

1 GROSSMAN, PETER GROSSMAN, SCOTT ERICKSON, and DOES 2-50, who complain and
2 allege as follows:

3 **GENERAL ALLEGATIONS**

4 1. On September 29, 2020, at approximately 7:10 p.m., defendant REBECCA
5 GROSSMAN drove drunk and hit and killed two innocent children, Mark and Jacob Iskander
6 (ages 11 and 8).

7 2. Just before the fatal crash, Mark and Jacob were out on a walk with their parents
8 and siblings (plaintiffs NANCY ISKANDER, KARIM ISKANDER, and brother ZACHARY
9 ISKANDER). The family was lawfully crossing Triunfo Canyon Road at Saddle Mountain Drive
10 within a marked crosswalk (hereafter the "SUBJECT INTERSECTION"). At the time of the fatal
11 collision, the entire family, including decedents Mark and Jacob Iskander had the lawful right-of-
12 way requiring all oncoming vehicles to yield to them.

13 3. But defendant REBECCA GROSSMAN did not yield to them. Instead, on this
14 same date and time, REBECCA GROSSMAN was racing a Mercedes Benz on Triunfo Canyon
15 Road towards the crosswalk at Saddle Mountain Drive at speeds in excess of 70 mph. Despite
16 actually seeing Mark and Jacob in the crosswalk and actually knowing that they both had the
17 right-of-way, REBECCA GROSSMAN intentionally disregarded their safety and right-of-way
18 and crashed into both of them. Mark and Jacob suffered severe blunt force trauma and later died
19 from those injuries. Mark and Jacob further suffered damage to their own personal property as a
20 result of this collision.

21 4. In addition to her wildly unsafe speed, another reason why REBECCA
22 GROSSMAN did not yield the right of way to Mark and Jacob (even though she saw them and
23 knew she was required to yield the right of way) was because she was intoxicated and drunk on
24 alcohol.

25 5. Prior to the fatal collision, REBECCA GROSSMAN intentionally and purposefully
26 drank alcohol well past the point of intoxication and then got behind the wheel of the vehicle. She
27 then proceeded to intentionally drive and race the vehicle at speeds that she actually knew were
28 unsafe. And, specifically, REBECCA GROSSMAN was intentionally speeding in an area that she

1 actually knew would have pedestrians as she had driven through the SUBJECT
 2 INTERSECTIONS many times before this fatal collision and saw pedestrians there, including
 3 pedestrians crossing within the same crosswalk that Mark and Jacob were in when she hit and
 4 killed them.

5 6. After the fatal collision, REBECCA GROSSMAN failed field sobriety tests
 6 administered by the LA County Sheriff. It was also determined her blood alcohol level was in
 7 excess of .08 percent. REBECCA GROSSMAN was then arrested.

8 7. At the time of the fatal collision, REBECCA GROSSMAN was operating a 2018
 9 Mercedes GLE bearing California license plate 8BBH031 (hereafter referred to as the "SUBJECT
 10 VEHICLE"). Defendant PETER GROSSMAN bought the SUBJECT VEHICLE and paid to
 11 insure it. At all times herein relevant, PETER GROSSMAN was the registered owner of the
 12 SUBJECT VEHICLE. At all times herein relevant, PETER GROSSMAN allowed REBECCA
 13 GROSSMAN to operate the SUBJECT VEHICLE as she saw fit.

14 8. All of the foregoing shall hereafter be referred to as the "FATAL COLLISION."
 15 **CONDUCT WARRANTING PUNITIVE DAMAGES AGAINST REBECCA GROSSMAN**

16 9. PLAINTIFFS re-allege and incorporate herein by reference each and every
 17 allegation and statement contained in all other paragraphs of this Complaint.

18 10. As alleged throughout this Complaint, REBECCA GROSSMAN's conduct was
 19 despicable and malicious and warrants an award of punitive damages. Such despicable and
 20 malicious conduct includes the following:

21 A. Prior to the FATAL COLLISION, REBECCA GROSSMAN actual knew
 22 that driving under the influence of alcohol was illegal and that getting into an accident with
 23 another while under the influence of alcohol was highly likely, and that if such an accident were to
 24 occur, it was highly likely that great bodily harm and even death to another would occur.

25 B. Despite this actual and specific knowledge, on September 29, 2020,
 26 REBECCA GROSSMAN made the intentional choice to drink alcohol well beyond the point of
 27 intoxication. And, prior to becoming intoxicated, REBECCA GROSSMAN intended to drive and
 28 race the SUBJECT VEHICLE on public roadways and streets, including the street where the

1 SUBJECT INTERSECTION was and where the FATAL COLLISION occurred. After becoming
2 illegally intoxicated—and with full permission from PETER GROSSMAN—REBECCA
3 GROSSMAN began driving and racing the SUBJECT VEHICLE.

4 C. Before and after REBECCA GROSSMAN became drunk and before she
5 got behind the wheel of the SUBJECT VEHICLE, she specifically knew the following:

6 1. She would be driving and racing through the SUBJECT
7 INTERSECTION with her boyfriend, defendant SCOTT ERICKSON;

8 2. The area of the SUBJECT INTERSECTION would have pedestrians
9 because it was adjacent to numerous residential neighborhoods and pedestrians frequented the
10 area; and

11 3. The SUBJECT INTERSECTION had a marked crosswalk that
12 pedestrians would be using at all times of the day and night, including the time when she would be
13 driving and racing through the SUBJECT INTERSECTION.

