

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

UNITED STATES DISTRICT COURT

for the  
Middle District of Georgia  
Valdosta Division

Filed 9:55 A M  
6/20/2019  
[Signature]  
DEPUTY CLERK U.S. DISTRICT COURT  
MIDDLE DISTRICT OF GEORGIA

Sydarius Reynolds, pro se

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

City of Adel, Georgia, Taylor Greene, Chad Castleberry, and John Doe

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Case No.

unknown 7:19-cv-91

(to be filled in by the Clerk's Office)

Jury Trial: (check one)  Yes  No

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS  
(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

**I. The Parties to This Complaint**

**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Sydarius Reynolds		
Address	370 East Dixie Lane		
	Dixie	Georgia	31629
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Brooks		
Telephone Number	229-292-0343		
E-Mail Address			

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	Chad Castleberry		
Job or Title <i>(if known)</i>	Chief of Police		
Address	204 East Third St.		
	Adel	Georgia	31620
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Cook		
Telephone Number	229-896-2224		
E-Mail Address <i>(if known)</i>	unknown		
	<input checked="" type="checkbox"/> Individual capacity <input type="checkbox"/> Official capacity		

Defendant No. 2

Name	Taylor Greene		
Job or Title <i>(if known)</i>	Police Officer badge 406		
Address	204 East Third St.		
	Adel	Georgia	31620
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Cook		
Telephone Number	229-896-2224		
E-Mail Address <i>(if known)</i>	unknown		
	<input checked="" type="checkbox"/> Individual capacity <input type="checkbox"/> Official capacity		

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**Defendant No. 3**

Name  
 Job or Title *(if known)*  
 Address  
  
 County  
 Telephone Number  
 E-Mail Address *(if known)*

City of Adel, Georgia		
Municipal		
204 East Third St.		
Adel	Ga	31620
<i>City</i>	<i>State</i>	<i>Zip Code</i>
Cook		
229-896-2224		

Individual capacity     Official capacity

**Defendant No. 4**

Name  
 Job or Title *(if known)*  
 Address  
  
 County  
 Telephone Number  
 E-Mail Address *(if known)*

John Doe		
Police Officer badge number 404		
204 East Third St.		
Adel	Georgia	31620
<i>City</i>	<i>State</i>	<i>Zip Code</i>
Cook		
229-896-2224		
unknown		

Individual capacity     Official capacity

**II. Basis for Jurisdiction**

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against *(check all that apply)*:

- Federal officials (a *Bivens* claim)
- State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

1) City of Adel, Georgia, (2) Chad Castleberry, (3) Taylor Greene, (4) John Doe 404 badge number- all deprived Plaintiffs of his rights to be free from:  
COUNT I- fourth amendment unreasonable seizure, under state and federal law  
COUNT II- Unlawful/Illegal stops, under state and federal law  
COUNT III- Unlawful/Illegal Detentions, under state and federal law  
COUNT IV- falsifying a police report, without probable cause, under Georgia Uniform Traffic Citation, Summons and Accusation, under state and federal law  
COUNT V- intentional and negligent infliction of emotional distress, under state law  
COUNT VI- failure to train and supervise, under state and federal law  
COUNT VII- City of Adel, Georgia Indemnification claim, under state law  
COUNT VIII- negligent hiring, retention, and training, under state law  
COUNT IX- 42 U.S.C.1983

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

NONE

D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

1. City of Adel, Georgia- failed to train and supervise as a policy makers, the proper management of their subordinates to ensure they follow correct policies within their duties by showing a deliberate indifferent on the proper procedure that includes false statements in police reports, without probable cause, depriving Plaintiff right to be free from unreasonable seizure, unlawful/illegal detention, unlawful/illegal stops, under the fourth and fourteenth amendment.  
2. Chad Castleberry- knowingly and intentionally, failed to supervise his subordinate by not overseeing the handling of false statements in police reports files, without probable cause, depriving Plaintiffs right to be free from unreasonable seizure and unlawful/illegal detention, under the fourth and fourteenth amendment.  
3. Taylor Greene- knowingly and intentionally, initiated and instituted an improper stop that resulting in an unlawful/illegal detention based on false statements in his police reports for an unreasonable seizure, depriving Plaintiff of his fourth and fourteenth amendment rights  
4. John Doe badge number 404- knowingly and intentionally, initiated and instituted an improper stop that resulting in an unlawful/illegal detention based on false statements in their police reports for an unreasonable seizure, depriving Plaintiff of his fourth and fourteenth amendment rights.

### III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

In Adel, Georgia

B. What date and approximate time did the events giving rise to your claim(s) occur?

On April 11, 2019, at approximately 14:43 p.m.

C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

1) On April 11, 2019, I was falsely issue an traffic ticket for a state law violation. As stated Briefly, I was traveling on West Fourth Street in the City of Adel, while approaching the intersection on North Burwell Avenue, there I made a complete stop at the stop sign while my passenger was looking for directions on his GPS. Suddenly, I was bluelighted by Officer Taylor Greene, whom said I was texting or talking. I advised Officer Greene that I was not texting or talking and that he could review my timeline in my call logs, but Officer Greene denied my request and stated that, he did not observe the incident or events, but instead took the observation of Officer John Doe badge number 404, who also incorrectly observed me texting or talking from inside my vehicle with tinted windows.

**IV. Injuries**

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

NONE

**V. Relief**

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Plaintiff's request that the court award compensation, punitive, and general damages in the amount of \$100,000

Plaintiffs request that the Court award any relief appropriate and just from all defendants in this case.

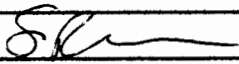
**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

Signature of Plaintiff    
 Printed Name of Plaintiff

**B. For Attorneys**

Date of signing:

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**Signature of Attornev**

**Printed Name of Attornev**

**Bar Number**

**Name of Law Firm**

**Address**


*City*

*State*

*Zip Code*

**Telephone Number**

**E-mail Address**
