

**IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION**

SAVANNAH LONG,

Plaintiff,

v.

ALEX WILEY, WILLIAM CHAMBERS,
TAYLOR NIEWINSKI, and NATALIE SADIK,

Defendants.

Case No. _____

JURY DEMANDED

COMPLAINT

Plaintiff Savannah Long (“Savannah”), for her complaint against Defendants Alex Wiley, William Chambers, Taylor Niewinski, and Natalie Sadik, by and through her undersigned attorneys, alleges as follows:

INTRODUCTION

1. Savannah brings this civil rights and state tort action as one of several victims of pervasive sexual abuse, assault, retaliation, and deliberate indifference against her and other women incarcerated at Logan Correctional Center (“Logan”), the State of Illinois’ only mixed security all-female prison operated by the Illinois Department of Corrections (“IDOC”), in Lincoln, Illinois. Over the course of several months in 2024 and 2025, Savannah was repeatedly sexually harassed, assaulted, and raped by two different correctional officers who abused their positions of authority, and the trust reposed in them by the State of Illinois.

2. Defendant Correctional Officer Alex Wiley (“C.O. Wiley”) served as a Correctional Food Services Supervisor, a position in which he wielded power over prisoners’ work assignments and sentence credits. In the late summer/fall of 2024, C.O. Wiley subjected Savannah to weeks of

sexual harassment before assaulting her twice in the prison kitchen, including forcing her to perform oral sex on him against her will. After Savannah complained of her abuse by C.O. Wiley, he retaliated by stripping away earned sentence credits that would have reduced her incarceration time.

3. After Savannah complained about C.O. Wiley's sexual assault, she was raped by another Logan correctional officer, Defendant William Chambers ("C.O. Chambers"). On June 16, 2025, C.O. Chambers directed Savannah to follow him to a staff bathroom. C.O. Chambers then forcibly inserted his penis into Savannah's vagina against her will. Throughout these incidents, even having already received Savannah's complaints of sexual abuse against C.O. Wiley, Logan administrators failed to protect Savannah. She continues to suffer severe psychological trauma from having been repeatedly sexually assaulted, including panic attacks that have necessitated medical intervention.

4. As a result of this sexual abuse, Savannah has suffered from panic attacks and emotional distress. When she reported her anxiety symptoms to medical providers, she was initially denied care and faced numerous barriers trying to receive medical treatment, further compounding Savannah's trauma.

5. Savannah's ordeal, while shocking, is tragically common. She is one among many women in custody who have been sexually abused by the correctional staff at Logan. The frequency and scope of sexual abuse at Logan is known to—but disregarded by—IDOC and other state administrators.

6. The magnitude of these women's suffering and IDOC's abject failure to address it constitutes an institutional breakdown—one that demands judicial intervention to protect this vulnerable population from further harm. Accordingly, in this action, Savannah asserts claims

under 42 U.S.C. § 1983 to vindicate her rights under the First and Eighth Amendments to the United States Constitution, and under Illinois law for assault, battery, civil sexual abuse, and intentional infliction of emotional distress for the severe psychological and physical injuries she sustained from the misconduct by defendant Correctional Officers and indifference by State administrators.

PARTIES AND RELEVANT NON-PARTIES

7. Savannah is a 26-year-old resident of Logan County, Illinois. Savannah currently is, and during all times relevant to the events at issue in this case was, incarcerated at Logan.

8. At all times relevant to the events at issue in this case, Defendant C.O. Wiley served as a Correctional Food Services Supervisor at Logan. In this role, C.O. Wiley was responsible for maintaining the security and safety of prisoners within Logan. At all times relevant to events at issue in this case, C.O. Wiley was acting under the color of law and within the scope of his employment.

9. At all times relevant to the events at issue in this case, Defendant C.O. Chambers served as a correctional officer at Logan. In this role, C.O. Chambers was responsible for maintaining the security and safety of prisoners within Logan. At all times relevant to events at issue in this case, C.O. Chambers was acting under the color of law and within the scope of his employment.

10. At all times relevant to the events at issue in this case, Defendant Taylor Niewinski (“C.O. Niewinski”) served as a correctional officer and Food Services Program Manager at Logan. In this role, C.O. Niewinski was responsible for maintaining the security and safety of prisoners within Logan and overseeing prisoners who worked in the kitchen. At all times relevant to events at issue in this case, C.O. Niewinski was acting under the color of law and within the scope of her employment.

