

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

ANGEL COLON; AMNERIS RAMOS DIAZ;
RODNEY SUMTER; JAY VASQUEZ; MARELY
MENENDEZ, as Personal Representative of the Estate
of GILBERTO SILVA MENENDEZ; CARLOS
MUNIZ-TORRES; MIGUEL VEGA; JONATHAN
GARCIA; ESTHER PETERSON; MERCEDES
MCQUERY; ROSALIA RAMOS and STANLEY
ALMODOVAR, as Co-Personal Representatives of the
Estate of STANLEY ALMODOVAR III; ROLANDO
RODRIGUEZ; DEMITRIUS POLANCO; KADIM
RAMOS; JACOBI CEBALLO; KALIESHA ANDINO;
BETTIE LINDSEY; SANDY ROBERTS;
KASSANDRA MARQUEZ; KATHERINE
PATRICIO; SYLVIA SERRANO; ROSAMARIA
FEBO; NORMAN CASIANO-MOJICA;
FRANCHESSKA MERCADO; LEYDIANA
PUYARENA; FELIPE MARRERO SANCHEZ;
COREY RIVERA; ILKA REYES; JEANETTE
MCCOY; YVENS CARRENARD; EDWIN RIVERA
ALVAREZ; CESAR RODRIGUEZ; MOHAMMED
ISLAM; DAVID JOURDENAIS; RONISE
CELESTIN; JOSEPH BRADLEY; BRIAN NUNEZ;
CHRISTIAN ORTIZ CARDONA; LIZMARYOOE
FINOL VILORIA; YORVIS CAMARGO ROMERO;
CARMEN NILDA CAPO-QUINONES, as Personal
Representative of the Estate of LUIS OCASIO CAPO;
CARLOS PEREZ ANGLERO; DIGNA ROSA
FERNANDEZ DE CARRILLO, as Personal
Representative of the Estate of SIMON CARRILLO
FERNANDEZ; DIMARIE RODRIGUEZ LOZADA, as
Personal Representative of the Estate of JEAN
CARLOS NIEVES RODRIGUEZ; CARLEEN
THOMAS; WERNEL E. MARTINEZ; JOSE M. DIAZ
UBILES; BERNADETTE CRUZ CARRION, as
Personal Representative of the Estate of PETER
GONZALEZ-CRUZ; JUAN JOSE CUFINO
RODRIGUEZ; KEINON CARTER; LEONEL
MELENDEZ; JULLIAM AMADOR; ADRIAN
LOPEZ; JAVIER NAVA; JOAQUIN ROJAS; RUBEN
GARCIA-TEJADA; GEOFFREY TASSOPOULOS;

CASE NO: 502017CA003447 MB AG

Cohen Milstein Sellers & Toll, PLLC
2925 PGA Boulevard, Suite 200, Palm Beach Gardens, FL 33410
Telephone: (561) 515-1400 Facsimile (561) 515-1401

EARL CROSBY and LISA CROSBY as Personal Representative of TEVIN CROSBY; ASael ABAD; JAVIER ANTONETTI; JUAN ANTONETTI; PATIENCE CARTER; SONIA CEDENO; MERCEDES GARCIA; CHRISTOPHER HANSEN; OLGA MARIA DISLA, as Personal Representative of the Estate of ANTHONY LAUEANO-DISLA; LYDIA ESTHER PEREZ, as Personal Representative of the Estate of JEAN CARLO MENDEZ PEREZ; JOSEPH NEGRON; NATHAN OROZCO; NICHOLAS PEREZ; JOSE RAMIREZ MARTINEZ; COREY RICHARDS; IVAN EDUARDO DOMINGUEZ, as Personal Representative of the Estate of ERIC IVAN ORTIZ-RIVERA; CHRISS WEST; OSMAN AGUILAR RAMSES; MARIELA BARAHONA; ANGELIQUE CARO; BERNICE DEJESUS VELAZQUEZ, as Personal Representative of the Estate of FRANKY DEJESUS VELASQUEZ; JACQUELINE ECHEVARRIA; MARITZA GOMEZ; IRIS REYES SANTIAGO and PEDRO JORGE DIAZ, as Personal Representatives of the Estate of JAVIER JORGE REYES; VICTOR MALDONADO; DEBORAH RILEY, as Personal Representative of the Estate of KIMBERLY JEAN MORRIS; MICHAEL MORALES HERNANDEZ; ITZA ORTIZ; FRANCISCO PABON; MARIO PEREZ; MAGDA RIVERA; ROLANDO RODRIGUEZ; GEOFFREY RODRIGUEZ; CARLOS SANTO DOMINGO; WILMARIEL TRINIDAD, as Personal Representative of the Estate of XAVIER SERRANO ROSADO; CARLEEN THOMAS; MIRIAM TORRES SANTIAGO; JAMMY VALENTIN FERNANDEZ, as Personal Representative of the Estate of LEROY VALENTIN-FERNANDEZ; and JOSE LUIS VIELMA, as Personal Representative of the Estate of LUIS VIELMA,

Plaintiffs,

v.

G4S SECURE SOLUTIONS (USA) INC., a Florida corporation,

Defendant.

*Cohen Milstein Sellers & Toll, PLLC
2925 PGA Boulevard, Suite 200, Palm Beach Gardens, FL 33410
Telephone: (561) 515-1400 Facsimile (561) 515-1401*

SECOND AMENDED COMPLAINT

Plaintiffs, ANGEL COLON; AMNERIS RAMOS DIAZ; RODNEY SUMTER; JAY VASQUEZ; MARELYS MENENDEZ, as Personal Representative of the Estate of GILBERTO SILVA MENENDEZ; CARLOS MUNIZ-TORRES; MIGUEL VEGA; JONATHAN GARCIA; ESTHER PETERSON; MERCEDES MCQUERY; ROSALIA RAMOS and STANLEY ALMODOVAR, as Personal Representatives of the Estate of STANLEY ALMODOVAR III; ROLANDO RODRIGUEZ; DEMITRIUS POLANCO; KADIM RAMOS; JACOBI CEBALLO; KALIESHA ANDINO; BETTIE LINDSEY; SANDY ROBERTS; KASSANDRA MARQUEZ; KATHERINE PATRICIO; SYLVIA SERRANO; ROSAMARIA FEBO; NORMAN CASIANO-MOJICA; FRANCHESSKA MERCADO; LEYDIANA PUYARENA; FELIPE MARRERO SANCHEZ; COREY RIVERA; ILKA REYES; JEANETTE MCCOY; YVENS CARRENARD; EDWIN RIVERA ALVAREZ; CESAR RODRIGUEZ; MOHAMMED ISLAM; DAVID JOURDENAIS; RONISE CELESTIN; JOSEPH BRADLEY; BRIAN NUNEZ; CHRISTIAN ORTIZ CARDONA; LIZMARYOOE FINOL VILORIA; YORVIS CAMARGO ROMERO; CARMEN NILDA CAPO-QUINONES, as Personal Representative of the Estate of LUIS OCASIO-CAPO; CARLOS PEREZ ANGLERO; DIGNA ROSA FERNANDEZ DE CARRILLO, as Personal Representative of the Estate of SIMON CARRILLO FERNANDEZ; DIMARIE RODRIGUEZ LOZADA, as Personal Representative of the Estate of JEAN CARLOS NIEVES RODRIGUEZ; CARLEEN THOMAS; WERNEL E. MARTINEZ; JOSE M. DIAZ UBILES; BERNADETTE CRUZ CARRION, as Personal Representative of the Estate of PETER GONZALEZ-CRUZ; JUAN JOSE CUFÍÑO RODRIGUEZ; KEINON CARTER; LEONEL MELENDEZ; JILLIAN AMADOR; ADRIAN

