FILED
U.S. DISTRICT COURT
BRUNSWICK DIV.
2026 MAR -4 P 12:48
CLERK KJM
SO. DIST. OF GA.

FORM TO BE USED BY PRISONERS IN FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983
in the UNITED STATES DISTRICT COURT for the SOUTHERN DISTRICT of GEORGIA

2:26cv21

Sean Christopher Thomas
GDC# 157496 Jenkins Correctional
3404 Kent Farm Rd.
Millen, Ga. 30442
(Enter above full name of plaintiff or plaintiffs)

v.

Appling County Sheriff Office
Jeff Evans, Captain
Mark Varnadore, Inv.
(Enter above full name of defendant or defendants)

I. Previous lawsuits

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action? Yes ____ No ✓

If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiffs: N/A

Defendants: N/A

2. Court (if federal court, name the district; if state court, name the county):

N/A

3. Docket number: N/A

4. Name of judge assigned to case: N/A

SHIELDS OF SHAME

5. Disposition
(for example, was the case dismissed? appealed? is it still pending?):

N/A

6. Approximate date of filing lawsuit: N/A

7. Approximate date of disposition: N/A

8. Were you allowed to proceed *in forma pauperis* (without prepayment of fees)? Yes ____ No ✓

B. While incarcerated or detained in any facility, have you brought any lawsuits in federal court which deal with facts other than those involved in this action?
Yes ____ No ✓

If your answer to B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to previous lawsuit:

Plaintiffs: N/A

Defendants: N/A

2. Court (name the district):

N/A

3. Docket number: N/A

4. Name of judge assigned to case: N/A

5. Disposition
(for example, was the case dismissed? appealed? is it still pending?):

N/A

6. Approximate date of filing lawsuit: N/A

SHIELDS OF SHAME

7. Approximate date of disposition: N/A

8. Were you allowed to proceed *in forma pauperis* (without prepayment of fees)? Yes ____ No ✓

C. As to any lawsuit filed in federal court where you were allowed to proceed *in forma pauperis*, was any suit dismissed on the ground that it was frivolous, malicious, or failed to state a claim? Yes ____ No ✓

1. If your answer to C is yes, name the court and docket number for each case:

N/A N/A

II. Place of present confinement: Jenkins Correctional Facility

A. Is there a prisoner grievance procedure in this institution? Yes ✓ No ____

B. Did you present the facts relating to your complaint to the appropriate grievance committee? Yes ____ No ✓

C. If your answer to B is yes:

1. What steps did you take? N/A This matter Does Not involve Georgia Department of Corrections, Current Place of Housing

2. What was the result? N/A

SHIELDS OF SHAME

3. Did you appeal any adverse decision to the highest level possible in the administrative procedure? Yes ___ No ✓

If yes, what was the result? N/A

D. If you did not utilize the prison grievance procedure, explain why not: This matter does not involve the Georgia Department of Correction).

III. Parties

(In Item A below, list your name as plaintiff and current address. Provide the name and address of any additional plaintiffs on an attached sheet.)

A. Name of plaintiff: Sean C. Thomas - 757496
Address: Jenkins Correctional Facility
3404 Kent Farm Dr.
Millen, Ga. 30442

(In Item B below, list the defendant's full name, position, place of employment, and current address. Provide the same information for any additional defendants in Item C below.)

B. Name of defendant: Jeff Evans, Bdg. No. 103, Cpt.
Position: Captain
Place of employment: Appling County Sheriff Department
Current address: 560 Barnes St. Ste. B
Baxley Ga. 31513

C. Additional defendants: Mark Varnadore, Bdg. No. 152, INV.
Appling County Sheriff Department
560 Barnes St. Ste. B
Baxley, Ga. 31513

SHIELDS OF SHAME

IV. Statement of Claim

State here as briefly as possible the FACTS in your case. Describe how each defendant is personally involved in the depriving you of your rights. You must include relevant times, dates, places, and names of witnesses. DO NOT GIVE LEGAL ARGUMENTS OR CITE ANY CASES OR STATUTES. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

On July 31, 2020 approx. 10:19 A.M. Captain Jeff Evans bdg. # 103 and Investigator Mark Varnadore bdg. # 152 of Appling County Sheriff's Office, Baxley Georgia 31513/ arrived at 129 Kersey Street, this incident was video and audio recorded by Body cam device of Inv. M. Varnadore and it depicts the actual occurence of how entry was obtained by these two officers and that is what Sean thomas states is illegal in this claim and violates his fourth and fourteenth Amend. to U.S. Const.

