

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
ROCK ISLAND DIVISION**

YANESSA MARTIN as Administrator for the
Estate of JAKARTA JACKSON, YANESSA
MARTIN, guardian, and next friend of Y.J.,
LUCIA JACKSON, guardian, and next friend of
J.J., and EZEKIEL JACKSON,

Plaintiffs,

v.

THE CITY OF ROCK ISLAND, TIMOTHY
MCCLLOUD, and BRETT TAYLOR,

Defendants.

No.: 4:25-cv-04117-SLD-RLH

FIRST AMENDED COMPLAINT AT LAW

Plaintiffs YANESSA MARTIN as Administrator for the Estate of JAKARTA JACKSON;
YANESSA MARTIN, guardian, and next friend of Y.J., a minor; LUCIA JACKSON, guardian,
and next friend of J.J., a minor; and EZEKIEL JACKSON, through their attorneys, ROMANUCCI
& BLANDIN, LLC, and BEN CRUMP LAW, complaining against Defendants THE CITY OF
ROCK ISLAND, TIMOTHY MCCLLOUD, and BRETT TAYLOR, state as follows:

INTRODUCTION

1. On January 5, 2025, Rock Island Police Department Officer Brett Taylor pulled up
to a parked car behind a home in Rock Island, Illinois. By the time Taylor pulled up, however, the
car’s driver, Jakarta Jackson (“Jakarta” or “Decedent”), had already left the car and was walking
away from it. Taylor commanded Jakarta to stop and “come here.” When Jakarta ignored Taylor
and kept walking away, Taylor began to chase after him and yelled, “*Stop or I will fucking shoot
you, bitch!*” Upon information and belief Taylor did this after learning that Jakarta had an

outstanding warrant for a missed court date and observing his car to have window tint that was darker than the local ordinance allowed.

2. Jakarta responded by running around the house and got back to his car. Taylor, who had begun running after Jakarta, was close behind. When Taylor got to the car, he used a police-issued baton to smash Jakarta's driver-side window. Two small children—Jakarta's daughter and his nephew—could be heard screaming from the back seat in terror, but Taylor did not relent. Taylor opened the door and began to pull Jakarta out while the car began slowly rolling forward, yelling at Jakarta to *"Put it in fucking park or I will fucking shoot you!"*

3. Taylor then jumped on the car's sideboard and continued to grab at Jakarta as the car rolled down a small embankment, hit a traffic sign, spun on the street, and came to a stop. At this point Taylor could see Jakarta, who was directly in front of him. Jakarta's hands were not on the wheel, and the car was not moving. Nevertheless Taylor, who was able to remove himself from the car immediately, pulled out his pistol and shot into the car with two screaming children at least five times, hitting Jakarta in multiple parts of his body.

4. Jakarta's killing fits a pattern within the Rock Island Police Department. Rock Island police routinely escalate encounters with civilians, generating situations in which they use extraordinary violence in encounters that should be resolved without force, or certainly not the force routinely employed. In repeated examples discussed in this complaint, Rock Island police resort to violence when doing so is not called for and in situations where force need not have been used. Indeed, in the wake of Jakarta's killing Rock Island's chief of police, Defendant McCloud, admitted that for years the Rock Island Police Department had failed to "rein in" young officers like Taylor, despite this violence. Far too often, the victims of this violence are Black residents of Rock Island, who are routinely subject to violent assaults by police, like Jakarta's killing.

5. Jakarta Jackson, who was 21, is dead. His daughter Y.J. has lost her father. Y.J., along with Jakarta's nephew J.J. and his brother Ezekiel suffered the terrifying ordeal of Taylor's shooting into the car in their general direction. On behalf of Jakarta's estate and these victims, Plaintiffs bring this complaint to seek redress for this unlawful conduct and the harm it has caused.

JURISDICTION AND VENUE

6. This action is brought pursuant to 42 U.S.C. § 1983 and state law to redress the deprivation under color of law of Jakarta Jackson's rights secured by the United States Constitution and the laws of the State of Illinois.

7. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1367.

8. Venue is proper under 28 U.S.C. § 1391(b)(1) and (b)(2).

PARTIES

9. Plaintiff Yanessa Martin is Administrator for the Estate of Jakarta Jackson. She is also the guardian and next friend of Y.J., who is Jakarta's daughter. At the time of the events giving rise to this complaint, Y.J. was three years old. Ms. Martin is a resident of Illinois.