11. At all times relevant to the events at issue in this case, Defendant Dr. Natalie Sadik (“Dr. Sadik”) was a psychiatrist at Logan. In this position, Dr. Sadik provided mental health care to prisoners and prescribed medications and other treatments as needed. At all times relevant to events at issue in this case, Dr. Sadik was acting under the color of law and within the scope of her employment.

12. At all times relevant to the events at issue in this case, Michael Long (“Warden Long”) served as the Warden of Logan. In this position, Warden Long is the Chief Administrative Officer of Logan and was responsible for the entire population of the prison. His powers and responsibilities thus included among others promulgating and enforcing rules, regulations, and procedures to ensure the safety and security of those in his custody, including Savannah. Warden Long was also responsible for preventing staff-on-prisoner violence, such as sexual assaults by guards, correctional officers, and employees.

13. At all times relevant to the events at issue in this case, Latoya Hughes (“IDOC Director Hughes”) served as the Director of the IDOC. In this position, IDOC Director Hughes was responsible for overseeing all operations of IDOC prisons. Her powers and responsibilities thus included, among others, implementing safeguards to protect IDOC staff and prisoners and ensuring safety and security for those in custody.

14. At all times relevant to the events at issue in this case, Justin Hammers (“IDOC Chief of Operations Hammers”) served as the IDOC Chief of Operations. In this position, IDOC Chief of Operations Hammers possessed authority over security staff at IDOC facilities and was responsible for ensuring that security staff were trained and conducted themselves in accordance with applicable laws, regulations, and standards.

15. At all times relevant to the events at issue in this case, Warden Long, Assistant Warden of Programs Cammi Pierce (“Assistant Warden Pierce”), Internal Affairs (“IA”) Lieutenant Chad McGinnis (“Lt. McGinnis”), Lieutenant David Brainard (“Lt. Brainard”), Prison Rape Elimination Act (“PREA”) Compliance Manager (“PCM”) Sarah Taapken (“Ms. Taapken”), Health Care Unit Administrator (“HCUA”) Shelbi Russell (“Ms. Russell”), Backup PCM Janeen Wright (“Ms. Wright”), Social Worker Abbey Venturini (“Ms. Venturini”), IA Officer Tasha Young (“Officer Young”), IA Officer Elaine Worth (“Officer Worth”), and Backup PCM Benjamin Estes (“Mr. Estes”) were designated as members of Logan’s PREA Incident Review Team (collectively, the “PREA Incident Review Team”). As members of this team, these individuals were responsible for reviewing prisoner grievances and ensuring that administrators and staff at Logan took steps to address the problem of custodial sexual assault and for ensuring the reasonable safety of prisoners.

JURISDICTION AND VENUE

16. Jurisdiction of the Court is proper pursuant to 28 U.S.C. §§ 1331 and 1343(a)(3) and (4), as this case arises under the First and Eighth Amendments to the Constitution of the United States and 42 U.S.C. § 1983.

17. Pendent and supplementary jurisdiction as to Savannah’s claims under state law is proper pursuant to 28 U.S.C. § 1367.

18. Venue is proper under 28 U.S.C. § 1391(b). On information and belief, all Defendants reside in this judicial district, and all events giving rise to the claims asserted herein occurred within this district.

FACTUAL BACKGROUND

I. Savannah was Incarcerated at Logan

19. On January 31, 2024, Savannah was put in custody at Logan to begin serving her sentence. She is projected to be discharged on or around August 28, 2026. During her time in Logan, she has been a model prisoner.

II. Savannah Worked as a Cook in the Kitchen at Logan

20. In August 2024, Savannah was offered a position to work in Food Services, specifically in the kitchen as a cook. New people in custody were not typically offered a position as a cook in the kitchen, which was a sought-after position among Logan's prisoners because, among other reasons, "cook" is classified as a "skilled worker," receives the highest wage range of the various categories of work assignments, and works with relatively less supervision than that exercised over other kitchen staff. While approximately thirty individuals worked in the kitchen at any given time, only four served as cooks. Thus, the opportunity to work as a cook was attractive to Savannah, especially as she was just 7 months into serving her sentence.

