

IN THE CIRCUIT COURT FOR THE CITY OF VIRGINIA BEACH

Michael Jeter

[REDACTED]
Norfolk, VA 23508
[REDACTED]
[REDACTED]

Plaintiff,

v.

Alejandro Peralta

[REDACTED]
[REDACTED]
Defendant (Driver),

And

Allstate Insurance Company

Defendant (Insurer)

To be served through its authorized agents:

Hayfield Insurance Agency and Financial Services, Inc.

6923 Telegraph Road

Alexandria, VA 22310

FILED
CLERK'S OFFICE
VA BEACH CIRCUIT COURT

OCT 30 2025

TINA E. SINNEN, CLERK
BY: [Signature] D.C.

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VA BEACH CIRCUIT COURT~~

~~OCT 27 2025~~

~~TINA E. SINNEN, CLERK
BY: [Signature] D.C.~~

Beau Burgess Proctor
Woodbridge, VA 22191-1305

Kidds Insurance Services, LLC (Gina Kidd, Agent)
1360 American Way
Bedford, VA 24523

COMPLAINT (Jury Trial Demanded)

COMES NOW the Plaintiff, Michael Jeter, and states as follows:

- 1. Plaintiff is a resident of Norfolk, Virginia.**
- 2. Defendant Alejandro Peralta was the operator of the at-fault vehicle involved in the collision described herein.**
- 3. Defendant Allstate Insurance Company insured Defendant Peralta under Claim No. 0806474177 LIA, and is licensed to conduct and does business in Virginia.**

FACTUAL ALLEGATIONS

- 4. On July 19, 2025, at approximately 2:41 PM, Plaintiff was traveling southbound on South Independence Blvd, approaching Baxter Road in the right-most through lane, moving lawfully and at or below the posted speed limit under a green traffic signal.**
- 5. The left through lanes were backed up and stopped, while Plaintiff's lane remained clear and unobstructed.**
- 6. A separate vehicle occupied the right-turn-only lane, preventing Plaintiff from evading right to avoid impact.**
- 7. Defendant Peralta, operating a gray Ford Explorer, abruptly crossed from the stopped left lane into Plaintiff's lane, without clearance and without legal right-of-way, in violation of Va. Code § 46.2-848 (improper/unsafe lane change).**

8. Plaintiff sounded his horn and attempted evasive action, but the collision was unavoidable, because the turn-lane vehicle blocked the only escape path and Peralta intruded into Plaintiff's lane.

9. The impact was a driver-side sideswipe, with damage extending from the rear driver-side door rearward, confirming that Peralta's vehicle entered Plaintiff's lane.

10. Plaintiff was not cited by law enforcement, and no finding of fault was made against Plaintiff.

11. Two eyewitness passenger occupants in Plaintiff's vehicle observed the collision and confirmed that Peralta crossed into Plaintiff's lane.

12. Plaintiff reported these eyewitness accounts to Defendant Allstate; however, Adjuster Treasher Lindsey stated the witnesses were "not credible" solely because they were inside Plaintiff's vehicle, and refused to consider their statements.

13. Virginia law does not permit disregarding eyewitness testimony solely because a witness is a vehicle occupant. Allstate's conduct constitutes failure to conduct a reasonable investigation.

14. On September 24, 2025, Allstate denied Plaintiff's claim and asserted that Plaintiff was at fault, despite the lane geometry, damage pattern, lack of citation, and eyewitness accounts proving otherwise.

15. Allstate's denial was repugnant to the evidence, factually false, and issued without lawful basis, in violation of:

- Va. Code § 38.2-510(A)(1) - Misrepresentation of pertinent facts
- Va. Code § 38.2-510(A)(6) - Failure to conduct a reasonable investigation
- Va. Code § 8.01-66.1 - Bad-faith refusal to settle a valid claim

DAMAGES

Plaintiff seeks full compensatory damages in an amount to be determined by the jury, but not less than \$1,000,000.00.

CAUSES OF ACTION

Count I - Negligence (Against Peralta)

Count II - Negligence Per Se (Va. Code § 46.2-848)

Count III - Bad Faith Refusal to Settle (Allstate; Va. Code § 8.01-66.1)

Count IV - Unfair Claim Settlement Practices (Allstate; Va. Code § 38.2-510)

Count V - Punitive Damages (Va. Code § 8.01-38.1 & Double Punitive Under § 8.01-66.1)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment jointly and severally against Defendants as follows:

- A. Compensatory damages not less than \$1,000,000.00;
- B. Punitive damages against Peralta in an amount determined by the jury;
- C. Punitive damages against Allstate under Va. Code § 8.01-38.1, in the statutory maximum amount of \$350,000.00;
- D. Additional punitive damages against Allstate pursuant to Va. Code § 8.01-66.1, including doubling of punitive damages;
- E. Trial by jury on all issues;
- F. Costs, interest, and all further relief deemed just.

PLAINTIFF DEMANDS TRIAL BY JURY.

Respectfully submitted,

Michael Jeter, Pro Se

(Signature)

Date:


10/27/25