10. Plaintiff Lucia Jackson is guardian and next friend of J.J., a nephew of Jakarta's. At the time of the events giving rise to this complaint, J.J. was six years old. Ms. Jackson is a resident of Illinois.

11. Plaintiff Ezekiel Jackson was Jakarta Jackson's brother. He is a resident of Illinois.

12. Defendant the City of Rock Island (hereinafter, "Rock Island" or "the City") is a municipal corporation organized and existing under the laws of the State of Illinois and maintains its principal office in the County of Rock Island. The City operates the Rock Island Police Department ("RIPD" or "the Department") which employed Defendants Brett Taylor and Timothy McCloud.

13. Defendant Timothy McCloud (“Defendant McCloud” or McCloud) is the Chief of the RIPD. He is being sued in his individual capacity. At all times relevant, he was acting as the Chief of RIPD with such authority under the color of law.

14. Defendant Brett Taylor (“Defendant Taylor” or “Taylor”) was an RIPD police officer. At the time of Jakarta’s death, Defendant Taylor had been an RIPD officer for approximately three years. Defendant Taylor is sued in his individual capacity. At all times relevant, he was acting as a City of Rock Island police officer with such authority under the color of law.

FACTUAL BACKGROUND

15. On or about January 5, 2025, at around 3:15 p.m., Jakarta was driving a maroon 2013 Ford Fusion around 12th Street and 34th Avenue in Rock Island, Illinois.

16. Jakarta’s brother Ezekiel was in the passenger seat, and in the back seat were Jakarta’s daughter Y.J., nephew J.J., and two adult friends.

17. Defendant Taylor was on stationary patrol on 34th Avenue facing 12th Street when he saw Jakarta’s car driving northbound on 12th Street and then turn on to 34th Avenue.

18. On information and belief, Taylor was able to see the occupants of the driver and passenger seats of Jakarta’s car. Taylor would have seen that both Jakarta and Ezekiel were Black.

19. Approximately one minute later, Taylor began driving around to look for Jakarta’s car.

20. The reason Taylor would give later was that the windows of Jakarta’s car were too dark, and the tint of the windows might be an ordinance violation.

21. Around this time, Taylor ran the plates of Jakarta’s car on his computer.

22. Upon information and belief, when Taylor ran the registration for the car, he learned that Jakarta had an arrest warrant for missing a court date.

23. Upon information and belief, the car registration provided a home address.

24. However, upon information and belief, no RIPD officer had come to the address in an effort to arrest Jakarta on the warrant.

25. Upon information and belief, police had not attempted to arrest Jakarta at his home because the warrant was for a non-violent offense.

26. Upon seeing the arrest warrant on his computer, however, Taylor continued to drive around the City looking for Jakarta's car.

27. Eventually Taylor saw Jakarta's car near the back of a home at 2403 12th Street and pulled up behind the car while activating the lights on his police car.

28. By the time Taylor parked behind Jakarta's car, however, Jakarta had already parked his own car and was walking away from it.

29. Taylor got out of his police car and yelled in Jakarta's direction, "*come here!*"

30. Jakarta, however, continued moving away from the two cars, around the side of the house at the 2403 12th Street address.

31. Taylor then began to run after Jakarta. As he did so, Taylor yelled loudly, "*Stop or I will fucking shoot you bitch!*"

32. Around the same time Taylor also radioed that he was pursuing a suspect. Upon information and belief, Taylor did this to summon other police officers to the scene.

33. At that moment, Jakarta had engaged in no conduct that could reasonably be construed as posing a threat of serious harm or justifying the use of deadly force.

34. After Taylor threatened Jakarta, Jakarta ran around the house and got back into his own car.

35. At that time, two adult friends who had been in the back seat of the car had gotten out and were trying to pull Y.J. and J.J. from the back seat as well.

36. While they were doing this Taylor came up to the car, took a police-issued baton, and struck the driver-side window where Jakarta was sitting. This shattered the window.

