

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

Travis Cook,)	
)	
<i>Plaintiff,</i>)	
)	No. 24-cv-____
<i>-vs-</i>)	
)	<i>(jury demand)</i>
Sheriff of Cook County and Cook)	
County, Illinois,)	
)	
<i>Defendants.</i>)	

COMPLAINT

Plaintiff, by counsel, alleges as follows:

1. This is a civil action arising under Section 202 of the Americans with Disabilities Act of 1990, 42 U.S.C. § 12132, and Section 504 of the Rehabilitation Act, 29 U.S.C. § 794(a). The jurisdiction of this Court is conferred by 28 U.S.C. § 12132 and 29 U.S.C § 794a(a)(2).
2. Plaintiff Travis Cook is a resident of the Northern District of Illinois.
3. Defendant Sheriff of Cook County is sued in his official capacity only. The Sheriff, at all times relevant, has received federal funds for the operation of the Cook County Jail.
4. Defendant Cook County is jointly responsible for the ADA and Rehabilitation Act violations alleged and is also joined in this action pursuant to *Carver v. Sheriff of LaSalle County*, 324 F. 3d 947 (7th Cir. 2003).
5. Plaintiff has been confined at the Cook County Jail since May 25, 2022.

6. As a result of several strokes, plaintiff is partially paralyzed on his left side.

7. Because of his disability, plaintiff is unable to safely use a toilet that lacks handrails.

8. Because of his disability, plaintiff is unable to safely use a shower that lacks handrails and a shower chair.

9. Even though Jail officials knew that plaintiff required these accommodations, they assigned him to a building at the jail that does not have accommodations for persons, like plaintiff, who because of mobility problems, require handrails by the toilet and in the shower and a shower seat.

10. As a result, plaintiff fell on several occasions while using the toilet or showering and suffered personal injuries.

11. As a result of the foregoing, plaintiff was denied rights secured by the Americans With Disabilities Act of 1990, 42 U.S.C. § 12132 *and* the Rehabilitation Act, 29 U.S.C. § 704.

12. Plaintiff hereby demands trial by jury.

Wherefore plaintiff prays for an appropriate award of compensatory damages against defendants, and for an award of costs, including fees.

/s/ Kenneth N. Flaxman
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