

IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT  
IN AND FOR VOLUSIA COUNTY, FLORIDA

LINDSEY ISAACS,  
Plaintiff,

CASE NO.:  
DIVISION:

and

FLORIDA HIGHWAY PATROL,  
a division of the Florida State Department of  
Highway Safety and Motor Vehicles,

Defendant.

\_\_\_\_\_ /

**VERIFIED COMPLAINT**

COMES NOW, Plaintiff, LINDSEY ISAACS, (hereinafter referred to as "Plaintiff"), sues Defendant, FLORIDA HIGHWAY PATROL (hereinafter referred to as "FHP") a division of the Florida State Department of Highway Safety and Motor Vehicles, and alleges:

**JURISDICTION, VENUE, AND PARTIES**

1. This is an action for damages in excess of \$50,000.00, exclusive of interest, costs, and attorneys fees.
2. Plaintiff is a resident of Flagler County, Florida.
3. Defendant, FHP is a division of the Florida State Department of Highway Safety and Motor Vehicles with its principal place of business in Tallahassee, Florida and authorized to conduct business throughout the state of Florida.
4. The Court has jurisdiction over the parties as this is where the unlawful action occurred and where the vehicle is currently located.
5. Venue is proper in Volusia County, Florida because the vehicle is currently being held at the FHP evidence facility located in DeLand, Florida.

**GENERAL ALLEGATIONS**

6. On October 4, 2025, an auto accident occurred on Interstate 4 in Volusia County, Florida.

7. The accident was a multi-vehicle accident which was allegedly caused by the Plaintiff's 2025 Dodge Durango, causing multiple fatalities.

8. However, upon arrival at the scene the 2025 Dodge Durango was not present, and there were no witness statements included in the accident report to indicate how the vehicle was identified.

9. On October 5, 2025, between the hours of 3:00 a.m. and 5:00 a.m. Florida Highway Patrol officers, as well as Flagler County Sheriffs arrived at the Plaintiff's residence to seize her vehicle.

10. The Plaintiff's vehicle was then towed by Johns Towing and held in evidence by the Flagler County Sheriff's Office.

11. At some point thereafter, the Plaintiff's vehicle was then transported to and logged into evidence at the FHP evidence facility located in DeLand, Florida.

12. To date, Plaintiff's vehicle remains in the custody of FHP more than ninety (90) days after its seizure without a filing of charges or any show cause as to why the vehicle is not being returned to the Plaintiff.

### **COUNT I** **REPLEVIN**

13. Paragraphs 1 through 12 are realleged and incorporated herein.

14. Pursuant to Fla. Stat. § 78.01 it states in part, "Any person whose personal property is wrongfully detained by any other person or officer may have a writ of replevin to recover said personal property and any damages sustained by reason of the wrongful taking or detention as herein provided," has a right of replevin.

15. Plaintiff's 2025 Dodge Durango, Vehicle Identification No.: 1C4SDJCT7SC529164, License Plate: RJVN10, was taken into custody and is currently at the Florida Highway Patrol evidence storage facility located at 1551 E. International Speedway Boulevard, DeLand, Florida 32724. It is Plaintiff's belief that the vehicle's value is in excess of \$50,000.00.

16. The Plaintiff is the registered owner of the vehicle and is entitled to possession of the vehicle, see attached as "Exhibit A" a copy of the Plaintiff's title and registration.

17. The Defendant came into possession of the vehicle when the vehicle was seized from the Plaintiff's residence on October 5, 2025, alleging that the vehicle had been involved in a

fatal auto accident. The Defendant currently remains in possession of the vehicle but has failed to file any criminal charges against the Plaintiff, or in the alternative show cause as to the continued detention of the vehicle.

18. The Defendant has not taken possession of the vehicle pursuant to any law related to a tax, assessment or fine against the Plaintiff.

19. Furthermore, to the Plaintiff's knowledge and belief, the Defendant has not taken the vehicle under an execution or attachment against the property of the Plaintiff.

20. As a result, the Plaintiff is entitled to a writ of replevin or in the alternative an Order to show cause as to why the vehicle should not be taken from the possession of the Defendant and delivered to Plaintiff.

