

EXHIBIT

“C”

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

DWOND DONAHUE, *et al.*

Plaintiffs,

vs.

COOK COUNTY, *et al.*

Defendants.

Case No. 07 CV 4534

HON. JUDGE GOTTSCHALL

HON. MAGISTRATE JUDGE COLE

AFFIDAVIT OF LAROY WARREN

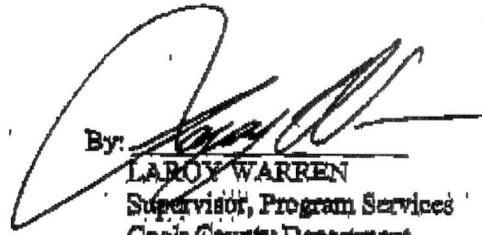
I, LAROY WARREN, being first duly sworn under oath, depose and state that the following is based upon my personal, firsthand knowledge and that if I were called upon to testify, my testimony would be as follows:

1. I am presently employed as Supervisor of the Program Services Office of the Cook County Department of Corrections located at 2700 S. California in Chicago, Illinois.
2. I have been so employed in my supervisory position since June of 2003.
3. As Supervisor of Program Services, I am familiar with the Cook County Department of Corrections ("CCDOC") general orders, rules, regulations, policies, customs, practices and procedures of the detainee grievance process and have reviewed all relevant material in preparation for this affidavit.
4. My duties include tracking and maintaining grievance records, including grievance responses and appeals filed by CCDOC detainees.
5. Each detainee grievance receives a grievance tracking number. The grievance tracking number, as well as the inmate's name and inmate's CIMIS number are recorded in the CCDOC Master Grievance log book. Each grievance that is processed in the CCDOC must be entered in the CCDOC Master Grievance log book.
6. The CCDOC Master Grievance log book is kept in the ordinary course of business.

7. I have thoroughly reviewed the CCDOC Master Log book kept by the Program Services Department for any and all grievances and appeals filed by the following inmates between August 15, 2006 and December 16, 2006:
- Dwond Donahue
 - Jerome Fountain
 - Bernardo Garcia
 - Darryl Johnson
 - Archie Mitchell
 - Bernard Rhone
 - Jarrod Rodriguez
 - Edward Sanders
 - Roberto Segura
 - Jacmar Turner
 - Raymour Davis aka Kevin Curtis
 - Eddie Mason
8. My exhaustive search revealed that Dwond Donahue filed one grievance within the above referenced timeframe and appealed that grievance. That grievance was dated 8/31/06 with 10/12/06 in parenthesis.
9. My exhaustive search revealed that Jerome Fountain filed one grievance within the above referenced timeframe but did not appeal that grievance. That grievance was dated 9/1/06.
10. My exhaustive search revealed that Bernardo Garcia filed two grievances within the referenced timeframe but did not appeal either grievance. Both grievances were dated 8/29/06.
11. My exhaustive search revealed that Darryl Johnson did not file a grievance within the above referenced timeframe.
12. My exhaustive search revealed that Archie Mitchell did not file a grievance within the above referenced timeframe.
13. My exhaustive search revealed that Bernard Rhone filed one grievance within the above referenced timeframe but did not appeal that grievance. That grievance was dated 9/11/06.
14. My exhaustive search revealed that Jarrod Rodriguez did not file a grievance within the above referenced timeframe.
15. My exhaustive search revealed that Edward Sanders did not file a grievance within the above referenced timeframe.
16. My exhaustive search revealed that Roberto Segura file one grievance within the above referenced timeframe and appealed that grievance. That grievance was dated 9/18/06.

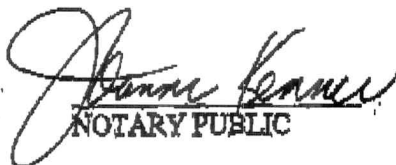
- 17. My exhaustive search revealed that Jamaar Turner did not file a grievance within the above referenced timeframe.
- 18. My exhaustive search revealed that Raymond Davis aka Kevin Curtis did not file a grievance within the above referenced timeframe.
- 19. My exhaustive search revealed that Eddie Mason filed one grievance within the above referenced timeframe but did not appeal that grievance. That grievance was dated 9/7/06.

