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COMMONWEALTH OF KENTUCKY  
BOYLE CIRCUIT COURT  
CIVIL DIVISION  
CIVIL ACTION NO. \_\_\_\_\_

30810

**FILED ELECTRONICALLY**

DEVIN LANGSDORF

PLAINTIFF

VS.

SETH OWENS, In His  
Individual Capacity as a  
Kentucky State Police Trooper

DEFENDANT

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**COMPLAINT**

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**I. PRELIMINARY STATEMENT**

1. On June 6, 2025, Kentucky State Police Trooper Seth Owens unlawfully and brutally assaulted Devin Langsdorf after pulling him over for an alleged traffic infraction. This brutal and unnecessary assault caused Mr. Langsdorf to suffer physical and emotional injuries. Plaintiff brings this state law action to secure fair compensation and to encourage the Defendant and others to refrain from the unnecessary use of unlawful force against civilians who pose no threat in the future.

**II. JURISDICTION AND VENUE**

2. Plaintiff incorporates and adopts the allegations set forth in the preceding paragraphs as if fully set forth herein.
3. The acts complained of herein occurred in Boyle County, Kentucky and therefore, venue is proper, and this Court has subject jurisdiction over this matter.
4. The amount in controversy exceeds this Court’s jurisdictional minimum.

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**III. THE PARTIES**

5. Plaintiff, Devin Langsdorf, (“Plaintiff Langsdorf”), was at all times relevant to this action <sup>30810</sup> a resident of Lancaster, Garrard County Kentucky and asserts his personal claims.
6. Defendant Seth Owens (“Defendant Owens”) was at all times relevant to this action a resident of the Commonwealth of Kentucky and employed as a law enforcement officer by the Kentucky State Police. Defendant is sued in his individual capacity.

**IV. FACTS**

7. Plaintiff incorporates by reference each and every paragraph of this Complaint as though fully set forth herein.
8. On June 6, 2025, Defendant Owens pulled Plaintiff Langsdorf over for allegedly speeding.
9. At the time that he was pulled over, Plaintiff Langsdorf had his three (3) year-old daughter with him in the minivan that he was driving.
10. Dash camera from Defendant Owens’ vehicle reveals that when Defendant Owens’ approached Plaintiff Langsdorf’s vehicle that they engaged in a brief conversation. However, at that time, Defendant Owens’ did not have his body worn camera activated and thus, the conversation cannot be heard.
11. At the end of the conversation, dash camera reveals that Plaintiff Langsdorf provided his driver’s license to Defendant Owens. This initial interaction and conversation lasted approximately twenty-seven (27) seconds in total.
12. Approximately five (5) seconds later, as Defendant Owens is walking back to his vehicle he abruptly turns and aggressively walks back to Plaintiff Langsdorf’s vehicle and immediately opens the driver’s side door to the minivan.

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13. For the next two minutes, dash camera shows Defendant Owens and Plaintiff Langsdorf again engaging in some sort of interaction / conversation. During this <sup>30810</sup> interaction, Defendant Owens reaches into Plaintiff Langsdorf's vehicle more than once and pulls Plaintiff Langsdorf's arm.
14. This interaction / conversation cannot be heard because yet again, Defendant Owens did not have his body worn camera activated.
15. After approximately two (2) minutes, Defendant Owens leaves the driver's side door of Plaintiff Langsdorf's vehicle and returns to the passenger side of his vehicle.
16. Approximately twenty (20) seconds later, Defendant Owens returns to Plaintiff Langsdorf's vehicle, places his state trooper hat on top of the minivan and grabs the left wrist of Plaintiff Langsdorf.
17. At this point, Defendant Owens has activated his body worn camera.
18. When he got back at Plaintiff Langsdorf's vehicle Defendant Owens immediately states to Plaintiff Langsdorf "Get out."
19. Plaintiff Langsdorf calmly tells Defendant Owens that his daughter is sleeping to which Defendant Owens replies "That's fine. Get out."
20. When Plaintiff Langsdorf calmly asked for the reason as to why he must get out of his vehicle, Defendant Owens states "Because I said so." Defendant Owens then yells "The Supreme Court says that you have to if I ask you to."
21. Again, this was nothing more than a simple alleged traffic stop for alleged speeding.
22. Plaintiff Langsdorf then requested that Defendant Owens let go of his arm because he has shoulder issues, however, Defendant Owens refused to let go of his arm.

