

PLAINTIFF'S MASTER PACKET FOR CIVIL ACTION

I. FORMAL PRE-LITIGATION DEMAND LETTER

Thurman E. Robinson Jr. 608 W. Almond Street Los Angeles, CA 90220 Phone: 323-540-1855 Email: appsefilepro@gmail.com

Pro Se

December 10, 2025

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED & FIRST-CLASS MAIL

Mark-Anthony Elijah Brown [Last Known Address] [Last Known City, GA ZIP]

Andrea Jones a/k/a Andrea Sutherland [Last Known Address] [Last Known City, GA ZIP]

Gwinnett County Attorney's Office Attn: Michael P. Ludwiczak, County Attorney 75

Langley Drive Lawrenceville, GA 30046

RE: FORMAL PRE-LITIGATION DEMAND FOR SETTLEMENT – \$8,500,000

Claims of Thurman E. Robinson Jr. for Malicious Prosecution, Defamation, Intentional Infliction of Emotional Distress, and Violation of Civil Rights

Dear Mr. Brown, Ms. Jones, and Gwinnett County Counsel:

This letter serves as a formal, non-negotiable demand for settlement of the substantial legal claims held by Thurman E. Robinson Jr. against each of you. These claims arise from a seven-year ordeal of malicious prosecution, a vicious defamation campaign, and gross, systemic violations of his constitutional rights.

As you know, all criminal charges wrongfully initiated against Mr. Robinson in the Gwinnett County State Court (Case Nos. 20-D-02604-S2 & 20-D-02206-2) were dismissed in 2025.

This favorable termination has now paved the way for Mr. Robinson to seek civil redress for the profound and irreversible damages he has suffered.

This letter represents your final opportunity to resolve this matter before litigation is formally commenced. The factual and legal basis for your liability is detailed exhaustively in the Civil Complaint which is part of the litigation packet that follows this letter. The seven years of this ordeal have inflicted staggering and well-documented damages upon Mr. Robinson, including over **\$2,500,000** in economic losses and over **\$5,000,000** in non-economic damages. The willful and malicious conduct of the individual defendants warrants the imposition of significant punitive damages.

DEMAND FOR SETTLEMENT

Accordingly, Mr. Robinson hereby demands a total settlement payment of **\$8,500,000** to resolve all claims against all parties named herein.

This payment must be made in full within **twenty-one (21) days** of the date of this letter. Failure to deliver the settlement funds or reach a binding, written settlement agreement by **December 31, 2025**, will result in the immediate filing of the Civil Complaint in Gwinnett County Superior Court. Once filed, we will aggressively pursue all available remedies, including the full measure of damages outlined above, pre- and post-judgment interest, and attorney's fees recoverable under federal law.

This is a serious matter with severe consequences for all defendants. The evidence of liability is overwhelming, and the damages are substantial.

Govern yourselves accordingly.

Sincerely,

Thurman E. Robinson Jr., *Pro Se*

IN THE SUPERIOR COURT OF GWINNETT COUNTY STATE OF GEORGIA
THURMAN E. ROBINSON JR.,

Plaintiff,

v.

Case No.: [to be assigned by

Clerk]

JURY TRIAL DEMANDED

MARK-ANTHONY ELIJAH BROWN;

ANDREA JONES (a/k/a ANDREA SUTHERLAND);

GWINNETT COUNTY, GEORGIA;

GWINNETT COUNTY PUBLIC DEFENDER'S

OFFICE;

SEAN KANE, in his individual capacity;

THE GWINNETT COUNTY MAGISTRATE

COURT,

in its official capacity;

TAMI BROWN, in her official capacity as

Clerk of the Gwinnett County State Court;

JUDGE SHAWN F. BRATTON, in his official

capacity as Judge of the Gwinnett County State Court;

and DOES 1-10, inclusive,

Defendants.

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II. MOTION AND AFFIDAVIT TO PROCEED IN FORMA PAUPERIS (CIVIL)

COMES NOW, Plaintiff Thurman E. Robinson Jr., and respectfully moves this Court for leave to proceed *in forma pauperis* in this matter without the prepayment of fees, costs, or security therefor, pursuant to O.C.G.A. § 9-15-2. In support of this motion, Plaintiff submits the following affidavit:

POVERTY AFFIDAVIT

I, Thurman E. Robinson Jr., being first duly sworn, depose and state as follows:

1. I am the Plaintiff in the above-styled action.
2. I believe I am entitled to the relief sought in my Complaint, and I make this affidavit in good faith.
3. I am unable to pay the costs of said proceeding or to give security therefor. My current financial situation is one of severe hardship. As a direct result of the malicious prosecution and civil rights violations detailed in my Complaint, my business ventures were destroyed, my professional reputation was ruined, and my ability to earn a living has been severely curtailed for the past seven years. The prolonged legal battle has exhausted all of my financial resources.
4. My current income is insufficient to cover both the necessities of life for myself and the substantial filing fees and court costs associated with commencing this civil action.
5. I therefore respectfully request that the Court issue an order allowing me to proceed with this lawsuit *in forma pauperis*.

