

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS**

| | | |
|------------------------------------|---|---------------------|
| AMANDA DAILY, |) | |
| |) | |
| Plaintiff, |) | Case No. _____ |
| |) | |
| v. |) | |
| |) | JURY TRIAL DEMANDED |
| MICHAEL J. BAKER; DANIEL LARA; |) | |
| LATOYA HUGHES, JUSTIN HAMMERS, |) | |
| RYAN NOTTINGHAM, CHRISTINE |) | |
| BRANNON-DORTCH, GLEN AUSTIN, |) | |
| MARLO BUTLER-JONES, JEANMARIE |) | |
| CASE, MELINDA EDDY, MICHAEL |) | |
| LONG, SARAH TAAPKEN, BENJAMIN |) | |
| ESTES, JANEEN WRIGHT, JICOLE |) | |
| HICKLE, JOSH CHRISTINE, MYRON |) | |
| NEISLER, JAMES HARVEY, MARSHA |) | |
| MIBBS, ARACELI CABARCAS, TIONA |) | |
| FARRINGTON, STEPHANY TREJOS, |) | |
| NATASHA DILLARD, DAVID |) | |
| BRAINARD, SHELBI RENTMEISTER |) | |
| (aka SHELBI RUSSELL), HEIDI BROWN, |) | |
| LATISHA O'NEAL, DANIELLE |) | |
| MITCHELL, KIT CLAPP, LUKE |) | |
| FAIRLESS, CHAD MCGINNIS, TASHA |) | |
| YOUNG, JOHN SOKOL, ELAINE |) | |
| WORTH, CAMMI PIERCE, and ABBEY |) | |
| VENTURINI, |) | |
| |) | |
| Defendants. |) | |

COMPLAINT

Now comes Plaintiff, AMANDA DAILY, by and through her attorneys, complaining of Defendants, MICHAEL J. BAKER, DANIEL LARA, LATOYA HUGHES, JUSTIN HAMMERS, RYAN NOTTINGHAM, CHRISTINE BRANNON-DORTCH, GLEN AUSTIN, MARLO BUTLER-JONES, JEANMARIE CASE, MELINDA EDDY, MICHAEL LONG, SARAH TAAPKEN, BENJAMIN ESTES, JANEEN WRIGHT, JICOLE HICKLE, JOSH CHRISTINE, MYRON NEISLER, JAMES HARVEY, MARSHA MIBBS, ARACELI

CABARCAS, TIONA FARRINGTON, STEPHANY TREJOS, NATASHA DILLARD, DAVID BRAINARD, SHELBI RENTMEISTER (aka SHELBI RUSSELL), HEIDI BROWN, LATISHA O'NEAL, DANIELLE MITCHELL, KIT CLAPP, LUKE FAIRLESS, CHAD MCGINNIS, TASHA YOUNG, JOHN SOKOL, ELAINE WORTH, CAMMI PIERCE, and ABBEY VENTURINI as follows:

INTRODUCTION

1. Starting on or about February 5, 2024, Defendant Michael J. Baker, a correctional officer at Logan Correctional Center ("Logan"), groomed and sexually assaulted Ms. Daily causing her to suffer from physical and mental harm. After reporting his assault, Ms. Daily experienced retaliation from correctional officers at Logan. Ms. Daily was also previously sexually assaulted by Defendant Daniel Lara, another correctional officer, while in custody at Logan.

2. Defendants, including the Director of the Illinois Department of Corrections ("IDOC"), the Chief of Operations, Agency PREA Coordinator, Wardens, PREA Compliance Managers, PREA Retaliation Monitor, PREA Incident Review Team, and Internal Affairs Officers all had actual or constructive knowledge of the conditions at Logan that led to Ms. Daily's sexual assault and retaliation, but failed to implement systems, processes, or controls to prevent or address the pattern of assaults against Ms. Daily while in their care. As a result, Ms. Daily accordingly seeks redress for her injuries and violations of her rights, including injunctive relief, compensatory and punitive damages, attorneys' fees, costs, and other remedies.

JURISDICTION AND VENUE

3. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1367 as this case arises under the Eighth and Fourteenth Amendments to the United States Constitution and 42 U.S.C. § 1983, the Americans with Disabilities Act, 42 U.S.C. § 12131, et seq., and the Rehabilitation Act, 29 U.S.C. § 794, et seq.

4. Venue is appropriate in the Central District of Illinois pursuant to 28 U.S.C. § 1391(b) as the events complained of occurred exclusively in this district.

PARTIES

5. Plaintiff Amanda Daily is a citizen of the United States and a resident of Illinois. At all times relevant to this case, Ms. Daily was incarcerated at Logan Correctional Center, a prison operated by IDOC in Lincoln, Illinois.

6. IDOC is a department and agency of the State of Illinois responsible for the custody, safety, medical treatment, and overall welfare of individuals incarcerated within the Illinois state prison system.

7. Defendant **Michael J. Baker** was, at all times relevant to this complaint, an employee of IDOC and a correctional officer at Logan. Defendant Baker was acting under color of law during the events at issue in this case.

8. Defendant **Daniel Lara** was, at all times relevant to this complaint, an employee of IDOC and a correctional officer at Logan. Defendant Lara was acting under color of law during the events at issue in this case.

9. At times relevant to this complaint, Defendant **Latoya Hughes** held the position of Director or Acting Director of IDOC with authority over all IDOC facilities, including Logan. Defendant Hughes' responsibilities included promulgating and/or enforcing rules, regulations, policies, and procedures to ensure the safety and security of individuals in IDOC custody, including Ms. Daily. Defendant Hughes was responsible for overseeing the conduct and training of staff at IDOC facilities. Defendant Hughes was acting under color of law and within the scope of her employment. Defendant Hughes is sued in both her individual and official capacities.

10. At times relevant to this complaint, Defendant **Justin Hammers** held the position of IDOC Chief of Operations. In this position, Defendant Hammers possessed authority over security staff at IDOC facilities, including Logan. Defendant Hammers was responsible for ensuring that security staff were properly trained and conducted themselves in accordance with applicable laws, regulations, and standards. Defendant Hammers was acting under color of law and within the scope of his employment. Defendant Hammers is sued in his individual capacity.

11. At times relevant to this complaint, Defendant **Ryan Nottingham** held the position of Agency PREA Coordinator. In this position, Defendant Nottingham was responsible for ensuring the reasonable safety of prisoners at all IDOC facilities, including Logan, including by developing, implementing, and overseeing policies and training to prevent and remedy sexual abuse and misconduct; maintaining written directions for IDOC staff regarding these policies pursuant to the Prison Rape Elimination Act of 2003 (“PREA”); ensuring PREA audits are regularly conducted; and preparing annual PREA reports evaluating the safety and security of prisoners at IDOC facilities and compliance with applicable laws, regulations, and standards. Defendant Nottingham was acting under color of law and within the scope of his employment. Defendant Nottingham is sued in his individual capacity.