LOPEZ; JAVIER NAVA; JOAQUIN ROJAS; RUBEN GARCIA-TEJADA; GEOFFREY RODRIGUEZ; CHRISOVALATOU TASSOPOULOS; EARL CROSBY and LISA CROSBY, as Personal Representatives of TEVIN CROSBY; ASael ABAD; JAVIER ANTONETTI; JUAN ANTONETTI; PATIENCE CARTER; SONIA CEDENO; MERCEDES GARCIA; CHRISTOPHER HANSEN; OLGA MARIA DISLA, as Personal Representative of the Estate of ANTHONY LAUEANO-DISLA; LYDIA ESTHER PEREZ, as Personal Representative of the Estate of JEAN CARLO MENDEZ PEREZ; JOSEPH NEGRON; NATHAN OROZCO; NICHOLAS PEREZ; JOSE RAMIREZ MARTINEZ; COREY RICHARDS; IVAN EDUARDO DOMINGUEZ, as Personal Representative of the estate of ERIC IVAN ORTIZ-RIVERA; CHRISS WEST; OSMAN AGUILAR RAMSES; MARIELA BARAHONA; ANGELIQUE CARO; BERNICE DEJESUS VELAZQUEZ, as Personal Representative of the Estate of FRANKY DEJESUS VELASQUEZ; JACQUELINE ECHEVARRIA; MARITZA GOMEZ; IRIS REYES SANTIAGO and PEDRO JORGE DIAZ, as Personal Representatives of the Estate of JAVIER JORGE REYES; VICTOR MALDONADO; DEBORAH RILEY, as Personal Representative of the Estate of KIMBERLY JEAN MORRIS; MICHAEL MORALES HERNANDEZ; ITZA ORTIZ; FRANCISCO PABON; MARIO PEREZ; MAGDA RIVERA; ROLANDO RODRIGUEZ; GEOFFREY RODRIGUEZ; CARLOS SANTO DOMINGO; WILMARIEL TRINIDAD, as Personal Representative of the Estate of XAVIER SERRANO ROSADO; CARLEEN THOMAS; MIRIAM TORRES SANTIAGO; JAMMY VALENTIN FERNANDEZ, as Personal Representative of the Estate of LEROY VALENTIN-FERNANDEZ; and JOSE LUIS VIELMA, as Personal Representative of the Estate of LUIS VIELMA, hereby sue G4S SECURE SOLUTIONS (USA) INC., a Florida corporation, and allege as follows:

PRELIMINARY STATEMENT

1. On June 12, 2016, Omar Mateen opened fire in Pulse, an Orlando nightclub he entered while heavily armed. By the time his rampage ended more than three hours later, 49 people were dead and at least 53 others were wounded. It was one of the deadliest mass shootings by a single shooter in United States history and an unfathomable blow to Orlando's LGBT community.¹

JURISDICTION, PARTIES, AND VENUE

2. This is an action for damages in excess of fifteen thousand dollars.
3. At all times material hereto, Plaintiff ANGEL COLON was a resident of the city of Orlando, Orange County, Florida.
4. At all times material hereto, Plaintiff AMNERIS RAMOS DIAZ was a resident of the city of Kissimmee, Osceola County, Florida.
5. At all times material hereto, Plaintiff RODNEY SUMTER was a resident of the city of Orlando, Orange County, Florida.
6. At all times material hereto, Plaintiff JAY VASQUEZ was a resident of the city of New Port Richey, Pasco County, Florida.
7. At all times material hereto, Plaintiff MARELYS MENENDEZ, named Personal Representative of the Estate of GILBERTO SILVA MENENDEZ on March 21, 2017, was a resident of the city of Orlando, Orange County, Florida. (Letter of Administration is attached hereto as "Exhibit A.")

¹ The Pulse nightclub is frequented by members of the LGBT (lesbian, gay, bisexual, transgender) community, which may have been a motivating factor behind Omar Mateen's attack.

8. The potential beneficiaries of the Estate of GILBERTO SILVA MENENDEZ in this wrongful death action and the relationship of each to the decedent are as follows:

- a. MARELY MENENDEZ, surviving parent;
- b. RAMON E. SILVA RIVERA, surviving parent; and
- c. The Estate of GILBERTO SILVA MENENDEZ.

9. At all times material hereto, Plaintiff CARLOS MUNIZ-TORRES was a resident of the city of Orlando, Orange County, Florida.

10. At all times material hereto, Plaintiff MIGUEL VEGA was a resident of the city of Kissimmee, Osceola County, Florida.

11. At all times material hereto, Plaintiff JONATHAN GARCIA was a resident of the city of Kissimmee, Osceola County, Florida.

12. At all times material hereto, Plaintiff ESTHER PETERSON was a resident of New York City, Bronx County, New York.

13. At all times material hereto, Plaintiff MERCEDES MCQUERY was a resident of the city of Orlando, Orange County, Florida.

14. At all times material hereto, Plaintiffs ROSALIA RAMOS and STANLEY ALMODOVAR, named as Personal Representatives of the Estate of STANLEY ALMODOVAR III on March 21, 2017, were residents of the city of Clermont, Lake County, Florida. (Letter of Administration is attached hereto as "Exhibit B.")

15. The potential beneficiaries of the Estate of STANLEY ALMODOVAR III in this wrongful death action and the relationship of each to the decedent are as follows:

- a. ROSALIA RAMOS, surviving parent;

b. STANLEY ALMODOVAR, surviving parent; and

c. Estate of STANLEY ALMODOVAR III.

16. At all times material hereto, Plaintiff ROLANDO RODRIGUEZ was a resident of the city of Orlando, Orange County, Florida.

17. At all times material hereto, Plaintiff DEMITRIUS POLANCO was a resident of the city of Orlando, Orange County, Florida.

18. At all times material hereto, Plaintiff KADIM RAMOS was a resident of the city of Orlando, Orange County, Florida.

19. At all times material hereto, Plaintiff JACOBI CEBALLO was a resident of the city of Oviedo, Seminole County, Florida.

20. At all times material hereto, Plaintiff KALIESHA ANDINO was a resident of the city of Orlando, Orange County, Florida.

21. At all times material hereto, Plaintiff BETTIE LINDSEY was a resident of the city of Orlando, Orange County, Florida.