Thurman E. Robinson Jr.

Sworn to and subscribed before me this 10th day of December, 2025.

Notary Public My Commission Expires:

III. CIVIL ACTION COMPLAINT

COMES NOW, Plaintiff Thurman E. Robinson Jr. (“Plaintiff” or “Mr. Robinson”), appearing *pro se*, and for his Complaint against Defendants Mark-Anthony Elijah Brown (“Brown”), Andrea Jones (“Jones”), Gwinnett County, Georgia (“Gwinnett County”), the Gwinnett County Public Defender’s Office, Sean Kane, in his individual capacity, the Gwinnett County Magistrate Court, Tami Brown, in her official capacity as Clerk of Court, Judge Shawn F. Bratton, in his official capacity, and DOES 1-10, alleges as follows:

A. INTRODUCTION: A SEVEN-YEAR NIGHTMARE OF MALICE AND NEGLECT

1. This is an action for damages to redress a seven-year campaign of malicious prosecution, systematic defamation, and profound civil rights violations that shattered a man’s life. This lawsuit arises from the ashes of a wrongfully initiated criminal prosecution that was allowed to fester for more than seven years due to the malicious, perjured acts of private individuals and the subsequent gross negligence, deliberate indifference, and systemic failures of Gwinnett County and its agents. What began as a personal vendetta by Defendant Brown, an abusive and manipulative ex-partner, was weaponized through a perversion of the court system. This initial act of malice was then tragically compounded and prolonged by a pattern of inexcusable governmental failure, depriving Mr. Robinson of his liberty, his career, his reputation, his future, and seven years of his life.
2. In 2018, Defendant Brown, with the active, knowing assistance of his mother, Defendant Jones, initiated a baseless criminal proceeding against Mr. Robinson by

maliciously procuring a Temporary Protective Order (TPO) through blatant perjury and then immediately fabricating a violation. This act of calculated deceit set into motion a legal nightmare that would consume nearly a decade of Mr. Robinson’s life. The Gwinnett County judicial system, rather than serving as a check against such abuse, became its engine. The Gwinnett County Magistrate Court first failed Mr. Robinson by denying his own legitimate plea for protection from Brown’s violence. Then, the Gwinnett County Public Defender’s Office, through its agent Sean Kane, provided constitutionally ineffective assistance of counsel, culminating in the complete abandonment of Mr. Robinson without notice of a critical hearing, which directly resulted in the issuance of an illegal bench warrant.

3. For over five years, this illegal warrant hung over Mr. Robinson’s head, effectively making him a fugitive for a crime he did not commit—a crime that was invented out of whole cloth. He was wrongfully arrested, forced to pay a crippling bond, had his driver’s license suspended, and his name was irreparably tarnished. The Gwinnett County State Court and its Clerk’s Office failed to address his repeated, desperate *pro se* pleas for relief, allowing the case to violate Georgia’s two-year statute of limitations for misdemeanors by more than five years and flagrantly violating Mr. Robinson’s fundamental right to a speedy trial. This systemic failure was not an isolated incident but occurred amidst a documented pattern of administrative chaos and misconduct within Gwinnett County’s judicial bodies during that period.
4. While the legal system he was forced to trust failed him at every turn, Defendants Brown and Jones continued their malicious campaign unabated. They systematically disseminated vicious, career-ending lies to Mr. Robinson’s business partners, investors, and professional mentors, falsely branding him a wanted criminal with “several warrants,” a “heavy drug use (coke)” problem, and severe “mental

imbalance.” These defamatory statements, timed for maximum damage, directly caused the collapse of lucrative, multi-million-dollar business ventures and foreclosed invaluable career opportunities at the precise moment Mr. Robinson was poised for massive success.

