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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, SOUTHWEST DISTRICT

JENNIFER LEVI, an individual; DANIEL
 LEVI, an individual; THE ESTATE OF
 BRAUN LEVI, by and through Successor-in-
 Interest JENNIFER LEVI.

Plaintiffs,

v.

JENIA RESHA BELT; DOES 1 through 10,
 Defendant.

Case No. **25TRCV03871**

**PLAINTIFFS' COMPLAINT FOR
 DAMAGES**

- 1. NEGLIGENCE**
 - 2. SURVIVAL ACTION**
- DEMAND FOR JURY TRIAL**

COMES NOW, Plaintiffs JENNIFER LEVI, an individual, DANIEL LEVI, an individual,
 and THE ESTATE OF BRAUN LEVI (together "Plaintiffs"), by and through Successor-in-Interest
 JENNIFER LEVI, for Causes of Action against Defendant JENIA RESHA BELT and DOES 1
 through 10, inclusive, and each of them, complains and alleges as follows:

GENERAL ALLEGATIONS

1. This action arises from a tragic and preventable drunk driving collision which took
 the life of the beloved only son of Jennifer and Daniel Levi. On May 4, 2025, 18-year-old and
 soon to be Loyola High School graduate BRAUN LEVI ("BRAUN") was struck and killed by a
 speeding drunk driver in Manhattan Beach. Defendant JENIA RESHA BELT ("BELT" or
 "Defendant") was a repeat-offender drunk driver having been previously arrested and prosecuted

1 for drunk driving and causing an injury collision. The Levi family brings this lawsuit seeking
2 damages in the name of the Live Like Braun Foundation to honor their beloved son and to raise
3 awareness against the dangers of drinking and driving.

4 2. On the night in question, BRAUN was crossing Sepulveda Boulevard near its
5 intersection with 2nd Street in the City of Manhattan Beach, County of Los Angeles, State of
6 California. At that same time, Defendant was operating a silver Infiniti FX35 (hereinafter,
7 "SUBJECT VEHICLE") bearing temporary California license plate AV58190 northbound on
8 Sepulveda Boulevard with four passengers in her vehicle. Prior to operating the SUBJECT
9 VEHICLE, Defendant BELT consumed excessive quantities of alcohol at a bar in Hermosa Beach
10 and became severely intoxicated. Despite knowing and understanding the grave dangers associated
11 with driving a vehicle while under the influence of alcohol, Defendant BELT willfully chose to
12 operate the SUBJECT VEHICLE while intoxicated at an unsafe and excessive rate of speed. As
13 she approached the intersection of Sepulveda Boulevard and 2nd Street, Defendant BELT failed to
14 observe Decedent BRAUN LEVI and violently struck him with the SUBJECT VEHICLE,
15 propelling his body down the roadway (hereinafter, "SUBJECT COLLISION"). After the
16 collision, the four passengers in the SUBJECT VEHICLE got out of the vehicle and fled the
17 scene. Tragically, as a result of Defendant BELT's actions, BRAUN LEVI was transported to
18 Harbor-UCLA Medical Center where he was pronounced dead. Arresting officers conducted a
19 blood-alcohol test of Defendant BELT which concluded her blood alcohol content was 0.19%,
20 more than double the legal limit.

21 3. Defendant BELT has a documented history of reckless, unsafe, and intoxicated
22 driving. At the time of this incident, Defendant BELT's driver's license remained suspended as a
23 result of a prior DUI charge arising from an arrest on November 25, 2023. On or about September
24 17, 2024, Defendant BELT entered into a plea agreement in that criminal matter, reducing the DUI
25 charge to a hit-and-run offense, and was placed on probation for a period of twelve (12) months.
26 As a result of the 2023 DUI arrest, BELT was made aware of the dangers of drinking and driving.
27 She was warned that drinking and driving can severely injure and even kill innocent people. She
28 was well aware of the impairing effects of alcohol on drivers including poor decision-making,

speeding, blurred vision, and slowed reaction time. Despite being on probation for a DUI-related offense, having a suspended license, and fully understanding the inherent dangers of driving while under the influence, Defendant BELT nevertheless willfully chose to operate her vehicle while severely intoxicated in conscious disregard for the safety of others, including Decedent BRAUN LEVI.

PARTIES

4. Decedent BRAUN LEVI, at all times relevant herein, was a resident of the County of Los Angeles. BRAUN was from the Pacific Palisades, California and had recently moved to Hermosa Beach with his mother and father after losing their home in the January 7, 2025, Palisades Fire. Braun was a stellar student at Loyola High School and was known as one of the most accomplished athletes in school history having won four consecutive tennis league championships, including three while serving as team captain. Braun was an outstanding academic student, was highly involved in volunteer and charity activities, and was admitted to the University of Virginia to play tennis.