22. At all times material hereto, Plaintiff SANDY ROBERTS was a resident of the city of Orlando, Orange County, Florida.

23. At all times material hereto KASSANDRA MARQUEZ was a resident of the city of Deltona, Volusia County, Florida.

24. At all times material hereto, Plaintiff KATHERINE PATRICIO was a resident of the city of Deltona, Volusia County, Florida.

25. At all times material hereto, Plaintiff SYLVIA SERRANO was a resident of the city of Deltona, Volusia County, Florida.

26. At all times material hereto, Plaintiff ROSAMARIA FEBO was a resident of the city of Sanford, Seminole County, Florida.

27. At all times material hereto, Plaintiff NORMAN CASIANO-MOJICA was a resident of the city of Orlando, Orange County, Florida.

28. At all times material hereto, Plaintiff FRANCHESSKA MERCADO was a resident of the city of Sanford, Seminole County, Florida.

29. At all times material hereto, Plaintiff LEYDIANA PUYARENA was a resident of the city of Cocoa, Brevard County, Florida.

30. At all times material hereto, Plaintiff FELIPE MARRERO SANCHEZ was a resident of the city of Orlando, Orange County, Florida.

31. At all times material hereto, Plaintiff COREY RIVERA was a resident of the city of Orlando, Orange County, Florida.

32. At all times material hereto, Plaintiff ILKA REYES was a resident of the city of Kissimmee, Osceola County, Florida.

33. At all times material hereto, Plaintiff JEANETTE MCCOY was a resident of the city of Orlando, Orange County, Florida.

34. At all times material hereto, Plaintiff YVENS CARRENARD was a resident of the city of Orlando, Orange County, Florida.

35. At all times material hereto, Plaintiff EDWIN RIVERA ALVAREZ was a resident of the city of Orlando, Orange County, Florida.

36. At all times material hereto, Plaintiff CESAR RODRIGUEZ was a resident of the city of Orlando, Orange County, Florida.

37. At all times material hereto, Plaintiff MOHAMMAD ISLAM was a resident of the city of Oviedo, Seminole County, Florida.

38. At all times material hereto, Plaintiff DAVID JOURDENAIS was a resident of the city of Oviedo, Seminole County, Florida.

39. At all times material hereto, Plaintiff RONISE CELESTIN was a resident of the city of Orlando, Orange County, Florida.

40. At all times material hereto, Plaintiff JOSEPH BRADLEY was a resident of the city of Orlando, Orange County, Florida.

41. At all times material hereto, Plaintiff BRIAN NUNEZ was a resident of the city of Orlando, Orange County, Florida.

42. At all times material hereto, Plaintiff CHRISTIAN ORTIZ CARDONA was a resident of the city of Orlando, Orange County, Florida.

43. At all times material hereto, Plaintiff, LIZMARYOOE FINOL VILORIA, was a resident of the city of Orlando, Orange County, Florida.

44. At all times material hereto, Plaintiff YORVIS CAMARGO ROMERO was a resident of the city of Orlando, Orange County, Florida.

45. At all times material hereto, Plaintiff CARMEN NILDA CAPO-QUINONES, as Personal Representative of the Estate of LUIS OCASIO-CAPO, was a resident of the city of Kissimmee, Osceola County, Florida. (Letter of Administration is attached hereto as "Exhibit C.")

46. The potential beneficiaries of the Estate of LUIS OCASIO-CAPO in this wrongful death action and the relationship of each to the decedent are as follows:

- a. CARMEN NILDA CAPO-QUINONES, surviving parent;
- b. LUIS OCASIO, surviving parent; and
- c. The Estate of LUIS OCASIO-CAPO.

47. At all times material hereto, Plaintiff CARLOS PEREZ ANGLERO was a resident of the city of Orlando, Orange County, Florida.

48. At all times material hereto, Plaintiff, DIGNA ROSA FERNANDEZ DE CARRILLO, named Personal Representative of the Estate of SIMON CARRILLO FERNANDEZ on September 8, 2016, was a resident of the city of Orlando, Orange County, Florida. (Letter of Administration is attached hereto as "Exhibit D.")

49. The potential beneficiaries of the Estate of SIMON CARRILLO FERNANDEZ in this wrongful death action and the relationship of each to the decedent are as follows:

- a. DIGNA ROSA FERNANDEZ DE CARRILLO, surviving parent; and
- b. The Estate of SIMON CARRILLO FERNANDEZ.

50. At all times material hereto, Plaintiff DIMARIE RODRIGUEZ LOZADA, named Personal Representative of the Estate of JEAN CARLOS NIEVES RODRIGUEZ on March 20, 2017, was a resident of the City of Kissimmee, Osceola County, Florida. (Letter of Administration is attached hereto as "Exhibit E.")

51. The potential beneficiaries of the Estate of JEAN CARLOS NIEVES RODRIGUEZ in this wrongful death action and the relationship of each to the decedent are as follows:

- a. DIMARIE RODRIGUEZ LOZADA surviving parent;
- b. FEDERICO NIEVES, surviving parent; and

c. Estate of JEAN CARLOS NIEVES RODRIGUEZ.

52. At all times material hereto, Plaintiff CARLEEN THOMAS was a resident of the city of Orlando, Orange County, Florida.

53. At all times material hereto, Plaintiff WERNEL E. MARTINEZ was a resident of the city of Orlando, Orange County, Florida.

54. At all times material hereto, Plaintiff JOSE M. DIAZ UBILES was a resident of the city of Orlando, Orange County, Florida.

55. At all times material hereto, Plaintiff, BERNADETTE CRUZ CARRION, named Personal Representative of the Estate of PETER GONZALEZ-CRUZ on September 12, 2016, was a resident of the City of Orlando, Orange County, Florida. (Letter of Administration is attached hereto as "Exhibit F.")

56. The potential beneficiaries of the Estate of PETER GONZALEZ-CRUZ in this wrongful death action and the relationship of each to the decedent are as follows:

- a. BERNADETTE CRUZ CARRION, surviving parent;
- b. RAFAEL ANTONIO GONZALEZ, surviving parent; and
- c. The Estate of PETER GONZALEZ-CRUZ.

57. At all times material hereto, Plaintiff JUAN JOSE CUFÍÑO RODRIGUEZ was a resident of the city of Orlando, Orange County, Florida.

58. At all times material hereto, Plaintiff KEINON CARTER was a resident of the city of Orlando, Orange County, Florida.

59. At all times material hereto, Plaintiff LEONEL MELENDEZ was a resident of the city of Orlando, Orange County, Florida.

60. At all times material hereto, Plaintiff JILLIAN AMADOR was a resident of the city of Kissimmee, Osceola County, Florida.

61. At all times material hereto, Plaintiff ADRIAN LOPEZ was a resident of the city of Orlando, Orange County, Florida.

62. At all times material hereto, Plaintiff JAVIER NAVA was a resident of the city of Orlando, Orange County, Florida.

63. At all times material hereto, Plaintiff JOAQUIN ROJAS was a resident of the city of Kissimmee, Osceola County, Florida.