14 D. Despite this express knowledge, and while she was extremely intoxicated,
15 REBECCA GROSSMAN made the intentional choice to drive and race at approximately 70 mph
16 (in a 45 mph zone), which was an extremely unsafe rate of speed for the area based on her prior
17 knowledge. She chose to drive at this unsafe speed because she was racing her boyfriend,
18 defendant SCOTT ERICKSON, who she had been drinking with just before the FATAL
19 COLLISION. REBECCA GROSSMAN further made the intentional choice to swerve the
20 SUBJECT VEHICLE unsafely and drive erratically as she neared the crosswalk that Mark and
21 Jacob were lawfully crossing in.

22 E. As REBECCA GROSSMAN approached the SUBJECT INTERSECTION,
23 she was required to stop and yield the right-of-way to decedents, who were crossing within a
24 marked crosswalk. Despite seeing decedents in the crosswalk, REBECCA GROSSMAN
25 intentionally and purposefully targeted decedents with the vehicle with the specific intent of
26 crashing into them both in order to cause then great bodily harm and/or death.

27 F. Alternatively, as REBECCA GROSSMAN approached the SUBJECT
28 INTERSECTION, she was required to lawfully stop and yield the right-of-way to decedents, who

1 were crossing within a marked crosswalk. But due to REBECCA GROSSMAN's intentional
2 intoxication, she was unable to timely react to and avoid decedents, who were in plain sight for
3 any sober and reasonable driver to see and who were in a marked crosswalk with the right-of-way.
4 Prior to the FATAL COLLISION, REBECCA GROSSMAN actually knew that drinking alcohol
5 to the point of intoxication would prevent her from being able to safely perceive and react and
6 avoid pedestrians, especially when she was racing at the excessive speeds that she purposely chose
7 to race at. Despite actually knowing this when she got into the SUBJECT VEHICLE and turning
8 it on, REBECCA GROSSMAN intentionally became intoxicated on the date of the FATAL
9 COLLISION, intentionally drove and raced the SUBJECT VEHICLE involved in the FATAL
10 COLLISION. Defendant REBECCA GROSSMAN actually knew before getting behind the
11 wheel that such conduct would lead to incidents like the FATAL COLLISION and would actually
12 cause the type of death and damages that occurred here in this FATAL COLLISION.

13 G. The FATAL COLLISION caused Mark Iskander to be thrown up on to the
14 hood and windshield of the SUBJECT VEHICLE. Despite seeing this and knowing Mark was on
15 the vehicle's hood, REBECCA GROSSMAN kept driving. She eventually slowed enough causing
16 Mark to roll off the hood, which caused him further blunt force trauma. With Mark discarded
17 from the hood, REBECCA GROSSMAN continued to purposefully flee the scene of FATAL
18 COLLISION. When she fled the scene, REBECCA GROSSMAN actually knew she was legally
19 required to stop and call for help. But she purposefully chose not to do this and preferred to
20 escape. It was only because the SUBJECT VEHICLE automatically shut down after suffering so
21 much structural damage from hitting two children that REBECCA GROSSMAN was forced to
22 stop. And even then, REBECCA GROSSMAN still refused to call for help or otherwise render
23 and aid to the two innocent children she had just hit with the car. Mark and Jacob Iskander lay
24 dying in the roadway as REBECCA GROSSMAN fled the scene. Mark and Jacob Iskander lay
25 dying in the roadway as REBECCA GROSSMAN was later forced to stop but then sat there and
26 did nothing. REBECCA GROSSMAN's intentional flight from the scene and/or inexcusable
27 failure to call for help or otherwise render aid was a substantial factor in causing the deaths of
28 Mark and Jacob Iskander as the delay that resulted from her failure to call for help and/or

1 otherwise render aid caused first responders to get there later than they should have. This delay in
 2 critical first aid care for blunt force injuries caused by REBECCA GROSSMAN's intentional
 3 flight from the scene and/or intentional failure to call for help was a substantial factor in causing
 4 the deaths of Mark and Jacob Iskander.

5 11. The FATAL COLLISION was a direct result of REBECCA GROSSMAN's
 6 intentional and despicable conduct. As a direct and foreseeable result of this intentional and
 7 despicable conduct, decedents suffered severe blunt force trauma from which they later died. As a
 8 further direct and foreseeable result of this intentional and despicable conduct, decedents suffered
 9 property damage as their clothing was destroyed.

10 12. As a direct result of the FATAL COLLISION, REBECCA GROSSMAN was
 11 booked and charged with the following:

- 12 A. Two counts of murder with malice aforethought (Penal Code 187(a));
- 13 B. Two counts of gross vehicular manslaughter (Penal Code 192(C)(1));
- 14 C. One count of violating California Vehicle Code 20001(B)(2), for her fleeing
 15 the scene of the crash and failing to call for help or otherwise provide aid to the two children she
 16 hit.

17 13. The above-described despicable conduct of REBECCA GROSSMAN was the
 18 direct cause of the FATAL COLLISION, decedents' death, decedents' property damage, and
 19 PLAINTIFFS' resulting harm, damages and losses.

