

4. Defendants Sheriff of Cook County and Cook County share responsibility for the facilities at the Cook County Jail.

5. Defendant Cook County is also joined in this action pursuant to *Carver v. Sheriff of LaSalle County*, 324 F. 3d 947 (7th Cir. 2003).

6. Defendant Sheriff has received federal funds since at least 2003.

7. Plaintiff is afflicted with knee osteoarthritis, causing him to have stability problems and to experiences severe pain while walking.

8. In 2014, before he entered the Cook County Jail, plaintiff was prescribed unloader knee braces for both knees to provide stability and to minimize pain.

9. Before his entry to the Jail, plaintiff wore his knee braces on a daily basis and experienced greater stability, support, and pain relief for his knee osteoarthritis.

10. Plaintiff entered the Jail on September 4, 2014.

11. Immediately before arriving at the Jail, plaintiff was processed by the Cook County Sheriff's Police at its Maybrook Facility.

12. In accordance with an explicit policy of the Sheriff, Cook County Sheriff's Police officers seized plaintiff's braces and held that property at the Maywood facility.

13. The Sheriff's explicit policy is to hold detainee property at the Maywood facility for six months and to then sell or dispose of that property if the detainee is unable to retrieve his (or her property) or to designate an agent to retrieve the property.

14. Plaintiff was unable to retrieve his knee braces from the Sheriff's Maywood facility individually because he was and continues to be a pre-trial detainee at the Jail.

15. Plaintiff was unable to designate an agent to retrieve the knee braces.

16. Plaintiff believes that the Sheriff has destroyed the knee-braces.

17. Employees of defendants are aware that plaintiff experiences severe knee pain and is unstable while walking.

18. As a result of a policy of the defendants of refusing to permit detainees to wear knee-braces, employees of defendants have refused to provide plaintiff with knee braces or any equivalent accommodation during his detention at the Jail.

19. Without his knee braces, plaintiff is unable to engage in the daily activity of walking on the same basis as non-disabled persons.

20. As a result of the foregoing, plaintiff was subjected to an unreasonable seizure of his property and deprived of his property without due process of law.

21. In addition, plaintiff has been, and continues to be, discriminated against on account of his disability, in violation of the ADA and the Rehabilitation Act.

WHEREFORE plaintiff requests that appropriate compensatory damages be awarded against defendants, that the Court grant such injunctive relief as may be appropriate, and that the costs of this action, including fees and costs, be taxed against defendants.

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