

and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

1055. At the time of the above-described sexual abuse of Claimant K.R., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

1056. The State is vicariously liable for the abuser's sexual abuse as well as its employees' failure to prevent and report said abuse.

Sexual Abuse of C.C.

1057. When Claimant C.C. was 16 years old and housed at IYC – Harrisburg, a correctional officer (hereinafter “C.C. Abuser 1” unless otherwise indicated), who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused C.C. in 2007.

1058. C.C. Abuser 1 was at all relevant times a white male, estimated to be in his 50s, and approximately 5'7 in height. He had salt-and-pepper hair and was cross-eyed. C.C. expects to learn the full name and identity of his abuser through the course of discovery.

1059. C.C. had the job of porter within IYC – Harrisburg, which allowed him to clean around the facility during the evenings. Approximately four to five months into his stay, C.C. was in the laundry room with another youth when C.C. was hit in the back of the head with a heavy metal object by C.C. Abuser 1. The other youth quickly left the laundry room. C.C. was in severe pain and severely dazed from the blow and leaned over the dryer to support himself. C.C. Abuser 1 then pulled down C.C.'s pants and sodomized him with a broomstick. Immediately after the

abuse, C.C. Abuser 1 said that if C.C. ever said anything about the incident, then the abuse would be worse next time.

1060. When C.C. was 17 years old and housed at IYC – Kewanee, a correctional officer named Mr. Wright, who was at all relevant times an employee of the State of Illinois vis a vis the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, sexually abused C.C. in 2008.

1061. Wright was at all relevant times a bald black male, estimated to be in his 30s, and approximately 6’2 in height.

1062. Approximately six months into C.C.’s stay at IYC – Kewanee, C.C. was placed in confinement, stripped naked and handcuffed with his hands behind his back. Wright entered the cell and squeezed C.C.’s genitals very hard, enough to cause C.C. severe pain. Wright sexually abused C.C. in this manner two more times after this incident, once again in confinement and once in a supervised cell area known to the incarcerated youths as a “suicide room.”

1063. During the period of abuse, C.C. reported Wright’s sexually abusive behavior to his counselor and a nurse within the medical unit of the facility. Both employees told C.C. that they could not help him and told him not to speak about the abuse again. No one at the facility followed up with C.C. regarding his reports.

1064. The above-described sexual abuse and/or acts perpetrated by these staff members were non-consensual. At the relevant times herein, Claimant C.C. was a minor in the legal and physical custody of the State and did not factually consent and could not legally consent.

1065. The State of Illinois and its employees knew or should have known that these staff members were sexually abusing children at IYC – Harrisburg and IYC – Kewanee before and after

the abuse occurred, and they negligently and/or willfully breached their duty to prevent the abuse, to make timely and reasonable efforts to stop the abuse, and to report it.

1066. At the time of the above-described sexual abuse of Claimant C.C., staff members were not adequately supervised, monitored, or surveilled by the State of Illinois. Upon information and belief, Defendant's failure to supervise, discipline, remove, and/or otherwise investigate staff members directly enabled the above-described sexual abuse.

1067. The State is vicariously liable for the abusers' sexual abuse as well as its employees' failure to prevent and report said abuse.

DELAYED DISCOVERY - COMMON LAW AND 735 ILCS 5/13-202.2

1068. Claimants reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

1069. In addition, or in the alternative, Claimants 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 in one of the IYC facilities, as stated more fully herein.

1070. One or more Claimants 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.

1071. One or more Claimants were unaware of the wrongful conduct of Defendant and its' efforts to conceal their Childhood Sexual Abuse.

1072. Claimants had not discovered, understood or appreciated that any problems they were experiencing (i.e., emotional, psychiatric, psychological, and sexual) were caused by the

failure of Defendant to prevent, report and protect them from the Childhood Sexual Abuse, as described more fully herein.

1073. Claimants 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 1 – *Negligence/Negligence per se*

1074. Claimants reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

1075. The State of Illinois by and through its Department of Corrections and the Department of Juvenile Justice, as well as their employees, agents, and officers, were required by law to take or otherwise voluntarily took the custody of minors, including Claimants herein, within its jurisdiction such as to deprive them of their normal opportunities for protection. The Claimants and the State of Illinois (and its 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 Claimants.

1076. As such, the State and its officers, agents, and employees, owed various duties to those juveniles, including Claimants, in its custody. They include, but are not limited to: (1) a duty to protect children; (2) a duty to protect them against an unreasonable risk of physical and/or psychological harm, including sexual abuse; (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) 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) 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) 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; and (9) to provide confined youth with access to emotional support services from outside the facility to help confined youth heal from trauma.