37. At this time, small children could be heard screaming from the back seat of the car.

38. Taylor then commanded Jakarta to get out of the car.

39. As Taylor did this, he opened the driver-side door and began to pull Jakarta out of the car.

40. While both of Jakarta's hands were up and he repeatedly asked, "*What did I do? What did I do?*"

41. Taylor replied, "*Put it in fucking park or I will fucking shoot you.*"

42. Jakarta began to drive slowly away.

43. Taylor jumped into the Ford Fusion as it was moving and continued to grab at Jakarta.

44. Jakarta's car rolled over the home's lawn, hit a street sign, slid on the snow, and came to a stop on the street immediately in front of the 2403 12th Street address.

45. The car was pointed down the street.

46. The car was not pointed at Taylor or anyone else in the immediate vicinity.

47. Jakarta's hands were up and visible to Taylor.

48. Jakarta's hands were not on the steering wheel.

49. Taylor, who had been grabbing at Jakarta, was able to remove his body from Jakarta's car immediately.

50. Taylor also was able to aim and operate his gun, which he used to shoot into the car's passenger compartment at least five times.

51. As he fired, Taylor pointed his gun directly in Ezekiel's direction as well.

52. As he fired, Taylor pointed his gun near the two children, Y.J. and J.J., seated in the back of the car.

53. Five of Taylor's bullets struck Jakarta.

54. At no point did Jakarta make verbal threats of harm towards Taylor or anyone else.

55. At no point did Jakarta lunge at, attempt to strike, or strike Taylor.

56. At no point did Jakarta threaten to use a weapon against Taylor or anyone else.

57. At no point did Jakarta make movements to suggest he may have a weapon.

58. At no point did Jakarta grab a weapon, much less threaten an officer with it, or pose a threat of bodily harm or death to any officer or anyone else.

59. An RIPD Incident Report states "nothing of note being located" when a sweep of Jakarta's vehicle was conducted.

60. According to the Report of the Rock Island County State's Attorney's Office regarding the shooting of Jakarta, "[t]here were no weapons discovered on Jackson or inside the Ford Fusion."

61. At approximately 3:30 p.m., an ambulance arrived at the scene.

62. Jakarta Jackson was transported to Trinity West Hospital where he was pronounced dead.

The City's Policies, Practices, and Customs Directly Caused Defendant Taylor's Constitutional Violations

63. Police within the Rock Island Police Department routinely escalate encounters with civilians, creating situations in which they use extraordinary violence in what should be non-

violent encounters. Rock Island Police Department officers resort to violence when doing so is not justified and in situations where force need not have been used and is unreasonable. These practices are so routine and accepted within the Rock Island Police Department that, while unwritten, they have the force of law within the Department. There are numerous examples of this, often involving Black members of the community, including:

- a. RIPD Officer Ramirez flagrantly used excessive force against Derrell Dickerson in 2011, even though Mr. Dickerson was a double leg and arm amputee. Officer Ramirez forcibly took Mr. Dickerson to the ground and pressed his knee on Mr. Dickerson's back, resulting in pain and bruising. Mr. Dickerson filed a lawsuit regarding this event, *Dickerson v. City of Rock Island, et al.*, Case No. 4:13-cv-04003-JEH (C.D. Ill.), which the City settled in 2016.
- b. In 2013, RIPD Officer Cary grabbed Airlyn Powell's neck and waist from behind and tackled her to the ground. After handcuffing Ms. Powell and placing her face down on the ground, Officer Cary then pepper sprayed her. Officer Cary then straddled Ms. Powell's back and forcefully pressed his knee into the middle of her back and his arm into her neck for approximately five minutes. Ms. Powell was treated at the hospital for the injuries that she sustained. Ms. Powell filed a lawsuit regarding this event, which the City settled in 2015. *See Powell v. City of Rock Island, et al.*, Case No. 4:15-cv-04013-SLD-JEH (C.D. Ill.).
- c. In May 2020 RIPD officers handcuffed Anthony Gay, forced him to the ground, kned him in the face, battered him, illegally detained him, and illegally seized his property. Mr. Gay filed a lawsuit against the City, *Gay v. City of Rock Island, et al.*,

Case No. 4:20cv04520-SLD (C.D. Ill.), which the City resolved with a monetary settlement.