12. At times relevant to this complaint, Defendants **Christine Brannon-Dortch, Glen Austin, Marlo Butler-Jones, JeanMarie Case, Melinda Eddy, and Michael Long** held the positions of Warden, Acting Warden, and/or Day to Day Warden of Logan (hereinafter, the “Warden Defendants” or “Wardens”). The Warden Defendants were responsible for the organization and supervision of Logan and for ensuring the reasonable safety of prisoners, including preventing staff-on-prisoner violence, such as sexual assault by officers. The Warden Defendants were also responsible for overseeing day-to-day operations at Logan, including

compliance with PREA and preventing sexual abuse and misconduct at the prison; for promulgating and implementing rules, regulations, policies, and procedures to ensure the reasonable safety of women in custody at Logan; for supervising, training, assigning, and disciplining staff at Logan, including Defendants Baker and Lara; and for ensuring the facility develops, documents, and complies with a staffing plan that provides for adequate levels of staffing and video monitoring to protect prisoners from sexual abuse and misconduct. As such, the Warden Defendants were acting under color of law and within the scope of their employment and are sued in their individual capacities.

13. At times relevant to this complaint, Defendants **Sarah Taapken, Benjamin Estes, and Janeen Wright** held the position of PREA Compliance Manager and/or Backup PREA Compliance Manager for Logan (hereinafter, the “PREA Compliance Manager Defendants”). In these positions, these Defendants were responsible for ensuring the reasonable safety of prisoners at Logan, including preventing sexual abuse and misconduct by officers; developing, planning, and overseeing efforts to address the problem of sexual abuse and misconduct at Logan; and for ensuring compliance with PREA regulations and standards for preventing sexual misconduct at the prison. As such, these Defendants were acting under color of law and within the scope of their employment and are sued in their individual capacities.

14. At times relevant to this complaint, Defendant **Janeen Wright** held the position of PREA Retaliation Monitor for Logan (hereinafter, the “PREA Retaliation Monitor Defendant”). In this position, this Defendant was responsible for ensuring the reasonable safety of prisoners at Logan, including preventing sexual abuse and misconduct by officers, and monitoring and preventing retaliation against prisoners who have made PREA reports or complaints. As such, this

Defendant was acting under color of law and within the scope of her employment and is sued in her individual capacity.

15. At times relevant to this complaint, Defendants **Jicole Hickie, Josh Christine, Myron Neisler, James Harvey, Marsha Mibbs, Araceli Cabarcas, Tiona Farrington, Stephany Trejos, Natasha Dillard, Benjamin Estes, David Brainard, Sarah Taapken, Shelbi Rentmeister (aka Shelbi Russell), Heidi Browne, Latisha O’Neal, Danielle Mitchell, Michael Long, Kit Clapp, Melinda Eddy, Luke Fairless, Chad McGinnis, David Brainard, Janeen Wright, Tasha Young, John Sokol, Elaine Worth, Cammi Pierce, and Abbey Venturini** were members of the PREA Incident Review Team at Logan (hereinafter, the “PREA Incident Review Team Defendants”). In this role, these Defendants were responsible for ensuring the reasonable safety of prisoners at Logan, including preventing sexual abuse and misconduct by officers, evaluating and recommending policy changes to prison administrators to address the problem of sexual abuse and misconduct at the facility, and for ensuring compliance with PREA regulations and standards for preventing sexual abuse and misconduct at the prison. As such, these Defendants were acting under color of law and within the scope of their employment and are sued in their individual capacities.

16. At times relevant to this complaint, Defendant Internal Affairs Officers **Benjamin Estes, Kit Clapp, Chad McGinnis, Tasha Young, and Elaine Worth** (hereinafter, the “Internal Affairs Officer Defendants”) were responsible for investigating PREA reports, issuing findings to address the problem of sexual abuse and misconduct at the facility, and ensuring compliance with PREA regulations and standards for preventing sexual abuse and misconduct at the prison. As such, these Defendants were acting under color of law and within the scope of their employment and are sued in their individual capacities.

17. Defendant **Michael Long** is the current warden at Logan. At all times relevant to this complaint, Defendant Long was acting under color of law and within the scope of his employment. Defendant Long is sued in both his individual and official capacities.

FACTUAL ALLEGATIONS

Logan Correctional Center's Culture of Silence and Abuse of Prisoners by Corrections Personnel

18. IDOC has “a zero tolerance policy for sexual abuse and sexual harassment” and must “establish and maintain a program for the prevention and intervention of sexual abuse and harassment in correctional facilities in accordance with the standards established by the Prison Rape Elimination Act of 2003.” IDOC Administrative Directive 04.01.301.

19. An incarcerated person cannot consent to sexual contact with a correctional officer, as set forth by the PREA, Illinois law, and IDOC policy. All sexual relations between correctional officers and prisoners are abusive even if a sexual act would have been considered consensual if it occurred outside of a prison.

20. The state of Illinois criminalizes sexual relations between staff and prisoners. A correctional officer engaging in sexual penetration with a person in custody is guilty of Criminal Sexual Assault, a Class 1 felony punishable by up to 15 years in prison. 720 ILCS 5/11-1.20(a)(2); *see also* 720 ILCS 5/11-1.50(a)(2) (Criminal Sexual Abuse felony for sexual conduct not involving penetration); 720 Ill. Comp. Stat. 5/11-9.2 (Custodial Sexual Misconduct). In fact, federal law and all fifty states (plus the District of Columbia) have made it a crime for prison officials to engage in sexual activity with prisoners.

21. Despite IDOC's “zero tolerance” sexual assault policy, sexual abuse and misconduct is widespread at Logan, and a large number of prisoners have reported being assaulted and harassed by prison staff.

22. Between 2020 and 2024, IDOC reported that 279 PREA complaints were made by prisoners at Logan. These complaints are a direct consequence of a pattern of the prison failing to protect incarcerated individuals from sexual abuse. The number of allegations of sexual harassment and sexual assault at Logan in recent years, and the number of those allegations perpetrated by staff, are outlined in the below chart:¹

| Year | Allegations of Sexual Harassment and Abuse at Logan Correctional Center | Number of Allegations of Staff-Perpetrated Abuse |
|-------------|--|---|
| 2020 | 68 | 18 |
| 2021 | 51 | 17 |
| 2022 | 55 | 17 |
| 2023 | 36 | 16 |
| 2024 | 69 | 34 |

23. In addition to the instances of sexual harassment and sexual assault reported in the PREA complaints, staff-on-prisoner sexual assaults at Logan have been referred to the Illinois State Police (“ISP”) for investigation.