21. Plaintiff has executed an affidavit swearing to these facts attached as "Exhibit B."

WHEREFORE, Plaintiff, LINDSEY ISAACS, request that this Court enter a writ of replevin to return Plaintiff's property to her or in the alternative an Order to show cause.

Respectfully submitted this 5<sup>th</sup> day of February 2026.

**DWYER & KNIGHT**

By: /s/ Marc E. Dwyer  
Marc E. Dwyer, Esquire  
Florida Bar No.: 0634700  
/s/ Jacob B. Steele  
Jacob B. Steele, Esquire  
Florida Bar No.: 1059859  
2517 W. Moody Blvd.  
Flagler Beach, FL 32136  
Telephone: (386) 445-7411  
Facsimile: (386) 693-4228  
E-Mail: [service@askdwyer.com](mailto:service@askdwyer.com)  
Attorneys for Plaintiff

**I understand that I am swearing or affirming under oath to the truthfulness of the claims made in this Complaint and that the punishment for knowingly making a false statement includes fines and/or imprisonment.**

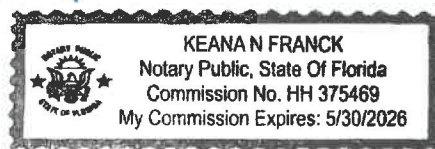
Dated: February 5, 2026.

  
LINDSEY ISAACS

**STATE OF FLORIDA**  
**COUNTY OF FLAGLER**

Sworn to or affirmed and signed before me, by means of   X   physical presence or  
       online notarization, on the 5<sup>th</sup> day of February 2026 by LINDSEY ISAACS.

  
NOTARY PUBLIC OR DEPUTY CLERK



*[Print, type, or stamp commissioned  
name of notary or deputy clerk]*

       Personally known  
  ✓   Produced identification

Type of Identification Produced:

  ✓   Driver's License  
       Other: \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the foregoing has been electronically filed this 5th day of February and a copy delivered via formal service of process to Florida Highway Patrol, Defendant, at 1551 E. International Speedway Boulevard, DeLand, Florida 32724.

**DWYER & KNIGHT**

By: /s/ Marc E. Dwyer

Marc E. Dwyer, Esquire  
Florida Bar No.: 0634700

/s/ Jacob B. Steele

Jacob B. Steele, Esquire  
Florida Bar No.: 1059859

2517 W. Moody Blvd.  
Flagler Beach, FL 32136  
Telephone: (386) 445-7411  
Facsimile: (386) 693-4228

E-Mail: [service@askdwyer.com](mailto:service@askdwyer.com)

Attorneys for Plaintiff

# Exhibit A

# IMPORTANT INFORMATION

SECTION 316.613, Florida Statutes, requires every operator of a motor vehicle transporting a child in a passenger car, van, autocycle or pickup truck registered in this state and operated on the highways of this state, shall, if the child is 5 years of age or younger, provide the protection of the child by properly using a crash-tested, federally approved child restraint device. For children aged through 3 years, such restraint device must be a separate carrier or a vehicle manufacturer's integrated child seat. For children aged 4 through 5 years, a separate carrier, an integrated child seat, or a child booster seat may be used. For limited exceptions, see s. 316.613, F.S.

S. 320.0605, F. S., requires the registration certificate, or true copy of a rental or lease agreement, issued for any motor vehicle to be in the possession of the operator or carried in the vehicle while the vehicle is being used or operated on the roads of this state.

S. 320.02 and 627.733, F. S., requires personal injury protection and property damage liability to be continuously maintained throughout the registration period. Failure to maintain the mandatory coverage may result in the suspension of your driver license and registration.

Mail To:

LINDSEY BROOKE ISAACS  
6127 SW 74TH CT  
OCALA, FL 34474

Important note: If you cancel the insurance for this vehicle, immediately return the license plate from this registration to a Florida driver license or tax collector office or by mail to: DHSMV, Return Tags, 2900 Apalachee Parkway, Tallahassee, FL 32399. Surrendering the plate will prevent your driving privilege from being suspended.

