

seizures and warrantless arrests and secure timely judicial review of such arrests; to protect detainees from undue risks of harm; and to implement effective systems to ensure that management controls adopted by the Detroit Police Department are properly carried out. Accordingly, the United States seeks a judgment granting injunctive and declaratory relief for the defendants' violations of law.

The United States of America alleges:

DEFENDANTS

1. The Defendant City of Detroit ("City") is a chartered municipal corporation in the State of Michigan.

2. The Defendant Detroit Police Department ("DPD") is a law enforcement agency operated by the City.

JURISDICTION AND VENUE

3. This Court has jurisdiction of this action under 28 U.S.C. §§ 1331 and 1345.

4. The United States is authorized to initiate this action pursuant to 42 U.S.C. § 14141.

5. Venue is proper in the Eastern District of Michigan pursuant to 28 U.S.C. § 1391, as the defendants reside in and the claims arose in the Eastern District of Michigan.

FACTUAL ALLEGATIONS

6. The defendants, through their acts or omissions, have