

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ANTONIO LEE BLANCHARD,)	
)	
Plaintiff,)	08 C 5037
)	
vs.)	Honorable Judge
)	Robert Gettleman
SUPERINTENDENT ANDREWS,)	
CHIEF D. HOWELL #117)	Magistrate Judge Cole
CAPTAIN DARCY, LIEUTENANT TUCKER,)	
SERGEANT DEW, CORRECTIONAL)	
OFFICER MOORE,)	
)	
Defendants.)	

**DEFENDANTS' STATEMENT OF MATERIAL
FACTS PURSUANT TO LOCAL RULE 56.1(a)**

NOW COME Defendants SUPERINTENDENT ANDREWS, CHIEF D. HOWELL, CAPTAIN DARCY, LIEUTENANT TUCKER, SERGEANT DEW, AND CORRECTIONAL OFFICER MOORE by their attorney ANITA ALVAREZ, State's Attorney of Cook County, through her assistant, Ronald Weidhuner, and, pursuant to Rule 56.1(a) of the Rules of the Northern District of Illinois, file this statement of material facts as to which there is no genuine issue:

1. Jurisdiction and venue are not disputed and this action is properly before this Court.
2. Plaintiff alleged that Plaintiff alleges upon entry into the jail on February 8, 2008 and when returning from court to the jail on February 14 and 29, 2008, March 20 and 21, 2008, April 28, 2008, May 29, 2008 and lastly on July 15, 2008 he was subjected to strip searches with approximately 35 other inmates. (Exhibit 1, plaintiff's deposition at 15-16)

3. On the July 15, 2008, Officer Moore made all the detainees being strip searched stand there about 4 seconds longer because plaintiff initially refused to strip, and Officer Moore stated “you all can thank your fellow detainee Blanchard for this.” (Exhibit 1, plaintiff’s deposition at 17-18)
4. Plaintiff was humiliated and complained to Chief Howell and Howell stated “what do you want me to do about it? It’s over now.” (Exhibit 1, plaintiff’s deposition at 18)
5. In regards to injuries plaintiff claimed he was “disgusted and confused by these actions. (Exhibit 1, plaintiff’s deposition at 16)
6. Plaintiff was humiliated. (Exhibit 1, plaintiff’s deposition at 18)
7. Plaintiff admitted that he never received any injuries as a result of these searches. No guards ever beat him, no detainees jumped him, nor was he threatened by any inmate. (Exhibit 1, plaintiff’s deposition at 20-21)
8. Plaintiff concluded with that the jail is a dangerous place and he was nervous about Officer Moore’s comment and what could happen. (Exhibit 1, plaintiff’s deposition at 22)

Respectfully Submitted,

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