



West Virginia E-Filing Notice

CC-20-2025-C-499

Judge: Stephanie Abraham

To: L. Dante DiTrapano
dditrapano@cldlaw.com

NOTICE OF FILING

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

E.G., Next of Friend v. Donald Lantz

CC-20-2025-C-499

The following complaint was FILED on 4/14/2025 2:55:17 PM

Notice Date: 4/14/2025 2:55:17 PM

Cathy S. Gatson
CLERK OF THE CIRCUIT COURT
Kanawha County
P.O. Box 2351
CHARLESTON, WV 25301

(304) 357-0440

COVER SHEET

E-FILED | 4/14/2025 2:55 PM
CC-20-2025-C-499
Kanawha County Circuit Clerk
Cathy S. Gatson

GENERAL INFORMATION

IN THE CIRCUIT COURT OF KANAWHA COUNTY WEST VIRGINIA

E.G., Next of Friend v. Donald Lantz

First Plaintiff:

☐ Business ☐ Individual
☐ Government ☒ Other

First Defendant:

☐ Business ☒ Individual
☐ Government ☐ Other

Judge:

Stephanie Abraham

COMPLAINT INFORMATION

Case Type: Civil

Complaint Type: Tort

Origin: ☒ Initial Filing ☐ Appeal from Municipal Court ☐ Appeal from Magistrate Court

Jury Trial Requested: ☒ Yes ☐ No **Case will be ready for trial by:** 4/30/2026

Mediation Requested: ☒ Yes ☐ No

Substantial Hardship Requested: ☐ Yes ☒ No

☐ Do you or any of your clients or witnesses in this case require special accommodations due to a disability?

- ☐ Wheelchair accessible hearing room and other facilities
- ☐ Interpreter or other auxiliary aid for the hearing impaired
- ☐ Reader or other auxiliary aid for the visually impaired
- ☐ Spokesperson or other auxiliary aid for the speech impaired
- ☐ Other: _____

☐ I am proceeding without an attorney

☒ I have an attorney: Timothy Houston, 500 RANDOLPH ST 500 Randolph Street, CHARLESTON, WV 25302

SERVED PARTIES

Name: Donald Lantz
Address: c/o Mark Plants, Esq. 320 2nd Ave, South Charleston WV 25303
Days to Answer: 30 **Type of Service:** Filer - Private Process Server

Name: Jeanna Whitefeather
Address: c/o Mark Plants, Esq. 320 2nd Ave, South Charleston WV 25303
Days to Answer: 30 **Type of Service:** Filer - Private Process Server

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

**E.G., as next friend of A.G. and
J.G, minors,**

Plaintiff,

v.

**Civil Action No. _____
Honorable _____**

(TRIAL BY JURY DEMANDED)

**DONALD LANTZ and
JEANNA WHITEFEATHER,**

Defendants.

CIVIL COMPLAINT

COMES NOW Plaintiff E.G., as next friend of A.G. and J.G., minors, by undersigned counsel, Calwell Luce diTrapano PLLC and Salango Law P.L.L.C., and alleges as follows for her Civil Complaint against Defendants Donald Lantz and Jeanna Whitefeather:

Parties

1. Plaintiff E.G. was at all times relevant hereto a citizen of West Virginia and resident of Fayette County, West Virginia.
2. After A.G. and J.G. were subjected to unspeakable acts of abuse and neglect at the hands of Defendants Lantz and Whitefeather, A.G. and J.G. were adopted by E.G. and E.G.'s husband in 2025 in Fayette County, West Virginia.
3. Plaintiff E.G. is a parent and legal guardian of A.G. and J.G.
4. Plaintiff E.G., as well as A.G. and J.G., are identified by their initials due to the sensitive nature of the allegations set forth herein and because A.G. and J.G. are minors.
5. Upon information and belief, Defendant Donald Lantz was at all times relevant hereto a citizen of West Virginia and resident of Kanawha County, West Virginia.

6. Upon information and belief, Defendant Jeanna Whitefeather was at all times relevant hereto a citizen of West Virginia and resident of Kanawha County, West Virginia.

Jurisdiction and Venue

7. Events giving rise to the Complaint took place in Kanawha County, West Virginia, and venue is proper in this Court pursuant to W. Va. Code § 56-1-1.

8. The Court has jurisdiction over the parties and the subject matter.

Factual Allegations

9. A.G. and J.G. were adopted by Defendants Lantz and Whitefeather in 2017 in the State of Minnesota.

10. Defendants moved with A.G. and J.G. to the State of Washington in 2019, and later moved to Kanawha County, West Virginia in May of 2023.

11. A.G. and J.G. experienced shocking and severe physical and emotional abuse and neglect while under the care of the Defendants following their adoption until such time as they were removed from Defendants' custody by authorities in West Virginia.

12. The severe physical and emotional abuse and neglect that Defendants inflicted upon A.G. and J.G. includes, but is not limited to:

- (a) Defendants would deny A.G. and J.G. food and/or water for days at a time;
- (b) Defendants would violently strike A.G. and J.G. if Defendants perceived these defenseless children were not listening to them; and
- (c) Defendants would not permit A.G. and J.G. to sleep inside their house, and instead required these children to sleep outside in a tent or in an outbuilding, whether it be snowing, raining, very cold, or very hot.

13. As a direct and proximate result of the physical and emotional abuse and/or neglect carried out by Defendants against A.G. and J.G., A.G. and J.G. have suffered severe and permanent physical and emotional injuries and damages.

