

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHEASTERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CRYSTAL BROWN, SARAN CRAYTON,	)	
SAMANTHA SLONIM, CELESTE	)	
ADDYMAN, ERIKA KNIERIM and JULIE	)	
HULL, on Behalf of Themselves and a Class of	)	
Similarly Situated Persons,	)	Case No. 17 C 8085
	)	
Plaintiffs,	)	Judge Matthew Kennelly
	)	
COOK COUNTY; LAW OFFICE OF THE	)	
COOK COUNTY PUBLIC DEFENDER; AMY	)	
CAMPANELLI, in her official and individual	)	
capacity as Public Defender of Cook County;	)	
and THOMAS DART, in his official and	)	
individual capacity as Sheriff of Cook County,	)	
	)	
Defendants.	)	
	)	
	)	

**PRELIMINARY INJUNCTION ORDER**

This matter is before the Court upon Plaintiffs’ Motion for Temporary Restraining Order and/or Preliminary Injunction (Doc. #9), Plaintiffs propose and the Defendant Thomas Dart does not oppose entry of the following Order:

The Parties to this Preliminary Injunction Order are: Cook County Sheriff Thomas Dart (“Sheriff”); Plaintiffs Brown, et al. as filed on behalf of themselves and all similarly situated female Assistant Public Defenders (“APDs”) and law clerks.

The Court Orders as follows:

1. During the pendency of this litigation, the Sheriff’s Office will preserve (a) all incident and disciplinary reports and (b) all video of reported incidents of indecent exposure or masturbation (defined as masturbation in public or in front of staff or visitors), and other sexual misconduct. An incident shall be considered reported if an administrative report is made (defined as a report made by an APD whether verbally or in writing to a deputy sheriff who shall promptly complete and submit an incident report for processing).

2. The Sheriff's Office will issue a directive to deputy sheriffs that no person will be discouraged or prevented from filing incident reports of indecent exposure, masturbation, and other sexual misconduct at any the Cook County Department of Corrections ("CCDOC") or the Court Services Division of the Cook County Judicial System (Court Service Division).<sup>1</sup>
3. The Sheriff's Office will send an email to the CCPD for dissemination to APDs providing information regarding the process by which an APD may report an incident of indecent exposure, masturbation, or other sexual misconduct advising that a report whether verbal or in writing will be accepted and processed and that any disciplinary proceeding against the detainee shall be adjudicated within 7 days of the report being made. The Sheriff's Office will also visibly post this same information in Court Service Division courthouse lockups.
4. Upon request made via email to the Sheriff's Office at a specific email address to be provided with the information set forth in Paragraph 3 above, the Sheriff's Office will provide a copy of an APD's incident report to the APD for the purpose of providing it to counsel and to the APD individually, subject to entry of a protective order to protect detainee privacy.
5. All detainees with a reported incident of indecent exposure, masturbation, or sexual misconduct will be provided with and required to wear a jumpsuit designed to thwart indecent exposure and masturbation. The jumpsuit will be promptly provided, and its use required, upon the first report of the behavior by any sworn or civilian personnel or person, without awaiting an inmate disciplinary hearing or adjudication. The jumpsuit will be worn in all CCDOC and Court Service Division facilities, and during transport. If the Sheriff's Office has an insufficient number of jumpsuits, then it will manufacture or purchase more.
6. Beginning on or before November 27, 2017, all detainees with a reported incident of indecent exposure, or masturbation, or sexual misconduct will be handcuffed at all times during transport from the jail to court, including the Leighton Criminal Courthouse, and will remain handcuffed at all times unless otherwise ordered by a criminal court judge, until their return to the jail. In the Leighton Criminal Courthouse, those detainees will remain handcuffed behind the back while in the Leighton Criminal Courthouse and will be kept on the "bridge" versus being held in the courtroom lockups. These procedures will be implemented at the time of documenting of the incident and pending administrative adjudication of the matter. Such measures will be continued with respect to the detainee after adjudication

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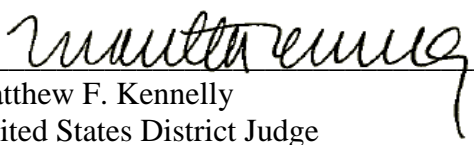
<sup>1</sup> Cook County Department of Corrections ("CCDOC") includes all jail divisions (including the medical division) as well as all tunnels and the lockup in the basement of the Leighton Criminal Courts building referred to as the "bridge." The Court Services Division of the Cook County Judicial System includes the following fourteen courthouses: Leighton Criminal Courts Building, the Daley Center, Rolling Meadows, Skokie, Bridgeview, Markham, Maywood, 51st Street, 111th Street, Belmont and Western, Harrison and Kedzie, Grand and Central, 555 West Harrison Street and 1100 S. Hamilton Avenue.

finding he engaged in the conduct reported.

7. On or before November 29, 2017, the Sheriff's Office will assign a deputized sworn staff member or exempt staff member to each of the eight lockup areas in the Leighton Criminal Courthouse on floors 4, 5, 6, and 7 to remain in each of those lockup areas at all times when detainees are present.
8. On or before December 4, 2017, the Sheriff's Office will issue a directive to deputy sheriffs that on floors 2 and 3 of the Leighton Criminal Courthouse (which houses the courtrooms with the "talk boxes" between the secure and unsecure areas for detainees to confer with attorneys) upon the request of an APD, the deputy sheriff shall escort a detainee to a location in the unsecured area behind the courtroom, where he will be secured for the purpose of meeting meet face to face with their counsel as necessary.
9. The Sheriff's Office will issue a directive reminding all detainees and employees that all detainees are required to be appropriately clothed in CCDOC issued uniforms , at all times when outside their cells, except when showering. Detainees refusing an instruction to leave a public area because they are not properly dressed may be escorted back to their cells.
10. The Sheriff's Office will issue a directive advising all employees that Cook County Public Defender Campanelli's directive barring APDs from the lockup areas at the Leighton Courthouse has been lifted.
11. The Sheriff's Office shall provide Plaintiffs' counsel with copies of all directives issued pursuant to this Order.

Dated: November 28, 2017

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Matthew F. Kennelly  
United States District Judge