20 **THE PARTIES**

21 14. Plaintiff NANCY ISKANDER, at all times herein relevant, is and was a resident of
 22 Los Angeles County. She is the biological and lawful mother to decedents Mark and Jacob
 23 Iskander. Pursuant to Code of Civil Procedure § 377.11, NANCY ISKANDER is the successor in
 24 interest to decedent Mark Iskander . She has executed and has filed herewith a Declaration
 25 affirming her status as such under penalty of perjury pursuant to Code of Civil Procedure §377.32.

26 15. Plaintiff KARIM ISKANDER, at all times herein relevant, is and was a resident of
 27 Los Angeles County. He is the biological and lawful father to decedents Mark and Jacob
 28 Iskander. Pursuant to Code of Civil Procedure § 377.11, KARIM ISKANDER is the successor in

1 interest to decedent Jacob Iskander. He has executed and has filed herewith a Declaration
 2 affirming his status as such under penalty of perjury pursuant to Code of Civil Procedure §377.32.

3 16. Plaintiff ZACHARY ISKANDER, at all times herein relevant, is and was a resident
 4 of Los Angeles County. He is the biological and lawful brother to decedents Mark and Jacob
 5 Iskander. Zachary is a minor child who brings suit through his father, KARIN ISKANDER, as his
 6 Guardian Ad Litem.

7 17. Defendant REBECCA GROSSMAN, at all times herein relevant, is and was a
 8 resident of Los Angeles County. It is believed she is PETER GROSSMAN's wife.

9 18. Defendant PETER GROSSMAN, at all times herein relevant, is and was a resident
 10 of Los Angeles County. It is believed he is REBECCA GROSSMAN's husband.

11 19. Defendant SCOTT ERICKSON, at all times herein relevant, is and was a resident
 12 of Los Angeles County. It is believed he is REBECCA GROSSMAN's boyfriend.

13 20. PLAINTIFFS are further informed and believe, and thereon allege, that
 14 DEFENDANTS and DOES 1 through 50, inclusive, were agents, servants, employees, successors
 15 in interest, and/or joint venturers of their co-defendants, and were, as such, acting within the
 16 course, scope, and authority of said agency, employment and/or venture, and that each and every
 17 defendant, as aforesaid, when acting as a principal, was negligent in the selection of each and
 18 every other defendant as an agent, servant, employee, successor in interest, and/or joint venturer.

19 21. The true names and capacities, whether individual, plural, corporate, partnership,
 20 associate, or otherwise, of DOES 1 through 50, inclusive, are unknown to PLAINTIFF who
 21 therefore sues said defendants by such fictitious names. The full extent of the facts linking such
 22 fictitiously sued defendants is unknown to PLAINTIFFS. PLAINTIFFS are informed and believe,
 23 and thereupon allege, that each of the defendants designated herein as a DOE was, and is,
 24 negligent, or in some other actionable manner, responsible for the events and happenings
 25 hereinafter referred to, and thereby negligently, or in some other actionable manner, legally and
 26 proximately caused the hereinafter described injuries and damages to PLAINTIFFS.

27 PLAINTIFFS will hereafter seek leave of the Court to amend this Complaint to show the
 28 defendants' true names and capacities after the same have been ascertained.

FIRST CAUSE OF ACTION

BATTERY

[As Against Defendant REBECCA GROSSMAN]

22. PLAINTIFFS re-allege and incorporate herein by reference each and every allegation and statement contained in all other paragraphs of this Complaint.

23. Defendant REBECCA GROSSMAN intentionally crashed into decedents Mark and Jacob Iskander in the SUBJECT VEHICLE with the specific intent to harm and offend them. At no time did decedents consent to being crashed into by REBECCA GROSSMAN. As a direct result of REBECCA GROSSMAN's intentional conduct, decedents suffered massive blunt force injuries from which they later died. Decedents further suffered personal property damage as a direct result of the FATAL COLLISION as their clothing was destroyed.

24. A reasonable person in decedents' situation would have similarly been harmed by REBECCA GROSSMAN's intentional conduct.

25. Defendant REBECCA GROSSMAN's intentionally wrongful and unlawful conduct was the direct, legal and proximate cause of the FATAL COLLISION, decedents' ultimate deaths, decedents' property damage, and PLAINTIFFS' damages and losses.

SECOND CAUSE OF ACTION

NEGLIGENCE

[As Against Defendant REBECCA GROSSMAN and PETER GROSSMAN]

26. PLAINTIFFS re-allege and incorporate herein by reference each and every allegation and statement contained in all other paragraphs of this Complaint.

27. Defendants REBECCA GROSSMAN owed a duty of care to all reasonably foreseeable people, including decedents and PLAINTIFFS, to drive, own, lease, manage, maintain, control, and operate the SUBJECT VEHICLE in a reasonable manner.

28. Defendants REBECCA GROSSMAN breached her duty to drive, own, lease, manage, maintain, control, and operate the SUBJECT VEHICLE in a reasonable manner. In particular, when REBECCA GROSSMAN was driving the SUBJECT VEHICLE at the time of the FATAL COLLISION, she was required to operate the SUBJECT VEHICLE in a safe and

1 lawful manner, without creating unreasonable risk and danger to others on the roadway, including
2 decedents. But REBECCA GROSSMAN failed in every respect to follow these duties when she
3 drove the SUBJECT VEHICLE when she was intoxicated, at a high rate of speed while swerving,
4 and in an area that she knew contained pedestrians. Such reckless conduct resulted in REBECCA
5 GROSSMAN crashing into and eventually killing decedents, who were in a marked crosswalk
6 with the lawful right-of-way.