Count I – Outrage / Intentional Infliction of Emotional Distress

14. Plaintiff reincorporates Paragraphs 1 through 13 as if fully stated herein.

15. Defendants intentionally, willfully, purposefully, and recklessly abused A.G. and J.G. (physically and emotionally) causing physical and mental injuries.

16. The conduct of the Defendants described herein was (1) intentional and reckless with knowledge that emotional distress would likely result, (2) severe and outrageous and went beyond all bounds of decency to be tolerated in a civilized community, and (3) the direct and proximate cause of the severe physical and emotional distress endured by A.G. and J.G.

17. As a direct and proximate result of the tortious and outrageous conduct by Defendants, A.G. and J.G. suffered unnecessary and avoidable psychological trauma, severe emotional distress, physical pain and suffering, and permanent injuries.

18. As a direct and proximate result of the unlawful and outrageous conduct by Defendants, A.G. and J.G. have incurred medical bills and will incur medical bills in the future; have been deprived of the enjoyment of life, thereby entitling A.G. and J.G. to an award of actual, consequential and exemplary damages, costs, and reasonable attorney fees, as well as punitive damages.

Count II – Negligence

19. Plaintiff reincorporates Paragraphs 1 through 18 as if fully stated herein.

20. Defendants owed A.G. and J.G. a duty to exercise reasonable care to protect them from foreseeable risks of harm – both physical and emotional.

21. Defendants breached that duty through their repeated neglect of A.G. and J.G.

22. As a direct and proximate result of Defendants' conduct, A.G. and J.G. suffered unnecessary and avoidable psychological trauma, severe emotional distress, physical pain and suffering, and permanent injuries.

23. As a direct and proximate of Defendants' conduct, A.G. and J.G. have incurred medical bills and will incur medical bills in the future; have been deprived of the enjoyment of life, thereby entitling A.G. and J.G. to an award of actual, consequential and exemplary damages, costs, and reasonable attorney fees.

Count III – Battery

24. Plaintiff reincorporates Paragraphs 1 through 23 as if fully stated herein.

25. The conduct of the Defendants described herein constituted battery to the persons of A.G. and J.G., insofar as the Defendants, and each of them, unlawfully and intentionally made violent physical contact with A.G. and J.G. for the purpose of causing A.G. and J.G. physical (and emotional) pain and injury.

26. As a direct and proximate result of Defendants' conduct, A.G. and J.G. suffered unnecessary and avoidable psychological trauma, severe emotional distress, physical pain and suffering, and permanent injuries.

27. As a direct and proximate result Defendants' conduct, A.G. and J.G. have incurred medical bills and will incur medical bills in the future; has been deprived of the enjoyment of life, thereby entitling A.G. and J.G. to an award of actual, consequential and exemplary damages, costs, and reasonable attorney fees, as well as punitive damages.

Count IV – False Imprisonment

28. Plaintiff reincorporates Paragraphs 1 through 27 as if fully stated herein.

29. The conduct of the Defendants described herein constituted false imprisonment to the persons of A.G. and J.G., insofar as the Defendants, and each of them, intentionally confined A.G. and J.G. without consent and without the legal authority to do so, for the purpose of causing A.G. and J.G. physical (and emotional) pain and injury.

30. As a direct and proximate result of Defendants' conduct, A.G. and J.G. suffered unnecessary and avoidable psychological trauma, severe emotional distress, physical pain and suffering, and permanent injury.

31. As a direct and proximate result of Defendants' conduct, A.G. and J.G. have incurred medical bills and will incur medical bills in the future; have been deprived of the enjoyment of life, thereby entitling A.G. and J.G. to an award of actual, consequential and exemplary damages, costs, and reasonable attorney fees, as well as punitive damages.

Damages

32. As a consequence of Defendants' conduct, as characterized above, A.G. and J.G. have suffered significant and substantial physical and emotional injuries, making Defendants liable for the following damages:

- a) Medical expenses, past and future;
- b) Physical pain and suffering, past and future;
- c) Emotional distress, past and future;
- d) Annoyance, embarrassment, humiliation, and inconvenience, past and future; and
- e) Loss of enjoyment of life, past and future.

33. Plaintiff seeks to recover and be made whole for the full and fair amount of compensatory and punitive damages to which Plaintiff is entitled to recover without such damages being limited by any statutory cap.

Punitive Damages

34. Defendants' actions, as set forth above, were willful, wanton and with a reckless disregard to harm to A.G. and J.G.

35. Plaintiff therefore seeks punitive damages against the Defendants, and each of them.

WHEREFORE, the Plaintiff prays that this Honorable Court enter judgment against the Defendants, and each of them, for all of the general and special damages as aforesaid, and for punitive damages, in an amount to be established by the evidence, together with prejudgment and post-judgment interest, reasonable attorneys' fees, costs expended in the prosecution of this lawsuit, and for any other relief that the Court may deem just and proper.

PLAINTIFF DEMANDS A TRIAL BY JURY.

**E.G., as next friend of A.G. and J.G.,
minors,**

By Counsel,

/s/ Timothy D. Houston

L. Danté diTrapano (WV Bar No. 6778)
David H. Carriger (WV Bar No. 7140)
Timothy D. Houston (WV Bar No. 10858)
CALWELL LUCE DI TRAPANO PLLC
Law and Arts Center West
500 Randolph Street
Charleston, West Virginia 25302
304.343.4323 / 304.344.3684 (facsimile)
dditrapano@cldlaw.com
dcarriger@cldlaw.com
thouston@cldlaw.com

and

Ben Salango (WV Bar No. 7790)
SALANGO LAW, P.L.L.C.
206 Capitol Street #200
Charleston, West Virginia 25301
304.342.0512 / 304.342.0513 (facsimile)
ben@salangolaw.com