1077. These duties are non-exhaustive and non-delegable. Given the special relationship of custodian and ward between the State of Illinois, its agents, and Claimants herein, the State of Illinois is directly and vicariously liable for the acts, omissions, and tortious conduct, whether negligent and/or intentional, of its employees and agents.

1078. As set forth in more detail above, sexual abuse of children at various IYC facilities across the State of Illinois 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 foreseeable and imminent. The State of Illinois and its officers, agents, and employees knew or should have known that it had numerous agents, officers, and employees who sexually abused children at IYC facilities across the state.

1079. The State of Illinois and its officers, agents, and employees breached each of the foregoing duties, among others.

1080. In so doing, the State of Illinois 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 Claimants were a member of the class the statutes or ordinances were intended to protect.

1081. The Defendant failed to use ordinary care in determining whether their facilities were safe and/or determining whether they had sufficient information to represent their facilities and/or programs as safe. The Defendant's breach of various duties include, but are not limited to: failure to protect Claimants from a known/suspected danger, failure to supervise staff members and Claimants, 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 their 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.

1082. Upon information and belief, the State of Illinois, 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 Claimants' abusers and/or their other agents to law enforcement.

1083. The State of Illinois and its employees, agents, and officers created a foreseeable risk of harm to Claimants. As vulnerable children placed and participating in the facilities and/or programs the Defendant offered that were overseen by poorly trained, insufficiently supervised, and inadequately vetted officers and supervisory staff, Claimants were foreseeable victims.

Additionally, as vulnerable children whom Claimants' abusers had access to and full control of through the Defendant's facilities and/or programs, Claimants were foreseeable victims. Moreover, the State of Illinois implemented an unconstitutional policy of strip-searching children without a particularized suspicion, which provided a false pretext for sexual abuse.

1084. As a direct and proximate result of the above-described conduct, Claimants 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*

1085. Claimants reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

1086. The State of Illinois, by and through its officers, agents, and employees of the Illinois Department of Corrections and the Illinois Department of Juvenile Justice committed childhood sexual abuse and sexual abuse as defined in Illinois Compiled Statute 735 ILCS 5/13-202.2.

1087. 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.

1088. This conduct perpetrated upon Claimants directly and proximately caused and will continue to cause Claimants 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.

1089. The abusers who perpetrated the abuse set forth herein were aided in accomplishing the abuse by the existence of the agency relationship with the State of Illinois, and the State of Illinois negligently and recklessly failed to prevent the abuse. Moreover, the State of Illinois, its agents, and the Claimants herein maintained a special relationship of custodian and ward. As such, the State of Illinois is vicariously liable for the conduct of its agents, officials, and employees constituting sexual abuse and childhood sexual abuse as defined in Illinois Compiled Statute 735 ILCS 5/13-202.2.

COUNT III – *Negligent Hiring or Retention against the State of Illinois*

1090. Claimants reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

1091. The State of Illinois knew or should have known that the Claimants’ abusers had a particular unfitness for their respective positions so as to create a danger of harm to the Claimants.

1092. The particular unfitness of the employees rendered the Claimants' injuries foreseeable to a person of ordinary prudence in the State of Illinois' position.

1093. The particular unfitness of these abusers was known or should have been known at the time the State of Illinois hired or retained them.

1094. The Defendant breached their duties to Claimants by actively maintaining and employing Claimants' abusers in positions of power and authority through which they had access to children, including Claimants, and power and control over children, including Claimants.

1095. The Defendant were negligent in their retention of Claimants' abusers in that they knew, or should have known, through the exercise of ordinary care, that the conduct of Claimants' abusers subjected third parties to an unreasonable risk of harm, including Claimants' abusers' sexual abuse of children in their charge.

1096. In failing to timely remove Claimants' 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 Claimants' injuries alleged in this action.

1097. The particular unfitness of Claimants' abusers, and the State of Illinois' various breaches of duties owed to the Claimants directly and proximately caused Claimants 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 IV – *Negligent Supervision*

1098. Claimants reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

1099. At all relevant times herein, the State of Illinois had a duty to supervise the Claimants' abusers so as to ensure that those minors in the State's custody would not be sexually abused.

1100. The State of Illinois breached this duty of supervision and negligently supervised the Claimants' abusers.

1101. The State of Illinois knew or should have known that both its employees who sexually abused Claimants and its employees who negligently failed to prevent and/or report the sexual abuse behaved in a dangerous or otherwise incompetent manner, and the State, having this knowledge, failed to supervise the employee adequately, or take other action to prevent the harm to Claimants.