5. After seven years of relentless, solitary effort, Mr. Robinson finally secured the dismissal of all criminal charges in 2025. But this vindication came at an immeasurable cost. The ordeal derailed his plans to attend law school, a goal he had worked toward his entire life. More devastatingly, the inexcusable seven-year delay caused him to age out of eligibility for his lifelong dream of serving in the United States Military. He has suffered profound, medically documented emotional distress, lost years of his professional life, and incurred substantial financial losses that have left him destitute.
6. This lawsuit seeks to hold all responsible parties accountable for their roles in this seven-year injustice. It seeks justice from the individuals who maliciously started this fire and from the government entities that negligently, recklessly, and with deliberate indifference, poured gasoline on it and allowed it to burn for seven years. Plaintiff seeks compensatory damages for his economic, emotional, and reputational injuries, punitive damages to punish and deter the outrageous and malicious conduct of the individual Defendants, and injunctive relief to correct the systemic failures that enabled this travesty, in a total amount not less than **\$8,500,000**.

B. THE PARTIES

7. **Plaintiff Thurman E. Robinson Jr.** is an individual citizen of the United States and, at all times relevant to the filing of this complaint, a resident of Los Angeles, California. He was a resident of Gwinnett County, Georgia, at the time the events giving rise to this action commenced.

8. **Defendant Mark-Anthony Elijah Brown** is an individual who, upon information and belief, resides in Gwinnett County, Georgia, and may be served at his last known address. He is sued in his individual capacity.
9. **Defendant Andrea Jones (a/k/a Andrea Sutherland)** is an individual who, upon information and belief, resides in Gwinnett County, Georgia, and is the mother of Defendant Brown. She is sued in her individual capacity.
10. **Defendant Gwinnett County, Georgia** is a political subdivision of the State of Georgia, subject to suit in this Court. It is responsible for the policies, customs, and oversight of its departments, including the Public Defender's Office, the Magistrate Court, and the State Court Clerk's Office.
11. **Defendant Gwinnett County Public Defender's Office** is an agency of Gwinnett County responsible for providing legal representation to indigent defendants. It is sued for its systemic failures resulting in the violation of Plaintiff's constitutional rights.
12. **Defendant Sean Kane** is an attorney licensed to practice in the State of Georgia. At all relevant times, he was an employee or agent of the Gwinnett County Public Defender's Office. He is sued in his individual capacity for his gross professional negligence and constitutional failures.
13. **Defendant The Gwinnett County Magistrate Court** is a judicial body of Gwinnett County. It is sued in its official capacity for declaratory and injunctive relief related to its role in the unconstitutional initiation of the proceedings against Plaintiff.
14. **Defendant Tami Brown** is the Clerk of the Gwinnett County State Court and is sued in her official capacity for the systemic failures of her office that contributed to the violation of Plaintiff's due process rights.

15. **Defendant Judge Shawn F. Bratton** is a Judge of the Gwinnett County State Court and is sued in his official capacity for declaratory and injunctive relief only.
16. **Defendants DOES 1-10** are fictitious names of individuals and entities whose identities are not yet known to Plaintiff but who were agents, employees, or co-conspirators of the named Defendants. Plaintiff will amend this Complaint to allege their true names when they are ascertained.

C. JURISDICTION AND VENUE

17. This Court has subject matter jurisdiction over the state law claims, as the conduct giving rise to these claims occurred in Gwinnett County.
18. This Court has concurrent jurisdiction over the federal claims brought under 42 U.S.C. § 1983, alleging violations of the U.S. Constitution.
19. Venue is proper in the Superior Court of Gwinnett County as Gwinnett County is a defendant, the individual defendants reside in Gwinnett County, and the cause of action arose in Gwinnett County.

D. EXHAUSTIVE FACTUAL ALLEGATIONS

1. The Genesis: A Manipulative Relationship and a Violent Assault

20. Plaintiff Thurman Robinson's story is one of profound resilience. Having overcome the immense challenges of growing up in the foster care system, he had, by 2018, established himself as a successful and driven entrepreneur. He was a published author, a real estate investor on the cusp of a major breakout, and a multi-business owner specializing in tax preparation and accounting. His life was a testament to his ambition. In May 2018 alone, he had earned a Master's degree, secured his first fix-and-flip property in Atlanta, and was on a clear trajectory to earn an annual income of approximately \$130,000. He was building the life he had always fought for.