21. At the time Savannah was offered the position as cook, the kitchen was overseen by C.O. Wiley, who served as a Correctional Food Services Supervisor. C.O. Wiley was a primary decision maker in selecting people to work in the kitchen. His office was located in the back area of the kitchen. In his office, C.O. Wiley maintained a log book (the "Log Book"), which was a hard cover book in which he made daily hand-written entries that tracked earned sentence credit ("good-time") for each prisoner working in the kitchen on a separate page.

22. While most other kitchen employees worked either on the serving line or in the dish room, working as a cook required Savannah to be in the back areas of the kitchen away from these other employees, including near the walk-in freezer and C.O. Wiley's supervisory office.

23. However, unbeknownst to Savannah at the time she accepted the cook position, the kitchen at Logan is known among the people in custody for inappropriate sexual conduct by its correctional officers. It is common knowledge throughout the prison that the kitchen's correctional officers regularly make sexual comments and jokes directed at female prisoners and demonstrate inappropriate interest in women they find attractive. Kitchen correctional officers also were known to exhibit favoritism towards the women the officers prefer. This sexual harassment at Logan is notorious, pervasive, and tolerated by prison administration, exposing vulnerable women in custody to misconduct by predatory officers and staff.

III. C.O. Wiley Exercised Significant Power and Authority Over Savannah

24. At all times relevant to the events at issue in this case, C.O. Wiley supervised the prisoners working in the kitchen. In this capacity, C.O. Wiley exerted significant power and authority over the female prisoners he hired to work in the kitchen, including the discretion to hire, fire, and assign roles to the prisoners who worked in the kitchen.

25. Importantly, C.O. Wiley also calculated and administered the good-time credit for the individuals who worked in the kitchen under his authority. Under Illinois law, the Director of the Department of Corrections may, at her discretion, award Earned Discretionary Sentence Credit ("EDSC") (also known as good-time credit) to individuals in custody based on good conduct and rehabilitative efforts. Eligible individuals who are serving less than five years may receive up to 180 days of credit, while those like Savannah who are serving five years or more may receive up to 365 days. The credit is awarded for compliance with departmental rules, participation in programming, and service to the institution, community, or state. *See* 730 Ill. Comp. Stat. 5/3-6-3(a)(3). Prisoners working in the kitchen thus could earn reductions in their sentences, specifically equalling a half-day reduction based on each day worked in the kitchen, up to a total of a 365-day reduction. C.O. Wiley recorded the respective amounts of "good-time" that was earned by

Savannah and the prisoners under his charge in the Log Book, which he kept in his office. C.O. Wiley had nearly complete control over the good-time credit records for prisoners who worked for him in the kitchen.

26. The extensive authority given to C.O. Wiley was not pursuant to Illinois state law or regulation. Rather, C.O. Wiley's empowerment resulted from deliberately poor governance choices by IDOC and Logan administrators. IDOC Director Hughes, IDOC Chief of Operations Hammers, and Warden Long could have implemented safeguards such as requiring multiple supervisors to approve hiring and firing decisions, rotating prisoners between different supervisors, or establishing independent oversight of good-time credit calculations. Instead, IDOC's policies vested complete discretionary control over crucial aspects of prisoners' lives—including their work assignments, daily conditions, and sentence length—in individual supervisors like C.O. Wiley, without any meaningful counterbalancing oversight or institutional accountability. This concentration of unchecked authority in individual correctional officers created an environment ripe for abuse, in which a single correctional officer could award or deprive vulnerable prisoners of key benefits (including job assignments and privileges during incarceration and "good-time" to shorten it) to manipulate and control them for the officer's personal benefit.

27. C.O. Wiley had acted inappropriately, verbally and, upon information and belief, physically, towards other women in custody in the kitchen prior to Savannah's employment. For example, in 2021, C.O. Wiley was accused of sexual abuse by another person in custody. He was never disciplined or criminally investigated for this assault. Staff and administrators at Logan were on notice about his past misconduct yet failed to take any actions to protect prisoners from him. This pattern of misconduct caused women assigned to work under C.O. Wiley to fear him and his sexual advances, through which they had to suffer for preferred work assignments in the kitchen.