5. Plaintiff JENNIFER LEVI is the mother of Decedent, and a resident of the County of Los Angeles. JENNIFER LEVI is the Successor-in-Interest to Decedent under California Code of Civil Procedure §377.32 as she has executed an affidavit in accordance therewith and thereby is successor to all claims and interests Decedent has available at law.

6. Plaintiff THE ESTATE OF BRAUN LEVI (hereinafter "THE ESTATE") is represented through its Successor-in-Interest, Plaintiffs JENNIFER LEVI, who is the surviving mother of Decedent BRAUN LEVI. As such, Plaintiff JENNIFER LEVI is the decedent's Successor-in-Interest, pursuant to Code of Civil Procedure § 377.11. Plaintiff JENNIFER LEVI has executed and filed with this complaint a declaration under penalty of perjury pursuant to Code of Civil Procedure § 377.32. *See* Exhibit 1.

7. Plaintiffs are informed and believe, and thereon allege, that Defendant JENIA RESHA BELT at all times herein relevant, was and is a resident of the County of Los Angeles.

8. Plaintiffs are informed and believe, and thereon allege, that at all times herein relevant, Defendant BELT was an employee and/or agent of DOES 1-10, inclusive, and was at all

1 times herein relevant acting within the course and scope of her employment and/or agency for
2 DOES 1-10, inclusive. Plaintiffs are further informed and believe, and thereon allege, that at all
3 times herein relevant, Defendant BELT was driving the SUBJECT VEHICLE so that she could
4 perform the duties of her employment and/or agency with DOES 1-10, inclusive. Plaintiffs are
5 further informed and believe, and thereon allege, that DOES 1-10, inclusive, authorized and gave
6 permission to Defendant BELT to use the SUBJECT VEHICLE for the purposes that she saw fit
7 during the course and scope of her employment and/or agency, including on the date and time of
8 the SUBJECT COLLISION.

9 9. Plaintiffs are further informed and believe, and thereon allege, that DOES 1
10 through 10, inclusive, were agents, servants, employees, successors-in-interest, and/or joint
11 venturers of their co-Defendant BELT, and were, as such, acting within the course, scope, and
12 authority of said agency, employment and/or venture, and that each and every defendant, as
13 aforesaid, when acting as a principal, was negligent in the selection of each and every other
14 defendant as an agent, servant, employee, successor-in-interest, and/or joint venturer.

15 10. The true names and capacities, whether individual, plural, corporate, partnership,
16 associate, or otherwise, of DOES 1 through 10, inclusive, are unknown to Plaintiffs who therefore
17 sued said Defendant DOES by such fictitious names. The full extent of the facts linking such
18 fictitiously sued Defendant DOES is unknown to PLAINTIFFS. PLAINTIFFS are informed and
19 believe, and thereupon allege, that each of the Defendants designated herein as a DOE was, and is,
20 negligent, or in some other actionable manner, responsible for the events and happenings
21 hereinafter referred to, and thereby negligently, or in some other actionable manner, legally and
22 proximately caused the hereinafter described injuries and damages to PLAINTIFFS. PLAINTIFFS
23 will hereafter seek leave of the Court to amend this Complaint to show the Defendant DOES true
24 names and capacities after the same have been ascertained.

FIRST CAUSE OF ACTION

NEGLIGENCE

(As Against All Defendants, BELT and DOES 1 through 10, Inclusive)

11. Plaintiffs re-allege and incorporate herein by reference each and every allegation

1 and statement contained in the prior paragraphs.

2 12. Defendant BELT, and DOES 1 through 10, inclusive, owed a duty of care to all
3 reasonably foreseeable people, including Decedent, to drive, own, lease, manage, maintain,
4 control, entrust and operate the SUBJECT VEHICLE in a reasonable manner to prevent harm and
5 injury to reasonably foreseeable people, including Decedent BRAUN LEVI.

6 13. DOES 1 through 10, inclusive, further owed a duty to hire drivers who were safe,
7 competent, and able to comply with the rules of the road and the California Vehicle Code when
8 they were on the job.