Further affiant sayeth not.

By: 

LAROY WARREN
Supervisor, Program Services
Cook County Department
of Corrections

Subscribed and sworn to before me
this 18th day of March, 2009


NOTARY PUBLIC



Part-A / Control # 2006 X 0986

Referred To: ~~DES~~ JAD

**COOK COUNTY DEPARTMENT OF CORRECTIONS
DETAINEE GRIEVANCE**

Detainee Last Name: Fountain First Name: Jerome

ID #: 2006-0025694 Div.: 6 Living Unit: 1R Date: 9/11/06

(-3 shift)

BRIEF SUMMARY OF THE COMPLAINT: ON 8-16-06 DIV #5-1F AN INCIDENT

TOOK PLACE AND OFFICERS WERE CALLED TO TIER 1F DIV #5. SOME
INMATES WERE TOLD TO COME FROM TOP DECK AND GET ON THE WALL
IN THE DAYROOM, OTHERS WERE TOLD TO LAY DOWN ON THE
BOTTOM DECK (I WAS ONE OF THEM) AS I LAY ON THE FLOOR
OFFICER GONZALES #5148 COMES SCREAMING OVER MY HEAD
WHILE I'M LAYING ON THE FLOOR SAYING (WHO DID IT MOTHERFUCKERS)
I LOOKED UP AND HE KICK ME IN THE EYE AND HEAD
A NUMBER OF TIMES. I WENT TO THE HOSPITAL (CERMAK)
AND WAS TREATED FOR INJURYS I SUSTAINED.

NAME OF STAFF OR DETAINEE(S) HAVING INFORMATION REGARDING THIS COMPLAINT:

Jerry Thomas CDOC# 20060049922 KEANDRE JONES CDOC# 20060055072

ACTION THAT YOU ARE REQUESTING:

THAT OFFICER BE PUNISHED RIGHTFULLY, THAT I BE COMPENSATED FOR MY INJURYS,
REVERSE SENTENCE.

DETAINEE SIGNATURE: Jerome Fountain

C.R.W.'S SIGNATURE: [Signature]

DATE C.R.W. RECEIVED: 9/18/06

Please note: Decisions of the "Detainee Disciplinary Hearing Board" cannot be grieved or appealed through the use of a grievance form.
All appeals must be made in writing and directly submitted to the Superintendent.

(WHITE COPY - PROG. SERV.) (YELLOW COPY - C.R.W.) (PINK COPY - DETAINEE) (GOLDENROD COPY - DIVISION/SUPT. OFFICE)

Confidential
DEF 00176

C.C.D.O.C. DETAINEE GRIEVANCE / REFERRAL & RESPONSE

EMERGENCY GRIEVANCES ARE THOSE INVOLVING AN IMMEDIATE THREAT TO THE WELFARE OR SAFETY OF A DETAINEE

Detainee's Last Name: Fountain First Name: Jerome ID# 2006-0025694

Is This Grievance An Emergency? YES [] NO [x]

C.R.W.'S Summary Of The Complaint: Detainee alleged physical abuse by correctional officer.

C.R.W. Referred Griev. To: IAO Date Referred: 9/18/06

Response Statement: IAO inquiries show inmates were combative toward correctional staff. A criminal case investigation is being conducted. NO IAO case file warranted. Incident Report on file.