28. Upon information and belief, C.O. Wiley selected and approved Savannah to work as a cook in the kitchen he supervised. He directly supervised Savannah throughout her assignment in the kitchen.

IV. C.O. Wiley Sexually Harassed and Assaulted Savannah

29. Shortly after Savannah started in her new cook position, C.O. Wiley began sexually harassing her. He told Savannah that she “looked good bent over” and that she should “sit on his face.” Savannah felt extremely uncomfortable as a result of C.O. Wiley’s inappropriate behavior and did not respond to his inappropriate sexual comments due to fear of retaliation, specifically, loss of her good-time credits.

30. C.O. Wiley’s verbal sexual harassment escalated to predatory behavior that isolated and intimidated Savannah. For example, C.O. Wiley followed Savannah into the freezer and, when Savannah asked if he needed assistance with work related matters, he responded with a suggestive “he would see.” A few days later, C.O. Wiley asked Savannah with inappropriate and suggestive undertones if she could “help him out.”

31. In the end of August 2024, two to three weeks after Savannah began working in the kitchen, C.O. Wiley sexually assaulted Savannah. At the end of a regular work shift, C.O. Wiley ordered Savannah and another female kitchen worker to remain in the kitchen after all the other women working in the kitchen had been dismissed for the day. Given his position of authority over Savannah, she felt she had no choice but to comply with C.O. Wiley’s demand.

32. C.O. Wiley then directed Savannah and the other worker to join him in the freezer at the back of the kitchen. The freezer is in an isolated area, away from other staff and people in custody. Before entering the freezer, C.O. Wiley told them that the camera in the freezer did not work. Savannah understood from this calculated and intimidating statement that there would be no evidence of anything that C.O. Wiley did to them in the freezer.

33. More pointedly, C.O. Wiley told Savannah before entering the freezer to “be a good girl, keep her mouth shut, and have some fun.” This statement—said by a correctional officer to a then 25-year old female and her fellow prisoner who both were subject to his authority and, at his instruction, were alone after working hours with him in the freezer—was a clear threat intended to intimidate Savannah into staying silent about what he was about to do to her.

34. Inside the freezer, C.O. Wiley assaulted both women. He forcibly kissed them, pulled up their shirts without their permission, and groped Savannah’s breasts and vagina.

35. Throughout the assault, Savannah was intimidated and scared. Savannah never consented to any aspect of C.O. Wiley’s sexual assault.

V. C.O. Wiley Sexually Assaulted Savannah Again

36. In early October 2024, C.O. Wiley again exploited his supervisory position and, using the same pattern of intimidation, committed a second, more violent sexual assault of Savannah.

37. Once again, C.O. Wiley ordered Savannah into the freezer with him, this time directing another prisoner to act as a lookout outside of the freezer.

38. Once he and Savannah were in the freezer and beyond the sight of a camera or anyone else, C.O. Wiley escalated his sexual violence against Savannah by pulling his pants down, telling Savannah to get on her knees, and forcing her to perform oral sex on him by pushing his penis into her mouth. C.O. Wiley continued his assault until he ejaculated in Savannah’s mouth.

39. C.O. Wiley continued his assault. After removing his penis from inside Savannah’s mouth, C.O. Wiley then ordered Savannah to pull her shirt up and show her breasts to him. C.O. Wiley then proceeded to grope Savannah’s breasts and kiss her mouth. Before leaving the freezer, C.O. Wiley threatened Savannah by stating “if you say anything, I control your days, just so you know,” insinuating that he would take away her good-time credits if she reported the assaults.

40. Throughout this second assault, Savannah was alone with C.O. Wiley and intimidated by and scared of him. Savannah never consented to any aspect of C.O. Wiley's sexual assault.

VI. C.O. Wiley Threatened and Then Retaliated Against Savannah by Firing Her and Revoking Her Good-Time Credits

41. After both instances of sexual assault, C.O. Wiley explicitly threatened Savannah to dissuade her from reporting his assaults of her. He told Savannah that if she told anyone about his actions, then she would lose her job and her valuable good-time credits that she earned from her work in the kitchen. Savannah had by this time already received sufficient credits to entitle her to being released from Logan more than three weeks early. C.O. Wiley's threat was serious, and he knew it struck at Savannah's paramount goal of securing an earlier release from prison.