24. According to data provided in response to open records requests, between January 2021 to June 2025, 85 PREA complaints were made by prisoners against Logan staff for sexual abuse, sexual misconduct, and sexual assault. Yet, only six staff members received any disciplinary action, and only three of the six were suspended or discharged. Further, only seven of the total PREA complaints made were referred by ISP to the State’s Attorney’s Office for charges. Staff-on-prisoner sexual assaults at Logan have also generated civil lawsuits. The assaults subject to

¹ The figures in this chart were compiled from the 2020 to 2024 Annual Illinois Department of Correction PREA Reports, available at <https://idoc.illinois.gov/programs/prisonrapeeliminationactof2003.html>.

such civil litigation include, for example: *Farris v. Kohlrus, et al.*, No. 3:17-cv-3279 (C.D. Ill. Nov. 28, 2017), *Doe v. MacLeod, et al.*, No. 3:18-cv-3191 (C.D. Ill. Aug. 2, 2018), and *Martinez v. Case, et al.*, No. 24-cv-1279 (C.D. Ill. Aug. 9, 2024).

25. Since 2023, two federal juries in the Central District of Illinois rendered multi-million-dollar verdicts in favor of plaintiffs after concluding that Logan officials failed to protect female prisoners from the risk of sexual abuse. *See* Jury Verdict, *MacLeod*, No. 3:18-cv-3191, Dkt. 223; Jury Verdict, *Metcalf v. Burke*, No. 18-cv-3260, Dkt. 189 (C.D. Ill. Feb. 2, 2024).

26. On information and belief, due to both staffing assignments and individual correctional officers leaving their posts, there are periods during which only one male correctional officer is present in various parts of Logan, including in the Residential Treatment Unit (“RTU”), a housing area specifically designated for individuals with serious mental health needs. This creates opportunities for staff to have one-on-one interactions with the women incarcerated at Logan and evade oversight.

27. Though Logan has cameras installed to monitor staff and prisoners, those cameras do not capture all areas of the prison. Instead, on information and belief, there are many black-out areas where individuals cannot be seen by the cameras, and these black-out areas are widely known to staff. These black-out areas include portions of the interior of cells, even when the door to the cell is open. IDOC staff also know how to manipulate doors and other obstacles to create black-out areas in hallways and cells. This similarly creates opportunities for staff to target the women incarcerated at Logan and escape documentation of their acts.

28. Further, it is widely known that any footage from those cameras is periodically, and permanently, deleted and that Logan does not routinely preserve the camera footage. Corrections staff therefore have additional opportunities to avoid review of their improper actions.

29. Correctional officers and other staff commit sexual abuse against incarcerated women in a variety of ways, including but not limited to, sexual contact through physical force, coercing sexual contact through other means, and/or inducing sexual contact through promising or providing privileges and other goods. Correctional officers also force sexual contact with incarcerated women in the guise of romantic relationships and other grooming, and while this contact is prohibited by law and policy, it is not actively dissuaded at Logan.²

30. Logan allows abuse to perpetuate by creating an environment where this abuse is normalized, protecting offenders from investigation and discipline, and retaliating against victims who come forward.³

31. As part of the pattern of sexual abuse at Logan, in recent years correctional officers have targeted and groomed multiple women while they were housed in the RTU. The correctional officers were aware that these women were particularly vulnerable given their mental health needs.

32. Given the documented history of sexual misconduct and abuse of prisoners by correctional officers and other staff, Defendants Hughes, Hammers, and Nottingham, and the Warden Defendants, PREA Compliance Manager Defendants, PREA Retaliation Monitor Defendant, PREA Incident Review Team Defendants, and Internal Affairs Officer Defendants knew or should have known about an ongoing problem of sexual misconduct and abuse by officers at Logan.

33. Defendants Hughes, Hammers, and Nottingham, and the Warden Defendants, PREA Compliance Manager Defendants, PREA Retaliation Monitor Defendant, PREA Incident Review Team Defendants, and Internal Affairs Officer Defendants also knew or should have

² Michelle VanNatta, *Conceptualizing and Stopping State Sexual Violence Against Incarcerated Women*, 37 SOC. JUST. 27, 32 (2010).

³ See Claudia Lomeli-Rodriguez, *Abuse of Power: Sexual Abuse in the Federal Prison System*, 1 ANNUAL REVIEW OF CRIMINAL JUSTICE STUDIES 132, 140–42 (2023).

known that prisoners housed in the RTU were particularly susceptible to coercion and abuse from correctional officers and staff.

34. At all times relevant to this complaint, Defendants Hughes, Hammers, and Nottingham, and the Warden Defendants, PREA Compliance Manager Defendants, PREA Retaliation Monitor Defendant, PREA Incident Review Team Defendants, and Internal Affairs Officer Defendants could have taken steps to address the culture of sexual abuse and misconduct by employees at Logan. But Defendants instead failed to make changes to the policies, procedures, or practices for detecting and addressing sexual abuse and misconduct by correctional officers and staff.

Ms. Daily's History of Sexual Assault at Logan Correctional Center

35. Ms. Daily entered IDOC custody on May 31, 2019. She was 19 years old and had never been in an adult prison facility before.

36. Ms. Daily has a history of mental illness and personal tragedy that has resulted in multiple serious suicide attempts, and she has been hospitalized in inpatient mental health facilities both prior to and during her incarceration.

37. Upon entering Logan, Ms. Daily reported that prior to her incarceration, she had been hospitalized for psychiatric treatment approximately ten times and also received outpatient psychiatric treatment. She also reported that she had made multiple, serious suicide attempts.

38. During her time at Logan, Ms. Daily was primarily housed in the RTU or the modified RTU (the "mRTU") to address her mental health needs.

39. On or about June 2020, Ms. Daily was playing basketball in the gym of housing unit 14, one of Logan's mental health units, with another prisoner when the basketball she was playing with accidentally hit correctional officer Defendant Daniel Lara. Defendant Lara said to

Ms. Daily, “You are in trouble now.” Ms. Daily later went to the bathroom and Defendant Lara followed her inside. He pushed her against the wall and put his penis inside of her vagina without her consent. Another prisoner walked into the bathroom and yelled at Defendant Lara to stop. Ms. Daily did not report the rape nor file a PREA at the time because she was afraid of what Defendant Lara might do and what retaliation she might face.

40. Defendant Lara was arrested the same month on June 25, 2020 and convicted of Custodial Sexual Misconduct, a Class 3 felony, on July 14, 2021 as related to the assault of another prisoner.

41. On or about July 9, 2020, Ms. Daily went to the health care unit at Logan because she was concerned that she was pregnant. She told a nurse that she was raped by Defendant Lara in June 2020 and that she felt “terrible to be raped in an institution that [is] supposed to protect me.”

42. Sometime in August or September of 2020, Ms. Daily was interviewed by investigators regarding Defendant Lara’s rape and gave a recorded interview. Ms. Daily’s allegation was not incorporated into the charges brought against Defendant Lara, even though there were other charges filed against him.

43. Despite these interviews, Ms. Daily never heard anything from Internal Affairs regarding the report, and she was not informed that anyone in the health unit at Logan or in Internal Affairs initiated a PREA report about the rape.

