

before midnight, two Chicago police officers entered the apartment and shot and killed one of the persons who was at that party, a man named Jose Villareal.

7. After the shooting, at the direction of defendant Swain, plaintiffs were subjected to a custodial arrest and transported to the 25th district police station.
8. At the time he ordered that plaintiffs be arrested and transported to the police station, Swain knew that none of the plaintiffs had committed an offense or was otherwise subject to arrest.
9. Swain ordered that plaintiffs be arrested and brought into the police station for questioning.
10. Defendant Gallet was present at the police station on September 28, 1988 and supervised the investigation into the death of Jose Villareal.
11. In the course of this investigation and with the personal involvement of defendant Gallet, plaintiffs were placed into a locked room and subjected to custodial interrogation.
12. The investigative detention of plaintiffs was undertaken in accordance with the custom and practice of the police department of the City of Chicago in investigating serious crimes.
13. Plaintiffs remained in police custody until about 7:00 a.m. on September 28, 1986 when they were permitted to leave.
14. As the direct and proximate result of the municipal policy and of defendants' wrongdoing, each plaintiff was deprived of her liberty,

embarrassed, humiliated, upset and subjected to severe emotional distress.

15. Each plaintiff hereby demands trial by jury.

WHEREFORE each plaintiff requests that judgment be entered in her favor and against defendants, jointly and severally, in an amount in excess of fifteen thousand dollars as compensatory damages and against the individual defendants in an amount in excess of fifteen thousand dollars as punitive damages.

Kenneth N. Flaxman
Elizabeth Dale
53 West Jackson Boulevard
Suite 1315
Chicago, Illinois 60604
(312) 431-0082
Attorneys for Plaintiff