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IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
FIRST JUDICIAL DISTRICT AT JUNEAU

MARISSA ZAMORA, Personal	)	
Representative of THE ESTATE OF	)	
ARMANDO SANCHEZ,	)	
	)	
Plaintiff,	)	
v.	)	
	)	
MICHAEL JOZEF PETRUSH and THE	)	
CITY AND BOROUGH OF JUNEAU,	)	
	)	
Defendants.	)	Case No. 1JU-26- 00732 CI
_____)		

**COMPLAINT**

**NOW COMES** Marissa Zamora, personal representative of the Estate of Armando Sanchez (hereinafter "Plaintiff"), by and through counsel Crowson Law Group, and hereby files suit against the above-captioned defendants and alleges as follows:

1. Armando Sanchez, deceased (hereinafter "Decedent"), formerly a resident of Skagway, Alaska, died intestate on June 10, 2024.
2. On March 23, 2026, Marissa Zamora was duly qualified and appointed as personal representative of the Estate of Armando Sanchez in file number 3AN-26-00323PR and is acting as personal representative of the estate in the institution of this

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action.

3. Upon information and belief, Michael Jozef Petrush (hereinafter Defendant Petrush), at all times mentioned herein, was and is a resident of Juneau, Alaska.

4. Defendant City and Borough of Juneau (hereinafter “Defendant Juneau”) is a unified home-rule municipality and municipal corporation duly organized and existing under the laws of the State of Alaska, located within the First Judicial District.

5. The incident described below occurred in Juneau, Alaska.

6. At all times alleged herein Defendant Petrush was an employee of Defendant Juneau and was acting in the course and scope of his employment

7. During the early morning hours of June 1, 2024 Defendant Petrush was driving a 2015 Chevrolet truck, Alaska license XZA276, which was owned by Defendant Juneau.

8. At all times herein mentioned, Decedent was a pedestrian.

9. On or about June 1, 2024, at approximately 4:56 a.m. Decedent was in the drive through area of True Noth Federal Credit Union at 2777 Postal Way in Juneau, Alaska.

10. At the same place and time Defendant Petrush entered the drive through and struck Decedent.

11. Defendant was negligent in the following ways:

- a. He failed to keep his vehicle under proper control;
- b. He failed to give full time and attention;
- c. He failed to keep a proper lookout;
- d. He drove his vehicle in a careless and reckless manner; and

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e. He was negligent in other ways as may be shown at trial.

12. The impact and resulting damages referenced herein was due to the negligence of Defendant Petrush.

13. Defendant Petrush's negligence is imputed to Defendant Juneau.

14. Defendant Juneau is vicariously liable for Defendant Petrush's negligent acts and omissions.

15. At the time of his death, the Decedent was of excellent health, constitution vigor and habit and had a reasonable expectation of living a normal and healthy life.

16. As a direct and proximate result of the acts and omissions of the Defendants, the Decedent survived for nine days during which he suffered severe physical and emotional pain.

17. As a direct and proximate result of the acts and omissions of the Defendants, the Decedent succumbed to his injuries and died on June 10, 2024.

18. As a direct and proximate result of the acts and omissions of the Defendants, the Decedents estate, family and heirs sustained damages and will continue to sustain damages in the future, including but not limited to the following:

- a. Loss of financial support through the reasonable and expected net income of the Decedent;
- b. Loss of Decedent's services, protection care and assistance;
- c. Loss of Decedent's society, companionship, comfort, guidance, kindly offices and advice;
- d. Incurred medical expenses;

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- e. Incurred funeral expenses; and
- f. Such other damages as may be shown at trial.

19. The injuries, grievances and damages as hereinabove set forth, were caused by the carelessness, negligence, and recklessness of the Defendants as stated herein.

20. The Decedent and his estate were injured and damaged in an amount to be determined by the trier of fact but believed to be greater than \$100,000.

**WHEREFORE**, Plaintiff prays for judgment against Defendant as follows:

- 1. For compensatory damages for pain, suffering, and other non-economic loss, medical and incidental expenses, in an amount to be determined by the trier of fact, but believed to be greater than \$100,000.00;
- 2. For attorneys' fees and costs of this action as provided by law and court rule;
- 3. For prejudgment interest authorized by law; and
- 4. For such other and further relief as the court deems just and proper.

DATE: 5/15/2026

CROWSON LAW GROUP  
*Attorneys for Plaintiff*

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