

## II.

### JURISDICTION AND VENUE

3. Jurisdiction stems from the Civil Rights Act of 1964, 42 U.S.C. §2000e-16 et seq., 28 U.S.C. §§ 1331, 1337, 1343, 1345 and 2401(a), which grant federal district courts jurisdiction over actions alleging unlawful and discriminatory employment practices by governmental agencies and provides for judicial review of cases involving race and/or retaliation. State courts have the inherent authority, and are competent, to adjudicate federal claims. Thus, the courts of the State of Indiana have concurrent jurisdiction to hear Title VII claims. *Yellow Freight Syst. v. Donnelly*, 494 U.S. 820 (1990). The unlawful practices alleged in this complaint occurred in the Saint Joseph County, which is situated in the Northern District of Indiana.

## III.

### PLAINTIFF

4. Plaintiff, SGT. NATHAN CANNON, is a citizen of the United States who has been employed as an officer in THE DEPARTMENT, in South Bend, Indiana for over 30 years, and employed as Detective in the South Bend Police Department's Detective Bureau for over 15 years. Plaintiff has held the rank of Sergeant for over 20 years. His performance was rated satisfactory or better, at all times material to this action.

## IV.

### DEFENDANTS

5. Defendant, former South Bend chief of Police, RONALD TEACHMAN, was the head of an executive agency (THE DEPARTMENT) within the meaning of the Civil Service Reform Act, 5 U.S.C. 1065 and the Civil Rights Act, as amended, 42 U.S.C. 2000e-16. RONALD