CO/AGY 14 / 05 T# 2247258827  
B# 34738505

## FLORIDA VEHICLE REGISTRATION

PLATE **RJVN10** DECAL **11816721** Expires **Midnight Fri 06/19/2026**

|             |                          |              |                   |       |                  |                |            |               |   |
|-------------|--------------------------|--------------|-------------------|-------|------------------|----------------|------------|---------------|---|
| YR/MK       | <b>2025/DODG</b>         | BODY         | <b>UT</b>         | COLOR | <b>BLK</b>       | Reg. Tax       | Class Code | 1             |   |
| VIN         | <b>1C4SDJCT7SC529164</b> |              |                   | TITLE | <b>159989762</b> | Init Reg.      | Tax Months | 0             |   |
| Plate Type  | <b>RGS</b>               | NET WT       | <b>5128</b>       |       |                  | County Fee     | 3.00       | Back Tax Mos  | 0 |
|             |                          |              |                   |       |                  | Mail Fee       |            | Credit Class  |   |
| DL/FEID     | <b>I220522027190</b>     |              |                   |       |                  | Sales Tax      |            | Credit Months |   |
| Date Issued | <b>07/29/2025</b>        | Plate Issued | <b>07/06/2024</b> |       |                  | Voluntary Fees |            |               |   |
|             |                          |              |                   |       |                  | Grand Total    | 3.00       |               |   |

LINDSEY BROOKE ISAACS  
6127 SW 74TH CT  
OCALA, FL 34474

# IMPORTANT INFORMATION

1. The Florida license plate must remain with the registrant upon sale of vehicle.
2. The registration must be delivered to a Tax Collector or Tag Agent for transfer to a replacement vehicle.
3. Your registration must be updated to your new address within 30 days of moving.
4. Registration renewals are the responsibility of the registrant and shall occur during the 30-day period prior to the expiration date shown on this registration. Renewal notices are provided as a courtesy and are not required for renewal purposes.
5. I understand that my driver license and registrations will be suspended immediately if the insurer denies the insurance information submitted for this registration.

RGS - SUNSHINE STATE

# Exhibit B

IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT  
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LINDSEY ISAACS,  
Plaintiff,

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and

FLORIDA HIGHWAY PATROL,  
a division of the Florida State Department of  
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Defendant.

\_\_\_\_\_/

**AFFIDAVIT OF PLAINTIFF**

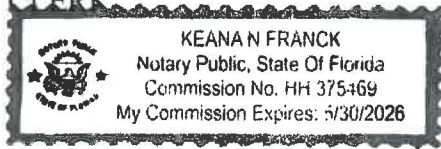
The undersigned, Lindsey Isaacs, having been first duly sworn, deposes and says:

1. I am over the age of 18 and otherwise capable to assert the facts contained herein.
2. I am the Plaintiff in this matter, and I have personal knowledge of the facts contained herein.
3. I am the registered owner of the 2025 Dodge Durango whose Vehicle Identification Number is 1C4SDJCT7SC529164.
4. The vehicle was seized from my residence in Palm Coast, Florida on the morning of October 5, 2025, by John's Towing.
5. I have not been arrested or charged in a criminal capacity for my vehicle's alleged involvement in the fatal auto accident that occurred on October 4, 2025.
6. I have not been provided with any hold or probable cause affidavit relating to the vehicle.
7. Defendant has not complied with any forfeiture proceedings to include filing a Complaint, paying a filing fee, or depositing a bond.

Lindsey Isaacs  
LINDSEY ISAACS

**STATE OF FLORIDA**  
**COUNTY OF FLAGLER**

Sworn to or affirmed and signed before me, by means of   X   physical presence or  
       online notarization, on the 5<sup>th</sup> day of February 2026 by LINDSEY ISAACS.

Keana N Franck  
NOTARY PUBLIC OR DEPUTY  
CLERK  


*[Print, type, or stamp commissioned  
name of notary or deputy clerk]*

       Personally known  
  ✓   Produced identification

Type of Identification Produced:

  ✓   Driver's License  
       Other: \_\_\_\_\_