7 29. As a direct and foreseeable result of REBECCA GROSSMAN's negligent conduct,
8 decedents suffered property damage as their clothing was destroyed in the FATAL COLLISION.

9 30. As a direct and foreseeable result of REBECCA GROSSMAN's negligent conduct,
10 she caused the FATAL COLLISION, decedents' ultimate deaths, decedents' property damage, and
11 PLAINTIFFS' resulting damages and losses.

12 31. Pursuant to California Vehicle Code 17150, "[e]very owner of a motor vehicle is
13 liable and responsible for death or injury to person or property resulting from a negligent or
14 wrongful act or omission in the operation of the motor vehicle, in the business of the owner or
15 otherwise, by any person using or operating the same with the permission, express or implied, of
16 the owner." At all times herein relevant, including the date of the FATAL COLLISION,
17 defendant PETER GROSSMAN was the registered owner of the SUBJECT VEHICLE. At all
18 times herein relevant, including the date of the FATAL COLLISION, defendant PETER
19 GROSSMAN gave permission to his wife, REBECCA GROSSMAN, to use the SUBJECT
20 VEHICLE. As detailed throughout this complaint, defendant REBECCA GROSSMAN was, at a
21 minimum, negligent in her operation of the SUBJECT VEHICLE and such negligence was a
22 substantial factor in causing the FATAL COLLISION and PLAINTIFFS' resulting harm.

23 **THIRD CAUSE OF ACTION**

24 **NEGLIGENCE (CALIFORNIA VEHICLE CODE SECTION 23152(a)(b), 22350, 23109)**

25 **[As against Defendant REBECCA GROSSMAN]**

26 32. PLAINTIFFS re-allege and incorporate herein by reference each and every
27 allegation and statement contained in all other paragraphs of this Complaint.

28 33. Defendant REBECCA GROSSMAN owed a duty of care to all reasonably

1 foreseeable people, including decedents and PLAINTIFFS to operate and drive the SUBJECT
2 VEHICLE in a reasonable manner.

3 34. California Vehicle Code sections 23152(a)(b), 22350, and 23109 also detailed the
4 duty of care owed to decedents and PLAINTIFFS by REBECCA GROSSMAN

5 35. California Vehicle Code section 21352(a) provides that "[i]t is unlawful for a
6 person who is under the influence of any alcoholic beverage to drive a vehicle."

7 36. California Vehicle Code section 21352(b) provides that "[i]t is unlawful for a
8 person who has 0.08 percent or more, by weight, of alcohol in his or her blood to drive a vehicle."

9 37. California Vehicle Code section 22350 provides that "[n]o person shall drive a
10 vehicle upon a highway at a speed greater than is reasonable or prudent having due regard for
11 weather, visibility, the traffic on, and the surface and width of, the highway, and in no event at a
12 speed which endangers the safety of persons or property."

13 38. California Vehicle Code section 23109 provides that "(a) A person shall not engage
14 in a motor vehicle speed contest on a highway. As used in this section, a motor vehicle speed
15 contest includes a motor vehicle race against another vehicle, a clock, or other timing device....

16 (b) A person shall not aid or abet in any motor vehicle speed contest on any highway. (c) A
17 person shall not engage in a motor vehicle exhibition of speed on a highway, and a person shall
18 not aid or abet in a motor vehicle exhibition of speed on any highway."

19 39. Defendants REBECCA GROSSMAN violated California Vehicle Code sections
20 21352(a)(b), 22350, and 23109 when she purposefully and intentionally became extremely
21 intoxicated with alcohol well past .08 percent and got behind the wheel of the SUBJECT
22 VEHICLE, and then drove and raced at speeds far in excess of the posted 45 mph speed limit in an
23 area at night that she knew would have pedestrians walking about. She also purposefully and
24 specifically intended to (and did) race her boyfriend, defendant SCOTT ERICKSON at the time of
25 the FATAL COLLISION. Just prior to leaving the location where the two of them were drinking
26 alcohol together, they discussed, planned, and encouraged each other to race on the roadway,
27 including the area of the SUBJECT INTERSECTION. As a direct and proximate result of
28 REBECCA GROSSMAN's violation of California Vehicle Code sections 21352(a)(b), 22350, and

1 23109, she crashed into decedents, which was a substantial factor in causing their ultimate deaths,
2 decedents' property damage, and PLAINTIFFS' resulting damages and losses.

3 40. California Vehicle Code sections 21352(a)(b), 22350, and 23109 were designed to
4 prevent the exact type of unsafe and illegal driving by REBECCA GROSSMAN that caused the
5 FATAL COLLISION. Sections 21352(a)(b), 22350, and 23109 were also designed to prevent the
6 exact type of collision-related resulting damages and losses that decedents and PLAINTIFFS
7 suffered as a direct and proximate result of REBECCA GROSSMAN's violation of Sections
8 21352(a)(b), 22350, and 23109.

9 41. Decedent and PLAINTIFFS were of the class of persons that California Vehicle
10 Code sections 21352(a)(b), 22350, and 23109 were intended to protect.