42. Despite this threat from C.O. Wiley, Savannah sought support from friends and acquaintances she had come to trust in the brief time she had already been incarcerated to deal with the trauma she experienced as a result of C.O. Wiley's sexual assaults. Savannah told two fellow women in custody that C.O. Wiley had sexually assaulted her against her will.

43. C.O. Wiley and Defendant C.O. Niewinski swiftly followed through on the threatened retaliation. Within days after disclosing the sexual assaults to the two other women in custody, Savannah was suddenly notified that, due to unidentified "administrative reasons," she had lost the 26 days of good-time credits she earned from the 52 days she had worked in the kitchen. No specific justification was provided to Savannah as to her removal and loss of good time credits. Nor was she afforded the opportunity to dispute these punishments.

44. Savannah asked C.O. Niewinski why she was being removed from her position. However, C.O. Niewinski could not articulate a clear reason why and merely stated that Savannah was being reassigned.

45. Upon information and belief, no disciplinary report was created that documented the reasons for Savannah's termination from her cook position. Certainly, no such report or reason was ever shared with Savannah. Logan correctional officers did not hire Savannah into another role, thereby foreclosing any opportunity for Savannah to continue earning good-time credits to reduce days off her sentence.

46. The arbitrary revocation of Savannah's good-time credits remained in effect until other Logan administrators intervened and had the credits restored. Savannah had explained to her correctional counselor, David Goff, how she believed that she lost her good-time credits as a punishment for speaking about C.O. Wiley's sexual assaults of her. In response, Mr. Goff spoke with C.O. Niewinski to ask her about Savannah's forfeited good-time credits. After that discussion, Savannah's good-time credits were restored. The timing of and unexplained reason for Savannah's loss of precious good-time credits confirmed that the revocation of those credits was retaliatory and unjustified.

VII. Savannah Continues to Suffer Serious Psychological Trauma from C.O. Wiley's Sexual Abuse of Her

47. Another cook in the kitchen learned of C.O. Wiley's sexual abuse of Savannah and reported it to Logan staff.

48. In response, Lt. McGinnis summoned Savannah to his office to discuss what had happened. Savannah did not feel comfortable disclosing details about C.O. Wiley's sexual abuse of her to Lt. McGinnis. Though Savannah was told that she would not face punishment for filing a grievance, Savannah fully understood the message sent by her firing and inexplicably cancelled good-time credits.

49. The LOGAN CORRECTIONAL CENTER OFFENDER HANDBOOK & ORIENTATION MANUAL, last updated July 2020 (the "Manual"), is a handbook distributed to Logan prisoners

with which they are to become familiar and act in accordance with to create a safe community for all women residing at Logan. MANUAL at 3. The Manual expansively defines what constitutes sexual abuse:

What is sexual abuse?

- Anytime another inmate sexually touches the sexual parts of your body, forces you to touch the sexual parts of their body, has sex with you without your ok, or forces you to have sex with someone else without your ok, it is against the law.
- Anytime a staff member makes sexual advances or comments, sexually touches you, or has sex with you, it is against the law. Even if you wanted or invited it, the staff person is not allowed to respond.

Id. at 23. The Manual then provides several examples of sexual assault, including among others “[r]ape” and “[a] staff person offering you a privilege or a favor in exchange for sex.” *Id.*

50. The Manual emphasizes to Logan prisoners, in bold and capitalized letters, that “**REPORTING IS THE FIRST STEP**” and goes on to explain in an immediately ensuing section entitled, “**What to Do If It Happens to You**” the following:

Sexual misconduct and/or assault by staff or offenders are prohibited by state law and IDOC policy. Individuals who are guilty of this behavior can only be disciplined and/or prosecuted if the abuse is REPORTED. It is the policy of the IDOC to provide a safe and secure environment for all offenders. In an effort to provide for this environment any observance of sexual activity or assault should be reported.

Id. at 24.

51. On or about January 2, 2025, Savannah submitted a PREA grievance detailing C.O. Wiley’s sexual abuse.

52. The sexual abuse and assaults that Savannah suffered at the hands of C.O. Wiley have seriously damaged Savannah’s mental health. Savannah has suffered from panic attacks and emotional distress because of C.O. Wiley’s sexual abuse of her. On or around November 2024,

these panic attacks became so intense that Savannah had to get an electrocardiogram (EKG) test after experiencing sharp chest pains and shortness of breath.

