

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA

JOY RANSOM,

Plaintiff,

CIVIL DIVISION  
CASE NO.:

v.

NELSON PELTZ; and  
CLAUDIA PELTZ,

Defendants.  
\_\_\_\_\_ /

**COMPLAINT AND DEMAND FOR JURY TRIAL**

Plaintiff, JOY RANSOM, by and through the undersigned counsel, hereby sues the Defendants, NELSON PELTZ and CLAUDIA PELTZ, and alleges:

1. This is an action for damages, which exceeds Fifty Thousand Dollars (\$50,000.00) exclusive of interest and costs, and is otherwise within this Court's jurisdictional limits.
2. Venue is proper in Palm Beach County in that all of the acts complained of herein occurred in Palm Beach County, Florida.
3. At all times material hereto Plaintiff, JOY RANSOM, was and is a resident of Palm Beach County, Florida, and is otherwise sui juris.
4. At all times material hereto Defendant, NELSON PELTZ, was and is a resident of Palm Beach County, Florida, and is otherwise sui juris.
5. At all times material hereto Defendant, CLAUDIA PELTZ, was and is a resident of Palm Beach County, Florida, and is otherwise sui juris.
6. At all times material hereto, and specifically on December 23, 2025, Defendants, NELSON PELTZ and CLAUDIA PELTZ, were the owners of a Pit Bull or a Pit Bull-mix dog named Houdini.

7. At all times material hereto, and specifically on December 23, 2025, Defendants, NELSON PELTZ and CLAUDIA PELTZ, owned the premises located at 548 N. County Road, Palm Beach, Florida 33480, in Palm Beach County.

8. At all times material hereto, and specifically on December 23, 2025, Plaintiff, JOY RANSOM, was a business invitee of Defendants', NELSON PELTZ and CLAUDIA PELTZ, premises located at 548 N. County Road, Palm Beach, Florida 33480, in Palm Beach County.

9. At all times material hereto, and specifically on December 23, 2025, while Plaintiff, JOY RANSOM, was legally on Defendants', NELSON PELTZ and CLAUDIA PELTZ, premises located at 548 N. County Road, Palm Beach, Florida 33480, Defendants', NELSON PELTZ and CLAUDIA PELTZ, dog, Houdini, lunged at and bit and attacked the Plaintiff, JOY RANSOM, who was injured as a result.

10. Florida Statute §767.01 provides that "Owners of dogs shall be liable for any damage done by their dogs to a person...."

#### **COUNT I- NEGLIGENCE**

Plaintiff, JOY RANSOM, re-alleges and restates the allegations in paragraphs 1 through 10 as if fully set forth herein.

11. At all times material hereto, and specifically on December 23, 2025, Houdini had a vicious nature, a vicious disposition, and/or had a propensity to attack and/or attempt attacks which was known or should have been known by Defendants, NELSON PELTZ and CLAUDIA PELTZ.

12. On at least one occasion prior to December 23, 2025, Houdini had attacked and/or attempted attacks on the Plaintiff, JOY RANSOM.

13. At all times material hereto, and specifically on December 23, 2025, Houdini was not under any form of restraint or control while on Defendants', NELSON PELTZ and CLAUDIA PELTZ, premises in an area traveled by business invitees, including Plaintiff, JOY RANSOM.

14. On December 23, 2025, Houdini, without any provocation, suddenly and without warning bit and attacked Plaintiff, JOY RANSOM, while she was legally on Defendants', NELSON PELTZ and CLAUDIA PELTZ, premises.

15. Defendants, NELSON PELTZ and CLAUDIA PELTZ, had a duty to keep persons, including but not limited to Plaintiff, JOY RANSOM, safe from harm from their dog, Houdini.

16. Defendants, NELSON PELTZ and CLAUDIA PELTZ, breached their duty owed to Plaintiff, JOY RANSOM, by:

- a. Negligently failing to prevent Houdini's vicious attack/attempted attack.;
- b. Negligently failing to have Houdini under restraint to prevent Houdini's vicious attack/attempted attack.;
- c. Negligently failing to secure Houdini in a confined space and/or cage to prevent Houdini's vicious attack/attempted attack.;
- d. Negligently failing to train Houdini to prevent Houdini's vicious attack/bite.; and/or
- e. Negligently failing to supervise Houdini to prevent Houdini's vicious attack/bite.