- d. On April 1, 2021, RIPD officers shot and killed Deshawn Tatum after he ran from police and jumped into another person's car at a gas station. RIPD officers escalated the situation when they approached the car that Tatum was driving, opened the driver and front passenger's side doors, and hung onto the car as Tatum reversed quickly. The officers created a dangerous situation for themselves and Tatum, which ultimately resulted in Tatum's death.
- e. On February 12, 2025, just over a month after Jakarta's death, Dustin Hook was outside of his own home working on his minibike. At that time, several RIPD officers approached him with guns drawn. Mr. Hook put his hands up immediately to comply, at which time RIPD officers tackled him. RIPD officers then kicked, punched, and kneed Mr. Hook's back. Following the unjustified use of force, Mr. Hook experienced ringing in his ear and terrible pain in his neck and back. Mr. Hook was told by RIPD that same night that this was a case of mistaken identity.
- f. On or about March 28, 2025, RIPD officers used unjustified force on Dyrell McCoy following a domestic disturbance call that Mr. McCoy placed to RIPD. Mr. McCoy sustained fractures to his tibia and fibula bones that resulted in Mr. McCoy requiring surgery to have metal screws, plates and a metal rod placed in his leg as a result of the force used.

64. The City and Defendant Chief McCloud are aware of and deliberately indifferent to this culture of using violence in what should be non-violent police encounters. Among other things:

- a. The City of Rock Island's policies, practices, and customs of failing to properly train, supervise, discipline, monitor, and control its officers, with respect to using force, were the moving force behind the unjustified shooting of Jakarta Jackson.
- b. The foregoing misconduct demonstrates that the City of Rock Island has repeatedly failed to train, supervise, and discipline RIPD officers who have used unreasonable and excessive force against individuals. These failures to train and discipline—in the face of widespread de-facto policies allowing the use of excessive and deadly force—cause, are deliberately indifferent to, and even encourage the use of unconstitutional force by members of RIPD.

65. Moreover, upon information and belief, the actions of Defendant Taylor were taken pursuant to, and were the direct result of, the City of Rock Island's long-standing, widespread, well-settled, entrenched, and well-known policies, practices, and customs of condoning, encouraging, and authorizing the RIPD's pattern of misconduct, including but not limited to:

- a. The use of excessive force against individuals who do not pose a threat to officers or the public that would justify the force used.
- b. The failure to discipline or meaningfully investigate officers who engage in misconduct, thereby fostering a culture of impunity.
- c. The failure to adequately train and supervise officers regarding the constitutional limits of force, de-escalation tactics, and appropriate responses to individuals in distress.

66. With respect to Defendant Taylor in particular, the Rock Island Police Department was on notice that Defendant Taylor, a newer officer, needed more training, supervision, and discipline.

67. In June 2022, Defendant Taylor, who was still completing RIPD's field training program and under the supervision of another officer, tackled arrestee Courtney Vesey to the ground. Defendant Taylor did so without giving commands first, telling Vesey that he was being arrested for aggravated battery, or making any efforts to arrest Vesey in a peaceful way.

68. Upon information and belief, the RIPD did not discipline Defendant Taylor for his failure to give commands or de-escalate the situation with Vesey, offer him remedial training, or provide him with additional supervision.

69. During a public town-hall meeting to address Jakarta's death, Defendant Chief Tim McCloud, referring to Jakarta's shooting, admitted that the "biggest problem that they [RIPD] is having" was that it was failing to "rein in" newer police officers. Those included Taylor, who had been on the force only three years.

Plaintiff's Severe Emotional Trauma and Damages

70. Defendant Taylor's actions caused substantial harm to Jakarta from the time when he was shot until he ultimately passed away. Taylor caused Jakarta to experience pain, fear, and horror for the last moments of his life. The driving force behind Taylor's actions was the policies of Rock Island and Defendant McCloud.

71. Jakarta's daughter, Y.J., who was three years old at the time of the shooting, will grow up without her father because of the actions and omissions of Defendants Taylor, McCloud, and the City of Rock Island. Y.J. lost her father, who went from being a major part of her life to simply being absent. For the rest of her life, she will have to face the world without the love, care, and support that her father would have provided for her.

72. By reason of the death of Jakarta, Jakarta's heir, Y.J., and next of kin have suffered, and in the future will suffer, pecuniary damages as a proximate result of the aforesaid intentional

and/or willful and wanton and/or negligent acts and/or omissions, including the loss of support, comfort, love, affection, protection, and society of Jakarta.

