

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
KENTUCKY, LOUISVILLE DIVISION

Michael D. Anderson v. Lawrence “Larry” Farmer, et al.

Anderson v. Farmer · No. 3:25-cv-802-RGJ · Decided June 9, 2026

SUMMARY

The United States District Court for the Western District of Kentucky addresses motions to dismiss claims arising from Michael D. Anderson’s allegedly wrongful arrest and detention based on the misidentification of another individual. The court grants the motions of Louisville/Jefferson County Metro Government and former and current LMPD chiefs, grants in part and denies in part Officer Lawrence Farmer’s motion, and analyzes sovereign immunity, municipal liability under Monell, and failure-to-train theories.

CASE DETAILS

COURT	United States District Court for the Western District of Kentucky, Louisville Division
JURISDICTION	United States District Court for the Western District of Kentucky, Louisville Division
DECIDED	June 9, 2026
DOCKET	3:25-cv-802-RGJ
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved under Federal Rule of Civil Procedure 12(b)(6) to dismiss federal civil-rights and Kentucky state-law claims arising from Anderson's allegedly mistaken arrest, detention, prosecution, and release. The court granted the motions as to Metro, Gwinn-Villaroel, and Humphrey; granted Farmer's motion in part; and denied it in part.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded factual allegations as true and draws reasonable inferences for the nonmoving party, but need not accept legal conclusions, labels, or formulaic recitations. The complaint must allege enough facts to state a facially plausible claim. Qualified immunity is generally inappropriate for resolution on a motion to dismiss because it is fact-intensive, although the plaintiff must still plead a plausible constitutional violation and violation of clearly established law.

PRECEDENTIAL VALUE	unpublished district-court memorandum opinion; precedential status unknown
PARTIES	Michael D. Anderson v. Lawrence “Larry” Farmer, Louisville/Jefferson County Metro Government, Jacquelyn Gwinn-Villaroel, Paul Humphrey

TOPICS

[motions to dismiss](#)
[section 1983](#)
[municipal liability](#)
[sovereign immunity](#)
[malicious prosecution](#)

PRACTICE AREAS

[civil rights](#)
[constitutional law](#)
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QUESTIONS PRESENTED

1. Whether Kentucky sovereign immunity barred Anderson's negligence, negligent hiring, supervision, and retention claims against Metro and officials sued in their official capacities.
2. Whether Anderson plausibly pleaded municipal liability under § 1983 based on an unlawful policy or custom or a failure to train.
3. Whether official-capacity claims against the LMPD chiefs were redundant of the claims against Metro.
4. Whether Farmer was absolutely immune from claims based on his grand-jury testimony and whether that immunity extended to his pre-grand-jury investigative conduct.
5. Whether Anderson plausibly pleaded a § 1983 fabrication-of-evidence claim based on Farmer's alleged selection and use of information concerning the wrong Michael Anderson.
6. Whether qualified immunity required dismissal of Anderson's federal claims against Farmer at the pleading stage.
7. Whether Anderson plausibly pleaded Kentucky malicious prosecution against Farmer.
8. Whether Anderson's negligence claim against Farmer was impermissibly duplicative of his malicious-prosecution claim.

HOLDINGS

1. Kentucky sovereign immunity barred Anderson's negligence-based state-law claims against Louisville/Jefferson County Metro Government, and the claims were dismissed with prejudice.
2. The official-capacity claims against the LMPD chiefs were dismissed with prejudice because they were protected by sovereign immunity as to state-law claims and were redundant of the claims against Metro as to the Monell claim.
3. Anderson failed to state a Monell policy-or-custom claim against Metro because the complaint relied on conclusory allegations and the retracted DOJ report without specific supporting facts identifying a

particular policy or custom and connecting it causally to his injury. The claim was dismissed without prejudice.

4. Anderson failed to state a § 1983 failure-to-train or failure-to-supervise claim against Metro because he did not plead facts showing inadequate training, deliberate indifference, or a causal connection between the training deficiency and the alleged constitutional injury.
5. Farmer was absolutely immune from any § 1983 claim based on his grand-jury testimony, but absolute immunity did not extend to his alleged pre-grand-jury investigative acts, including falsifying information in the criminal complaint and selecting information for the wrong suspect.
6. Anderson plausibly pleaded a Fourth Amendment fabrication-of-evidence claim against Farmer based on allegations that Farmer knowingly or in bad faith selected information concerning Anderson, the wrong suspect, and used it in the criminal complaint and warrant.
7. The court declined to dismiss Farmer's federal claims on qualified-immunity grounds because the complaint plausibly alleged that Farmer acted in bad faith and knowingly or recklessly fabricated evidence, and the fact-intensive defense was generally inappropriate for resolution under Rule 12(b)(6).
8. Anderson plausibly pleaded a Kentucky malicious-prosecution claim against Farmer, so Farmer's motion to dismiss that claim was denied.
9. Anderson could not proceed on his negligence claim against Farmer because the claim relied on the same facts as his malicious-prosecution claim and merely characterized the alleged malicious prosecution as negligence. The negligence claim was dismissed with prejudice.

KEY QUOTATIONS

“To survive a motion to dismiss, a plaintiff must allege “enough facts to state a claim to relief that is plausible on its face.”” (Section II)

“Courts take judicial notice of facts, not documents.” (Section III.A.2.i)

“Rehberg does not affect the thin but conspicuous line between, on the one hand, law-enforcement officers who only provide grand-jury testimony” (Section III.D.1.i)

“it is generally inappropriate for a district court to grant a 12(b)(6) motion to dismiss on the basis of qualified immunity.” (Section III.D.1.iii)

“a plaintiff cannot proceed with a claim for negligence where the claim is really a malicious prosecution claim.” (Section III.D.2.ii)

FACTUAL BACKGROUND

On December 24, 2024, LMPD arrested Michael D. Anderson at a gas station pursuant to a warrant issued for another person named Michael Anderson. Anderson was detained for nearly four months, indicted and charged with wanton endangerment and domestic-violence assault, and released after a prosecutor reviewed body-camera footage and determined that Anderson was not the suspect. The charges were dismissed with prejudice on May 14, 2025. Anderson alleges that Detective Lawrence Farmer knew the correct suspect's identity but selected

Anderson's CourtNet information, resulting in allegedly false information in the criminal complaint and arrest warrant.