21. Mr. Robinson's relationship with Defendant Mark-Anthony Brown, which began in 2015 and lasted until May 2018, was the antithesis of this success. From the outset, the relationship was characterized by Brown's manipulative and controlling behavior. Brown frequently invoked a facade of a "Jamaican Man" cultural identity as a justification for his unrealistic expectations and aggressive conduct, all while concealing his own identity and personal struggles. This created a volatile and dishonest dynamic in which Mr. Robinson was constantly walking on eggshells.
22. Throughout their three-year relationship, Mr. Robinson provided significant financial and emotional support to Brown. He helped Brown establish a graphic design business, referred numerous clients to him, and purchased a \$2,500 computer to help him complete his college degree at the Art Institute—a degree Brown ultimately failed to obtain. Mr. Robinson also supported Brown through previous legal troubles, including paying for his probation on a marijuana charge.
23. Brown's behavior grew increasingly erratic and aggressive. After Brown was released from probation, his demeanor towards Mr. Robinson became hostile and physically threatening. This culminated in a violent assault where Brown, in a fit of rage, punched Mr. Robinson in the head ten times, stole his bag, trashed his house, and tore the windshield wipers off his car. This was the breaking point. Fearing for his safety, Mr. Robinson ended the relationship and took the responsible step of seeking legal protection.

2. The Weaponization of the Court: A Plea for Help Ignored, A Retaliatory Lie Believed

24. On August 1 and August 10, 2018, Mr. Robinson, the victim of a violent assault, sought a Temporary Protective Order (TPO) against Brown in the Gwinnett County Magistrate Court. He presented evidence of Brown's harassment, controlling behavior, and the recent violent attack. The magistrate, whose identity is sought

through discovery, dismissed Mr. Robinson’s legitimate fears and denied his petition. This was not just a procedural failure; it was a catastrophic error in judgment that empowered an aggressor and set the stage for the malicious prosecution that followed. The magistrate’s failure to take Mr. Robinson’s plea for protection seriously demonstrated a profound lack of concern for his safety and emboldened Brown to escalate his retaliatory campaign.

25. Upon learning of Mr. Robinson’s attempt to secure a TPO, Brown, with the full knowledge and encouragement of his mother, Defendant Jones, immediately retaliated. On or about October 12, 2018, they filed their own petition for a TPO against Mr. Robinson. Their petition was a work of pure fiction, a malicious inversion of reality in which they cast Mr. Robinson, the actual victim, as the aggressor. Brown and Jones knowingly and willfully committed perjury, fabricating stories of harassment and threats to obtain the order. Their motive was not protection but revenge—to punish Mr. Robinson for seeking to escape Brown’s control.
26. The TPO was granted *ex parte*, based solely on the perjured statements of Brown and Jones. This wrongfully obtained order became the legal instrument Brown would use to instigate a criminal prosecution, transforming a private vendetta into a state-sanctioned persecution.

3. The Malicious Act: A Fabricated Violation and a Wrongful Arrest

27. The day the TPO hearing against Mr. Robinson was held, he was not in court. He was a patient at Kaiser Hospital, being treated for alcohol poisoning, and had notified the court of his hospitalization. Despite this, the TPO was granted in his absence.
28. Immediately upon leaving the courthouse, Defendant Brown did not go home. He drove directly to the vicinity of Mr. Robinson’s residence. He positioned himself at a gas station at the corner of Beaver Ruin Road and Steve Reynolds Boulevard—a

location he knew Mr. Robinson would have to pass upon leaving the hospital. This was a calculated ambush.

29. As Mr. Robinson left the hospital, he encountered Brown, who was waiting for him. Unaware that the TPO had been finalized, and seeing his harasser once again encroaching on his personal space, Mr. Robinson began recording Brown's actions on his phone to document the continued harassment for the court. Brown, seeing he was being recorded, immediately called the police and falsely claimed that Mr. Robinson was violating the TPO. He maliciously inverted the situation, portraying Mr. Robinson's attempt to gather evidence of harassment as an act of harassment itself.
30. Based solely on Brown's deliberate and false report, Gwinnett County law enforcement sought and obtained a warrant (No. 18W16290) for Mr. Robinson's arrest for Aggravated Stalking. Mr. Robinson was subsequently arrested and spent two days incarcerated in the Gwinnett County Jail, an experience that was profoundly traumatic and humiliating. He was forced to post a crippling \$15,000 bond to secure his release. The entire criminal prosecution was born from this single act of perjury and malice, instigated without a shred of probable cause.

4. The Campaign of Defamation: The Systematic Destruction of a Career and a Reputation

31. While the fraudulent criminal case was pending, Defendants Brown and Jones launched a parallel campaign to destroy Mr. Robinson's personal and professional life through a systematic campaign of defamation. They contacted his business associates, investors, and mentors to spread vicious lies, intending to isolate him and ruin him financially.

