

UNITED STATES DISTRICT COURT
for the
CENTRAL DISTRICT OF ILLINOIS
Springfield Division

LUKE A. THOMAS,

Plaintiff,

-against-

DEVRON OHRN, in his official and individual
capacities;
JUSTIN OLIVER, in his official and individual
capacities;
GWENDOLYN M. THOMAS, in her official and
Individual capacities;
GEORGEANNE OSMER, individually;
JOHN D. OSMER, individually;
CASS COUNTY, ILLINOIS;
MENARD COUNTY, ILLINOIS;
THE EIGHTH JUDICIAL CIRCUIT OF ILLINOIS;
JOHN DOES 1–10, individually and in their official
capacities (as applicable)

Defendants.

Civil Action No. 26-CV-03219

Notice of Filing Supplemental Group
Exhibit OM4

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**NOTICE OF FILING SUPPLEMENTAL GROUP EXHIBIT OM4 IN SUPPORT OF
PLAINTIFF’S FIRST AMENDED COMPLAINT, RENEWED MOTION FOR
TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION, AND
RNEEWED MOTION FOR THE APPOINTMENT OF COUNSEL**

NOW COMES Plaintiff, Luke A. Thomas, pro se, and hereby files the attached
Supplemental Group Exhibit "OM4" in support of his First Amended Complaint (Doc. 33),
Renewed Motion for Temporary Restraining Order and Preliminary Injunction (Doc. 37) and
Renewed Motion for Appointment of Counsel. In support thereof, Plaintiff states as follows:

INDEX OF SUPPLEMENTAL GROUP EXHIBIT "O"

Exhibit	Description	Date
Previously Identified	Mayo Clinic Messages from Plaintiff and between Def. Ohrn and Provider (Provided for ease of reference)	
OM4a	Cass County Sheriff's Office FOIA Response (October 19, 2022)-Excerpt- County Officers—Defendant Ohrn-Sheriff & Death Examiner	October 19, 2022
OM4b	Mayo Clinic Clinical Note (September 14, 2022), documenting Sheriff Ohrn's coordination of "informal" search with the Osmer	September 14, 2022
OM4c	[www.colwellmemorialhome.com/about-us/our-staff] Webpage for Colwell Memorial Home , Beardstown, Illinois, “About Us/Our Staff” Listing for Defendant John D. Osmer.	current
OM4d	Photograph-Establish Employment as Sangamon County Deputy on September 14, 2022	November 1, 2021
OM4e	Excerpts from 55 ILCS 5/3-6001 et seq. (Sheriff duties)	Current
OM4f	Excerpts from 55 ILCS 5/3-3013 (Death Examiner/Coroner duties)	Current

RELEVANCE OF THE EXHIBITS
I. The CCSO Policy Manual [Group Ex M, M-3, filed 7-26-2026] Contains No Policy on Deputization of Private Citizens, Retired Officers, or Officers from Other Jurisdictions

The Cass County Sheriff's Office Policy and Procedure Manual, in effect at the time of the September 12, 2022 seizure, contains **no policy governing:**

1. The deputization of private citizens to assist in law enforcement activities;
2. The deputization of retired officers from any jurisdiction;
3. The use of active officers from other jurisdictions without formal mutual aid agreements;
4. Coordination with officers from other jurisdictions;
5. The chain of command when officers from other jurisdictions are involved; or

6. Jurisdictional limits of officers from other counties.

(Exhibit M, M-3, CCSO Policy Manual)

II. The Mayo Clinic Clinical Note Documents Sheriff Ohrn's Coordination of an "Informal" Search with the Osmers

On September 14, 2022, Sheriff Ohrn informed Mayo Clinic that:

"Sheriff Devron & area local law enforcement (including spouse - Gwen's father, former area sheriff, & Gwen's brother whom is sheriff in a nearby county) continue to search informally as there is personal & professional reasons to help Mr. Thomas & entire family during this time."