9 14. Defendant BELT and DOES 1 through 10, inclusive, breached their duty to drive,
10 own, lease, manage, maintain, control, entrust and operate the SUBJECT VEHICLE in a
11 reasonable manner. In particular, when Defendant BELT was driving the SUBJECT VEHICLE
12 while in the course and scope of employment with Defendants DOES 1 through 10, inclusive, she
13 was required to follow all traffic laws and rules of the road, including not driving while under the
14 influence of alcohol, not driving while her license was suspended, paying attention to the roadway,
15 and yielding to pedestrians in or near the roadway. But Defendant BELT violated the traffic laws
16 and rules of the road when she knowingly consumed excess amounts of alcohol prior to operating
17 the SUBJECT VEHICLE, chose to drive with a suspended license, failed to pay proper attention
18 to the roadway, failed to yield to a pedestrian in or near the roadway, and hit BRAUN LEVI.
19 Defendant BELT's actions violated numerous California *Vehicle Code* Sections, including but not
20 limited to California *Vehicle Code* ("CVC") 23152(a) & (b) (driving under the influence of alcohol
21 and driving with a Blood Alcohol Concentration ("BAC") of 0.08 % or greater, respectively), and
22 23153 (a) & (b) (driving under the influence of alcohol while concurrently violating vehicle code,
23 proximate cause of which is bodily injury to another person; driving with a BAC of 0.08 % or
24 greater while concurrently violating vehicle code, proximate cause of which is bodily injury to
25 another person). Further, Defendant DOES 1-10 breached their duties owed to PLAINTIFFS and
26 Decedent when they negligently hired Defendant BELT, including by failing to adequately
27 investigate BELT to determine whether she was competent to drive safely, and able to comply
28 with the rules of the road and the California *Vehicle Code*.

9 17. As a direct, legal, and proximate result of the careless, negligent, and unlawful
10 conduct of DEFENDANT BELT and DOES 1 through 10, inclusive, which caused Decedent's
11 death, each Plaintiff has suffered all available wrongful death damages in an amount to be
12 determined according to proof at the time of trial, including but not limited to the loss of
13 Decedent's love, companionship, comfort, care, assistance, protection, affection, society, and
14 moral support.

15 18. As a direct, legal, and proximate result of the careless, negligent, and unlawful
16 conduct of Defendant BELT, and DOES 1 through 10, inclusive, which caused Decedent's death,
17 Plaintiff JENNIFER LEVI as Successor-in-Interest is entitled to pre-death pain and suffering
18 damages under Code of Civil Procedure § 377.34 and all special damages available at law
19 (including past medical specials and loss of earnings).

Survival Action

**(SURVIVAL ACTION by JENNIFER LEVI as Successor-in-Interest to THE ESTATE OF
BRAUN LEVI, against Defendant JENIA RESHA BELT)**

24 19. Plaintiffs re-allege and incorporate herein by reference each and every allegation
25 and statement contained in the prior paragraphs.

26 20. The negligence described above caused decedent BRAUN LEVI to suffer traumatic
27 injuries, which later caused his death.

28 21. The aforementioned SUBJECT COLLISION giving rise to this wrongful death and

1 survival action caused decedent BRAUN LEVI to suffer various traumatic injuries. As a legal,
2 direct and proximate result of the conduct of Defendant BELT and DOES 1 through 10, inclusive,
3 Decedent suffered pre-death physical injuries, mental anguish, terror, anxiety and
4 unconsciousness.

5 22. As a result of the injuries and later the death of decedent BRAUN LEVI, Plaintiff
6 THE ESTATE OF BRAUN LEVI by and through its Successor-in-Interest JENNIFER LEVI
7 therefore seeks all damages accruing to the Decedent in a survival action pursuant to the
8 California Code of Civil Procedure § 377.34. All of said damages combine to a sum in excess of
9 the jurisdictional minimum of this Court, including any and all damages that the Decedent would
10 have been entitled to had he lived, including punitive damages as against Defendant BELT and
11 DOES 1 through 10, inclusive, which will be stated according to proof, pursuant to § 425.10 of the
12 California Code of Civil Procedure.

13 23. Defendant BELT acted negligently, recklessly and/or carelessly in causing the
14 collision that resulted in the death of BRAUN LEVI.

15 24. Defendants BELT had prior knowledge of the dangers and risks of serious injury or
16 death that driving under the influence of alcohol would and did create to members of the public,
17 such as Decedent BRAUN LEVI. Despite such knowledge, Defendants BELT engaged in such
18 misconduct. Said misconduct by Defendant BELT in recklessly creating said substantial risk and
19 high probability of injury or death to members of the public, was irresponsible and done in
20 conscious disregard for the rights and safety of the public, including Decedent BRAUN LEVI.

21 25. Defendant BELT acted with "malice" in that she engaged in despicable conduct in
22 conscious disregard of the rights, safety, and welfare of others, including the Decedent, thereby
23 entitling Plaintiffs to an award of punitive damages pursuant to California Civil Code Section
24 3294.

25 26. Specifically, Defendant BELT acted with malice in that she engaged in despicable
26 conduct and in conscious disregard of the rights, safety, and welfare of decedent BRAUN LEVI
27 by conduct that included, but is not limited to, the following:

28 i. On the date of the SUBJECT COLLISION, Defendant BELT drove to a bar

1 in Hermosa Beach where she intended to consume alcohol. Defendant BELT thereafter operated
2 the SUBJECT VEHICLE.

