

NO.

JEFFERSON CIRCUIT COURT
DIVISION _____

ICHIRO VANCE

PLAINTIFF

COMPLAINT**FREEDOM MORTUARY SERVICES, LLC
D/B/A LANKFORD FUNERAL HOME AND FAMILY CENTER
AND
RANDY LANKFORD****DEFENDANTS**

Comes the Plaintiff, Ichiro Vance, by and through counsel, and for his cause of action against the Defendants states as follows:

1. At all times material hereto, the Plaintiff, Ichiro Vance was the son and heir of Jennie Chiba.
2. At the time of her death, Jennie Chiba was a resident of Louisville, Jefferson County, Kentucky. Jennie died intestate on March 5, 2022.
3. At the time of her death and upon referral by the Jefferson County Coroner, Ichiro Vance contracted with the Defendants, Freedom Mortuary Services, LLC d/b/a Lankford Funeral Home and Family Center and Randy Lankford for final death preparations.
4. The Defendant, Freedom Mortuary Services, LLC d/b/a Lankford Funeral Home and Family Center, by and through its agents and/or employees accepted the payment and duty of making final death preparations for Jennie Chiba.
5. The Defendant, Freedom Mortuary Services, LLC d/b/a Lankford Funeral Home and Family Center, by and through its agents and/or employees traveled to Jefferson County, Kentucky to retrieve the body of Jennie Chiba and transport it to its facility in the State of Indiana.

6. Freedom Mortuary Services, LLC d/b/a Lankford Funeral Home and Family Center is a domestic limited liability corporation doing business in the State of Indiana. The business status is currently listed as active with the Indiana Secretary of State, Business Entity Division.

7. The Defendant, Randy Lankford serves as a funeral director at Freedom Mortuary Services, LLC d/b/a Lankford Funeral Home and Family Center located at 3106 Middle Road, Jeffersonville, Indiana 47130.

8. Plaintiff, Ichiro Vance paid in full to the Defendants pursuant to contract for services to be rendered by the Defendants.

9. The Defendants failed to communicate with the Plaintiff as to the whereabouts of his mother's remains.

10. In early July, police performed a search of Lankford Funeral Home and Family Center and discovered more than thirty decomposing bodies and the cremated remains of numerous bodies.

11. Plaintiff is unaware as to the whereabouts of his mother's body and/or remains.

I. COUNT 1 – STATUTORY VIOLATION

12. Plaintiff adopts and incorporates herein by reference all statements made in Paragraphs 1-11 as if fully set forth herein.

13. The Defendants, by and through their agents and/or employees violated KRS 525.120.

14. The Defendant entered into a contract and accepted remuneration for the preparation of a corpse for burial or the burial or cremation of a corpse and then deliberately failed to prepare, bury, or cremate that corpse in accordance with that contract.

15. The Defendants statutory violation creates liability for its abuse of the corpse of Jennie Chiba.

16. As a direct and proximate result of the statutory violation by the Defendants, Plaintiff, Ichiro Vance has sustained significant emotional pain and suffering all as a direct result of the Defendant's abuse of his mother's corpse pursuant to statute.

II. COUNT 2 – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

17. Plaintiff adopts and incorporates herein by reference all statements made in Paragraphs 1-16 as if fully set forth herein.

18. The Defendants conduct in negligently failing to properly dispose of Jennie Chiba's remains was negligent and outrageous.

19. As a direct and proximate result of the Defendants negligent and outrageous conduct, Plaintiff, Ichiro Vance has sustained severe emotional suffering.

III. COUNT 3 – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

20. Plaintiff adopts and incorporates herein by reference all statements made in Paragraphs 1-19 as if fully set forth herein.

21. The Defendants conduct in knowingly accepting remuneration to dispose of the body of Jennie Chiba and deliberately failing to do so has intentionally inflicted severe emotional suffering on the Plaintiff.

IV. COUNT 4 – VIOLATION OF KENTUCKY CONSUMER PROTECTION ACT

22. Plaintiff adopts and incorporates herein by reference all statements made in Paragraphs 1-21 as if fully set forth herein.

23. The Defendants conduct represents clear violations of the Kentucky Consumer Protection Act as the Defendants fraudulently or deceptively schemed to accept remuneration and failed to dispose of the body of Jennie Chiba in accordance with the terms of the contract.

WHEREFORE, the Plaintiff demands judgment against the Defendants in an amount sufficient to establish the jurisdiction of this Court, for his costs herein expended, for attorney fees, for punitive damages and for any and all other just and proper relief to which he may appear entitled.

PLAINTIFF DEMANDS TRIAL BY JURY.

Respectfully submitted,

s/ Jeffrey T. Sampson

Jeffrey T. Sampson
THE SAMPSON LAW FIRM
1154 South Third Street
Louisville, Kentucky 40203
(502) 584-5050
COUNSEL FOR PLAINTIFF