32. In October 2018, they targeted the most critical professional relationship in Mr. Robinson's life: his partnership with Ms. Lorraine Beato, a nationally recognized real estate mentor. Mr. Robinson had invested \$25,000 into a project with Ms. Beato and was featured in a four-page article in Think Realty Magazine in 2019 for his success. He was on a path to significant wealth and recognition.
33. Brown, using his business's Instagram page "dream_visionz," and in direct text communications, contacted Ms. Beato. In a message sent on or about October 16, 2018, Brown, or an agent acting on his behalf, wrote to Ms. Beato: "Goodmorning Lorraine Beato. Your associate Thurman Robinson has several warrants for his arrest from multiple people. Warrant for Criminal trespassing. Warrant for harassing communication. Warrant for violation of restraining order. All is available on gwinnett county courts. Plus a few more from other victims of his heavy drug use and mental imbalance. Please be careful." He continued, "Upon realizing that his drug use (coke) and mental health was not under his control I decided to cut all business ties. Mr. Robinson has cost me thousands of dollars in property damage in retaliation... He uses your name and husbands name a lot and also acts as if he is apart of your business and brand."
34. Every assertion in this message was a malicious falsehood. Mr. Robinson had no valid warrants (only the one based on Brown's lies), does not use illegal drugs, and the portrayal of him as having a "mental imbalance" was a deliberate and stigmatizing distortion. These statements constitute libel and slander *per se* under Georgia law.
35. The impact of this defamatory attack was immediate and catastrophic. Ms. Beato, a respected professional, was alarmed by the false warnings and severed her professional relationship with Mr. Robinson. This resulted in the collapse of their real

estate venture, costing Mr. Robinson hundreds of thousands of dollars in direct and future income and destroying a once-in-a-lifetime mentorship opportunity.

36. Brown and Jones repeated similar defamatory statements to other individuals in Mr. Robinson’s professional and social circles, including his family members, causing widespread reputational harm and leading to the loss of other clients, contracts, and investment opportunities.

5. The Systemic Collapse: Abandonment by Counsel and Judicial Indifference

37. As an indigent defendant, Mr. Robinson was appointed counsel from the Gwinnett County Public Defender’s Office. His appointed attorney, Defendant Sean Kane, provided representation that was not merely ineffective but was a complete constitutional failure amounting to professional malpractice.
38. Mr. Kane’s representation was characterized by a lack of communication and a clear desire to dispose of the case with minimal effort. He attempted to force Mr. Robinson to plead guilty and accept 24 months of probation without ever investigating the merits of the case, listening to Mr. Robinson’s side of the story, or mounting any form of defense. Mr. Robinson refused, insisting on his innocence.
39. In August 2020, to escape the ongoing harassment and pursue new opportunities, Mr. Robinson relocated to Los Angeles, California. He provided his contact information to Mr. Kane. In late 2020, the Gwinnett County State Court scheduled an arraignment for December 1, 2020. This was during the height of the COVID-19 pandemic.
40. Defendant Kane wholly failed in his fundamental duty to notify his client of this critical court date. Mr. Robinson received no call, no letter, no email—no communication whatsoever. Instead of filing a motion for a continuance, Mr. Kane took the unconscionable step of filing a “Defense Counsel Notice of Intent to

Withdraw” on February 8, 2022, after the fact. In his notice, Kane knowingly created the conditions for a failure to appear, falsely stating he was withdrawing because the Defendant had become “hostile, profane, and insulting.” This was a self-serving fabrication to cover his own professional negligence. Mr. Robinson was, in effect, abandoned.

41. Unaware of the hearing, Mr. Robinson did not appear. As a direct result of his counsel’s abandonment and the system’s failure, Judge Shawn F. Bratton issued a bench warrant for his arrest for “Failure to Appear.” This warrant was constitutionally infirm. For the next five years, this illegal warrant rendered him a fugitive.

6. A System Adrift: The Gwinnett County Solicitor’s Office and a Pattern of Misconduct

42. The gross mismanagement of Mr. Robinson’s case did not occur in a vacuum. During this same period, the Gwinnett County Solicitor’s Office, then under the leadership of Brian Whiteside, was plagued by documented dysfunction and misconduct. In 2020, a Gwinnett County judge took the extraordinary step of filing a petition against Solicitor General Whiteside’s office, alleging it had “obstructed the administration of justice.” This reflects a pattern of systemic problems and a disregard for procedural rights that directly impacted countless defendants, including Mr. Robinson.
43. The Solicitor’s Office had a duty to review the merits of Mr. Robinson’s case and recognize its baseless nature. Instead, it allowed a malicious, private dispute to clog the public courts for years, contributing to the violation of the statute of limitations and Mr. Robinson’s speedy trial rights.