73. As a direct and proximate result of the unimaginable trauma of witnessing Defendant Taylor shoot and kill Jakarta in close proximity, Plaintiffs Y.J., J.J., and Ezekiel Jackson have suffered and continue to suffer injuries and damages, including without limitation great pain of body and mind; shock; severe and permanent emotional distress; physical manifestations of the aforesaid emotional distress; terror; embarrassment; loss of self-esteem; disgrace; humiliation; and loss of enjoyment of life; they have incurred and will continue to incur severe psychological injury and incur expenses for medical and psychological treatment, therapy and counseling.

**COUNT I –
Excessive Force - Fourth Amendment, 42 U.S.C. § 1983
(Estate of Jakarta Jackson as against Defendant Taylor)**

74. Each paragraph of this Complaint is incorporated as if restated fully herein.

75. As described in the preceding paragraphs, Defendant Taylor subjected Jakarta to unreasonable and excessive force in violation of his Fourth Amendment rights.

76. Defendant Taylor's use of deadly force against Jakarta was objectively unreasonable and violated Jakarta's clearly established federal constitutional rights. No reasonable officer in Defendant Taylor's position would have believed that deadly force was justified in this case.

77. Defendant Taylor acted maliciously, willfully, and with evil intent, and/or with reckless or deliberate indifference to Jakarta's federally protected rights.

78. Defendant Taylor's actions were taken under color of state law and within the scope of his employment.

79. Defendant Taylor's actions directly and proximately caused Jakarta's injury and damages, as more fully set forth above.

**COUNT II–
Excessive Force - Fourth Amendment, 42 U.S.C. § 1983
(Estate of Jakarta Jackson as against Defendant McCloud)**

80. Each paragraph of this Complaint is incorporated as if restated fully herein.

81. As described in the preceding paragraphs, Defendant Taylor subjected Jakarta to unreasonable and excessive force in violation of his Fourth Amendment rights.

82. Defendant McCloud knew that officers he supervised had a practice of using excessive force on similar occasions.

83. Defendant McCloud also knew that newer officers on the police force, which included Officer Taylor, had a practice of using excessive force.

84. Upon information and belief, Defendant McCloud also knew that Officer Taylor had a practice of using excessive force.

85. Defendant McCloud approved, condoned, and ignored said practices of using excessive force.

86. As a result, excessive force was used against Jakarta as described in this complaint.

**COUNT III–
Excessive Force - Fourth Amendment, 42 U.S.C. § 1983
(Estate of Jakarta Jackson as against Defendant City of Rock Island)**

87. Each paragraph of this Complaint is incorporated as if restated fully herein.

88. As described in the preceding paragraphs, Defendant Taylor subjected Jakarta to unreasonable and excessive force in violation of his rights under the Fourth Amendment.

89. At the time, the City of Rock Island had a policy or custom of using excessive force against civilians that was persistent and widespread.

90. Policy-making officials for the City of Rock Island were aware of this policy and custom and approved of it or turned a blind eye to it.

91. The City's policy-making officials knew or should have known about the policy and custom by virtue of its widespread nature.

92. The City of Rock Island also failed adequately to train, supervise, and discipline its officers.

93. The City of Rock Island knew that it was highly predictable that constitutional violations like that to which Jakarta was subjected would occur without adequate training, supervision, and discipline of its officers, because there was a pattern of similar constitutional violations, and because it was highly predictable even without a pattern that such a constitutional violation would occur.

94. Rock Island's foregoing customs, and its failure to train, supervise, or discipline its police officers, caused the violation of Jakarta's rights described in this complaint.

**COUNT IV–
Willful and Wanton Conduct, Wrongful Death, 740 ILCS 180/1, et seq.
(Estate of Jakarta Jackson as against Defendants Taylor and City of Rock Island)**

95. Each paragraph of this Complaint is incorporated as if restated fully herein.

96. Plaintiff Yanessa Martin is the duly appointed Administrator of the Estate of Jakarta Jackson, deceased, having been so appointed by the Circuit Court of Rock Island County on March 18, 2025.

97. Plaintiff Yanessa Martin as Administrator of the Estate of Jakarta Jackson, deceased, brings this cause of action pursuant to the provisions of 740 ILCS 180/1, et seq., commonly referred to as the Illinois Wrongful Death Act.

98. On January 5, 2025, and at all relevant times, Defendant City of Rock Island, by and through the acts and/or omissions of its agents and/or employee Defendant Taylor, had a duty, in accordance with the laws of the state of Illinois, to exercise due care in his interactions with the Decedent, and a duty to refrain from willful and wanton conduct in his interactions with the Decedent, which could cause the Decedent harm.