(OM4a)

This document establishes:

1. **John D. Osmer (former Cass County Sheriff)** was searching for Plaintiff without any official authority;
2. **John D. Osmer II (Sangamon County Deputy) (OM4d)** was searching for Plaintiff outside his jurisdiction;
3. **Sheriff Ohrn coordinated** with both of them;
4. The search was **"informal"** —meaning no official record, no chain of custody, no accountability;
5. The search was driven by **"personal & professional reasons" (OM4a)**—meaning the Osmers' personal interests, not law enforcement duties.

III. The CCSO Policy Manual Has No Policy on Conflicts of Interest (Exhibit M, M-3)

The CCSO Policy Manual contains **no policy addressing conflicts of interest** involving deputies or the Sheriff himself. This is particularly significant given:

1. Sheriff Ohrn was hired by former Sheriff John D. Osmer;
2. Sheriff Ohrn was endorsed by John D. Osmer in his election;

3. Sheriff Ohrn coordinated with the Osmers during the September 12, 2022 seizure;
4. Sheriff Ohrn is the Cass County Death Examiner (**OM4a**);
5. Sheriff Ohrn told Mayo Clinic Plaintiff had "lost sense of reality" and was "dying from cancer" (**OM4b**)—statements he knew were false.

(Exhibit M, M-3, CCSO Policy Manual; OM4a, FOIA Response; Exhibit OM4b, Mayo Clinic Clinical Note)

IV. Sheriff Ohrn Serves as the Cass County Death Examiner

The FOIA response from the Cass County Sheriff's Office confirms that Sheriff Ohrn serves as the **Cass County Death Examiner**. This is also reflected in the Cass County Directory and the CCSO Policy Manual.

The same person who:

1. Coordinated the search for Plaintiff with the Osmers;
2. Told Mayo Clinic Plaintiff had "lost sense of reality";
3. Told Mayo Clinic Plaintiff was "dying from cancer";
4. Facilitated the seizure of Plaintiff's property;
5. Is the Cass County Death Examiner.

V. The CCSO Policy Manual Has No Policy on Interactions with Persons with Disabilities

The CCSO Policy Manual contains **no policy specifically addressing interactions with persons with disabilities** or vulnerable adults, despite the ADA's requirements. This is particularly significant given:

1. Plaintiff is a Stage III cancer survivor with documented cognitive disabilities;
2. Plaintiff was visibly debilitated (159 pounds, exhausted) on September 12, 2022;
3. Sheriff Ohrn mocked Plaintiff instead of assisting him;

4. Sheriff Ohrn told Mayo Clinic Plaintiff had "lost sense of reality";
5. The Sheriff is the Cass County Death Examiner.

(Exhibit M, M-3, CCSO Policy Manual)

VI. The CCSO Policy Manual Has No Policy on Mental Health Crises

The CCSO Policy Manual contains **no policy addressing mental health crises**, despite the fact that law enforcement officers are frequently called to respond to individuals in mental health distress.

(Exhibit M, M-3, CCSO Policy Manual)

VII. The CCSO Policy Manual Has No Policy on Citizen Criminal Complaints

The CCSO Policy Manual contains **no policy on how to handle citizen criminal complaints**, particularly when the complaint alleges misconduct by a Sheriff's Office employee. On September 14, 2022, Plaintiff attempted to report crimes to Sheriff Ohrn, who refused to take his report.

(Exhibit M, M-3, CCSO Policy Manual)

VIII. Sheriff Ohrn Violated Multiple CCSO Policies

The CCSO Policy Manual contains policies that Sheriff Ohrn violated in his treatment of Plaintiff:

Policy	What It Requires	How It Was Violated
1-4 & 1-11	"Always use legal justification and means for any arrest, search or seizure"	Sheriff Ohrn authorized a warrantless search and seizure without legal justification
1-19	Protect victims of domestic violence; assist with removal of property; provide information about available relief	Sheriff Ohrn failed to protect Plaintiff, facilitated seizure of property, refused to provide information

Policy	What It Requires	How It Was Violated
1-22	Avoid harsh/insolent language; maintain impartiality; treat persons with respect (Exhibit M, M-3, CCSO Policy Manual)	Sheriff Ohrn mocked Plaintiff, was not impartial, treated Plaintiff with disrespect

ARGUMENT: RELEVANCE TO PLAINTIFF'S CLAIMS

I. The "Deputization Gap" Supports Plaintiff's Conspiracy Claim (Count IV)

The absence of any policy governing the deputization of private citizens, retired officers, or officers from other jurisdictions allowed Sheriff Ohrn to coordinate with the Osmers to search for Plaintiff without accountability. The Mayo Clinic clinical note documents that Sheriff Ohrn was coordinating an "informal" search for Plaintiff with John D. Osmer (retired Sheriff) and John D. Osmer II (Sangamon County Deputy). This is direct evidence of the conspiracy alleged in Count IV.