53. Savannah faced numerous barriers trying to receive treatment for her panic attacks and anxiety symptoms. The first medical provider she saw, Defendant Dr. Sadik, refused to take Savannah's symptoms seriously and prescribe her medication. When Savannah requested to see another provider, she was told that only her original medical provider, Dr. Sadik, could request that she receive a new provider. After a significant delay, Savannah was eventually able to receive medication for her anxiety and panic attacks.

54. Savannah continues to suffer the emotional trauma from being sexually assaulted by C.O. Wiley. She has been prescribed medication to address certain negative psychological consequences from C.O. Wiley's sexual abuse. She also has been relocated to another housing unit away from C.O. Wiley. Despite these measures, Savannah still suffers from her anxiety symptoms. Specifically, she has experienced frequent, debilitating nightmares almost every night for the last few months before the filing of this Complaint. She is also experiencing symptoms of depression, including negative thoughts and a lack of interest in engaging in daily activities.

VIII. C.O. Chambers Raped Savannah

55. On June 16, 2025, after Savannah had reported C.O. Wiley's sexual abuse, she was raped by another correctional officer, C.O. Chambers.

56. Prior to June 16, 2025, C.O. Chambers inappropriately remarked to Savannah that "Wiley was a lucky dude, because you're pretty cute," indicating that he was aware of C.O. Wiley's assaults of Savannah.

57. At approximately 4:00 a.m. on that day, C.O. Chambers entered Savannah's cell and awakened her by rubbing her leg and kissing her mouth. C.O. Chambers directed her into a small, single-use staff bathroom away from any common areas.

58. In the bathroom, C.O. Chambers forcibly kissed Savannah, removed her clothing, groped her breasts, turned her around, and forcibly inserted his penis into her vagina against her will. C.O. Chambers then ejaculated into a nearby toilet. Throughout the attack, Savannah was trapped in the bathroom and unable to resist due to C.O. Chambers' physical dominance and her fully justified fear that any resistance would result in further severe retaliation against her. Before leaving the bathroom, C.O. Chambers told Savannah to not tell anyone about the assault because he would get into trouble.

59. Savannah never consented to any aspect of C.O. Chamber's sexual assault. Although she did not directly report the assault to prison staff due to her well-founded fears of retaliation, including, but not limited to, her experience from reporting C.O. Wiley's sexual assault, counselors at Logan somehow learned what C.O. Chambers had done to Savannah and they reported this sexual assault to IA, suggesting that knowledge of the assault spread through institutional channels.

60. C.O. Chambers was previously accused of sexual assault in a PREA complaint in 2024. Similar to C.O. Wiley, as of the filing of this Complaint, C.O. Chambers faced no consequences and was never criminally investigated. Again, despite being on notice for C.O. Chamber's past misconduct, Warden Long, Director Hughes and other Logan administrators failed to take any action to protect prisoners from him.

IX. Savannah Continues to be Subjected to Derision and Retaliation

61. Following C.O. Wiley's and C.O. Chambers' sexual assaults, Savannah has been subjected to jokes and ridicule from other Logan correctional officers. In addition to this humiliating derision, Officers Heinz, Riley, and Bird have harassed Savannah by asking her for the details of the sexual assaults committed by their fellow correctional officers. These attempts at humor and inquiries were not meant to help Savannah overcome the sexual abuse she suffered.

Rather, the painful consequence of the correctional officers' words and actions was to force Savannah to relive her traumatic sexual assaults, with the wrongful goal of punishing Savannah for having reported the sexual abuse she suffered.

62. In a grotesque exercise in intimidation, while Savannah was in the hospital for a medical examination and rape kit procedure after being raped by C.O. Chambers, her living quarters were searched and disturbed by Logan prison personnel under the false pretense that C.O. Chambers had given Savannah contraband vaping materials. C.O. Chambers did not give her anything. The officers executing the search did not find any vaping materials or any other prohibited items during their search. By executing this violating search, officers sent a loud and clear warning to Savannah as to the consequences she would face for reporting their colleagues' serious misconduct.