11 42. Defendants REBECCA GROSSMAN's intentionally wrongful and unlawful
12 conduct, including her violations of Sections 21352(a)(b), 22350, and 23109 were the direct, legal
13 and proximate cause of the FATAL COLLISION, decedents' ultimate death, decedents' property
14 damage, and PLAINTIFFS' resulting damages and losses.

15 43. Pursuant to California Vehicle Code 17150, "[e]very owner of a motor vehicle is
16 liable and responsible for death or injury to person or property resulting from a negligent or
17 wrongful act or omission in the operation of the motor vehicle, in the business of the owner or
18 otherwise, by any person using or operating the same with the permission, express or implied, of
19 the owner." At all times herein relevant, including the date of the FATAL COLLISION,
20 defendant PETER GROSSMAN was the registered owner of the SUBJECT VEHICLE. At all
21 times herein relevant, including the date of the FATAL COLLISION, defendant PETER
22 GROSSMAN gave permission to his wife, REBECCA GROSSMAN, to use the SUBJECT
23 VEHICLE. As detailed throughout this complaint, defendant REBECCA GROSSMAN was, at a
24 minimum, negligent in her operation of the SUBJECT VEHICLE and such negligence was a
25 substantial factor in causing the FATAL COLLISION and PLAINTIFFS' resulting harm.

26 **FOURTH CAUSE OF ACTION**

27 **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

28 **[As Against Defendant REBECCA GROSSMAN]**

1 of SCOTT ERICKSON was despicable as it showed a willful and conscious disregard of the rights
2 and safety of others, including PLAINTIFFS. In particular, on the date of the FATAL
3 COLLISION, SCOTT ERICKSON was drinking alcohol with REBECCA GROSSMAN. When
4 they left the location where they were drinking together, SCOTT ERICKSON knew REBECCA
5 GROSSMAN was unfit to drive the SUBJECT VEHICLE because she was too intoxicated to do
6 so. He knew so because he personally observed her drinking and paid for those drinks.

7 52. Prior to leaving the location where they were drinking together, SCOTT
8 ERICKSON and REBECCA GROSSMAN discussed, planned, and encourage each other to race
9 their vehicles on the roadway, including the area of the SUBJECT INTERSECTION. SCOTT
10 ERICKSON left the location where he was drinking alcohol with REBECCA GROSSMAN with
11 the specific intent to race his vehicle. SCOTT ERICKSON specifically wanted REBECCA
12 GROSSMAN to chase after him in the SUBJECT VEHICLE because he believed the specific
13 danger involved in racing would be exciting for the couple.

14 53. As SCOTT ERICKSON approached the SUBJECT INTERSECTION, he was
15 racing his vehicle with REBECCA GROSSMAN, reaching speeds in excess of 70 mph in a 45
16 mph zone that were obviously unsafe for the current conditions as it was at night, in a residential
17 community that SCOTT ERICKSON actually knew would have pedestrians out and about in the
18 area, including in the SUBJECT INTERSECTION.

19 54. SCOTT ERICKSON actually knew that racing his vehicle with REBECCA
20 GROSSMAN alongside in the SUBJECT VEHICLE would cause REBECCA GROSSMAN to try
21 to keep up with him. SCOTT ERICKSON specifically intended this and wanted REBECCA
22 GROSSMAN to race him because he believed she would be impressed by the racing. Indeed, the
23 two planned and encouraged each other to race each other before they left the location where they
24 were drinking together. Despite such knowledge and intent, and despite actually knowing that
25 REBECCA GROSSMAN was drunk and unfit to drive the SUBJECT VEHICLE, SCOTT
26 ERICKSON nevertheless raced through the SUBJECT INTERSECTION with REBECCA
27 GROSSMAN following behind him trying to keep up with him.

28 55. SCOTT ERICKSON knew a crash, like the FATAL COLLISION, was virtually

1 certain to occur because of the speed of the vehicles involved, the fact they were racing in a
2 heavily populated area that would (and did) have pedestrians nearby, at night, and because of
3 REBECCA GROSSMAN's intoxication, which he personally observed and participated in as he
4 was drinking alcohol with her and buying her drinks just before the crash.

5 56. As SCOTT ERICKSON illegally and unsafely raced through the SUBJECT
6 INTERSECTION, he narrowly avoided hitting Mark and Jacob Iskander with his vehicle. But,
7 SCOTT ERICKSON personally observed REBECCA GROSSMAN crash into the two children
8 and saw REBECCA GROSSMAN not stop the SUBJECT VEHICLE and try to flee the scene.

9 57. Knowing that his despicable conduct played a substantial factor in causing the
10 FATAL COLLISION, and that two children had been hit, SCOTT ERICKSON knew that he was
11 required to stop his vehicle and call for help and/or render aid to the two children. Despite seeing
12 this and knowing this, SCOTT ERICKSON kept driving and fled the scene.