II. The "Deputization Gap" Supports Plaintiff's Monell Claim

Cass County's failure to maintain policies governing the deputization of private citizens, retired officers, and officers from other jurisdictions constitutes deliberate indifference under *Monell v. Dep't of Soc. Servs.*, 436 U.S. 658 (1978). The lack of these policies allowed Sheriff Ohrn to bypass standard procedures, avoid accountability, and act as a private agent for the Osmers. This is a moving force behind the constitutional violations alleged in Plaintiff's First Amended Complaint.

III. The Death Examiner Conflict Supports the "Bad Faith" Exception to Younger Abstention

Sheriff Ohrn's role as the Cass County Death Examiner, combined with his coordination of the search for Plaintiff with the Osmers and his false statements to Mayo Clinic, demonstrates

that the state forum is not merely inadequate—it is actively hostile to Plaintiff's claims. The state forum cannot provide a remedy because the state actors who should be enforcing the law are the same actors who violated Plaintiff's rights.

IV. The Policy Gaps Support Plaintiff's ADA Claim

The absence of policies governing interactions with persons with disabilities, vulnerable adults, and mental health crises demonstrates systemic discrimination and deliberate indifference to the rights of disabled individuals.

CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests that the Court consider the attached Supplemental Group Exhibit "O" in connection with the First Amended Complaint (Doc. 33) the Renewed Motion for Temporary Restraining Order and Preliminary Injunction (Doc. 37), and Renewed Motion for the Appointment of Counsel. The exhibits demonstrate:

1. That the CCSO Policy Manual contains no policy governing the deputization of private citizens, retired officers, or officers from other jurisdictions—a gap that allowed Sheriff Ohrn to coordinate with the Osmer's to search for Plaintiff without accountability;
2. That the Mayo Clinic clinical note documents Sheriff Ohrn's coordination of an "informal" search with John D. Osmer (retired Sheriff) and John D. Osmer II (Sangamon County Deputy)—direct evidence of the conspiracy;
3. That Sheriff Ohrn serves as the Cass County Death Examiner—a chilling conflict given his false statements about Plaintiff's mental state and his coordination with the Osmer's;

4. That the CCSO Policy Manual contains no policy on conflicts of interest, interactions with persons with disabilities, mental health crises, or citizen criminal complaints—evidence of deliberate indifference;
5. That Sheriff Ohrn violated multiple CCSO policies in his treatment of Plaintiff; and
6. That federal intervention is necessary to prevent continuing irreparable harm.

Respectfully submitted,

By: /s/Luke A. Thomas
LUKE A. THOMAS
PLAINTIFF, pro se
Email: thomaslitigation2022@gmail.com
Phone: 309-217-8452
Illinois ARDC No.: 6278591

VERIFICATION

I, Luke A. Thomas, declare under penalty of perjury that the foregoing allegations are true and correct to the best of my knowledge and belief. Furthermore, the attached exhibit is a true and correct copy of the original instrument, varying only by any required redactions or identifiers.

Executed this 6th day of August, 2026

By: /s/Luke A. Thomas
LUKE A. THOMAS
PLAINTIFF, pro se
Email: thomaslitigation2022@gmail.com
Phone: 507-910-1605
Illinois ARDC No.: 6278591

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of August, 2026, I electronically filed the foregoing document with the Clerk of the Court for the United States District Court for the Central District of Illinois using the CM/ECF system, which will provide Notice to the following defendants:

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Dated August 6, 2026

By: /s/Luke A. Thomas

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