3 ii. At this location, Defendant BELT consumed numerous drinks as defined by
4 the California Department of motor vehicles, prior to and within close temporal proximity to the
5 SUBJECT COLLISION. The amount of alcohol Defendant BELT consumed rose to a point of
6 appreciable impairment of her nervous system, brain, and/or muscles.

7 iii. Defendant BELT consumed alcohol with knowledge that she would
8 thereafter have to operate a motor vehicle on public street.

9 iv. Defendant BELT voluntarily commenced and thereafter continued to
10 consume alcoholic beverages to the point of intoxication, knowing from the outset that she must
11 thereafter operate a motor vehicle.

12 v. Defendant BELT thereafter operated the SUBJECT VEHICLE on May 4,
13 2025, while under the influence of alcohol in conscious disregard of the health and safety of other
14 motorists and pedestrians, including decedent BRAUN LEVI in violation of California Vehicle
15 Code § 23153(a).

16 vi. Defendant BELT operated a vehicle on public streets while intoxicated with
17 a conscious indifference to the fact that others would likely be harmed by her actions.

18 vii. Defendant BELT operated the vehicle in such a grossly reckless and
19 despicable manner, by driving at a high rate of speed for an appreciable amount of time, in
20 violation of California Vehicle Code § 21460(a), that it was extremely likely if not certain that she
21 would cause injury and/or death to others.

22 viii. As a result of her impaired state, Defendant BELT operated the vehicle in
23 such a grossly reckless and despicable manner by driving while intoxicated, while having a
24 suspended license, at a high rate of speed for an appreciable amount of time, without any effort to
25 correct her path placing herself directly into the path of BRAUN LEVI.

26 ix. As a legal, direct, and proximate result of the conduct of Defendant BELT
27 and DOES 1 through 10, inclusive, and each of them, as aforesaid, Decedent BRAUN LEVI was
28 injured in his person by the SUBJECT COLLISION and survived for a period of time after the

initial impact and/or initial injury.

x. Decedent BRAUN LEVI sustained severe injuries to his body and head that ultimately resulted in his death.

xi. Officers responding to the scene noted that when BELT was first approached there was a strong odor of alcohol.

xii. Officers responding to the scene determined that BELT had been driving under the influence of an alcoholic beverage and arrested BELT for driving under the influence.

xiii. Officers responding to the scene conducted a blood test of BELT and determined her blood alcohol content to be 0.19%, more than double the legal limit.

xiv. Officers responding to the scene determined that BELT was driving on a license that was suspended due to a prior driving under the influence related incident.

28. Plaintiffs are further informed and believe, and thereon allege, that because Defendant BELT had actual knowledge of her impaired state and her inability to safely operate a motor vehicle, Defendant BELT intentionally chose to sit behind the wheel of a motor vehicle and drive the vehicle through city streets.

29. Because the acts and/or omissions of Defendant BELT were committed with a willful and conscious disregard of the rights, safety, and welfare of others, as fully set forth above, causing injury and damage to Plaintiff THE ESTATE OF BRAUN LEVI, by and through its Successor-In-Interest JENNIFER LEVI, Plaintiffs request the assessment of punitive damages against Defendant BELT in an amount appropriate to punish or set an example pursuant to California Civil Code § 3294.

PRAYER FOR DAMAGES

WHEREFORE, Plaintiffs hereby prays for judgment against Defendant JENIA RESHA BELT as follows:

1. \$100,000,000 for JENNIFER LEVI with all proceeds directed to the Live Like Braun Foundation;

2. \$100,000,000 for DANIEL LEVI with all proceeds directed to the Live Like Braun Foundation.

3. On behalf of THE ESTATE OF BRAUN LEVI, for punitive damages in an amount necessary to punish and/or set an example of Defendant JENIA RESHA BELT, according to proof, with all proceeds directed to the Live Like Braun Foundation.

DATED: November 12, 2025

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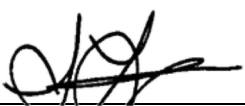
By: 
 Spencer R. Lucas
 Attorneys for Plaintiffs

REQUEST FOR TRIAL BY JURY

Plaintiffs JENNIFER LEVI, an individual, DANIEL LEVI, an individual, and THE ESTATE OF BRAUN LEVI, by and through Successor-in-Interest JENNIFER LEVI, hereby request a jury trial.

DATED: November 12, 2025

PANISH | SHEA | RAVIPUDI LLP

By: 
 Spencer R. Lucas
 Attorneys for Plaintiffs