13 58. When he fled the scene, SCOTT ERICKSON actually knew he was legally
14 required to stop and call for help. But he purposefully chose not to do this and preferred to escape.
15 Mark and Jacob Iskander lay dying in the roadway as SCOTT ERICKSON fled the scene and did
16 nothing to help the two children who had been hurt (and eventually died) in substantial part
17 because of the despicable conduct described above. SCOTT ERICKSON's intentional flight from
18 the scene and/or inexcusable failure to call for help or otherwise render aid was a substantial factor
19 in causing the deaths of Mark and Jacob Iskander as the delay that resulted from his failure to call
20 for help and/or otherwise render aid caused first responders to get there later than they should
21 have. This delay in critical first aid care for blunt force injuries caused in substantial part by
22 SCOTT ERICKSON's intentional flight from the scene and/or intentional failure to call for help
23 was a substantial factor in causing the deaths of Mark and Jacob Iskander.

24 59. SCOTT ERICKSON's grossly negligent conduct was a substantial factor in causing
25 the SUBJECT COLLISION, decedents' ultimate deaths, decedents' property damage, and
26 PLAINTIFFS' resulting damages and losses.

27 60. In addition, California Vehicle Code sections 22350 and 23109 also detailed a duty
28 of care owed by defendant SCOTT ERICKSON to decedents and PLAINTIFFS.

1 61. California Vehicle Code section 22350 provides that "[n]o person shall drive a
2 vehicle upon a highway at a speed greater than is reasonable or prudent having due regard for
3 weather, visibility, the traffic on, and the surface and width of, the highway, and in no event at a
4 speed which endangers the safety of persons or property."

5 62. California Vehicle Code section 23109 provides that "(a) A person shall not engage
6 in a motor vehicle speed contest on a highway. As used in this section, a motor vehicle speed
7 contest includes a motor vehicle race against another vehicle, a clock, or other timing device....

8 (b) A person shall not aid or abet in any motor vehicle speed contest on any highway. (c) A
9 person shall not engage in a motor vehicle exhibition of speed on a highway, and a person shall
10 not aid or abet in a motor vehicle exhibition of speed on any highway."

11 63. Defendant SCOTT ERICKSON violated California Vehicle Code sections 22350
12 and 23109 when he purposefully and intentionally drove at speeds far in excess of the posted 45
13 mph speed limit in an area he knew would have pedestrians walking about at night. He also
14 violated sections 22350 and 23109 when he purposely engaged in a motor vehicle speed contest
15 with defendant REBECCA GROSSMAN where the two of them were racing each other to and
16 through the SUBJECT INTERSECTION. SCOTT ERICKSON's violation of California Vehicle
17 Code section 22350 and 23109 was a substantial factor in causing the FATAL COLLISION,
18 decedents' ultimate deaths, decedents' property damage, and PLAINTIFFS' resulting damages and
19 losses.

20 64. California Vehicle Code sections 22350 and 23109 were designed to prevent the
21 exact type of unsafe and illegal driving by SCOTT ERICKSON that caused the FATAL
22 COLLISION. Sections 22350 and 23109 were also designed to prevent the exact type of
23 collision-related resulting damages and losses that decedents and PLAINTIFFS suffered as a
24 direct and proximate result of SCOTT ERICKSON's violations of Sections 22350 and 23109.

25 65. Decedent and PLAINTIFFS were of the class of persons that California Vehicle
26 Code sections 22350 and 23109 were intended to protect.

27 66. Defendants SCOTT ERICKSON despicable and grossly negligent conduct,
28 including his violations of Sections 22350 and 23109, were the direct, legal and proximate cause

1 of the FATAL COLLISION, decedents' ultimate death, decedents' property damage, and
 2 PLAINTIFFS' resulting damages and losses.

3 **SIXTH CAUSE OF ACTION**

4 **FRAUDULENT CONVEYANCE**

5 **[As Against Defendants REBECCA GROSSMAN and PETER GROSSMAN]**

6 67. PLAINTIFFS re-allege and incorporate herein by reference each and every
 7 allegation and statement contained in all other paragraphs of this Complaint.

8 68. After the FATAL COLLISION, defendants REBECCA GROSSMAN and PETER
 9 GROSSMAN actually knew that PLAINTIFFS were creditors against them because of severe and
 10 permanent harm they caused PLAINTIFFS arising out of the FATAL COLLISION.

11 69. Because defendants REBECCA GROSSMAN and PETER GROSSMAN actually
 12 knew PLAINTIFFS were creditors, they became deeply concerned that properties they owned
 13 would become subject to liquidation and collection in the very likely event of a verdict and
 14 judgment in a civil lawsuit that exceeded their insurance policy limits.

15 70. In light of this deep concern, and with the sole goal of wanting to hinder, delay, and
 16 defraud PLAINTIFF creditors of being able to collect against their properties and assets,
 17 defendants REBECCA GROSSMAN and PETER GROSSMAN purposely engaged in a scheme to
 18 transfer their properties and assets to each other, individually, and/or to trusts.

19 71. In particular, the following fraudulent transfers of property and assets have
 20 occurred to date:

21 72. **25163 Jim Bridger Road, Hidden Hills, CA 91302**: (hereafter the "Jim Bridger
 22 Home").

23 A. On or about October 21, 2014, defendants purchased the Jim Bridger Home
 24 as husband and wife.

25 B. On or about February 28, 2024, defendants borrowed \$1,000,000 from Peter
 26 Grossman's brother, Jeffrey Grossman, who records a deed of trust against the property. There is
 27 no writing to formally document this so-called "loan" and Jeffrey Grossman is charging no
 28 interest. Neither Peter Grossman nor Rebecca Grossman have begun to repay the loan.