PROCEDURAL HISTORY

Anderson filed a complaint under 42 U.S.C. § 1983 and Kentucky law after criminal charges based on mistaken identity were dismissed with prejudice. Metro, former LMPD Chief Gwinn-Villaroel in her official capacity, current LMPD Chief Humphrey in his official capacity, and LMPD officer Farmer in his individual capacity moved to dismiss. The court dismissed Metro's state-law claims with prejudice and its Monell claims without prejudice; dismissed all claims against Gwinn-Villaroel and Humphrey with prejudice; dismissed Farmer's negligence claim with prejudice; and allowed Anderson's § 1983 fabrication-of-evidence and Kentucky malicious-prosecution claims against Farmer to proceed.

DISPOSITION

other

CASES CITED

- Total Benefits Plan. Agency, Inc. v. Anthem Blue Cross & Blue Shield, 552 F.3d 430 (6th Cir. 2008)
- Tackett v. M & G Polymers, USA, LLC, 561 F.3d 478 (6th Cir. 2009)
- Ashcroft v. Iqbal, 556 U.S. 662 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544 (2007)
- Southfield Education Ass'n v. Southfield Board of Education, 570 F. App'x 485 (6th Cir. 2014)
- Yanero v. Davis, 65 S.W.3d 510 (Ky. 2001)
- Louisville/Jefferson County Metro Government v. Cowan, 508 S.W.3d 107 (Ky. App. 2016)
- Jewish Hospital Healthcare Services, Inc. v. Louisville/Jefferson County Metro Government, 270 S.W.3d 905 (Ky. App. 2008)
- Meinhart v. Louisville Metro Government, 627 S.W.3d 824 (Ky. 2021)
- Breathitt County Board of Education v. Prater, 292 S.W.3d 883 (Ky. 2009)
- Sistrunk v. City of Hillview, 545 F. Supp. 3d 493 (W.D. Ky. 2021)
- Carter v. Louisville Metro Police Department, 2023 WL 5986137 (W.D. Ky. Sept. 14, 2023)
- Monell v. Department of Social Services of City of New York, 436 U.S. 658 (1978)
- Jackson v. City of Cleveland, 925 F.3d 793 (6th Cir. 2019)
- Ciminillo v. Streicher, 434 F.3d 461 (6th Cir. 2006)
- Chambers v. Sanders, 63 F.4th 1092 (6th Cir. 2023)
- Garner v. Memphis Police Department, 8 F.3d 358 (6th Cir. 1993)
- Spears v. Ruth, 589 F.3d 249 (6th Cir. 2009)
- Thomas v. City of Chattanooga, 398 F.3d 426 (6th Cir. 2005)
- Wright v. Louisville Metro Government, 144 F.4th 817 (6th Cir. 2025)
- Jones v. Louisville/Jefferson County Metro Government, 482 F. Supp. 3d 584 (W.D. Ky. 2020)

- Mann v. Helmig, 289 F. App'x 845 (6th Cir. 2008)
- Daugherty v. Louisville-Jefferson County Metro Government, 495 F. Supp. 3d 513 (W.D. Ky. 2020)
- Bickerstaff v. Lucarelli, 830 F.3d 388 (6th Cir. 2016)
- Kiner v. City of Memphis, 2026 WL 1065014 (6th Cir. Apr. 14, 2026)
- City of Canton v. Harris, 489 U.S. 378 (1989)
- Ellis ex rel. Pendergrass v. Cleveland Municipal School District, 455 F.3d 690 (6th Cir. 2006)
- Fisher v. Harden, 398 F.3d 837 (6th Cir. 2005)
- Board of County Commissioners of Bryan County v. Brown, 520 U.S. 397 (1997)
- Rehberg v. Paul, 566 U.S. 356 (2012)
- King v. Harwood, 852 F.3d 568 (6th Cir. 2017)
- Buckley v. Fitzsimmons, 509 U.S. 259 (1993)
- Codrington v. Dolak, 142 F.4th 884 (6th Cir. 2025)
- Clark v. Abdallah, 131 F.4th 432 (6th Cir. 2025)
- Anderson v. Knox County, 2023 WL 4536078 (6th Cir. July 13, 2023)
- Spurlock v. Satterfield, 167 F.3d 995 (6th Cir. 1999)
- Wesley v. Campbell, 779 F.3d 421 (6th Cir. 2015)
- Gregory v. City of Louisville, 444 F.3d 725 (6th Cir. 2006)
- Martin v. O'Daniel, 507 S.W.3d 1 (Ky. 2016)
- Massey v. McKinley, 690 S.W.2d 131 (Ky. App. 1985)
- Seiller Waterman, LLC v. RLB Properties, Ltd., 610 S.W.3d 188 (Ky. 2020)
- Phat's Bar & Grill v. Louisville Jefferson County Metro Government, 918 F. Supp. 2d 654 (W.D. Ky. 2013)
- Estep v. Combs, 366 F. Supp. 3d 863 (E.D. Ky. 2018)
- Harmon v. Harper, 2020 WL 3013890 (W.D. Ky. June 4, 2020)
- Kentucky v. Graham, 473 U.S. 159 (1985)