44. Ms. Daily experienced other sexual harassment and abuse from officers at Logan. For example, beginning on or about September 2023, another officer, Correctional Officer Matthew McCarty would come into the cell Ms. Daily shared with her roommate and coerce the women to expose their breasts in exchange for contraband food from outside the prison. As with

Defendant Lara, Officer McCarty has also been accused of sexually abusing at least three other incarcerated women at Logan.

45. Ms. Daily's mental health continued to suffer during her incarceration, including as a result of the sexual assault and harassment by Defendant Lara and Officer McCarty.

Michael Baker's Grooming of Ms. Daily for Sexual Exploitation

46. Towards the end of that year, Ms. Daily suffered a personal tragedy in December 2023 when her father passed away. Distressed by the loss of her father, Ms. Daily's medications were adjusted to address her mental health needs by increasing the dosage and placing Ms. Daily in a more sedative state.

47. Ms. Daily resided on unit 8 in the mRTU from December 21, 2023 until May 15, 2024. Defendant Baker was assigned as an officer in unit 8 for a 90-day period on or about January 1, 2024 to on or about March 29, 2024.

48. Ms. Daily had previously seen Defendant Baker on a few occasions at Logan and recognized him as someone she knew from her youth.

49. Ms. Daily and Defendant Baker started talking frequently while he was on shift in her unit.

50. On or about February 5, 2024, Defendant Baker began flirting with Ms. Daily and giving her sexualized attention. He began grooming her, telling Ms. Daily they were in a relationship, that he loved her, and that he would leave his fiancée (Natasha Baker, née Ekstam, who also worked at Logan) for her.

51. Defendant Baker's grooming escalated into physical contact on or about February 13, 2025, when Defendant Baker came into Ms. Daily's cell when no one else was in the room. While in Ms. Daily's room, Defendant Baker hugged and kissed Ms. Daily.

52. This behavior continued for the next several weeks. Defendant Baker repeatedly entered Ms. Daily's cell early in the morning and woke her up by rubbing his fingers across Ms. Daily's forehead, tucking her hair behind her ear, calling her by a nickname, and saying "good morning." Defendant Baker told Ms. Daily that he loved her and was going to take her home. He told Ms. Daily "I want to fuck you."

53. On or about March 6, 2024, Ms. Daily was moved to a different cell at Logan. Defendant Baker continued to come into Ms. Daily's cell almost every day to hug and kiss her. Defendant Baker would often pick her up and kiss her in her cell with her legs wrapped around his waist.

54. Defendant Baker would only enter Ms. Daily's cell when no one else was around. On information and belief, Defendant Baker would intentionally visit Ms. Daily when he knew her cellmate would be out of their room and when he knew no one would be around.

55. On information and belief, Defendant Baker, like other Logan correctional officers, also knew where all of the cameras were located and knew how to avoid them. He was also aware that the camera recordings are erased after a few months. He used this knowledge to ensure his visits to Ms. Daily's cell would be outside the view of the cameras.

56. During these visits, Defendant Baker would step into Ms. Daily's cell, intentionally avoiding the reach of security cameras installed in the hallway of the unit. He would place one foot in the cell and leave one foot outside of her cell so it looked like he was just sticking his head in to speak with Ms. Daily. In reality, however, he would reach around the door to kiss and hug Ms. Daily.

57. Defendant Baker told Ms. Daily that "if I didn't trust you, I wouldn't do this," coercing her to not report his actions even though they violated the law and IDOC procedure.

58. Defendant Baker also threatened Ms. Daily directly, on one occasion forcing Ms. Daily to tear up a letter she was writing to an ex-girlfriend and stating “If you don’t stop writing her, I’ll kill you.”

59. Defendant Baker also interacted with Ms. Daily in an inappropriate manner outside of her cell.

60. For instance, on at least one occasion when she was crying in the dayroom, he comforted her by touching her chin.

61. On one occasion, Ms. Daily was standing by the log book box and felt Defendant Baker’s penis through his pants. He looked at her and said “I want to fuck you.” Ms. Daily also told ISP that she believed that cameras on the unit would have showed her touching Defendant Baker’s penis through his pants when he was standing by the log book box doing “wing checks.”

62. Defendant Baker would also “play around” with Ms. Daily while he signed the log book on her housing unit. They would push each other around in a friendly manner and Ms. Daily would flip his hood over his head.

63. Defendant Baker frequently gave Ms. Daily contraband pens, markers, and highlighters. Defendant Baker was caught at least one other time trying to give an ink pen to a prisoner. Defendant Baker was aware that giving contraband pens, markers, and highlighters to prisoners was against prison rules. Giving out contraband pens to create the impression of preferential treatment is known to be a form of grooming and a way to apply coercive pressure to prisoners by correctional officers at Logan.

64. Defendant Baker would also provide improper and coercive favors or privileges by downloading music onto Ms. Daily’s tablet.

65. On or about March 29, 2024, Defendant Baker again came into Ms. Daily's room while many of the women on Ms. Daily's unit were at a community meeting. Ms. Daily was alone in her room at the time. Defendant Baker picked Ms. Daily up and began kissing her. This time hugging and kissing was not enough. After he briefly left Ms. Daily's room, Defendant Baker returned and said "I'm not done." He picked Ms. Daily back up and began kissing her again. Defendant Baker forced his hands down Ms. Daily's pants and penetrated her vagina with his fingers.

66. Defendant Baker abruptly stopped seeing Ms. Daily after the March 29, 2024 assault when he was transferred off the unit at the end of his 90-day rotation.

67. Defendant Baker used his power and influence to groom Ms. Daily and prey on her vulnerabilities. He knew she had a history of mental illness, that she was extremely sad about her father's recent passing, and was taking sedative medications for her mental health needs that made her groggy.

68. Defendant Baker also knew that Ms. Daily had previously attempted suicide. Defendant Baker's then fiancée, Natasha Baker (née Ekstam), who also worked at Logan, responded to Ms. Daily's suicide attempt in May 2023 after Ms. Daily cut her arm with a razor blade and swallowed the razor. At the time, Defendant Baker was working with Natasha Baker and called other staff to help respond to the incident.

69. While Defendant Baker was stationed in unit 8, Ms. Daily would talk to Defendant Baker about her mental health struggles because he was crisis trained. In one instance, she gave him a razor blade, which he took and flushed down the toilet.

70. Defendant Baker took advantage of his power over Ms. Daily for his own sexual gratification. Defendant Baker visited Ms. Daily when he knew she was most likely to be alone.

He knew how to position himself outside of the view of the cameras at Logan, specifically installed to monitor and prevent this kind of exploitation. Despite being aware of her vulnerabilities, he told Ms. Daily that he loved her and that they were in a relationship to keep her from reporting his sexual advances.

71. Further, Defendant Baker began grooming Ms. Daily while she was housed in the mRTU at Logan, a unit specifically designed for women with mental health needs. On information and belief, other correctional officers at Logan have similarly groomed and sexually abused women housed in Logan's mental health units. Defendant Baker perpetuated a pattern of exploiting particularly vulnerable women at Logan for sexual gratification.