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23. Fifty-One (51) seconds into this interaction, Plaintiff Langsdorf complies and gets out of his vehicle without a struggle.

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24. In Defendant Owens’ traffic citation that he issued to Plaintiff Langsdorf, he stated that Plaintiff Langsdorf was “belligerent” during the traffic stop. However, Defendant Owens’ body camera video reveals that Plaintiff Langsdorf never once raised his voice at Defendant Owens. Plaintiff Langsdorf remained calm the entire time because his daughter was sleeping in his vehicle.

25. Once he was outside of the vehicle, Defendant Owens orders Plaintiff Langsdorf “to get on the ground” without any justification. The area in which he ordered Plaintiff Langsdorf to “get on the ground” was right in the middle of the exit lane of the highway.

26. Within two (2) seconds of ordering Plaintiff Langsdorf to the ground, Defendant Owens immediately escalated the situation and leg whipped Plaintiff Langsdorf onto the ground in the middle of the exit lane:

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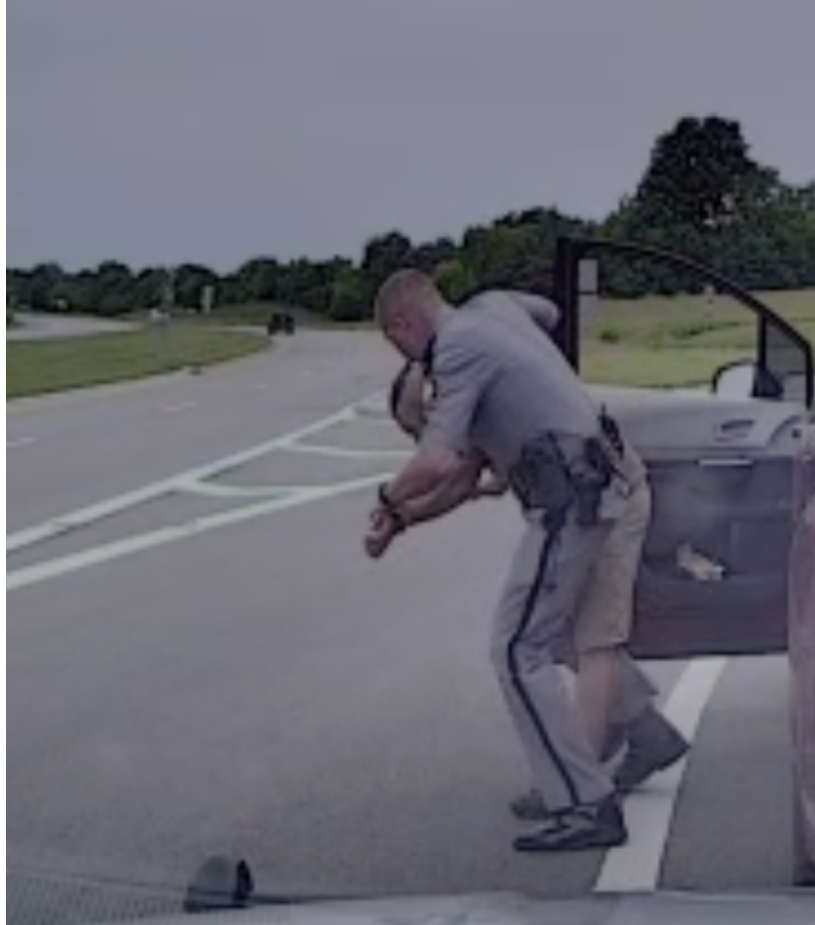
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27. Once Plaintiff Langsdorf was on the ground, Defendant Owens unlawfully struck Plaintiff Langsdorf three (3) time with violent knee kicks into his left rib cage dangerously close to passing traffic in the middle of the exit lane:

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28. Defendant Owens then transitioned and violently struck Plaintiff Langsdorf in his right rib cage four (4) times with knee kicks:



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29. During this violent assault, Plaintiff Langsdorf repeatedly tells Defendant Owens that he cannot put his hands behind his because of his shoulder issues. He also pleads to Defendant Owens that his daughter is in the car and yells for help.

