

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

Keith Rogers,	)	
	)	
<i>Plaintiff,</i>	)	
	)	<i>(jury demand)</i>
<i>-vs-</i>	)	
	)	15-cv-____
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 42 U.S.C. § 1983. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. § 1343.
2. Plaintiff Keith Rogers is a resident of the Northern District of Illinois.
3. Defendant Thomas Dart is the Sheriff of Cook County. Plaintiff sues Dart in his official capacity.
4. Defendant Cook County is responsible, in collaboration with defendant Sheriff, for providing medical services to detainees at the Cook County Jail. Defendant Cook County is also joined in this action pursuant to *Carver v. Sheriff of LaSalle County*, 324 F. 3d 947 (7th Cir. 2003).

5. Plaintiff was arrested on January 19, 2014 and entered the Cook County Jail on January 20, 2014.

6. While being processed into the Jail, plaintiff informed intake personnel that he was taking a variety of prescription medications for serious medical needs, including being enrolled in a methadone maintenance program.

7. Jail personnel did not provide plaintiff with methadone until January 26, 2014.

8. Plaintiff underwent extremely painful withdrawal until he began to receive his prescribed methadone.

9. At all times relevant, there was a widespread practice or custom at the Jail of inordinate delay in providing methadone treatment to detainees.

10. The data available to plaintiff shows that between March 9, 2009 and March 19, 2011, 73 detainees who entered the Cook County Jail did not receive methadone until their fourth day at the jail.

11. Methadone has a “half-life” of about one day. This means that a person regularly taking methadone will begin withdrawal symptoms after one day without the drug; three days without methadone will be an extremely painful period of “cold turkey” withdrawal.

12. Defendants have known since the decision of the Seventh Circuit in *Davis v. Carter*, 452 F.3d 686 (7th Cir. 2006) that a widespread practice or custom of inordinate delay in providing methadone treatment to detainees at the Jail is unconstitutional.

13. At all times relevant, defendants have turned a blind eye to the injuries caused by their widespread practice or custom of inordinate delay in providing methadone treatment to detainees at the Jail.

14. As a result of having been deprived of methadone, plaintiff suffered painful withdrawal symptoms and great physical pain and was deprived of rights secured by the Fourth and Fourteenth Amendments to the Constitution of the United States.

15. Plaintiff hereby demands trial by jury.

Wherefore plaintiff requests that appropriate compensatory damages be awarded against defendants.

/s/ Kenneth N. Flaxman
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