

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

# THIRD AMENDED COMPLAINT

Pursuant to leave of Court, plaintiff files this amended complaint and, by counsel, alleges as follows:

1. This is a civil action arising under 42 U.S.C. § 1983. The jurisdiction of this Court is conferred by 28 U.S.C. § 1333.

2. Plaintiff Tyrone R. Williams is a resident of the Northern District of Illinois who was detained at the Cook County Jail from June 8, 2020 through October 29, 2021.

3. Defendant Thomas Dart is the Sheriff of Cook County. Plaintiff sues Dart in his official capacity only.

4. Defendant Cook County shares responsibility with defendant Dart for providing medical care for detainees at the Cook County Jail.

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

6. In early 2020, defendants became aware that the coronavirus poses a significant risk to the health and wellbeing of detainees at the Jail. Defendants also learned that many detainees, including plaintiff, were at high risk of potential

COVID-related complications that could result in death.

7. Defendants learned in early 2020 about guidelines issued by the Centers for Disease Control to prevent the spread of the virus. These guidelines include social distancing, hand sanitizing, and the wearing of face masks by detainees and correctional staff.

8. Defendants adopted but did not implement or enforce policies for social distancing, hand sanitizing, and the wearing of face masks by detainees and correctional staff.

9. At all times relevant, defendants knew that the failure to implement and enforce policies for social distancing, hand sanitizing, and the wearing of face masks by detainees and correctional staff would increase the number of persons who were infected by the coronavirus.

10. Plaintiff became infected with the coronavirus in December of 2020 and was placed in a 14-day quarantine with other similarly infected detainees.

11. While infected by the coronavirus, plaintiff experienced shortness of breath, fatigue, fever, chills, coughing, muscle and body aches, and headaches. Plaintiff lost his sense of smell and taste and had a sore throat and a runny nose. Plaintiff experienced nausea, diarrhea, and persistent vomiting.

12. The failure of defendant Sheriff to implement and enforce policies for social distancing, hand sanitizing, and the wearing of face masks by detainees was a cause of plaintiff's coronavirus infection.

13. As a result of the foregoing, plaintiff suffered physical harm.

14. Plaintiff hereby demands trial by jury.

WHEREFORE plaintiff requests that an appropriate amount of damages and costs and fees be awarded against defendants.

Respectfully submitted,

/s/ Kenneth N. Flaxman  
Kenneth N. Flaxman  
knf@kenlaw.com  
Joel Flaxman  
200 S Michigan Ave, Ste 201  
Chicago, IL 60604  
(312) 427-3200  
*attorneys for plaintiff*