D/C Miriam Renta (print - name of individual responding to this griev.) Date: 9/11/06 Div./Dept. IAO

Sup J. Allen (print - name of Supt. / Designee / Dept. Admin.) Date: 9/12/06 Div./Dept. 6

L. Walker (print - name of Prog. Serv. Admin. / Asst. Admin.) Date: 9/12/06

Date Detainee Received Response: 9/12/06 Detainee Signature: Jerome Fountain

REQUEST FOR AN APPEAL

APPEALS MUST BE MADE WITHIN 14 DAYS OF THE DATE THE DETAINEE RECEIVED THE RESPONSE

Date Detainee Request For An Appeal: / /

Detainee's Basis For An Appeal:

Appeal Board's Acceptance Of Detainee's Request: YES [] NO []

Appeal Board's Reasoning / Decision / Recommendation To The Superintendent Or Administrator:

Appeal Board's Signatures / Dates:

Date Detainee Rec.'d the Appl. Bd.'s Response: / / Detainee Signature:

GRIEVANCE CODE(S): () () () ()

now
5, 12, LS

Part-A / Control #: 2006 X 1079

Referred To: IAD

**COOK COUNTY DEPARTMENT OF CORRECTIONS
DETAINEE GRIEVANCE**

Detainee Last Name: Rhone First Name: Bernard

ID #: 2006-0036173 Div.: 5 Living Unit: 1-F Date: 09/11/06

BRIEF SUMMARY OF THE COMPLAINT: On August 16, 2006; a incident occurred in Division 5, on 1-F that multiple correctional officers were called and order all inmates to lay face down on the floor at that time they committed to kick and beat inmates at random.

I was punch, kick and stomp by multiple officers.

NAME OF STAFF OR DETAINEE(S) HAVING INFORMATION REGARDING THIS COMPLAINT:

I'm requesting to go forward with a civil ACTION THAT YOU ARE REQUESTING: suit on all parties involved in this incident.

DETAINEE SIGNATURE: Bernard Rhone

C.R.W.'S SIGNATURE: R. Dowd DATE C.R.W. RECEIVED: 9/26/06

Please note: Decisions of the "Detainee Disciplinary Hearing Board" cannot be grieved or appealed through the use of a grievance form. All appeals must be made in writing and directly submitted to the Superintendent.

(WHITE COPY - PROG. SERV.) (YELLOW COPY - C.R.W.) (PINK COPY - DETAINEE) (GOLDENROD COPY - DIVISION/SUPT. OFFICE)

Horney - Neil L. Toppel

Confidential
DEF 00408

C.C.D.O.C. DETAINEE GRIEVANCE / REFERRAL & RESPONSE

EMERGENCY GRIEVANCES ARE THOSE INVOLVING AN IMMEDIATE THREAT TO THE WELFARE OR SAFETY OF A DETAINEE

Detainee's Last Name: Rhone First Name: Bernard ID#: 2006-0036173

Is This Grievance An Emergency? YES NO

C.R.W.'S Summary Of The Complaint: Mr. Rhone alleges physical abuse.

C.R.W. Referred Griev. To: IAD Date Referred: 9/26/06

Response Statement: IAD inquiry shows inmates were combative towards staff. A criminal investigation is being conducted against inmates. No IAD case file warrants. Incident Report on file.

D/Co Miriam Rentes - [Signature] Date: 9/26/06 Div./Dept. IAD
(print - name of individual responding to this griev.) (signature of individual responding to this griev.)

Chief Fy 1.1 - [Signature] Date: 9/29/06 Div./Dept. J
(print - name of Supt. / Designee / Dept. Admin.) (signature of Supt. / Designee / Dept. Admin.)

L. WARREN - [Signature] Date: 9/27/06
(print - name of Prog. Serv. Admin. / Asst. Admin.) (signature of Prog. Serv. Admin. / Asst. Admin.)

Date Detainee Received Response: 9/28/06 Detainee Signature: Bernard Rhone

REQUEST FOR AN APPEAL

APPEALS MUST BE MADE WITHIN 14 DAYS OF THE DATE THE DETAINEE RECEIVED THE RESPONSE

Date Detainee Request For An Appeal: / /

Detainee's Basis For An Appeal: _____

Appeal Board's Acceptance Of Detainee's Request: YES NO

Appeal Board's Reasoning / Decision / Recommendation To The Superintendent Or Administrator: _____

Appeal Board's Signatures / Dates: _____

Date Detainee Rec.'d the Appl. Bd.'s Response: / / Detainee Signature: _____

GRIEVANCE CODE(S): () () () ()

Confidential
DEF 00409

non P.W.S., I.M.