64. At all times material hereto, Plaintiff RUBEN GARCIA-TEJADA was a resident of the city of Orlando, Orange County, Florida.

65. At all times material hereto, Plaintiff GEOFFREY RODRIGUEZ was a resident of the city of Orlando, Orange County, Florida.

66. At all times material hereto, Plaintiff CHRISOVALATOU TASSOPOULOS was a resident of the city of Groveland, Lake County, Florida.

67. At all times material hereto, Plaintiffs EARL CROSBY and LISA CROSBY, as Personal Representatives of TEVIN CROSBY, are residents of the City of Statesville, Saginaw County, North Carolina. (Letter of Administration is attached hereto as "Exhibit G.")

68. The potential beneficiaries of the Estate of TEVIN CROSBY in this wrongful death action and the relationship of each to the decedent are as follows:

- a. EARL E. CROSBY, surviving parent;
- b. LISA B. CROSBY, surviving parent; and
- c. The Estate of TEVIN CROSBY.

69. At all times material hereto, Plaintiff ASael ABAD was a resident of the city of Orlando, Orange County, Florida.

70. At all times material hereto, Plaintiff JAVIER ANTONETTI was a resident of the city of Orlando, Orange County, Florida.

71. At all times material hereto, Plaintiff JUAN ANTONETTI was a resident of the city of Orlando Orange County, Florida.

72. At all times material hereto, Plaintiff PATIENCE CARTER was a resident of New York City, New York County, New York.

73. At all times material hereto, Plaintiff SONIA CEDENO was a resident of the city of Orlando, Orange County, Florida

74. At all times material hereto, Plaintiff MERCEDES GARCIA was a resident of the City of Orlando, Orange County, Florida.

75. At all times material hereto, Plaintiff CHRISTOPHER HANSEN was a resident of the city of Orlando, Orange County, Florida.

76. At all times material hereto, Plaintiff OLGA MARIA DISLA was Personal Representative of the Estate of ANTHONY LAUEANO-DISLA. (Letter of Administration is attached hereto as "Exhibit H.")

77. The potential beneficiaries of the Estate of ANTHONY LAUEANO-DISLA in this wrongful death action and the relationship of each to the decedent are as follows:

- a. OLGA MARIA DISLA, surviving parent;
- b. LUIS LAUEANO RODRIGUEZ, surviving parent; and
- c. The Estate of ANTHONY LAUEANO-DISLA.

78. At all times material hereto, Plaintiff LYDIA ESTHER PEREZ was Personal Representative of the Estate of JEAN CARLO MENDEZ PEREZ. (Letter of Administration is attached hereto as “Exhibit I.”)

79. The potential beneficiaries of the Estate of JEAN CARLO MENDEZ PEREZ in this wrongful death action and the relationship of each to the decedent are as follows:

- a. LYDIA ESTHER PEREZ, surviving parent;
- b. ANGEL MENDEZ, surviving parent; and
- c. Estate of JEAN CARLO MENDEZ PEREZ.

80. At all times material hereto, Plaintiff JOSEPH NEGRON was a resident of the city of Orlando, Orange County, Florida.

81. At all times material hereto, Plaintiff NATHAN OROZCO was a resident of the city of Orlando, Orange County, Florida.

82. At all times material hereto, Plaintiff NICHOLAS PEREZ was a resident of the City of Kissimmee, Osceola County, Florida.

83. At all times material hereto, Plaintiff JOSE RAMIREZ MARTINEZ was a resident of the city of Orlando, Orange County, Florida.

84. At all times material hereto, Plaintiff COREY RICHARDS was a resident of the city of Orlando, Orange County, Florida.

85. At all times material hereto, Plaintiff IVAN EDUARDO DOMINGUEZ was Personal Representative of the estate of ERIC IVAN ORTIZ-RIVERA. (Letter of Administration is attached hereto as “Exhibit J.”)

86. The potential beneficiaries of the Estate of ERIC IVAN ORTIZ-RIVERA in this wrongful death action and the relationship of each to the decedent are as follows:

- a. IVAN EDUARDO DOMINGUEZ, surviving spouse; and
- b. The Estate of ERIC IVAN ORTIZ-RIVERA.

87. At all times material hereto, Plaintiff CHRISS WEST was a resident of the City of Orlando, Orange County, Florida.

88. At all times material hereto, Plaintiff OSMAN AGUILAR RAMSES was a resident of the city of Orlando, Orange County, Florida.

89. At all times material hereto, Plaintiff MARIELA BARAHONA was a resident of the City of Kissimmee, Osceola County, Florida.

90. At all times material hereto, Plaintiff ANGELIQUE CARO was a resident of the city of Orlando, Orange County, Florida.

91. At all times material hereto, Plaintiff BERNICE DEJESUS VELAZQUEZ was Personal Representative of the Estate of FRANKY DEJESUS VELASQUEZ.

92. The potential beneficiaries of the Estate of FRANKY DEJESUS VELASQUEZ in this wrongful death action and the relationship of each to the decedent are as follows:

- a. AIDA LUZ VELASQUEZ VASQUEZ, surviving parent; and
- b. The Estate of FRANKY DEJESUS VELASQUEZ.

93. At all times material hereto, Plaintiff JACQUELINE ECHEVARRIA was a resident of St. Cloud, Florida.

94. At all times material hereto, Plaintiff MARITZA GOMEZ was a resident of Orlando, Florida.

95. At all times material hereto, Plaintiffs IRIS REYES SANTIAGO and PEDRO JORGE DIAZ, were Personal Representatives of the Estate of JAVIER JORGE REYES.

96. At all times material hereto, Plaintiff VICTOR MALDONADO was a resident of Apopka, Florida.

97. At all times material hereto, Plaintiff DEBORAH RILEY was Personal Representative of the Estate of KIMBERLY JEAN MORRIS.

98. At all times material hereto, Plaintiff MICHAEL MORALES HERNANDEZ was a resident of Lutz, Florida.

99. At all times material hereto, Plaintiff ITZA ORTIZ was a resident of Orlando, Florida.

100. At all times material hereto, Plaintiff FRANCISCO PABON was a resident of Orlando, Florida.

101. At all times material hereto, Plaintiff MARIO PEREZ was a resident of Homestead, Florida.

102. At all times material hereto, Plaintiff MAGDA RIVERA was a resident of Orlando, Florida.

103. At all times material hereto, Plaintiff ROLANDO RODRIGUEZ was a resident of Orlando, Florida.

104. At all times material hereto, Plaintiff GEOFFREY RODRIGUEZ was a resident of Orlando, Florida.

105. At all times material hereto, Plaintiff CARLOS SANTO DOMINGO was a resident of Lake Mary, Florida.

106. At all times material hereto, Plaintiff WILMARIEL TRINIDAD was Personal Representative of the Estate of XAVIER SERRANO ROSADO.