7. Seven Years of Delay, a Pro Se Struggle, and Irreparable Prejudice

44. From 2020 to 2025, Mr. Robinson, acting *pro se* from California with limited resources, fought tirelessly to resolve the case. He filed numerous motions to dismiss,

motions to recall the warrant, and letters to the Clerk's Office and the Court, pleading for his case to be heard. His filings clearly laid out the statute of limitations violations, the speedy trial violations, and the lack of notice. His pleas were met with years of silence and inaction from the Gwinnett County State Court and the Clerk's Office, headed by Defendant Tami Brown. This demonstrates a custom or policy of deliberate indifference to the constitutional rights of *pro se* defendants.

45. The prejudice caused by this unconscionable delay is staggering.
 - a. **Lost Career as a Military Officer:** Mr. Robinson had a lifelong ambition to serve in the U.S. Military. The pending criminal charge and the active bench warrant made him ineligible. By the time the case was finally dismissed in 2025, he had aged out of eligibility, permanently destroying this dream.
 - b. **Lost Opportunity for a Legal Education:** Mr. Robinson had been accepted into and planned to attend law school. The financial strain and legal uncertainty created by this case forced him to abandon those plans.
 - c. **Economic Devastation:** Beyond the deals sabotaged by Brown's defamation, the cloud of a criminal warrant prevented Mr. Robinson from obtaining stable employment, costing him years of income. He lost everything he had built, including the \$130,000 annual income he was earning and the \$15,000 bond fee.
 - d. **Severe Emotional and Psychological Harm:** For seven years, Mr. Robinson lived as a marked man. He suffered from severe anxiety, depression, insomnia, and at times, suicidal ideation, as documented in his medical records and prescriptions for mood and depression medications. The emotional toll has been profound and will have lifelong effects.

46. Finally, in August 2025, after years of relentless effort, the Gwinnett County State Court dismissed all charges against Mr. Robinson, providing the favorable termination that is a prerequisite for this action. But this belated justice cannot undo the seven years of damage inflicted upon his life.

E. CAUSES OF ACTION

COUNT I: MALICIOUS PROSECUTION (O.C.G.A. § 51-7-40) (Against Defendants Brown and Jones)

47. Plaintiff realleges and incorporates by reference all preceding paragraphs.
48. Defendants Brown and Jones initiated and continued a criminal prosecution against Plaintiff by filing a knowingly false and perjured petition for a TPO and by subsequently making a knowingly false report to the police, which directly caused the issuance of an arrest warrant and the filing of criminal charges.
49. The prosecution was instituted and carried on without any probable cause. Defendants knew that their allegations were false. The eventual dismissal of the case confirms the absence of probable cause.
50. The prosecution was instituted and carried on with malice. Defendants' primary motive was not to seek justice but to retaliate against, harass, intimidate, and inflict harm upon Plaintiff, using the legal system as a tool for a personal vendetta. Under Georgia law, malice may be inferred from a total lack of probable cause.
51. The prosecution terminated in Plaintiff's favor when all charges were dismissed in August 2025.
52. As a direct result of Defendants' malicious prosecution, Plaintiff suffered immense damages, including loss of liberty, payment of a \$15,000 bond fee, loss of past and future income, severe damage to his reputation, and extreme mental anguish and emotional distress.

COUNT II: DEFAMATION (LIBEL PER SE AND SLANDER PER SE) (Against

Defendants Brown and Jones)

53. Plaintiff realleges and incorporates by reference all preceding paragraphs.
54. Defendants Brown and Jones, acting with actual malice, published numerous false and defamatory statements about Plaintiff to third parties, including the written messages to Ms. Lorraine Beato stating Plaintiff “has several warrants,” engages in “heavy drug use (coke),” and suffers from “mental imbalance.”
55. These statements constitute defamation *per se* under O.C.G.A. § 51-5-4 because they falsely imputed to Plaintiff the commission of crimes and ascribed to him conduct and characteristics incompatible with his profession.
56. The statements were false, published without privilege, and made with actual malice, meaning Defendants knew the statements were false or acted with reckless disregard for their truth. Their intent was to injure Plaintiff’s reputation and interfere with his business relationships.
57. As a direct result, Plaintiff suffered presumed damages to his reputation and specific, quantifiable special damages, including the loss of the business partnership with Ms. Beato, resulting in hundreds of thousands of dollars in economic losses, as well as general damages for humiliation and mental anguish.