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30. Despite his pleas, Defendant Owens then proceeded to unlawfully punch Plaintiff Langsdorf three (3) times in the shoulder and back area of Plaintiff Langsdorf – again dangerously close to oncoming traffic in the middle of the exit lane:



31. Despite Plaintiff Langsdorf’s shoulder issues and obvious pain that he was in, Defendant Owens then forcibly yanked both of Plaintiff Langsdorf’s arms behind his back and handcuffed him.

32. After violently and unlawfully assaulting Plaintiff Langsdorf, Defendant Owens at Plaintiff Langsdorf against his minivan. Defendant Owens then flippantly threatened that he will have the “Cabinet” come get Plaintiff Langsdorf’s daughter.

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33. As a result of the brutal and unnecessary assault by the Defendant Owens, Plaintiff Langsdorf suffered further injury to his shoulder and body.

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34. Defendant Owens' actions were completely unlawful and unnecessary in response to a simple traffic stop.

35. Defendant Owens' actions were so willful, wanton, malicious and in utter disregard for Plaintiff Langsdorf's rights as to warrant the imposition of punitive damages.

36. No reasonable law enforcement officer could have thought that repeatedly beating an unarmed defenseless man during a traffic stop was lawful under the circumstances.

37. As a direct and proximate result of Defendant Owens' unlawful actions Plaintiff suffered permanent and irreparable harm damages including deprivation of his enjoyment of life, enduring past and future physical and mental pain and suffering, and incurring past and future medical expense.

V. **FIRST CAUSE OF ACTION - ASSAULT AND BATTERY**

38. Plaintiff incorporates by reference each and every paragraph of this Complaint as though fully set forth herein.

39. Defendant Owens intentionally, maliciously, and in bad faith applied and threatened to apply unlawful, and unnecessary physical force against Plaintiff.

40. Said physical contact was unnecessary and excessive and, furthermore, the physical contact was without cause or any legal justification whatsoever.

41. As the proximate result of the assault and battery inflicted upon Plaintiff by Defendant Owens, and/or the failure to stop the unnecessary threat and/or use of force, Plaintiff sustained permanent injuries and damages including punitive damages.

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**VII. SECOND CAUSE OF ACTION –INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

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- 42. Plaintiff incorporates by reference each and every paragraph of this Complaint as though fully set forth herein.
- 43. Defendant Owens inflicted severe emotional distress on Plaintiff.
- 44. Defendant Owens acted intentionally or recklessly when he committed the acts enumerated above.
- 45. Defendant Owens’ conduct was so outrageous and intolerable that it offends the generally accepted standards of decency and morality.
- 46. Defendant Owens’ conduct was a substantial factor in causing Plaintiff’s extreme and severe emotional distress, including punitive damages.

**VII. THIRD CAUSE OF ACTION –NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

- 47. Plaintiff incorporates by reference each and every paragraph of this Complaint as though fully set forth herein.
- 48. Defendant Owens negligently inflicted severe emotional distress on Plaintiff.
- 49. Defendant Owens’ conduct was a substantial factor in causing Plaintiff’s extreme and severe emotional distress.

**VIII. JURY DEMAND**

- 50. Plaintiff hereby demands a trial by jury of all issues triable by a jury.

**IX. PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff, Devin Langsdorf, demands that this Court award him:

- 1. Compensatory damages in an amount to be shown at trial;
- 2. Punitive damages in an amount to be shown at trial;

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- 3. Costs incurred in this action and a reasonable attorney’s fee;
- 4. Prejudgment interest; and
- 5. Such other and further relief as the Court may deem just and proper.

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Respectfully submitted,

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