Ms. Daily's Suicide Attempt and Resulting Investigation

72. On May 15, 2024, Ms. Daily attempted suicide by swallowing a razor blade and cutting her left arm with a razor blade. She wrote a suicide note that detailed how Defendant Baker used and abused her.

73. After the suicide attempt, Ms. Daily was moved to housing unit 14.

74. Dr. N. Velez-Pagán, an administrator in Logan's mental health unit, spoke with Ms. Daily as she recovered from her suicide attempt. Ms. Daily described her interactions with Defendant Baker, explaining that it was a stressor leading to the May 15, 2024 suicide attempt. Ms. Daily told Dr. Velez-Pagán that the interactions were on camera. She also told Dr. Velez-Pagán that there were other individuals in custody that were involved with Defendant Baker.

75. Dr. Velez-Pagán wrote an incident report based on Ms. Daily's recounting, but Ms. Daily pleaded that Dr. Velez-Pagán give that incident report directly to Warden Jean Case and not to Major Thomas. Major Thomas was known to be good friends with Defendant Michael Baker.

76. The nurse who examined Ms. Daily after her suicide attempt in May 2024 told Ms. Daily she was required to call Major Thomas to report the assault because Defendant Baker had penetrated her with his finger during the March 2024 assault. When the nurse told Major Thomas what had happened to Ms. Daily, he responded “that was three months ago. Why are you calling me now?” and hung up the phone.

77. On or about May 28, 2025, Defendant McGinnis of IDOC Internal Affairs conducted an administrative interview with Ms. Daily regarding the allegations in her suicide note.

78. The Illinois State Police Division of Internal Investigation then received a Checklist Initiation Report (“CIR”) from IDOC Investigations and Intelligence Central Region Commander Nicole Price reporting allegations of sexual misconduct by Defendant Baker against Ms. Daily.

79. A PREA Checklist was initiated for Ms. Daily on or about May 30, 2024.

80. Upon information and belief, even though the PREA Checklist and the CIR had been sent to the ISP within the timeframe that camera footage should have shown Defendant Baker entering Ms. Daily’s cell and their interactions on unit 8, no footage was preserved.

81. Despite Ms. Daily’s sexual assault report, she was not transferred from Logan, and Defendant Baker continued to work there.

82. Ms. Daily was told by Defendant McGinnis not to speak to anyone about the assault.

83. On or about June 27, 2024, Ms. Daily was interviewed by ISP Special Agents Dallas Gray and Trevor Schlindwein about Defendant Baker’s abuse. She explained again to the state police detectives that she knew of other incarcerated women who were victimized by Defendant Baker.

84. Soon after the investigation began, Ms. Daily was asked by William Chambers, an Internal Affairs officer, if she was pregnant by Defendant Baker. This alarmed Ms. Daily because the incident report and investigation were required to be kept confidential per IDOC policy. The fact that other officers asked her whether she was pregnant indicated that Internal Affairs had violated confidentiality requirements.

85. Other correctional officers also made comments to Ms. Daily about Defendant Baker's abuse, asking her why she put their "boy" in her suicide note. This similarly indicated that Ms. Daily's report was not confidential, and that correctional officers were more interested in protecting Defendant Baker.

Retaliation Against Ms. Daily for Reporting Her Abuser

86. On information and belief, correctional officers at Logan retaliated against Ms. Daily after she formally reported Defendant Baker's abuse. This retaliation harmed Ms. Daily's physical and mental well-being.

87. Natasha Baker, who at the time was engaged to Defendant Baker, would call Ms. Daily a "bitch" and make rude and vindictive comments to Ms. Daily. Natasha Baker also falsely claimed that Ms. Daily lied about her abuse by Defendant Baker.

88. In June 2024, Ms. Daily reported that she was in fear for her life at Logan because of Natasha Baker and requested to be transferred to a different prison.

89. This behavior affected Ms. Daily's activities of daily living. Natasha Baker was often stationed in the "bubble," or control room in unit 41: the unit where Ms. Daily was housed in late 2024. Because Ms. Daily was intimidated by Natasha Baker's verbal abuse and position of authority, she avoided going to the chow hall for meals, attending programming, or going out on the walk when Natasha Baker was working in the "bubble."

90. Other correctional officers harassed Ms. Daily. For example, in mid-November, 2024, Ms. Daily's room was "shaken down" twice in one week, which was significantly more frequently than the once-monthly searches that were routine at Logan.

Logan Officials Refused to Accommodate Ms. Daily's Disability in Denying Her Request to Transfer to a Safe Facility

91. Because she was made to feel unsafe and continued to experience retaliation at Logan, Ms. Daily requested a transfer to Decatur Correctional Center. She explained to Logan correctional officers and detectives from ISP that she did not feel safe and feared for her life.

92. On information and belief, other women incarcerated at Logan who were also sexually assaulted by correctional officers similarly requested transfers to Decatur Correctional Center and those requests were granted.

93. Ms. Daily's request for a transfer to Decatur Correctional Center was denied. Ms. Daily was told that Decatur Correctional Center was unable to accommodate her mental health status. Even after the Warden at Logan approved Ms. Daily's transfer, she has been told that she would not be able to go to Decatur Correctional Center because of her mental health conditions.

94. Ms. Daily was therefore forced to remain in an unsafe environment with Logan as her parent institution because of her mental health disabilities.

The Lasting Trauma of Defendant Daniel Lara's and Defendant Baker's Abuse

95. Because Ms. Daily is forced to remain at Logan as her parent institution, she has suffered extraordinary emotional hardship. As a result of this ongoing series of abuse by correctional officers at Logan, Ms. Daily has suffered lasting, traumatic effects that have impacted her mental health and wellbeing.

96. Ms. Daily immediately began having flashbacks of Defendant Lara's abuse. She reported that she was scared Defendant Lara would be able to get to her.

97. Ms. Daily immediately began having nightmares of Defendant Baker assaulting her. These dreams were so distressing that Ms. Daily urinated on herself in her sleep.

98. Ms. Daily also lives in fear of running into Defendant Baker again at Logan. The knowledge that she would once again be forced to face her abuser and that Defendant Baker would have again have authority over Ms. Daily and access to her life and living spaces has caused her to suffer psychological distress, pain, suffering, humiliation, and substantially interfered with her mental health and well-being.

99. Ms. Daily attempted suicide again after learning that Defendant Baker would be coming back to work in August 2024. She felt unsafe at the prospect that he would be in the same facility as her and that she could run into him.

100. Ms. Daily also suffered lasting health effects from her suicide attempt in May and August 2024, which were related to Defendant Baker's abuse. Among other things, she injured her esophagus, which caused difficulty swallowing and forced her to request a liquid diet. Ms. Daily also had sutures and stitches in her arm to repair multiple self-inflicted cuts.