Part-A / Control #: 2006X 0972

Referred To: IAD

COOK COUNTY DEPARTMENT OF CORRECTIONS DETAINEE GRIEVANCE

Detainee Last Name: MACON First Name: EDDIE

ID #: 2006-0046911 Div.: 5 Living Unit: 1F Date: 9/7/06

BRIEF SUMMARY OF THE COMPLAINT: ON the 16th of August 2006 I EDDIE MACON WAS ON the deck of division 5 1F when a C/O was ASSAULTED by ANOTHER inmate I myself had nothing to do with this ASSAULT or anything else for that matter, but I still WAS ASSAULTED by SEVERAL OFFICERS which NAMES ARE AS FOLLOWED: C/O DEWLOW, C/O REEY, C/O NAVARRO, and C/O ALLISON ARE the ONES I know by NAME but there ~~were~~ WERE A lot of others! While laying on the floor AS I WAS told I WAS STAMPED in the back and kicked in the ribs for something I had nothing to do with! So I hope that this matter will be looked into and delt with accordingly!
Thank you for your time.

DANIEL WHITE #20060059858 WESLEY RODGERS 20050049031
NAME OF STAFF OR DETAINEE(S) HAVING INFORMATION REGARDING THIS COMPLAINT:

That Action will be taking against these officers to the fullest extent
ACTION THAT YOU ARE REQUESTING:
And that I be compensated currency for my pain and suffering!

DETAINEE SIGNATURE: Eddie Macon

C.R.W.'S SIGNATURE: R. Dowd

DATE C.R.W. RECEIVED: 9/7/06

Please note: Decisions of the "Detainee Disciplinary Hearing Board" cannot be grieved or appealed through the use of a grievance form. All appeals must be made in writing and directly submitted to the Superintendent.

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Confidential
DEF 00184

C.C.D.O.C. DETAINEE GRIEVANCE / REFERRAL & RESPONSE

EMERGENCY GRIEVANCES ARE THOSE INVOLVING AN IMMEDIATE THREAT TO THE WELFARE OR SAFETY OF A DETAINEE

Detainee's Last Name: MACON First Name: Eddie ID#: 2006 0046911

Is This Grievance An Emergency? YES NO

C.R.W.'S Summary Of The Complaint: Mr. Maccon alleges that he was assaulted
by several officers, after another inmate assaulted an office

C.R.W. Referred Griev. To: IAD Date Referred: 9/17/06

Response Statement: IAD inquiries show inmates were combative
towards staff members. A Criminal Investigation is
being conducted. NO IAD case file warranted. Incident
Report on file.

D/c Miriam Rentas [Signature] Date: 9/11/06 Div./Dept. IAD
(print - name of individual responding to this griev.) (signature of individual responding to this griev.)

Supt. S. Jones [Signature] Date: 9/14/06 Div./Dept. 5
(print - name of Supt. / Designee / Dept. Admin.) (signature of Supt. / Designee / Dept. Admin.)

WARREN [Signature] Date: 9/12/06
(print - name of Prog. Serv. Admin. / Asst. Admin.) (signature of Prog. Serv. Admin. / Asst. Admin.)

Date Detainee Received Response: 9/14/06 Detainee Signature: Eddie Maccon

REQUEST FOR AN APPEAL

APPEALS MUST BE MADE WITHIN 14 DAYS OF THE DATE THE DETAINEE RECEIVED THE RESPONSE

Date Detainee Request For An Appeal: / /

Detainee's Basis For An Appeal: _____

Appeal Board's Acceptance Of Detainee's Request: YES NO

Appeal Board's Reasoning / Decision / Recommendation To The Superintendent Or Administrator:

Appeal Board's Signatures / Dates:

Date Detainee Rec.'d the Appl. Bd.'s Response: / / Detainee Signature: _____

GRIEVANCE CODE(S): () () () ()