107. The potential beneficiaries of the Estate of XAVIER SERRANO ROSADO in this wrongful death action and the relationship of each to the decedent are as follows:

- a. KELVYN EMMANUEL SERRANO LOZANO, surviving child; and
- b. The Estate of XAVIER SERRANO ROSADO.

108. At all times material hereto, Plaintiff CARLEEN THOMAS was a resident of Orlando, Florida.

109. At all times material hereto, Plaintiff MIRIAM TORRES SANTIAGO was a resident of Alturas de Rio Grande, Puerto Rico.

110. At all times material hereto, Plaintiff JAMMY VALENTIN FERNANDEZ was Personal Representative of the Estate of LEROY VALENTIN-FERNANDEZ.

111. The potential beneficiaries of the Estate of LEROY VALENTIN-FERNANDEZ in this wrongful death action and the relationship of each to the decedent are as follows:

- a. LIDIO VALENTIN, surviving parent;
- b. LOURDES LIZZETTE FERNANDEZ, surviving parent; and
- c. The Estate of LEROY VALENTIN-FERNANDEZ.

112. At all times material hereto, Plaintiff JOSE LUIS VIELMA was Personal Representative of the Estate of LUIS VIELMA.

113. The potential beneficiaries of the Estate of LUIS VIELMA in this wrongful death action and the relationship of each to the decedent are as follows:

- a. JOSE LUIS VIELMA, surviving parent;

- b. ROBERTINA ASTUDILLO MOJICA, surviving parent; and
- c. The Estate of LUIS VIELMA.

114. Defendant G4S SECURE SOLUTIONS (USA), INC., is a Florida Corporation with its principal place of business located at 1395 University Boulevard, Jupiter, in Palm Beach County, Florida, where it regularly conducts business.

115. The mass murderer Omar Mateen was an employee of G4S SECURE SOLUTIONS (USA), INC.

116. Venue is proper in the Circuit Civil Court of Palm Beach County, Florida, pursuant to Fla. Stat. §§ 47.011 and 47.051, because Defendant G4S SECURE SOLUTIONS (USA), INC., has offices for transaction of its customary business in Palm Beach County.

117. The Court has jurisdiction as this is an action for damages that exceeds the sum of fifteen thousand (\$15,000.00) dollars, exclusive of costs, interest, and attorneys' fees.

118. All conditions precedent to the filing of the action have been met or waived.

GENERAL ALLEGATIONS

119. On June 12, 2016, shortly after 2:00 a.m., OMAR MATEEN entered Pulse Nightclub (hereafter referred to as "Pulse"), armed with a SIG Sauer MCX semi-automatic rifle, 9mm Glock 17 semi-automatic pistol, and over 200 rounds of ammunition.

120. On June 12, 2016, at said time, OMAR MATEEN opened fire on the patrons inside Pulse, including many of the Plaintiffs herein.

121. For hours, MATEEN terrorized the patrons and staff of Pulse while repeatedly making claims to hostages and victims that he "wouldn't stop his assault until America stopped

bombing his country” and threatening that he had explosive devices and snipers stationed outside the club.

122. MATEEN phoned 911 at approximately 2:22 a.m. praising the Boston Marathon bombers Tamerlan and Dzhokar Tsarnaev, and American suicide bomber Moner Mohammad Abu Salha, who died in Syria in 2014.

123. MATEEN claimed during a call to hostage negotiators that he had bombs strapped onto his body.

124. At approximately 4:29 a.m., Mateen told negotiators that he planned to strap explosive vests to four hostages and detonate them.

125. By the time MATEEN was fatally shot by police, ending his three-hour rampage, 49 people were dead or dying, at least 53 others had suffered permanent physical injuries and scarring due to wounds from MATEEN’s gunfire, and in excess of 300 people, all who had been inside Pulse when MATEEN entered, suffered psychological trauma.

126. Upon information and belief, on more than one occasion prior to June 12, 2016, MATEEN was observed watching violent Islamic State of Iraq and the Levant (“ISIL”) recruiting videos in his home.

127. Upon information and belief, on more than one occasion prior to June 12, 2016, OMAR MATEEN visited Pulse premises to “scout out” the club, part of the plan of action resulting in the June 12, 2016 mass shootings.

128. MATEEN spent thousands of dollars in the weeks preceding the attack on weapons and ammunition, inclusive of the weapons and ammunition MATEEN used during the June 12, 2016 mass shootings.

129. In the months, weeks, and/or days before the Pulse nightclub shooting, MATEEN made it known that he wanted to carry out a large-scale attack of violence involving the use of weapons against members of the public.

130. Defendant G4S SECURE SOLUTIONS (USA), INC., employed MATEEN as a security guard. G4S SECURE SOLUTIONS (USA), INC., is a wholly owned subsidiary and/or operational unity or division of G4S PLC, a corporation existing by and under the laws of England, which through its subsidiaries, operates a global, integrated security business under a 'One G4S' business model.

131. At all times relevant, Defendant G4S was required to administer psychological examinations to its hires, including MATEEN, before employing and training them as armed security guards.

132. Such examinations include sections in which a psychologist must attest to the applicant's mental and emotional stability.

133. The purpose of such examinations is to determine the employees' fitness to carry firearms in the course of their duties.

134. Such examinations were required by Florida law.

135. It was the purported policy of Defendant G4S to conduct the psychological examinations by having the prospective employees complete paper tests that were reviewed and evaluated by a psychologist

136. Pursuant to its purported policy, prospective employees did not speak to a psychologist in person.

137. Pursuant to its purported policy, prospective employees were not examined, in person, by any psychologist.

138. Defendant G4S failed to uniformly follow its policy.

139. Prospective employees were sometimes not required to complete the paper examinations.

140. Defendant G4S would advise such prospective employees of their passing results without the examinations ever being reviewed by a psychologist.

141. In 2009, Danny Fitzsimons, a G4S security guard, shot and killed two colleagues after displaying signs of psychological imbalance.

142. At the time G4S hired Fitzsimons, he had a criminal record and had been accused of assault and firearms offenses.

143. Further, investigations revealed that G4S had previously received an email from a member of the public expressing concerns over Fitzsimons' mental stability and stating Fitzsimons should not be given a weapon.

144. Despite being dismissed from a contract in Iraq for punching a client during his employment, and despite Fitzsimons experiencing flashbacks and other symptoms of post-traumatic stress disorder during his employments, G4S continued to employ Fitzsimons.

145. After the shooting, an English court ruled that G4S had not adequately vetted Fitzsimons, and continued to employ him despite being warned on multiple occasions that Fitzsimons was not fit for duty.

146. As a result of the Danny Fitzsimons incident and subsequent investigation and litigation, Defendant G4S was aware of failures in the vetting of its employees.

147. Defendant G4S hired MATEEN as a security guard on or about September 10, 2007.

148. Upon information and belief, MATEEN was hired by Defendant G4S as a Custom Protection Officer.

149. “Custom Protection Officer” was a role granted a higher-level security clearance than other security guards employed by G4S.