1102. The State of Illinois' negligence proximately caused the Claimants 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 V – *Negligent Training*

1103. Claimants reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

1104. The State of Illinois was at all times responsible for the safety of the children in its custody. The State 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 the State is vicariously liable for the actions and omissions of their employees and agents in failing to train the abusers of Claimants.

1105. The State of Illinois 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.

1106. At all relevant times, Claimants' abusers were employees and/or agents of the Defendant. Claimants' abusers and the Defendant (or Defendant's agents) were therefore in employee-employer relationships. As employees and/or agents of the Defendant, Claimants' 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 Claimants. Claimants' 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.

1107. At all relevant times, the Defendant had a duty, arising from their (or their agents') employment of Claimants' abusers, to ensure that Claimants' abusers did not sexually abuse children in State custody, including training and supervising them to ensure they did not sexually abuse children in State 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.

1108. The Defendant were negligent in their hiring, training, and supervision of Claimants' abusers in that they knew, or should have known, through the exercise of ordinary care, that the conduct of Claimants' abusers would subject Claimants to an unreasonable risk of harm, including the propensity of Claimants' abusers to sexually abuse children in their charge.

1109. The State of Illinois gave Claimants' abusers regular, direct, ongoing access to Claimants 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.

1110. 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 IYC staff.

1111. The Defendant were 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.

1112. In negligently hiring, training, supervising, and retaining Claimants' 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.

1113. It was reasonably foreseeable to the Defendant that their failure to exercise reasonable care would result in sexual abuse of children in the custody of the Illinois Department of Corrections and/or the Illinois Department of Juvenile Justice, including Claimants.

1114. Claimants would not have suffered the foreseeable harm complained of herein but for the Defendant's negligent hiring, training, supervision, and retention of Claimants' abusers and the negligent training and instruction of their other agents and employees.

1115. At all relevant times, the Defendant's actions were negligent, willful, wanton, malicious, reckless, grossly negligent, and outrageous in their disregard for Claimants' rights and safety.

1116. As a direct and proximate result of the above-described conduct, Claimants 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 VI – *Negligent Failure to Follow Establish Policies and Procedures*

1117. Claimants reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

1118. 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.

1119. Defendant, by and through their authorized agents, servants, and/or employees, officers, and directors, owed a duty to follow these policies and procedures 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 Claimants in private and semi-private areas of the facilities;
- c. failing to adequately supervise the employees and agents;
- d. failing to protect Claimants from harm;
- e. failing to warn or advise Claimants that certain employees and agents posed a danger to Claimants;
- f. failing to investigate the information, reports, rumors, complaints and allegations concerning certain employees and agents' sexual grooming and/or sexual abuse of Claimants;
- g. attempting to conceal Claimants' 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. failing to terminate perpetrators and allowing certain employees and agents to remain employed at Defendant's facilities after learning of the sexual grooming and/or sexual abuse of Claimants;
- k. failing to implement and/or to follow policies and procedures which were intended to protect Claimants from abuse by employees and agents of Defendant; and/or
- l. implementing policies, such as unconstitutional strip search policies, that were a moving force of the abuse set forth herein.

1120. As a direct and proximate result of one or more of the aforementioned negligent, willful and/or wanton acts and/or omissions, Claimants were subjected to sexual abuse and exploitation by employees and agents of Defendant and was caused to suffer the above referenced injuries.

HISTORY OF THE CLAIM

1121. The claims presented herein have not been presented to any State department or officer and have not been the subject of administrative proceedings.

OWNERSHIP

1122. Claimants are the owners of claims herein and have retained the law firms of Bailey Glasser LLP and Levy Konigsberg LLP on a contingency basis.

ENTITLEMENT

1123. Claimants are entitled to the amount claimed from the State of Illinois after allowing all just credits.

DAMAGES AND BILL OF PARTICULARS

1124. Claimants reallege and incorporate by reference each and every previous allegation above as if fully stated in this Count.

1125. Each Claimant 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.

1126. Each Claimant herein individually claims and demands judgment in the amount of the jurisdictional maximum of \$2,000,000.00, said maximum to be adjusted upward according to the U.S. Bureau of Labor Statistics Consumer Price Index-u from the preceding 12-month calendar year.

WHEREFORE, premises considered, Claimants request judgment against the state of Illinois in keeping with the foregoing and such other additional relief to which Claimants may be entitled under law and which the Court deems just, fair, and appropriate under the circumstances.

It is respectfully submitted, this the 6th day of May, 2024.



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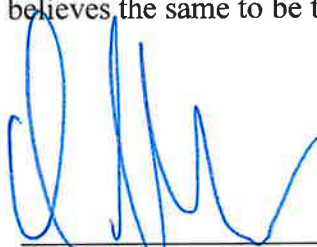
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VERIFICATION

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.



D. Todd Mathews