

- h. failing to discipline adequately DPD officers who engage in misconduct;
- i. failing to review adequately the basis for arrests and seizures by DPD officers;
- j. failing to develop a mechanism to ensure timely judicial review of warrantless arrests;
- k. failing to develop an adequate fire safety program for DPD holding cells;
- l. failing to conduct adequate medical and mental health screening and failing to provide adequate care for serious medical needs of detainees in DPD holding cells;
- m. failing to ensure DPD officers adequately supervise detainees in DPD holding cells; and
- n. failing to maintain DPD holding cells in a sanitary manner.

CAUSE OF ACTION

11. Through the actions described in paragraphs 6-10 above, the defendants have engaged in and continue to engage in a pattern or practice of conduct by DPD officers that deprives persons of rights, privileges, or immunities secured or protected by the Constitution (including the Fourth and Fourteenth Amendments) or the laws of the United States, in violation of 42