150. “Custom Protection Officer” warranted more stringent vetting prior to hire.

151. Upon information and belief, MATEEN’s hiring occurred in Palm Beach County, Florida.

152. In October of 2006, prior to being hired by Defendant G4S, MATEEN worked as a recruit for the Florida Department of Corrections.

153. Following the mass shooting at Virginia Tech in April 2007, MATEEN suggested in a corrections officer training class that he would bring a gun to class.

154. MATEEN was dismissed by the Florida Department of Corrections days later on April 27, 2007.

155. Upon information and belief, before employing MATEEN as an armed security guard, Defendant G4S knew of his dismissal by the Florida Department of Corrections.

156. Upon information and belief, before employing MATEEN as an armed security guard, Defendant G4S knew of MATEEN’s propensity to carry weapons into unauthorized locations.

157. Shortly after his hiring, MATEEN’s “psychological evaluation” was submitted by Defendant G4S to the Florida Department of Agriculture and Consumer Services, the state

agency responsible for issuing gun permits, in order to secure approval for MATEEN's security guard firearms licenses.

158. Upon information and belief, in reliance on such evaluation, the Florida Department of Agriculture and Consumer Services issued MATEEN a Class G firearms license, which allowed MATEEN to carry concealed weapons.

159. In order to obtain MATEEN's Class G firearms license, Defendant G4S falsely represented to the Florida Department of Agriculture and Consumer Services that MATEEN's psychological assessment was given, reviewed, approved, and signed by Dr. Carol Nudelman.

160. Dr. Carol Nudelman never evaluated MATEEN.

161. Dr. Carol Nudelman never saw MATEEN's psychological exam.

162. Dr. Carol Nudelman did not sign his psychological evaluation.

163. Dr. Carol Nudelman closed her Florida practice two years prior to the date of MATEEN's alleged evaluation.

164. Dr. Carol Nudelman was not living or practicing in Florida at the time of MATEEN's alleged psychological assessment.

165. Subsequent investigation by the Florida Department of Agriculture and Consumer Services revealed that Dr. Nudelman's name was falsely listed on 1,514 forms that Defendant G4S submitted between 2006 and 2016, prompting the Department to fine Defendant G4S.

166. Upon information and belief, had the State of Florida, at any time prior to June of 2016, been appropriately advised that MATEEN's psychological evaluation was not given, reviewed, or approved by a licensed psychologist, the State of Florida would have revoked MATEEN's firearms license.

167. Upon information and belief, Defendant G4S failed to have MATEEN complete the required psychological evaluation.

168. Upon information and belief, Defendant G4S failed to have a licensed psychologist review and approve the results of MATEEN's psychological evaluation.

169. After obtaining MATEEN's Class G firearms license, Defendant G4S provided MATEEN with 28 hours of firearms training, including instruction and practice on a shooting range.

170. Upon information and belief, in order to maintain MATEEN's Class G firearms license, Defendant G4S provided MATEEN with yearly refresher firearms training, including instruction and practice on a shooting range.

171. The firearms training provided to MATEEN by Defendant G4S enabled MATEEN to become a proficient gun user, and an expert marksman.

172. In 2013, while working as an armed guard for Defendant G4S at the St. Lucie Courthouse, MATEEN repeatedly threatened his colleagues.

173. These threats included an instance in which he told a deputy sheriff that he, MATEEN, would have the terror group al-Qaeda kill the coworker's family.

174. During this time period, MATEEN bragged to a co-worker about being associated with the Boston Marathon bombers.

175. During this time period, MATEEN told colleagues that he had family connections to al-Qaeda and Hezbollah.

176. During this time period, MATEEN told colleagues that he hoped law enforcement would raid his home "so he could martyr himself."

177. During this time period, MATEEN praised Nidal Hasan, the Army major who shot forty-five people at Fort Hood, to his coworkers.

178. Upon information and belief, these instances were reported to management of Defendant G4S by other employees.

179. The St. Lucie County Sheriff's Department reported MATEEN's conduct to management of Defendant G4S.

180. The St. Lucie County Sheriff's Department requested MATEEN's immediate and permanent removal from the St. Lucie County Courthouse.

181. Upon information and belief, after learning of the incidents described above, Defendant G4S failed to administer to MATEEN any new psychological evaluation or assessment to determine whether he was fit for duty.

182. Upon information and belief, after learning of the incidents described above, Defendant G4S failed to administer to MATEEN any new psychological evaluation or assessment to determine whether MATEEN required behavioral intervention.

183. Upon information and belief, after learning of the incidents described above, Defendant G4S failed to administer to MATEEN any new psychological evaluation or assessment to determine whether MATEEN should be dismissed.

184. Upon information and belief, after learning of the incidents described above, Defendant G4S failed to notify the Florida Department of Agriculture and Consumer Services of the incidents.

185. Any of these actions may have resulted in MATEEN's dismissal and removal of his security firearms license.

186. Had the State of Florida, at any time prior to June of 2016, been appropriately advised of these incidents, it may have resulted in the revocation of MATEEN's security firearms license.

187. Instead, upon information and belief, Defendant G4S continued to provide MATEEN with yearly firearms training to maintain his Class G firearms license.

188. Said continued training made MATEEN a more proficient shooter.

189. Said continued training increased the threat MATEEN posed to society.

190. After learning of the incidents described above, Defendant G4S did not terminate MATEEN.

191. After learning of the incidents described above, Defendant G4S merely transferred MATEEN to a different position within the company.

192. After learning of the incidents described above, Defendant G4S allowed MATEEN to retain his security firearms license.

193. After learning of the incidents described above, Defendant G4S assisted MATEEN in fulfilling the requirements, including training requirements, for him to retain his security firearms license.

194. An official and agent of Defendant G4S has since stated that this transfer did not occur for disciplinary or precautionary reasons, stating "It's not as if a decision was taken that he was never again going to be given an armed position."

195. After MATEEN's transfer, he worked with Daniel Gilroy, a former police officer, during several months in 2014-2015.

196. Gilroy repeatedly reported to Defendant G4S that he was concerned with MATEEN's behavior.

197. Gilroy reported to Defendant G4S that MATEEN was unhinged and unstable.

198. Gilroy reported to Defendant G4S that MATEEN was constantly angry.

199. Gilroy reported to Defendant G4S that MATEEN was engaged in frequent homophobic and racist rants.

200. Gilroy reported to Defendant G4S that MATEEN talked about killing people.

201. Gilroy reported to Defendant G4S that MATEEN threatened he would commit a mass shooting, killing enough people to set a record.

202. MATEEN's behavior was sufficiently threatening for Gilroy to make repeated requests that Defendant G4S transfer him to a new position.

203. When Defendant G4S refused to do so, Gilroy left his position with G4S rather than continue to work alongside MATEEN.

204. Due to MATEEN's conduct and repeated threats, Defendant G4S knew or should have known MATEEN was likely to cause bodily harm to others.

