

CHARGE

From approximately April 29, 2000 to approximately June, 2003, in Detroit, in the Eastern District of Michigan, Southern Division, defendants WILLIAM MELENDEZ, a/k/a "Robocop," MATTHEW ZANI, a/k/a "Spike," JEFFREY WEISS, a/k/a "Joker," TROY BRADLEY, CHRISTOPHER RUIZ, TIMOTHY GILBERT, MARK DIAZ, JERROD WILLIS, CHRIS GUINN, THOMAS TURKALY, RICARDO VILLARRUEL, JOHN MCLEOD, JOHN WATKINS, DENNY BORG, JAMES COSS, STEPHEN PETROFF, and NICOLE RICH, being police officers with the Detroit Police Department and while acting under color of the laws of the State of Michigan and City of Detroit, did willfully conspire and agree with each other and with various other unindicted co-conspirators both known and unknown to the grand jury to injure, oppress, threaten and intimidate persons in the State of Michigan in the free exercise and enjoyment of the rights secured to them by the Constitution and laws of the United States, those rights including:

- ◆ the right to be free from unreasonable search and seizure by one acting under color of law;
- ◆ the right to be free from the deprivation of liberty without due process of law, which includes the right not to have criminal charges based on fraudulent evidence or false information;
- ◆ the right to be free from the deprivation of property without due process of law by one acting under color of law; and
- ◆ the right to be free from the intentional use of unreasonable force by one acting under color of law.