101. Ms. Daily has also been transferred to the Joliet Inpatient Treatment Center ("JITC") twice since reporting Defendant Baker's abuse. This shows a deterioration of Ms. Daily's mental health as she now needs treatment at a facility designated for inpatient mental health care.

102. Additionally, Ms. Daily lost her job as a porter shortly after her suicide attempt on May 15, 2024 because her mental health was deemed unstable. The suicide, mental health deterioration, and subsequent job loss is a direct result of the abuse she suffered from Defendant Baker. Ms. Daily's job is crucial to earning good time credit, which can lead to a reduction in time served. Ms. Daily no longer has access to these benefits because her mental health continues to suffer from the trauma inflicted by Defendants.

103. As a direct and proximate result, Ms. Daily had her right to bodily integrity taken from her by Defendants.

104. As a direct and proximate result, Ms. Daily had her dignity as a human being taken away from her by Defendants.

105. As a direct and proximate result, Ms. Daily has suffered extreme emotional distress inflicted upon her by Defendants.

106. As a direct and proximate result, Ms. Daily has suffered trauma inflicted upon her by Defendants causing her to fear for her personal safety.

COUNT I

**42 U.S.C. § 1983 – CRUEL AND UNUSUAL PUNISHMENT IN VIOLATION OF THE
EIGHTH AMENDMENT AGAINST DEFENDANT MICHAEL BAKER**

107. Ms. Daily realleges each paragraph of this complaint as if fully set forth in this count.

108. Defendant Baker used force to coerce Ms. Daily into engaging in sexual activity when she was legally incapable of consenting to that activity. That force, which included digital penetration of her vagina, was objectively unreasonable, meant to degrade and humiliate Ms. Daily, and served no penological justification.

109. In using force against Ms. Daily, Defendant Baker used extreme or excessive cruelty toward her for the purpose of causing harm, including degradation and humiliation. The actions of Defendant Baker were not in a good faith effort to maintain or restore security or discipline.

110. Alternatively, Defendant Baker knew that using force in the form of sexual penetration of Ms. Daily's vagina presented a risk of harm to Ms. Daily, but recklessly disregarded that risk and Ms. Daily's emotional and physical safety by failing to take reasonable measures to minimize the risk of harm.

111. As a direct and proximate cause of Defendant Baker's wrongful conduct, Ms. Daily's rights were violated and she has experienced injuries, including physical and psychological injuries and severe emotional distress.

COUNT II

42 U.S.C. § 1983 – FAILURE TO PROTECT MS. DAILY IN VIOLATION OF THE EIGHTH AMENDMENT AGAINST DEFENDANT HUGHES, DEFENDANT HAMMERS, DEFENDANT NOTTINGHAM, WARDEN DEFENDANTS, PREA COMPLIANCE MANAGER DEFENDANTS, PREA RETALIATION MONITOR DEFENDANT, PREA INCIDENT REVIEW TEAM DEFENDANTS, AND INTERNAL AFFAIRS OFFICER DEFENDANTS

112. Ms. Daily realleges each paragraph of this complaint as if fully set forth in this count.

113. In the manner described more fully above, Defendant Baker's conduct toward Ms. Daily violated her right to be free from cruel and unusual punishment. Sexual abuse serves no penological justification.

114. Defendant Baker's abuse of Ms. Daily was not an isolated incident at Logan—indeed, Ms. Daily had herself suffered a previous sexual assault by Defendant Lara at Logan. Defendants Hughes, Hammers, and Nottingham, and the Warden Defendants, PREA Compliance Manager Defendants, PREA Retaliation Monitor Defendant, PREA Incident Review Team Defendants, and Internal Affairs Officer Defendants were each on notice of numerous instances of sexual misconduct and abuse by prison staff directed at Logan prisoners, were aware that a systemic sexual assault problem existed at Logan, and were further aware of the custom, policies, and practices at Logan that permitted sexual misconduct and abuse to flourish.

115. Defendants Hughes, Hammers, and Nottingham, and the Warden Defendants, PREA Compliance Manager Defendants, PREA Retaliation Monitor Defendant, PREA Incident Review Team Defendants, and Internal Affairs Officer Defendants had actual knowledge of this

pattern of sexual abuse, had the realistic opportunity to intervene to prevent or stop the misconduct from occurring, and failed to take reasonable measures to remedy the violations.

116. In the alternative, these Defendants were on notice of a substantial risk of harm to Ms. Daily and they consciously disregarded that risk.

117. Specifically, Defendants Hughes, Hammers, and Nottingham were responsible for developing, implementing, and overseeing regulations, policies, procedures, and practices to prevent and remedy sexual abuse and misconduct at all IDOC facilities, including Logan. These Defendants were also responsible for ensuring compliance with PREA standards, training staff, and auditing IDOC facilities. Despite numerous lawsuits and complaints over the years highlighting ongoing problems at Logan, Defendants Hughes, Hammers, and Nottingham allowed a culture to persist at Logan that failed to protect individuals in custody from sexual abuse and misconduct. These Defendants knew or should have known of a widespread practice by prison staff at Logan who engaged in sexual abuse or misconduct, including by way of direct reporting and internal investigations, annual PREA compliance reports, PREA audits, John Howard Association Investigations and Reports, grievances, training, reports from counselors and medical staff, meetings, and lawsuits.

118. The Warden Defendants were responsible for the creation, implementation, oversight, and supervision of all training, policies, and procedures followed by prison staff at Logan. These Defendants were responsible for ensuring the reasonable safety of prisoners at Logan and for ensuring the facility complied with adequate levels of staffing and surveillance to protect prisoners from sexual abuse and misconduct. These Defendants knew or should have known of a widespread practice by prison staff at Logan who engaged in sexual harassment, sexual abuse, or sexual misconduct, including by way of direct reporting and internal investigations, annual PREA

compliance reports, PREA audits, John Howard Association Investigations and Reports, grievances, training, reports from counselors and medical staff, meetings, and lawsuits.

119. The PREA Compliance Manager Defendants, PREA Retaliation Monitor Defendant, and PREA Incident Review Team Defendants, were responsible for the creation, implementation, oversight, and supervision of the training, policies, and procedures at Logan that related to PREA violations. These Defendants knew or should have known of a widespread practice by IDOC employees at Logan who engaged in sexual harassment, sexual abuse, or sexual misconduct, including by way of direct reporting and internal investigations, annual PREA compliance reports, PREA audits, John Howard Association Investigations and Reports, grievances, training, reports from counselors and medical staff, meetings, and lawsuits.

120. The Internal Affairs Officer Defendants were responsible for or involved in the for the creation, implementation, oversight, and supervision of the training, policies, and procedures at Logan that related to PREA violations. These Defendants knew or should have known of a widespread practice by IDOC employees at Logan who engaged in sexual harassment, sexual abuse, or sexual misconduct, including by way of direct reporting and internal investigations, annual PREA compliance reports, PREA audits, John Howard Association Investigations and Reports, grievances, training, reports from counselors and medical staff, meetings, and lawsuits.