205. Upon information and belief, after being informed of MATEEN's behavior by Gilroy as described above, Defendant G4S failed to administer to MATEEN any new psychological evaluation or assessment to determine whether MATEEN was fit for duty.

206. Upon information and belief, after being informed of MATEEN's behavior by Gilroy as described above, Defendant G4S failed to administer to MATEEN any new psychological evaluation or assessment to determine whether MATEEN required behavioral intervention.

207. Upon information and belief, after being informed of MATEEN's behavior by Gilroy as described above, Defendant G4S failed to administer to MATEEN any new psychological evaluation or assessment to determine whether MATEEN should be dismissed.

208. Upon information and belief, after being informed of MATEEN's behavior by Gilroy as described above, Defendant G4S failed to notify the Florida Department of Agriculture and Consumer Services of the behavior.

209. Upon information and belief, after being informed of MATEEN's behavior by Gilroy as described above, Defendant G4S failed to notify local, state, and federal law enforcement of MATEEN's threats to commit acts of mass violence.

210. Any of these actions may have resulted in MATEEN's dismissal.

211. Had the State of Florida, at any time prior to June of 2016, been appropriately advised of these incidents, it may have resulted in the revocation of MATEEN's firearms licensure.

212. Upon information and belief, had Defendant G4S notified state or federal law enforcement of MATEEN's threats to commit mass acts of violence, it would have resulted in the investigation, surveillance, detention, or arrest of MATEEN, and would have eliminated MATEEN's ability to purchase firearms.

213. Instead, upon information and belief, Defendant G4S continued to provide MATEEN with yearly firearms training to maintain his Class G firearms license.

214. Said continued training made MATEEN a more proficient shooter.

215. Said continued training increased the threat that MATEEN posed to society.

216. Upon information and belief, MATEEN continued to make similar threats of violence throughout his employment with G4S.

217. Defendant G4S never reported such threats to the Florida Department of Agriculture and Consumer Services, the State of Florida, or local, state, and federal law enforcement.

218. Approximately two weeks prior to the assault on Pulse Nightclub, MATEEN attempted to purchase body armor and ammunition from a licensed gun dealer in Jensen Beach, Florida.

219. MATEEN did not identify himself to the gun dealer or show his Class G firearms license.

220. This gun dealer refused to make a sale to MATEEN.

221. About a week before the massacre at Pulse, MATEEN purchased a Sig Sauer MCX semiautomatic rifle and a Glock 17 handgun from a licensed gun dealer in St. Lucie County.

222. The owner of the dealership from which MATEEN purchased the weapons cited MATEEN's security licensures, including his Class G firearms license, as a reason for his decision to sell MATEEN the weapons.

223. Had MATEEN not possessed a security firearms license, he would not have been able to procure these weapons from that dealership.

224. MATEEN used these weapons to commit the mass murder at the Pulse Nightclub.

COUNT I- NEGLIGENCE

(ANGEL COLON; AMNERIS RAMOS DIAZ; RODNEY SUMTER; JAY VASQUEZ; CARLOS MUNIZ-TORRES; MIGUEL VEGA; JONATHAN GARCIA; ESTHER PETERSON; MERCEDES MCQUERY; ROLANDO RODRIGUEZ; DEMITRIUS POLANCO; KADIM RAMOS; JACOBI CEBALLO; KALIESHA ANDINO; BETTIE LINDSEY; SANDY ROBERTS; KASSANDRA MARQUEZ; KATHERINE PATRICIO; SYLVIA SERRANO; ROSAMARIA FEBO; NORMAN CASIANO-MOJICA; FRANCHESSKA MERCADO; LEYDIANA PUYARENA; FELIPE MARRERO SANCHEZ; COREY RIVERA; ILKA REYES; JEANETTE MCCOY; YVENS CARRENARD; EDWIN RIVERA ALVAREZ; CESAR RODRIGUEZ; MOHAMMED ISLAM; DAVID JOURDENAIS; RONISE CELESTIN; JOSEPH BRADLEY; BRIAN NUNEZ; CHRISTIAN ORTIZ CARDONA; LIZMARYOOE FINOL VILORIA; YORVIS CAMARGO ROMERO; CARLOS PEREZ ANGLERO; CARLEEN THOMAS; WERNEL E. MARTINEZ; JOSE M. DIAZ UBILES; JUAN JOSE CUFINO RODRIGUEZ; KEINON CARTER; LEONEL MELENDEZ; JILLIAN AMADOR; ADRIAN LOPEZ; JAVIER NAVA; JOAQUIN ROJAS; RUBEN GARCIA-TEJADA; GEOFFREY RODRIGUEZ; CHRISOVALATOU TASSOPOULOS; ASael ABAD; JAVIER ANTONETTI; JUAN ANTONETTI; PATIENCE CARTER; SONIA CEDENO; MERCEDES GARCIA; CHRISTOPHER HANSEN; JOSEPH NEGRON; NATHAN OROZCO; NICHOLAS PEREZ; JOSE RAMIREZ MARTINEZ; COREY RICHARDS; CHRISS WEST; OSMAN AGUILAR RAMSES; MARIELA BARAHONA; ANGELIQUE CARO; JACQUELINE ECHEVARRIA; MARITZA GOMEZ; VICTOR MALDONADO; MICHAEL MORALES HERNANDEZ; ITZA ORTIZ; FRANCISCO PABON; MARIO PEREZ; MAGDA RIVERA; ROLANDO RODRIGUEZ; GEOFFREY RODRIGUEZ; CARLOS SANTO DOMINGO; CARLEEN THOMAS; and MIRIAM TORRES SANTIAGO v. DEFENDANT G4S)

225. Plaintiffs incorporate paragraphs 1-224 as though fully set forth herein.
226. Defendant G4S employed MATEEN as a security officer.
227. Defendant G4S trained MATEEN to use a firearm, making him an expert marksman.
228. Defendant G4S assisted MATEEN in obtaining security licensure permitting him to carry concealed firearms.
229. Defendant G4S assisted MATEEN in maintaining security licensure permitting him to carry concealed firearms.

230. Defendant G4S knew that MATEEN repeatedly made terroristic threats and threats of mass violence against members of the general public.

231. Defendant G4S has a duty to use due care in providing firearm training, but failed to do so with regard to MATEEN.

232. Defendant G4S has a duty to use due care in obtaining/maintaining its employees' security licensure, but failed to do so with regard to MATEEN.

233. Defendant G4S has a duty to report to local, state, and federal law enforcement known terroristic threats and threats of mass violence against members of the general public, but failed to do so with regard to MATEEN.

234. By obtaining/maintaining MATEEN's gun license and providing ongoing firearms training, Defendant G4S assumed a duty to appropriately advise local, state, and federal governmental agencies or departments of any known concerns with MATEEN's psychological fitness.

235. By obtaining/maintaining MATEEN's security firearms license and providing him ongoing firearms training, Defendant G4S assumed a duty to appropriately advise local, state, and federal governmental agencies or departments, including local, state, and federal law enforcement, of any known terroristic threats or threats of mass violence to the general public made by MATEEN.

