

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CHARLES PRIVETTE,
Plaintiff,

CASE NO.:

vs.

08 45 57 2

P.T.G. ENTERTAINMENT, INC.,
d/b/a BOOBY TRAP
Defendant.

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CLERK OF DISTRICT COURT
BROWARD COUNTY
FLORIDA

2008 SEP 24 04 3: 38

CIRCUIT CIVIL

COMPLAINT

Plaintiff, CHARLES PRIVETTE, sues the Defendant, P.T.G. ENTERTAINMENT, INC.,
d/b/a BOOBY TRAP ("PTG ENTERTAINMENT"), and states:

1. This is an action for damages in excess of Fifteen Thousand (\$15,000.00) Dollars.
2. At all times material hereto, the Plaintiff, CHARLES PRIVETTE, was a resident of Broward County, State of Florida.
3. That at all times material hereto, the Defendant, PTG ENTERTAINMENT, is a Florida corporation that was authorized to do business and was doing business in Broward County, Florida.
4. That at all times material hereto, the Defendant, PTG ENTERTAINMENT, by and through its agents, employees, and/or servants, had exclusive dominion, possession and control of the premises located at 2840 Hammondville Road, Pompano Beach, Florida that was used as an adult entertainment night club.
5. That on or about January 14, 2008, Plaintiff, CHARLES PRIVETTE, was lawfully on the premises of Defendant, PTG ENTERTAINMENT, as an invitee.
6. At the aforesaid time and place, Plaintiff, CHARLES PRIVETTE, was sitting in the front row near the stage watching a show performed by an exotic dancer.

#4298
NLP
D=1
S=1

7. At the aforesaid time and place, Defendant, PTG ENTERTAINMENT's employee negligently performed her pole dance routine when one of her high heeled shoes flew up in the air and struck the mirrored glass ceiling causing the mirror to shatter and fall onto Plaintiff.

8. At the aforesaid time and place, Plaintiff, CHARLES PRIVETTE, was unable to avoid being hit by pieces of the shattered mirror and high heeled shoe.

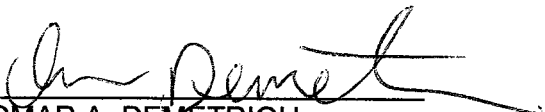
9. Defendant, PTG ENTERTAINMENT, had a duty to ensure the safety of its patrons like, Plaintiff, CHARLES PRIVETTE.

10. Defendant, PTG ENTERTAINMENT, breached its duty when its employee failed to perform her routine in reasonably safe manner.

11. Defendant, PTG ENTERTAINMENT, is vicariously liable for the negligence of its employees when conducted in the scope of their employment.

12. That as a direct and proximate result of the aforementioned negligence on the part of the Defendant, PTG ENTERTAINMENT, Plaintiff, CHARLES PRIVETTE, suffered bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life and expense of hospitalization, medical and nursing care and treatment. The losses are either permanent or continuing and Plaintiff will suffer losses in the future.

WHEREFORE, Plaintiff, CHARLES PRIVETTE, demands judgment against the Defendant, PTG ENTERTAINMENT, INC., for damages, costs, and interest where applicable, and further demand trial by jury on all issues so triable.

By: 
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