99. On January 5, 2025, and at all relevant times, Defendant City of Rock Island, by and through the acts and/or omissions of its agents and/or employees, had a duty, in accordance with the laws of the state of Illinois, to refrain from retaining officers who posed a risk of harm to the public, including the Decedent.

100. On January 5, 2025, Defendant Taylor, acting as a duly authorized agent of Defendant City of Rock Island, undertook to interfere with and excessively restrain the Decedent.

101. At the time and place alleged herein, Defendant Taylor restrained the Decedent through the use of unreasonable and dangerous physical force without justification.

102. On January 5, 2025, and at all relevant times Defendant City of Rock Island, by and through the acts and/or omissions of its agents and/or employee Defendant Taylor, owed a duty to the Decedent to refrain from willful and wanton misconduct, including the use of excessive force, during the performance of their duties as police officers.

103. At the time and place alleged herein, Defendant City of Rock Island, by and through the acts and/or omissions of its agents and/or employee Defendant Taylor, breached his duty to Decedent by acting in an intentional manner, willful and wanton manner, and/or with utter indifference and conscious disregard for Decedent's health and safety, in one or more of the following respects:

- a. Pointing a gun at Decedent prior to shooting Decedent;

- b. Shooting Decedent;
- c. Shooting Decedent without lawful justification;
- d. Shooting Decedent when a reasonable belief that deadly force was necessary to prevent death or great bodily harm to anyone by Jakarta did not exist;
- e. Continuing to shoot Decedent after he no longer posed a threat of death or serious bodily harm to anyone;
- f. Continuing to shoot Decedent when a reasonable belief that deadly force was necessary to prevent death or great bodily harm to anyone no longer existed;
- g. Discharging a weapon in such a manner as to shoot Decedent;
- h. Discharging a weapon in such a manner as to shoot Decedent without justification;
- i. Discharging a weapon in such a manner as to shoot Decedent in an excessive and unreasonable way;
- j. Using excessive and inappropriate deadly force on Decedent;
- k. Using excessive and inappropriate deadly force without justification;
- l. Using excessive and inappropriate deadly force without lawful justification;
- m. Failing to exercise the proper level of force that was warranted under the circumstances;
- n. Failing to de-escalate;
- o. Failing to properly respond to, de-escalate, and/or defuse the situation without resorting to deadly force;
- p. Failing to use, or allowing to be used, less dangerous means of restraint on Decedent before using and discharging their firearms, as Decedent was not engaged in conduct that would justify such deadly force;

- q. Failing to adhere to a use of force continuum consistent with that used by law enforcement agencies in the state of Illinois; and/or
- r. Was otherwise willful and wanton and/or negligent.

104. In the course of the aforementioned willful and wanton acts and/or omissions, Defendant Taylor was acting within the course and scope of his employment with Defendant City of Rock Island and the Rock Island Police Department, and, thus, Defendant City of Rock Island is liable based on the theory of *respondeat superior*, as pled below in Count VI.

105. As a direct and proximate result of one or more of the aforesaid intentional and/or willful and wanton and/or negligent acts and/or omissions, Decedent sustained injuries which resulted in his January 5, 2025, death.

106. The Decedent is survived by (1) his daughter, Y.J.; (2) his father Earl Jackson; his brother Ezekiel Jackson; (3) his sister Latriece Jackson; and (4) his brother Seville Jackson.

107. By reason of the death of the Decedent, the Decedent's heirs and next of kin have suffered, and in the future will suffer, pecuniary damages as a proximate result of the aforesaid intentional and/or willful and wanton and/or negligent acts and/or omissions, including the loss of support, comfort, love, affection, protection, and society of Decedent.

COUNT-V

Willful and Wanton Conduct, Wrongful Death--Survival, 755 ILCS 5/27-6 (Estate of Jakarta Jackson as against Defendant Taylor and City of Rock Island)

108. Each paragraph of this Complaint is incorporated as if restated fully herein.

109. Plaintiff Yanessa Martin is the duly appointed Administrator of the Estate of Jakarta Jackson, deceased, having been so appointed by the Circuit Court of Rock Island County on March 18, 2025.

110. Plaintiff as Independent Administrator of the Estate of Jakarta Jackson, deceased, brings this cause of action pursuant to the provisions of 755 ILCS 5/27-6, commonly referred to as the Illinois Survival Statute.