COUNT III: INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS (IIED)

(Against Defendants Brown and Jones)

58. Plaintiff realleges and incorporates by reference all preceding paragraphs.
59. The conduct of Defendants Brown and Jones was intentional, reckless, extreme, and outrageous. Their multi-year campaign to destroy Plaintiff’s life by knowingly making false accusations to law enforcement, committing perjury, and spreading vicious lies to his business partners goes far beyond all possible bounds of decency

and must be regarded as atrocious and utterly intolerable in a civilized community. Weaponizing the criminal justice system to settle a personal score is conduct of the most extreme and outrageous nature.

60. There is a direct causal connection between this outrageous conduct and the severe emotional distress suffered by Plaintiff.
61. Plaintiff's emotional distress was, and is, severe. As documented in his medical records, he has suffered from debilitating anxiety, panic attacks, severe depression, insomnia, and suicidal ideation as a direct result of Defendants' actions. This is a profound psychological injury that has fundamentally altered the course of his life.

COUNT IV: VIOLATION OF CIVIL RIGHTS (42 U.S.C. § 1983) (Against Gwinnett County and its Agents)

62. Plaintiff realleges and incorporates by reference all preceding paragraphs.
63. Defendants Gwinnett County, its Public Defender's Office, Sean Kane, the Clerk of Court, and the State Court Judge are persons acting under color of state law.
64. These Defendants, through their policies, customs, and deliberate indifference, deprived Plaintiff of his rights under the Fourth, Sixth, and Fourteenth Amendments to the United States Constitution.
65. **Sixth Amendment (Right to Counsel and Speedy Trial):** Gwinnett County and its Public Defender's Office maintained a policy or custom of failing to adequately supervise appointed counsel and failing to have a system to ensure clients were notified of court dates, resulting in Sean Kane's abandonment of Plaintiff. This led to a complete deprivation of Plaintiff's right to effective assistance of counsel. Furthermore, the County and its judicial officers maintained a custom of allowing cases like Plaintiff's to languish indefinitely, demonstrating deliberate indifference to his Sixth Amendment right to a speedy trial.

66. **Fourteenth Amendment (Due Process):** The combination of the lack of notice, the failure to provide counsel, the failure to rule on pending motions, and the unconscionable seven-year delay constituted a wholesale violation of Plaintiff's right to procedural due process.
67. These constitutional violations were the result of an official policy or a persistent, widespread custom of Gwinnett County and its agencies, sufficient to establish municipal liability under *Monell v. Dep't of Soc. Servs.*, 436 U.S. 658 (1978).

COUNT V: GROSS NEGLIGENCE / PROFESSIONAL MALPRACTICE (Against Gwinnett County, its Officials, and Sean Kane)

68. Plaintiff realleges and incorporates by reference all preceding paragraphs.
69. In the alternative, Defendants Gwinnett County, its officials, and Sean Kane owed a duty to Plaintiff to administer the justice system and provide legal representation in a manner that complies with statutory, ethical, and constitutional mandates.
70. These Defendants breached this duty through a series of acts and omissions so reckless as to amount to a conscious disregard for or indifference to the consequences, including the failure to have a functioning system for notice, the failure to oversee the public defender system, the failure to manage the court's docket, and Sean Kane's individual failure to notify his client of a court date before withdrawing. This breach constitutes gross negligence and professional malpractice.

F. DETAILED BREAKDOWN OF DAMAGES

71. The total demand of **\$8,500,000** is a direct and calculated result of the catastrophic, multi-faceted damages inflicted upon Plaintiff over seven years. It is comprised of the following:
 - a. **Economic Damages (Special Damages): \$2,500,000.** This amount is calculated based on:

