

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

Theresa Kennedy, Santiago)
Bravo, and John Plummer,)
) No. 20-cv-1440
Plaintiffs,)
)
-vs-) (Judge Durkin)
)
City of Chicago,)
)
Defendant.)

AMENDMENT TO AMENDED COMPLAINT

Pursuant to leave of Court, plaintiffs file this amendment to the amended complaint, adding the following paragraphs:

- 2a. Plaintiffs Santiago Bravo and John Plummer are residents of the Northern District of Illinois.
- 15a. Plaintiffs Bravo and Plummer were subject to an unconstitutional detention because of the municipal policy described in paragraphs 6-13 of the amended complaint: Bravo was not permitted to post bond at the police station because he had been arrested on a warrant issued by a court sitting in Cook County but outside of the First Municipal District; Plummer was not permitted to post bond at the police station because he was arrested on a Sunday.

87. Plaintiff Santiago Bravo was arrested by Chicago police officers on Tuesday, November 20, 2022 at about 12:28 P.M. The Chicago Police Department created a record of the arrest as CB number 30195155.

88. Chicago police officers determined that plaintiff Bravo was the subject of an outstanding warrant issued by a judge of the Second Municipal District and applied the above-described municipal policy to prevent Bravo from posting the cash bond that had been set on the warrant even though Bravo was able to pay that bond.

89. Acting pursuant to the above-described policy, Chicago police officers held plaintiff Bravo overnight at the police station until he was transported to “Central Bond Court” at the George N. Leighton Criminal Court Building, 2650 South California Avenue, Chicago, Illinois.

90. At Central Bond Court, employees of the Cook County Sheriff assigned plaintiff Bravo an identification number of 20221121039.

91. Employees of the Cook County Sheriff presented Bravo to a Judge on November 21, 2022, and the Judge permitted Bravo’s mother to post the bond that had been set on the warrant. Bravo’s mother had been ready, willing, and able to have posted the bond at the police station on November 20, 2022. Bravo was released in the late afternoon or early evening of November 22, 2022.

92. Plaintiff John Plummer was arrested by Chicago police officers on Sunday, June 19, 2022 at about 7:10 P.M. The Chicago Police Department created a record of the arrest as CB number 30147293.

93. Chicago police officers determined that plaintiff Plummer was the subject of an outstanding warrant issued by a judge of the First Municipal District and applied the above-described municipal policy to prevent Plummer from posting the cash bond that had been set on the warrant even though Plummer was able to pay that bond.

94. Acting pursuant to the above-described policy, Chicago police officers held plaintiff Plummer overnight at the police station until he was transported to “Central Bond Court” at the George N. Leighton Criminal Court Building, 2650 South California Avenue, Chicago, Illinois.

95. At Central Bond Court, employees of the Cook County Sheriff assigned plaintiff Plummer an identification number of 20220620010.

96. Employees of the Cook County Sheriff presented Plummer to a Judge on June 20, 2022, and the Judge permitted Plummer’s fiance to post the bond that had been set on the warrant. Plummer’s fiance had been ready, willing, and able to have posted the bond at the police station on June 19, 2022. Plummer was released in the late afternoon or early evening of June 20, 2022.

/s/ Kenneth N. Flaxman
KENNETH N. FLAXMAN
ARDC No. 830399
JOEL A. FLAXMAN
200 S Michigan Ave Ste 201
Chicago, IL 60604-2430
(312) 427-3200
attorneys for plaintiffs