111. On January 5, 2025, Defendant Taylor, acting as duly authorized agent of Defendant Rock Island, undertook to interfere with and excessively restrain the Decedent.

112. At the time and place alleged herein, Defendant Taylor restrained the Decedent through the use of unreasonable and dangerous physical force without justification.

113. On January 5, 2025, and at all relevant times, Defendant City of Rock Island, by and through the acts and/or omissions of its agents and/or employee Defendant Taylor, owed a duty to the Decedent to refrain from willful and wanton misconduct, including the use of excessive force, during the performance of their duties as police officers.

114. At the time and place alleged herein, Defendant City of Rock Island, by and through the acts and/or omissions of its agents and/or employee Defendant Taylor, breached its duty to the Decedent by acting in an intentional manner, willful and wanton manner, and/or with utter indifference and conscious disregard for the Decedent's health and safety, in one or more of the following respects:

- a. Pointing a gun at Jakarta prior to shooting Decedent;
- b. Shooting Decedent;
- c. Shooting Jakarta without lawful justification;
- d. Shooting Decedent when a reasonable belief that deadly force was necessary to prevent death or great bodily harm to anyone by Jakarta did not exist;
- e. Continuing to shoot Decedent after he no longer posed a threat of death or serious bodily harm to anyone;

- f. Continuing to shoot Decedent when a reasonable belief that deadly force was necessary to prevent death or great bodily harm to anyone no longer existed;
 - g. Discharging a weapon in such a manner as to shoot Decedent;
 - h. Discharging a weapon in such a manner as to shoot Decedent without justification;
 - i. Discharging a weapon in such a manner as to shoot Jakarta in an excessive and unreasonable way;
 - j. Using excessive and inappropriate deadly force on Decedent;
 - k. Using excessive and inappropriate deadly force without justification;
 - l. Using excessive and inappropriate deadly force without lawful justification;
 - m. Failing to exercise the proper level of force that was warranted under the circumstances;
 - n. Failing to de-escalate;
 - o. Failing to properly respond to, de-escalate, and/or defuse the situation without resorting to deadly force;
 - p. Failing to use, or allowing to be used, less dangerous means of restraint on Decedent before using and discharging their firearms, as Decedent was not engaged in conduct that would justify such deadly force;
 - q. Failing to adhere to a use of force continuum consistent with that used by law enforcement agencies in the state of Illinois; and/or
 - r. Was otherwise willful and wanton and/or negligent.
115. In the course of the aforementioned willful and wanton acts and/or omissions, Defendant Taylor was acting within the course and scope of his employment with Defendant City of Rock Island and the Rock Island Police Department, and, thus,

Defendant City of Rock Island is liable based on the theory of *respondeat superior*, as pled in Count VI.

116. As a direct and proximate result of one or more of the aforesaid intentional and/or willful and wanton and/or negligent acts and/or omissions, the Decedent sustained injuries of a personal and pecuniary nature prior to this death, and, had he survived, he would have been entitled to bring this action for damages, including, without limitation, (a) physical and emotional injuries, (b) past medical expenses, (c) conscious pain and suffering, (d) disability, (e) disfigurement, (f) pain and suffering, (g) emotional trauma, and (h) loss of chance of survival, and this action has survived him pursuant to the provisions of 755 ILCS 5/27-6.

COUNT VI–
Respondeat Superior
(Estate of Jakarta Jackson as against Defendant City of Rock Island)

117. Each paragraph of this Complaint is incorporated as if restated fully herein.

118. At all relevant times, an employer/employee relationship existed between Defendant City of Rock Island and Defendant Taylor, given the latter's designation and role as a duly appointed City of Rock Island and Rock Island Police Department employee.

119. At all relevant times, Defendant City of Rock Island controlled or had the right to control the conduct of Defendant Taylor.

120. At all relevant times, the acts of Defendant Taylor described in the claims above were committed within the scope of his employment as a duly appointed City of Rock Island and Rock Island Police Department employee – particularly, in light of the following:

- a. Defendant Taylor's conduct was of a kind he was employed to perform or reasonably could be said to have been contemplated as part of his employment as a duly appointed City of Rock Island and Rock Island Police Department employee;

- b. Defendant Taylor’s conduct occurred substantially within the authorized time and space limits of his employment as duly appointed City of Rock Island and Rock Island Police Department employee; and
- c. Defendant Taylor’s conduct was motivated, at least in part, by a purpose to serve his employer, as a duly appointed City of Rock Island and Rock Island Police Department employee.