63. The appalling sexual abuse of and retaliation against Savannah recounted above violates both U.S. federal and Illinois state law. Sadly, Savannah's case is one of many similar instances of sexual violence directed at the people in custody at Logan by its correctional officers. These abuses of authority by correctional officers and staff, who have repeatedly misused their positions of power to extract sexual favors from a vulnerable group of incarcerated women, represent a pattern of wrongful conduct that was known or should have been known to supervisory staff, including among others Warden Long and the PREA Incident Review Team. The repeated nature of these assaults, the spread of knowledge among staff, and the consistent failure to protect Savannah reveal deliberate indifference to her constitutional rights and the rights of other women incarcerated at Logan.

64. Savannah brings these claims within the statute of limitations, as the constitutional and statutory harms are part of an ongoing pattern of sexual abuse and retaliation.

CLAIMS

COUNT I

DEFENDANTS WILEY AND CHAMBERS VIOLATED THE EIGHTH AMENDMENT

(42 U.S.C. § 1983)

(UNNECESSARY AND WANTON INFLICTION OF PAIN)

(Defendants C.O. Wiley and C.O. Chambers)

65. Savannah realleges and incorporates paragraphs 1 through 64 as if fully set forth herein.

66. Defendant C.O. Wiley used his position of authority to inflict physical and sexual assault onto Savannah for his personal gratification, not for any valid correctional or institutional purpose.

67. C.O. Wiley's forced oral sex, kissing, and sexual touching constituted sadistic and wanton abuse without justification.

68. As a result of C.O. Wiley's actions, Savannah suffered severe mental, emotional, and physical distress.

69. In addition, Defendant C.O. Chambers used his position of authority to physically and sexually assault Savannah for his personal gratification, not for any valid correctional or institutional purpose.

70. C.O. Chamber's forced penetrative sex constituted sadistic and wanton abuse without justification.

71. As a result of C.O. Chambers's actions, Savannah suffered severe mental, emotional, and physical distress.

COUNT II
DEFENDANTS VIOLATED THE FIRST AMENDMENT
(RETALIATION)

(Defendants C.O. Wiley and C.O. Niewinski)

72. Savannah realleges and incorporates paragraphs 1 through 71 as if fully set forth herein.

73. After Savannah reported her assaults, Defendant C.O. Wiley and Defendant C.O. Niewinski used their positions of power in the kitchen to get Savannah fired from her cook position because she spoke out about C.O. Wiley's assaults of her.

74. The causal link between Savannah speaking out and her being fired from the kitchen amounts to retaliation.

COUNT III
DEFENDANTS VIOLATED THE EIGHTH AMENDMENT
(FAILURE TO PROVIDE MEDICAL ATTENTION)

(Defendant Dr. Sadik)

75. Savannah realleges and incorporates paragraphs 1 through 74 as if fully set forth herein.

76. After Savannah began experiencing severe panic attacks because of C.O. Wiley's sexual assaults, she met with Defendant Dr. Sadik in the hopes of finally receiving treatment for her anxiety symptoms. However, Dr. Sadik refused to treat Savannah.

77. As a result of Dr. Sadik's refusal to provide medical treatment, Savannah suffered severe mental, emotional, and physical distress.

78. Dr. Sadik's refusal to medically treat Savannah amounts to failure to provide medical attention and constitutes the infliction of cruel and unusual punishment prohibited by the Eighth Amendment of the U.S. Constitution.

COUNT IV - (PENDENT STATE CLAIM)
DEFENDANTS COMMITTED ASSAULT AND BATTERY AGAINST SAVANNAH
(Defendants C.O. Wiley and C.O. Chambers)

79. Savannah realleges and incorporates paragraphs 1 through 78 as if fully set forth herein.

80. Defendant C.O. Wiley intentionally and offensively touched Savannah, including by forcing her to engage in oral sex, groping her, and kissing her.

81. Savannah never consented to any of these acts by C.O. Wiley.

82. As a result of C.O. Wiley's actions, Savannah suffered severe mental, emotional, and physical distress.

83. In addition, Defendant C.O. Chambers intentionally and offensively touched Savannah, including by forcing her to engage in sex, groping her, and kissing her.