17. As a direct and proximate result of the Defendants', NELSON PELTZ and CLAUDIA PELTZ, negligence, Plaintiff, JOY RANSOM, suffered bodily injury and resulting physical and mental pain and suffering, disability, physical impairment, disfigurement, mental anguish, inconvenience, loss of capacity for the enjoyment of life, loss of earnings and impairment of earning capacity and/or permanent aggravation of a pre-existing condition, and further incurred hospital bills, medical bills, and/or other bills as a result of said injuries. The injuries to Plaintiff, JOY RANSOM, are either permanent or continuing in nature and Plaintiff will continue to suffer these losses in the future.

WHEREFORE, Plaintiff, JOY RANSOM, respectfully demands judgment against Defendants, NELSON PELTZ and CLAUDIA PELTZ, on Count I, for damages, costs, and interest, if or when applicable, and all other relief this Court deems just and appropriate.

**COUNT II – NEGLIGENCE PER SE / VIOLATION  
OF FLORIDA'S DANGEROUS DOG STATUTE**

Plaintiff, JOY RANSOM, re-alleges and restates the allegations in paragraphs 1 through 10 as if fully set forth herein.

18. Prior to December 23, 2025, Houdini had, on at least one occasion(s), attacked and/or attempted to attack Plaintiff, JOY RANSOM, and other business invitees, such that Defendants,

NELSON PELTZ and CLAUDIA PELTZ, knew or should have known that Houdini met the criteria for classification as a “dangerous dog” under Florida Statute §767.11.

19. More specifically, on December 16, 2024, Defendant was sued in Palm Beach County, Case Number 502024CA011826XXXAMB, by Mileydis Morejon due to Houdini lunging and attempting to attack Ms. Morejon which caused her to be injured when she fell to the ground attempting to escape from Houdini’s attack.

20. Notwithstanding said prior attacks and/or attempted attacks, Defendants, NELSON PELTZ and CLAUDIA PELTZ, failed to report Houdini’s dangerous propensities to the appropriate animal control authority and failed to obtain a certificate of registration for Houdini as required by Florida Statute §767.12(5)(a)1., and failed to renew any such registration annually as required by that section.

21. Defendants, NELSON PELTZ and CLAUDIA PELTZ, further failed to have Houdini permanently identified by microchip as required by Florida Statute §767.12(5)(a)1.c., and failed to keep Houdini muzzled and restrained by a substantial chain or leash at all times outside of a proper enclosure, as required by Florida Statute §767.12(5)(a)3.

22. Florida Statute §767.12 was enacted to protect members of the public, including Plaintiff, JOY RANSOM, from the exact type of harm she suffered on December 23, 2025, and Defendants’, NELSON PELTZ and CLAUDIA PELTZ, violations of said statute constitute negligence per se.

23. As a direct and proximate result of Defendants’, NELSON PELTZ and CLAUDIA PELTZ, statutory violations, Plaintiff, JOY RANSOM, suffered the injuries and damages described in paragraph 17 above.

WHEREFORE, Plaintiff, JOY RANSOM, respectfully demands judgment against Defendants, NELSON PELTZ and CLAUDIA PELTZ, on Counts I and II, for damages, costs, and interest, if or when applicable, and all other relief this Court deems just and appropriate.

**DEMAND FOR JURY TRIAL**

Plaintiff, JOY RANSOM, hereby demands trial by jury of all issues so triable as a matter of right.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that an original and one copy of the foregoing has been served on the above Defendants, NELSON PELTZ AND CLAUDIA PELTZ, with the Complaint, related documents and discovery.

Dated: July 10, 2026.

**STEINGER, GREENE & FEINER. P.A.**

1645 Palm Beach Lakes Blvd., 8<sup>th</sup> Floor

West Palm Beach, FL 33401

Phone and Fax: (561) 437-4402

Attorneys for Plaintiff

[mblackman@injurylawyers.com](mailto:mblackman@injurylawyers.com)

[jrousseau@injurylawyers.com](mailto:jrousseau@injurylawyers.com)

[samperez@injurylawyers.com](mailto:samperez@injurylawyers.com)

*s/ Max B. Blackman*

Max B. Blackman, Esquire

Florida Bar No.: 1014579

NOT A CERTIFIED COPY