121. Defendant City of Rock Island is, therefore, liable for the actions of Defendant Taylor, as a duly appointed City of Rock Island and Rock Island Police Department employee, in accordance with the doctrine of *respondeat superior*.

**COUNT VII–
Indemnification Claim, 745 ILCS 10/9-102
(Estate of Jakarta Jackson Against Defendant City of Rock Island)**

122. Each paragraph of this Complaint is incorporated as if restated fully herein.

123. Under Illinois law, local public entities are “empowered and directed to pay any tort judgment [...] for compensatory damages (and may pay any associated attorney’s fees and costs) for which it or an employee while acting within the scope of his employment is liable[.]” *See* 745 ILCS 10/9-102.

124. At all relevant times, Defendant Taylor served as a duly appointed City of Rock Island and Rock Island Police Department employee and acted under the color of law and in his official capacity as a sworn law enforcement officer.

125. At all relevant times, the acts of Defendant Taylor described in the claims above were committed within the scope of his employment as a duly appointed City of Rock Island and Rock Island Police Department employee.

126. Defendant City of Rock Island is, therefore, liable for any tort judgments for compensatory damages in this case arising from the actions of Defendant Taylor.

**COUNT VIII–
Intentional Infliction of Emotional Distress
(Plaintiff Yanessa Martin, guardian, and next friend of Y.J. as against Defendant Taylor)**

127. Each paragraph of this Complaint is incorporated as if restated fully herein.

128. Defendant Taylor intended to inflict emotional distress or should have known that emotional distress was likely the result of Defendant Taylor’s conduct.

129. Defendant Taylor’s conduct was extreme and dangerous.

130. Defendant Taylor’s conduct caused severe emotional distress to Y.J., as described above.

**COUNT IX–
Intentional Infliction of Emotional Distress
(Plaintiff Lucia Jackson, guardian, and next friend of J.J. as against Defendant Taylor)**

131. Each paragraph of this Complaint is incorporated as if restated fully herein.

132. Defendant Taylor intended to inflict emotional distress or should have known that emotional distress was likely the result of Defendant Taylor’s conduct.

133. Defendant Taylor’s conduct was extreme and dangerous.

134. Defendant Taylor’s conduct caused severe emotional distress to J.J., as described above.

**COUNT X –
Intentional Infliction of Emotional Distress
(Plaintiff Ezekiel Jackson as against Defendant Taylor)**

135. Each paragraph of this Complaint is incorporated as if restated fully herein.

136. Defendant Taylor intended to inflict emotional distress or should have known that emotional distress was likely the result of Defendant Taylor's conduct.

137. Defendant Taylor's conduct was extreme and dangerous.

138. Defendant Taylor's conduct caused severe emotional distress to Ezekiel Jackson, as described above.

PRAYER FOR RELIEF (All Counts)

WHEREFORE, Plaintiffs respectfully request that the Court enter an order:

- a. Granting judgment in favor of Plaintiffs and against Defendants;
- b. Awarding Plaintiffs compensatory and punitive damages, in a sum to be determined by the jury at trial;
- c. Declaring that Defendants' misconduct as described herein is unlawful;
- d. Awarding Plaintiff Yanessa Martin, as Administrator of Jakarta Jackson's Estate attorneys' fees, costs, and expenses pursuant to 42 U.S.C. § 1988; and
- e. Awarding Plaintiffs such additional relief, whether in law or in equity, as this Court deems just and proper.

JURY DEMAND

Plaintiffs hereby demand a trial by jury pursuant to Federal Rule of Civil Procedure 38(b) on all issues so triable.

DATE: July 18, 2025

Respectfully submitted,

s/Maura D. White

Antonio M. Romanucci
Maura D. White
Stephen H. Weil
Romanucci & Blandin
321 N. Clark St., Suite 900
Chicago, IL 60654
P: (312) 458-1000
E-mail: aromanucci@rblaw.net

BEN CRUMP LAW, PLLC
717 D Street N.W., Suite 310
Washington, D.C. 20004
P: (337) 501-8356
E-mail: ben@bencrump.com

Attorneys for Plaintiffs