121. The above-described pattern and practice of sexual misconduct by IDOC employees at Logan was so pervasive as to constitute a de facto policy where Defendants Hughes, Hammers, and Nottingham, and the Warden Defendants, PREA Compliance Manager Defendants, PREA Retaliation Monitor Defendant, PREA Incident Review Team Defendants, and Internal Affairs Officer Defendants had authority over this practice and the duty and power to take steps to make changes to reduce the danger that Ms. Daily and other Logan prisoners would be subjected

to sexual misconduct and abuse by prison staff. Each of these Defendants exhibited deliberate indifference to the risk of objectively serious harm of sexual abuse of Logan prisoners by prison staff. These Defendants manifested deliberate indifference to these constitutional violations by failing to take reasonable measures to remedy these violations.

122. Among other things, Defendants Hughes, Hammers, and Nottingham, and the Warden Defendants, PREA Compliance Manager Defendants, PREA Retaliation Monitor Defendant, PREA Incident Review Team Defendants, and Internal Affairs Officer Defendants failed to take reasonable steps to either prevent the abuse from occurring or report the misconduct to alleviate the potential for future abuses, thus directly encouraging abuse such as was suffered by Ms. Daily. Defendants also failed to adequately investigate, train, supervise, control, and discipline, including terminate, prison staff who engaged in, or were accused of engaging in, sexual abuse and misconduct, thus directly encouraging and facilitating future abuses such as those affecting Ms. Daily. In this way, Defendants directed, knew about, facilitated, approved, condoned, and consented to the conduct that caused the violation of Ms. Daily's constitutional rights, and violated Ms. Daily's rights by maintaining policies and practices that were the moving force driving the foregoing constitutional violations.

123. As a direct and proximate cause of Defendants Hughes, Hammers, and Nottingham, and the Warden Defendants, PREA Compliance Manager Defendants, PREA Retaliation Monitor Defendant, PREA Incident Review Team Defendants, and Internal Affairs Officer Defendants' actions or failure to act, Ms. Daily was sexually abused at Logan, her rights were violated, and she has experienced injuries, including physical and psychological injuries and severe emotional distress.

COUNT III

**42 U.S.C. § 1983 – FAILURE TO TRAIN IN VIOLATION OF THE EIGHTH
AMENDMENT AGAINST DEFENDANT HUGHES, DEFENDANT HAMMERS,
DEFENDANT NOTTINGHAM, WARDEN DEFENDANTS, PREA COMPLIANCE
MANAGER DEFENDANTS, PREA RETALIATION MONITOR DEFENDANT, PREA
INCIDENT REVIEW TEAM DEFENDANTS, AND INTERNAL AFFAIRS OFFICER
DEFENDANTS**

124. Ms. Daily realleges each paragraph of this complaint as if fully set forth in this count. Defendants had actual knowledge of a history of sexual abuse at Logan.

125. The training program at Logan was not adequate to train and supervise the prison's employees on the unique challenges and requirements presented in dealing with women prisoners and to identify and respond to the risks of sexual misconduct and abuse by prison staff.

126. As set forth more fully above, Defendants Hughes, Hammers, and Nottingham, and the Warden Defendants, PREA Compliance Manager Defendants, PREA Retaliation Monitor Defendant, PREA Incident Review Team Defendants, and Internal Affairs Officer Defendants were on notice of numerous instances of sexual misconduct and abuse by prison staff directed at Logan prisoners, were aware that a systemic sexual assault problem existed at Logan, and were further aware of the custom, policies, and practices at Logan that permitted sexual misconduct and abuse to flourish. These Defendants were responsible for training IDOC staff to prevent and respond to sexual misconduct and abuse.

127. As a direct and proximate cause of Defendants Hughes, Hammers, and Nottingham, and the Warden Defendants, PREA Compliance Manager Defendants, PREA Retaliation Monitor Defendant, PREA Incident Review Team Defendants, and Internal Affairs Officer Defendants' failure to adequately train and supervise Logan staff, Ms. Daily was sexually abused at Logan, her rights were violated, and she has experienced injuries, including physical and psychological injuries, and severe emotional distress.

COUNT IV

**42 U.S.C. § 12132 – DISCRIMINATION ON THE BASIS OF DISABILITY IN
VIOLATION OF THE AMERICANS WITH DISABILITIES ACT AGAINST
DEFENDANT HUGHES, IN HER OFFICIAL CAPACITY**

128. Ms. Daily realleges each paragraph of this complaint as if fully set forth in this count.

129. Title II of the ADA states that “no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.” 42 U.S.C. § 12132.

130. At all times relevant to her claims in this case, Ms. Daily was a qualified individual with a disability within the meaning of Title II of the ADA, 42 U.S.C. § 12131(2) and had a right not to be subjected to discrimination on the basis of her disability by IDOC.

131. IDOC is a “public entity” within the meaning of Title II of the ADA, 42 U.S.C. § 12131(1).

132. Because of the sexual abuse, retaliation, and harassment that she experienced, Ms. Daily requested to be transferred to Decatur Correctional Center.

133. Ms. Daily’s request was denied because of her mental health conditions.

134. In denying Ms. Daily’s request, IDOC officials discriminated against her on the basis of her disability by refusing to offer a reasonable accommodation and forcing her to remain housed in a facility where she suffered sexual assault, where her abuser continued to work, and where her abuser’s spouse harassed her.

135. As a direct and proximate result of the refusal to transfer Ms. Daily, Ms. Daily was denied access to employment, programmatic, and educational opportunities at Decatur.

136. In addition, as a direct and proximate result of the failure to provide an adequate accommodation to Ms. Daily, Ms. Daily avoided attending meals or going on approved walks due to the retaliation and humiliation she suffered remaining in the same facility with her abuser and her abuser's spouse.

137. Ms. Daily's request to transfer to Decatur Correctional Center and receive mental health treatment at the facility was reasonable and not unduly burdensome. Upon information and belief, other prisoners who were subjected to sexual abuse at Logan were transferred to Decatur.

138. As a result of this wrongful conduct, Ms. Daily's rights were violated and she experienced injuries, including physical and psychological injuries and severe emotional distress.

COUNT V
**29 U.S.C. § 794 – DISCRIMINATION ON THE BASIS OF DISABILITY IN VIOLATION
 OF THE REHABILITATION ACT AGAINST DEFENDANT HUGHES, IN HER
 OFFICIAL CAPACITY**

139. Ms. Daily realleges each paragraph of this complaint as if fully set forth in this count.

140. The purpose of the Rehabilitation Act is to ensure that no “qualified individual with a disability in the United States . . . shall, solely by reason of [] disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance . . .” 29 U.S.C. § 794(a).

141. At all times relevant to Ms. Daily's claims, IDOC received federal financial assistance within the meaning of 29 U.S.C. § 794(a).

142. At all times relevant to her claims in this case, Ms. Daily was a qualified individual with a disability within the meaning of the Rehabilitation Act, 29 U.S.C. § 794(a).