1 C. On or about March 14, 2024, defendant Rebecca Grossman executes a Deed
2 of Trust valued at \$5,915,877 against her interest in the Jim Bridger Home to her husband's sole
3 benefit. This amount was allegedly for legal fees that Rebecca Grossman incurred for the criminal
4 trial for the FATAL COLLISION that resulted in five felony convictions, including two murder
5 convictions. Peter Grossman is identified on the recorded Deed of Trust as the lender. But to the
6 extent these legal fees were even paid, Peter Grossman paid them with community property funds,
7 so any promise, pledge, agreement or requirement that Rebecca Grossman pay Peter Grossman
8 back this amount is completely illusory and the Grossman defendant know this. It is completely
9 illusory because spouses cannot validly make loans to each other using community funds. As
10 further evidence of this fraudulent transaction, the Grossman defendants executed a promissory
11 note for amounts "spent for the legal defense for the Iskander case," where Peter Grossman was
12 the lender and Rebecca Grossman was the borrower. The promissory note was characterized as a
13 "loan" that was to be repaid only upon the sale of the Jim Bridger Home. There was no interest
14 charged for the fake loan and, again, to the extent any money was actually paid by Peter
15 Grossman, that money was community property.

16 D. On or about July 9, 2025, Rebecca Grossman executed a quitclaim
17 interspousal deed of transfer for her half interest in the Jim Bridger Home to Peter Grossman for
18 no consideration of any kind. Then, on this same date, Peter Grossman executed quitclaim deed
19 for allegedly the entirety of the Jim Bridger Home to the "JB Road Trust." Remarkably, when
20 asked in his deposition in February 2026 to identify the beneficiaries of the JB Road Trust, Peter
21 Grossman lied and testified that he could not recall. When asked whether specifically he was a
22 beneficiary, he lied and said he did not know. Then, after his deposition was adjourned, he finally
23 produced the JB Road Trust Agreement and, of course, he was identified as the sole creator and
24 sole beneficiary of the JB Road Trust.

25 E. As further evidence of the Grossman defendants' fraudulent intent, during a
26 recorded jail house call between Peter and Rebecca Grossman, Peter Grossman discussed
27 protecting the Jim Bridger Home from Brian Panish, who is plaintiffs' counsel, and who the
28 Grossmans know would seek to collect an excess judgment in this case against, among other

1 things, the Jim Bridger Home. This call demonstrates the Grossmans' clear awareness that the Jim
2 Bridger Home is at risk to collection by the PLAINTIFF creditors by and through their counsel,
3 and that they have taken steps to "protect" the home from plaintiffs, albeit fraudulent steps.

4 F. The Jim Bridger is currently listed for sale for \$13,500,000.

5 73. **1410 Buckhead Drive, Greensboro, Georgia 30642**: (hereafter the "Buckhead
6 Home").

7 A. On or about November 5, 2021, Peter Grossman purchased the Buckhead
8 Home for \$1,050,000 with community property funds. Instead of titling the property with
9 Rebecca Grossman's name included as husband and wife, or other means that would reflect the
10 true nature of the home as community property, Peter Grossman titled the home as his own
11 property. Despite knowing that the home was actually community property, and with Rebecca
12 Grossman's full knowledge and consent, Peter Grossman titled the home so as to indicate it was
13 separate property to avoid and prevent the PLAINTIFF creditors from reaching it and collecting
14 on it after verdict and judgment in this civil case.

15 B. On or about December 6, 2021, in furtherance of this fraudulent scheme and
16 conveyance, Peter Grossman executed a quitclaim deed for no consideration of any kind the
17 entirety of Buckhead Home to the "Richard Grossman Grandchildren's Trust," of which the
18 Grossman's children are the sole beneficiaries, and which both Peter Grossman and Rebecca
19 Grossman are the trustees. This was yet another step in the Grossmans defendants' fraudulent
20 attempt to protect the Buckhead Home from creditors because they completed this transaction for
21 the sole purpose of attempting to hinder, delay, and defraud PLAINTIFF creditors from collecting
22 an excess judgment against the Buckhead home.

23 74. **The Grossmans' Bitcoin**: The Grossman defendants own bitcoin. The exact
24 amount is not known because both defendants purposefully refused to identify it or produce any
25 documents about it in response to discovery requests. What is known based on recorded jailhouse
26 calls between the Grossman defendants is that they bought it for \$9,000 and it is currently being
27 saved on a Coinbase wallet. During this same jailhouse call, defendant Peter Grossman bragged
28 that the current price of the bitcoin at that time was \$92,000, but when he realized his disclosure,

1 he promptly demanded that Rebecca Grossman stop talking about it on a recorded line so that the
2 PLAINTIFF creditors would not know the true nature and extent of that bitcoin with the intent of
3 trying to hinder, delay, and defraud PLAINTIFF creditors from recovering and collecting on after
4 a verdict and judgment in this case. It is believed that after the Grossman defendants learned that
5 PLAINTIFFS discovered their Bitcoin ownership, that they immediately undertook steps to
6 transfer—and actually transferred—that ownership to a trust that they have direct control over
7 and/or are the direct beneficiaries of so as to further hinder, block, and delay PLAINTIFFS'
8 attempts learn of the true nature and extent of this Bitcoin ownership and hinder, block, and delay
9 their attempts to liquidate and collect the Bitcoin after a verdict and judgment in this case.