- **Lost Past and Future Income:** Loss of the documented \$130,000 per year income trajectory from 2018 to the present, and projected future losses due to career destruction, totaling approximately \$1,000,000.
 - **Lost Business Opportunities:** The specific, documented collapse of the real estate venture with Lorraine Beato and other investment opportunities, valued conservatively at \$500,000.
 - **Lost Military Career Earning Potential:** The loss of a full 20-year military career with pay, benefits, and pension, valued at approximately \$985,000.
 - **Direct Financial Costs:** The non-refundable \$15,000 bond fee paid to secure release from wrongful incarceration.
- b. **Non-Economic Damages (General Damages): \$5,000,000.** This amount is sought to compensate for the profound, intangible, yet devastating harm suffered by Plaintiff, including:
- Seven years (2,555 days) of severe, medically documented emotional distress, including anxiety, depression, and suicidal ideation.
 - The complete and public destruction of his personal and professional reputation.
 - The loss of liberty during his incarceration and the five years he was forced to live as a fugitive under an illegal warrant.
 - The profound psychological trauma of being victimized first by an abuser, and then by the very system meant to protect him.
 - The loss of his life's ambitions and future.
- c. **Punitive Damages: \$1,000,000.** This amount is sought against Defendants Brown and Jones specifically, pursuant to O.C.G.A. § 51-12-5.1, to punish and

deter their willful, malicious, and fraudulent conduct in weaponizing the legal system for a personal vendetta.

G. PRAYER FOR RELIEF

WHEREFORE, Plaintiff Thurman E. Robinson Jr. respectfully prays for judgment against the Defendants as follows:

- A. For **Economic and Special Damages** in an amount to be proven at trial, but no less than **\$2,500,000**.
- B. For **Non-Economic General Damages** in an amount to be proven at trial, but no less than **\$5,000,000**.
- C. For **Punitive Damages** against Defendants Brown and Jones in an amount to be determined at trial, but no less than **\$1,000,000**.
- D. For reasonable **attorney's fees and the costs** of this litigation pursuant to 42 U.S.C. § 1988 and O.C.G.A. § 13-6-11.
- E. For **declaratory and injunctive relief** against Gwinnett County and its officials, ordering them to reform the policies and customs that led to the violation of Plaintiff's rights.
- F. For pre-judgment and post-judgment interest as allowed by law.
- G. For such other and further relief as this Court deems just and proper.

H. JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

Respectfully submitted, this 10th day of December, 2025.

Thurman E. Robinson Jr., Pro Se 608 W. Almond Street Los Angeles, CA 90220 Phone:
323-540-1855 Email: appsefilepro@gmail.com

IV. EXHIBITS IN SUPPORT OF PLAINTIFF'S COMPLAINT

EXHIBIT A: Communications from Mark-Anthony Brown and/or Andrea Jones to Lorraine Beato.

EXHIBIT B: Medical records and prescriptions documenting severe emotional distress.

EXHIBIT C: Evidence of lost business opportunities and income statements from 2018.

EXHIBIT D: Military enlistment eligibility requirements and communications with recruiters.

EXHIBIT E: Copy of criminal case dismissal order.

(Exhibits to be attached by Plaintiff upon filing)

V. PROPOSED ORDER GRANTING IN FORMA PAUPERIS STATUS

IN THE SUPERIOR COURT OF GWINNETT COUNTY STATE OF GEORGIA

THURMAN E. ROBINSON JR., Plaintiff,

v.

Case No.: [to be assigned by

Clerk]

MARK-ANTHONY ELIJAH BROWN; et al.,

Defendants.

Upon consideration of the Plaintiff's Motion and Affidavit to Proceed *In Forma Pauperis*, and it appearing to the Court that the Plaintiff is unable to pay the costs of filing and prosecuting this action, it is hereby ORDERED that the Plaintiff, Thurman E. Robinson Jr., is authorized to commence and prosecute this action without being required to prepay fees or costs or give security therefor.

The Clerk of the Superior Court of Gwinnett County is hereby directed to file the Plaintiff's Complaint and to issue and serve all process therein without cost to the Plaintiff.

SO ORDERED, this _____ day of _____, 2025.

JUDGE, SUPERIOR COURT OF GWINNETT COUNTY

VI. CERTIFICATE OF SERVICE

I, Thurman E. Robinson Jr., hereby certify that on this 10th day of December, 2025, I will cause a true and correct copy of the foregoing **PLAINTIFF'S MASTER PACKET FOR CIVIL ACTION** to be served upon the following Defendants via a duly authorized process server, or as otherwise prescribed by the Georgia Rules of Civil Procedure:

Mark-Anthony Elijah Brown [Last Known Address] [Last Known City, GA ZIP]

Andrea Jones a/k/a Andrea Sutherland [Last Known Address] [Last Known City, GA ZIP]

Sean Kane, Esq. [Last Known Business Address] [City, GA ZIP]

Gwinnett County, Georgia c/o Michael P. Ludwiczak, County Attorney Gwinnett County

Attorney's Office 75 Langley Drive Lawrenceville, GA 30046

Thurman E. Robinson Jr., *Pro Se*