143. The operations of IDOC are “program[s] or activit[ies]” within the meaning of 29 U.S.C. § 794(b)(1)(A)–(B) and/or (b)(2)(B).

144. Because of the retaliation and harassment that she experienced, Ms. Daily requested to be transferred to Decatur Correctional Center.

145. Ms. Daily's request was denied because of her mental health conditions.

146. In denying Ms. Daily's request, IDOC officials discriminated against her on the basis of her disability by refusing to offer a reasonable accommodation and forcing her to remain housed in a facility where she suffered sexual assault, where her abuser continued to work, and where her abuser's spouse harassed her.

147. As a direct and proximate result of the denial of Ms. Daily's transfer, Ms. Daily was denied access to employment and educational opportunities at Decatur.

148. In addition, as a direct and proximate result of the denial of Ms. Daily's transfer, Ms. Daily avoided attending meals or going on approved walks due to the retaliation and humiliation she suffered remaining in the same facility with her abuser and her abuser's spouse.

149. Ms. Daily's request to transfer to Decatur Correctional Center and receive mental health treatment at the facility was reasonable and not unduly burdensome. Upon information and belief, prisoners who were subjected to sexual abuse at Logan were transferred to Decatur.

150. As a result of the wrongful conduct, Ms. Daily's rights were violated and she experienced injuries, including physical and psychological injuries and severe emotional distress.

COUNT VI
740 ILCS 82/5 et seq. ILLINOIS GENDER VIOLENCE ACT CLAIM AGAINST
DEFENDANT MICHAEL BAKER

151. Ms. Daily realleges each paragraph of this complaint as if fully set forth in this count.

152. Defendant Baker subjected Ms. Daily to a physical intrusion or physical invasion of a sexual nature by hugging and kissing her, and by inserting his fingers into her vagina.

153. Defendant Baker did this under coercive conditions because this physical intrusion or invasion took place while he was a correctional officer and Ms. Daily was incarcerated at Logan.

154. As a result of Defendant Baker's wrongful conduct, Ms. Daily's rights were violated and she experienced injuries, including physical and psychological injuries and severe emotional distress.

COUNT VII
**740 ILCS 82/5 et seq. ILLINOIS GENDER VIOLENCE ACT CLAIM AGAINST
DEFENDANT DANIEL LARA**

155. Ms. Daily realleges each paragraph of this complaint as if fully set forth in this count.

156. Defendant Lara subjected Ms. Daily to a physical intrusion or physical invasion of a sexual nature by inserting his penis in Ms. Daily's vagina.

157. Defendant Lara did this under coercive conditions because this physical intrusion or invasion took place while he was a correctional officer and Ms. Daily was incarcerated at Logan.

158. As a result of Defendant Lara's wrongful conduct, Ms. Daily's rights were violated and she experienced injuries, including physical and psychological injuries and severe emotional distress.

COUNT VIII
**WILLFUL AND WANTON CONDUCT AGAINST DEFENDANT BAKER,
DEFENDANT HUGHES, DEFENDANT HAMMERS, DEFENDANT NOTTINGHAM,
WARDEN DEFENDANTS, PREA COMPLIANCE MANAGER DEFENDANTS, PREA
RETALIATION MONITOR DEFENDANT, PREA INCIDENT REVIEW TEAM
DEFENDANTS, AND INTERNAL AFFAIRS OFFICER DEFENDANTS**

159. Ms. Daily realleges each paragraph of this complaint as if fully set forth in this count.

160. Defendants' actions were willful and wanton and demonstrated an utter indifference to the safety of Ms. Daily and other prisoners. Defendants were aware of or

deliberately indifferent to the fact that their conduct posed a risk to Ms. Daily's safety and recklessly disregarded that risk.

161. As a direct and proximate result of Defendant Baker, Defendant Hughes, Defendant Hammers, Defendant Nottingham, the Warden Defendants, PREA Compliance Manager Defendants, PREA Retaliation Monitor Defendant, PREA Incident Review Team Defendants, and Internal Affairs Officer Defendants' willful and wanton misconduct, Ms. Daily suffered injuries, including physical and psychological injuries and severe emotional distress.

COUNT IX
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AGAINST DEFENDANT
MICHAEL BAKER**

162. Ms. Daily realleges each paragraph of this complaint as if fully set forth in this count.

163. Defendant Baker engaged in extreme and outrageous conduct by sexually abusing Ms. Daily.

164. Defendant Baker intended to inflict severe emotional distress or knew that there was a high probability that his conduct would cause severe emotional distress. Defendant Baker knew that Ms. Daily suffered from mental illness and was in a vulnerable state due to the recent passing of her father.

165. Defendant Baker's extreme and outrageous conduct caused Ms. Daily severe emotional distress. Due to the distress caused by Defendant Baker's actions, Ms. Daily's mental health suffered. She attempted suicide and was transferred to a mental health treatment facility.

COUNT X
BATTERY AGAINST DEFENDANT MICHAEL BAKER

166. Ms. Daily realleges each paragraph of this complaint as if fully set forth in this count.

167. Defendant Baker intentionally inflicted bodily harm and engaged in offensive bodily contact when he sexually abused Ms. Daily by digitally penetrating her vagina. Defendant Baker's actions were intentional, willful, and wanton.

168. Defendant Baker's actions directly and proximately caused physical and psychological injuries and severe mental distress.

* * *

WHEREFORE, Ms. Daily hereby prays that this Court enter judgment in her favor and against the defendants, awarding compensatory damages, costs and attorneys' fees, and punitive damages against each Defendant in their individual capacities. Ms. Daily also requests the Court grant injunctive relief against Defendants in their official capacities for a transfer out of Logan Correctional Center, and whatever additional relief this Court deems equitable and just.

JURY DEMAND

WHEREFORE, Plaintiff hereby demands a trial by jury pursuant to Federal Rule of Civil Procedure 38(b).

Dated: September 17, 2025

Respectfully submitted,

/s/ Michelle A. Ramirez

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Counsel for Plaintiff Amanda Daily

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by the rules and provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Amanda Daily

(b) County of Residence of First Listed Plaintiff Logan County, Illinois
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
Sidley Austin LLP
One South Dearborn, Chicago, IL 60603
(312) 853-7000

DEFENDANTS

Michael J. Baker, et al.

County of Residence of First Listed Defendant Logan County, Illinois
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|---------------------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

| CONTRACT | TORTS | FORFEITURE/PENALTY | BANKRUPTCY | OTHER STATUTES |
|---|--|---|---|---|
| <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise | PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability | <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions | <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 | <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes |
| REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property | CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input checked="" type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement | | | |

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 U.S.C. § 1983; 42 U.S.C. § 12132; 29 U.S.C. § 794

Brief description of cause:

Plaintiff brings suit for infliction of cruel and unusual punishment in violation the Eighth Amendment.

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
 Original Proceedings. (1) Cases which originate in the United States district courts.
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related cases, if any. If there are related cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.