

porch to investigate.

4. Plaintiff saw a Detroit police officer who was talking to a neighbor in a loud voice and the said officer was walking in an unstable, staggering and drunken manner.

5. When the Detroit police officer, later identified as defendant STEVEN PONGRACZ, saw plaintiff on her porch, he, using foul language, shouted that he wanted to talk to her.

6. When defendant PONGRACZ approached plaintiff, she smelled a strong odor of alcohol about him and he was behaving in a drunken manner so she told him to get away from her because he was drunk.

7. Defendant PONGRACZ grabbed the plaintiff brusquely and said, "Bitch, you're going to jail." Whereupon he arrested the plaintiff.

8. Defendant PONGRACZ had no probable cause to arrest the plaintiff.

9. Defendant PONGRACZ handcuffed plaintiff with her hands behind her and he made the handcuffs so tight that her wrists began to turn purple and to bleed.

10. Defendant PONGRACZ drew his pistol and threatened to blow plaintiff's brains out, thereby causing her great fear for her life and trepidation.

11. Defendant PONGRACZ then took plaintiff to the police car, brutally threw her in the back seat causing her to strike her head on the car. He then slammed the car door on plaintiff's bare foot.

12. While defendant PONGRACZ was brutalizing