84. Savannah never consented to any of these acts by C.O. Chambers.

85. As a result of C.O. Chambers's actions, Savannah suffered severe mental, emotional, and physical distress.

86. Under Illinois law, these actions constitute assault and battery.

COUNT V - (PENDENT STATE CLAIM)
DEFENDANTS COMMITTED CIVIL SEXUAL ABUSE AGAINST SAVANNAH
(Defendants C.O. Wiley and C.O. Chambers)

87. Savannah realleges and incorporates paragraphs 1 through 86 as if fully set forth herein.

88. Defendant C.O. Wiley engaged in non-consensual sexual acts, including oral sex, groping, and kissing, with Savannah while acting under color of law as a correctional officer.

89. Savannah never consented to any of these acts by C.O. Wiley.

90. As a result of C.O. Wiley's actions, Savannah suffered severe mental, emotional, and physical distress.

91. In addition, Defendant C.O. Chambers engaged in non-consensual sexual acts, including forcible groping, kissing, and penetrative sex with Savannah while acting under color of law as a correctional officer.

92. Savannah never consented to any of these acts by C.O. Chambers.

93. As a result of C.O. Chambers's actions, Savannah suffered severe mental, emotional, and physical distress.

94. Under Illinois law, these actions meet the definition of sexual abuse.

COUNT VI - (PENDENT STATE CLAIM)
DEFENDANTS CAUSE INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(Defendants C.O. Wiley and C.O. Chambers)

95. Savannah realleges and incorporates paragraphs 1 through 94 as if fully set forth herein.

96. Defendant C.O. Wiley's conduct was extreme, outrageous, and intended to cause emotional distress or was done with reckless disregard for Savannah.

97. Savannah experienced long term psychological harm, panic attacks, humiliation, and fear as a direct result of the sexual abuse and retaliation by C.O. Wiley that she has endured.

98. In addition, Defendant C.O. Chambers' conduct was extreme, outrageous, and intended to cause emotional distress or was done with reckless disregard for Savannah.

99. Savannah experienced long term psychological harm, panic attacks, humiliation, and fear as a direct result of the sexual abuse by C.O. Chambers that she has endured.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Savannah Long respectfully requests that the Court enter an order granting the following relief:

- (1) awarding damages in excess of \$75,000, as this Court deems appropriate under the circumstances;
- (2) awarding punitive damages in such an amount as this Court deems appropriate under the circumstances;
- (3) awarding costs and attorneys' fees pursuant to 42 U.S.C. § 1988;
- (4) injunctive relief:
 - (i) prohibiting all Defendants from intimidating Savannah or discussing any allegations in this Complaint with her; and
 - (ii) requiring C.O. Niewinski and C.O. Wiley to computerize Logan's Log Book and make it accessible to all affected Logan staff and prisoners; and
- (5) awarding such other and further relief as the Court deems just and proper.

JURY TRIAL

Plaintiff demands a jury trial.

Dated: September 17, 2025

Respectfully submitted,

One of the Attorneys for Plaintiff,
SAVANNAH LONG

/s/ Michael D. Lehrman

Michael D. Lehrman (ARDC #6313339)
Peter P. Tomczak (ARDC # 6278608)
Christina Norman (ARDC #6330213)
Alisa Simons (ARDC #6346224)
Crofton Kelly (ARDC # 6342466)
BAKER & McKENZIE LLP
300 East Randolph Street, Suite 5000
Chicago, Illinois 60601
(312) 861-8000
Michael.Lehrman@bakermckenzie.com
Crofton.Kelly@bakermckenzie.com
Christina.Norman@bakermckenzie.com
Alisa.Simons@bakermckenzie.com
Peter.Tomczak@bakermckenzie.com

Elizabeth Payne (ARDC #6334874)
CHICAGO ALLIANCE AGAINST SEXUAL
EXPLOITATION
307 N. Michigan, Suite 1020
Chicago, IL 60601
(773) 244-2230
epayne@caase.org

Nicole Schult (ARDC #6306949)
Shireen Jalali-Yazdi (ARDC #6349281)
UPTOWN PEOPLE'S LAW CENTER
4413 N. Sheridan
Chicago, IL 60640
(773) 769-1411
nicole@uplcchicago.org
shireen@uplcchicago.org