10 75. The Jim Bridger Home, Buckhead Home, and Bitcoin transactions were entirely
11 fraudulent for all the reasons detailed above. As further evidence of their fraudulent nature, the
12 following is known to date:

13 A. The property and asset transactions were to insiders, *i.e.*, to the Grossman
14 defendants, themselves, or directly to entities that they had direct control over and/or were direct
15 beneficiaries of.

16 B. After these fraudulent transactions, the Grossman defendants debtors remained in
17 direct control the property and assets despite the real properties' change of title.

18 C. The transactions were also concealed, at least initially, as the Grossman defendants
19 refused to produce any credible documents or evidence that would identify whether Peter
20 Grossman paid the legal fees identified in the promissory note or deed of trust for the Jim Bridger
21 Home and the true nature and extent of who and what the "JB Road Trust" is. It was not until a
22 motion to compel production against defendant Peter Grossman was filed that he finally produced
23 the JB Road Trust document that identified himself as the sole creator and sole beneficiary of that
24 trust. And, to date, the Grossman defendants still refuse to produce any documents relating to the
25 Buckhead Home transaction that identifies the true nature and extent of the so-called "Richard
26 Grossman Grandchildren's Trust" that now owns the Buckhead Home even though that trust paid
27 not a penny for the property and title. With respect to the Bitcoin, as detailed above, the
28 Grossman defendants refused to identify and disclose the asset despite a Court-order requiring

1 them to do so and they also refused to produce any documents or information about their Bitcoin
 2 ownership in response to discovery requests in the pending civil lawsuit.

3 D. All of the fraudulent transfers were done after the Grossman defendants were sued
 4 by the PLAINTIFF creditors.

5 E. The fraudulent transfers represent a substantial portion of the Grossman defendants'
 6 assets. Indeed, the Jim Bridger Home is listed for sale at \$13,500,000 and the Buckhead Home is
 7 currently worth \$1,606,900. Moreover, the Grossman defendants claim there is a premarital
 8 agreement between them that dictates property and asset ownership. Based on the Grossman
 9 defendants' claims, these fraudulent transactions would leave Rebecca Grossman nearly penniless,
 10 which is exactly what the Grossman defendants want to project because they believe the
 11 PLAINTIFFS will not pursue an excess judgment involving Rebecca Grossman if they believe she
 12 is nearly penniless.

13 F. With respect to Jim Bridger Home and Buckhead Home fraudulent transfers, the
 14 quitclaims deeds associated with both of them were done for no consideration of any kind. It is
 15 also believed that the transfer of the Bitcoin was done for no consideration of any kind.

16 G. All of the above-identified transactions and concealment of same were done after
 17 the fatal collision.

18 76. As a direct and foreseeable result of the fraudulent conduct by the Grossman
 19 defendants identified above, PLAINTIFFS suffered harm because properties and assets that are
 20 subject to liquidation and collection by them because of the FATAL COLLISION have been
 21 purposefully hidden, blocked, and concealed, which is exactly what the Grossman defendants
 22 wanted to do. Stated another way, the Grossman defendants fully intended to protect, hide, and
 23 secret away these properties and assets so that the PLAINTIFFS could not liquidate and collect
 24 them after a verdict and judgment. The Grossman defendants knew their conduct and these
 25 transactions were wrong and fraudulent and done to purposefully frustrate the PLAINTIFFS
 26 attempt to seek full and fair compensation for the FATAL COLLISION.

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PRAYER FOR RELIEF

PLAINTIFFS prays judgment against the defendants REBECCA GROSSMAN, PETER GROSSMAN, SCOTT ERICKSON and DOES 2-50, inclusive, and each of them, as follows:

1. For non-economic damages, according to proof;
2. For economic damages, according to proof;
3. For property damage, according to proof;
4. For punitive damages as against REBECCA GROSSMAN, according to proof;
5. For reasonable attorney fees against REBECCA GROSSMAN pursuant to Code of Civil Procedure section 1021.4;
6. For punitive damages as against SCOTT ERICKSON, according to proof;
7. Avoidance of each fraudulent transfer to the extent necessary to satisfy PLAINTIFFS' claims and damages;
8. An injunction against further disposition by defendants PETER GROSSMAN and REBECCA GROSSMAN, or both, of the properties and assets fraudulently transferred;
9. For the imposition of a constructive trust of the assets and properties fraudulently transferred by defendants PETER GROSSMAN and REBECCA GROSSMAN;
10. The appointment of a receiver to take charge of the assets and properties fraudulently transferred by defendants PETER GROSSMAN and REBECCA GROSSMAN;
11. For prejudgment interest, according to proof;
12. For pre-trial interest, according to proof; and
13. For such other and further relief as this Court may deem just and proper.

DATED: February 24, 2026

PANISH | SHEA | RAVIPUDI LLP



By: _____
Brian Panish
Andrew Owen
Attorneys for Plaintiffs

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DEMAND FOR JURY TRIAL

PLAINTIFFS hereby demand a trial by jury as to all causes of action.

DATED: February 24, 2026

PANISH | SHEA | RAVIPUDI LLP



By: _____

Brian Panish
Andrew Owen
Attorneys for Plaintiffs