The entry of 129 Kersey St. by Jeff Evans and Mark Varnadore on the morning of July 31, 2020 was "NOT" supported by

1. A valid search Warrant
2. Permission or Waiver from Sean Thomas
3. Exigent Circumstances
4. No Emergency

This is proven by viewing Exhibit-A- the recording of this incident

SHELDS OF SHAME

TWO. ACSO

Inv. M. Varnadore bdg. 152 of ~~ACSO~~ who filmed or recorded this incident through his Body cam device, but the statement he made in the APPLING CO. SHERIFF's OFFICE - NIBRS INCIDENT REPORT is in direct conflict with the video recording and his account states that:

1. Leah Thomas opened the inner carport door to her home.
2. Leah Thomas relayed to Inv. Varnadore that he may enter home. Is a false statement

Inv. Varnadore knew that on his sworn oath as a Peace Officer the statements made by him were "Not" true, but they were used to justify entering the Thomas residence (without any authorization supported by law) and the video contradicts his account of what transpired, truly explaining and showing exactly how Jeff Evans and himself gained access and entered 129 Kersey St, Baxley GA. July 31, 2020

This entry of the Thomas residence by these Law Enforcement Officers was Illegal and it is proven by there record of this incident

See Exhibit -A-

By presenting irrefutable proof that Jeff Evans violated Clearly Established Law, Due Process Rights of Sean and Leah Thomas on the morning of July 31-2020 approx. 10:19 AM, This evidence is supplied by Inv. Mark Varnadore bdg.# 152 thru the Appling Co. Sheriff's Office

See Exhibits -A- and -B-

SHIELDS OF SHAME

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

1. To determine from the evidence presented if Jeff Evans and Mark Varnadore violated Sean Thomas, Leah Thomas 4th Amendment Right under U.S. Constitution, Art. I., Sec. I., Para. XIII. of GA. Constitution and adjudicate it in the district Court Order of this case.
2. Award to Plaintiff punitive damages against:
(a) Jeff Evans in the amount $3,500,000.00
(b) Mark Varnadore in the amount $3,500,000.00
(c) Issue injunction order to prevent this type of policing within the Appling County Sheriff's Office.
(d) Any such other relief this Court deems just and proper.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 15th day of Sept., 19 2025

Prisoner No. 757496

Sean Thomas
(Signature of Plaintiff)

SHIELDS OF SHAME

Exhibit -B-

APPLING CO. SHERIFF'S OFFICE - NIBRS INCIDENT REPORT

INTERNAL COPY

INITIAL REPORT

Report ID: 20230605122230000007056

AGENCY ORI
GA0010000

CASE NUMBER
20-07-0895-S

CAD NUMBER

Narrative

Type of Narrative	Reporting Officer	Statement Date	Statement Time
Investigators Summary	152 Mark Varnadore		

On 7/31/2020 INV Varnadore was located at 129 Kersey Street in Baxley, Appling County, Georgia. INV Varnadore was located at this specific location for the purpose of assisting in a Narcotics Investigation. INV Varnadore observed, noted, and performed essentially the following during this investigative act.

INV Varnadore met with a female subject identified as Leah Thomas (Thomas is Sean Thomas' spouse), Thomas relayed INV Varnadore may enter her residence. Thomas opened the inner carport door. INV Varnadore observed a white in color Chevrolet Truck bearing GA Tag RDD8404 under the carport. INV Varnadore along with CPT Evans explained to Thomas what was going on. INV Varnadore asked Thomas if she would consent to a search of her residence at 129 Kersey Street along with the white truck under the carport. Thomas relayed she would consent to the search of both. INV Varnadore provided Thomas with an Appling County Sheriff's Office Consent to Search From. INV Varnadore thoroughly explained the consent to search form at approximately 10:19 hours. Thomas signed the form at 10:23 hours consenting to the search of 129 Kersey Street and the 2012 white truck under the carport. INV Varnadore asked Deputy Dupree to sit with Thomas as INVs and Uniformed Deputies searched the residence. INV Varnadore along with INV Gruber searched the rear left bedroom where a bag containing numerous five-dollar bills in US currency was located. INV Varnadore continued to assist in the search of the rest of the residence. INV Varnadore was notified by INV Leggett a large quantity of illegal drugs was located on the dining room table.

INV Varnadore will provide digital copies of the photographs taken during this investigative act to INV Leggett. INV Varnadore will provide the consent to search form to INV Leggett to be placed into this Case File.
INV Varnadore will download his body camera which was activated during this investigative act.

SHIELDS OF SHAME