236. By obtaining/maintaining MATEEN's security firearms license and providing him ongoing firearms training, Defendant G4S assumed a duty to appropriately advise local, state, and federal governmental agencies or departments, including local, state, and federal law enforcement, of any known terroristic ideations or actions by MATEEN.

237. By obtaining/maintaining MATEEN's gun license and providing him ongoing firearms training, Defendant G4S assumed a duty to appropriately advise local, state, and federal governmental agencies or departments, including local, state, and federal law enforcement, of any known suspicious activities by MATEEN.

238. By obtaining/maintaining MATEEN's gun license and providing him ongoing firearms training, Defendant G4S assumed a duty to appropriately advise local, state, and federal governmental agencies or departments, including local, state, and federal law enforcement, of any known risk MATEEN posed to the general public.

239. In breach of these duties, prior to hiring and training MATEEN, Defendant G4S failed to conduct an appropriate psychological evaluation of MATEEN that was reviewed and approved by a licensed psychologist.

240. In breach of these duties, prior to obtaining/maintaining MATEEN's Class G firearms license, Defendant G4S failed to conduct an appropriate psychological evaluation of MATEEN that was reviewed and approved by a licensed psychologist.

241. In breach of these duties, Defendant G4S fraudulently represented to the Florida Department of Agriculture and Consumer Services that MATEEN was given and passed a psychological assessment.

242. In breach of these duties, Defendant G4S failed to accurately report to the Florida Department of Agriculture and Consumer Services that MATEEN was not given the required psychological evaluation.

243. In breach of these duties, Defendant G4S failed to accurately report to the Florida Department of Agriculture and Consumer Services that MATTEN's psychological evaluation was not reviewed by any licensed psychologist.

244. In breach of these duties, Defendant G4S failed to accurately report to the Florida Department of Agriculture and Consumer Services that MATTEN's psychological evaluation was not approved by any licensed psychologist.

245. In breach of these duties, Defendant G4S failed to appropriately report to any state, local, or federal governmental department or agency, including local, state, and federal law enforcement, that MATEEN made terroristic threats and threats of mass violence against members of the general public.

246. In breach of these duties, Defendant G4S failed to appropriately report to any state, local, or federal governmental department or agency, including local, state, and federal law enforcement, that MATEEN demonstrated a propensity to threateningly carry weapons into unauthorized locations.

247. In breach of these duties, Defendant G4S failed to appropriately report to any state, local, or federal governmental department or agency, including local, state, and federal law enforcement, that MATEEN made violent threats against his coworkers and their families.

248. In breach of these duties, Defendant G4S failed to appropriately report to any state, local, or federal governmental department or agency, including local, state, and federal law enforcement, that MATEEN professed an allegiance with, and sympathy for, terrorists.

249. In breach of these duties, Defendant G4S failed to appropriately report to any state, local, or federal governmental department or agency, including local, state, and federal law

enforcement, that MATEEN expressed an appreciation for gruesome terrorist attacks on Americans.

250. In breach of these duties, Defendant G4S failed to appropriately report to any state, local, or federal governmental department or agency, including local, state, and federal law enforcement, that MATEEN was behaving unhinged and unstable.

251. In breach of these duties, Defendant G4S failed to appropriately report to any state, local, or federal governmental department or agency, including local, state, and federal law enforcement, that MATEEN was engaging in homophobic and racist rants.

252. In breach of these duties, Defendant G4S failed to appropriately report to any state, local, or federal governmental department or agency, that MATEEN had talked about his desire to kill people while at work.

253. In breach of these duties, Defendant G4S trained MATEEN to use a firearm when it knew or should have known that MATEEN had been dismissed by the Florida Department of Corrections for making threats against his training class and had demonstrated a propensity to threateningly carry weapons into unauthorized locations.

254. In breach of these duties, Defendant G4S obtained MATEEN's Class G firearms license when it knew or should have known that MATEEN had been dismissed by the Florida Department of Corrections for making threats against his training class and had demonstrated a propensity to threateningly carry weapons into unauthorized locations.

255. In breach of these duties, Defendant G4S maintained MATEEN's Class G firearms license when it knew or should have known that MATEEN had been dismissed by the

Florida Department of Corrections for making threats against his training class and had demonstrated a propensity to threateningly carry weapons into unauthorized locations.

256. In breach of these duties, Defendant G4S maintained MATEEN's Class G firearms license when it knew or should have known that MATEEN made violent threats against his coworkers and their families.

257. In breach of these duties, Defendant G4S provided firearms training to MATEEN when it knew or should have known that MATEEN made violent threats against his coworkers and their families.

258. In breach of these duties, Defendant G4S maintained MATEEN's Class G firearms license when it knew or should have known that MATEEN professed an allegiance with, and sympathy for, terrorists.

259. In breach of these duties, Defendant G4S provided firearms training to MATEEN when it knew or should have known that MATEEN professed an allegiance with, and sympathy for, terrorists.

260. In breach of these duties, Defendant G4S maintained MATEEN's Class G firearms license when it knew or should have known that MATEEN idolized the commission of gruesome terrorist attacks on Americans.

261. In breach of these duties, Defendant G4S provided firearms training to MATEEN when it knew or should have known that MATEEN idolized the commission of gruesome terrorist attacks on Americans.

262. In breach of these duties, Defendant G4S maintained MATEEN's Class G firearms license when it knew or should have known that MATEEN was behaving unhinged and unstable.

263. In breach of these duties, Defendant G4S provided firearms training to MATEEN when it knew or should have known that MATEEN was behaving unhinged and unstable.

264. In breach of these duties, Defendant G4S maintained MATEEN's Class G firearms license when it knew or should have known that MATEEN was engaging in homophobic and racist rants.

265. In breach of these duties, Defendant G4S provided firearms training to MATEEN when it knew or should have known that MATEEN was engaging in homophobic and racist rants.

266. In breach of these duties, Defendant G4S maintained MATEEN's Class G firearms license when it knew or should have known that MATEEN was talking about his desire to kill people while at work.

267. In breach of these duties, Defendant G4S provided firearms training to MATEEN when it knew or should have known that MATEEN was talking about his desire to kill people while at work.

268. As a direct and proximate result of the aforementioned negligence of Defendant G4S, Plaintiffs suffered bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, loss of earnings, loss of ability to earn money, and/or

aggravation of a previously existing condition. The losses are either permanent or continuing and Plaintiffs will suffer the losses in the future.

WHEREFORE, Plaintiffs ANGEL COLON; AMNERIS RAMOS DIAZ; RODNEY SUMTER; JAY VASQUEZ; CARLOS MUNIZ-TORRES; MIGUEL VEGA; JONATHAN GARCIA; ESTHER PETERSON; MERCEDES MCQUERY; ROLANDO RODRIGUEZ; DEMITRIUS POLANCO; KADIM RAMOS; JACOBI CEBALLO; KALIESHA ANDINO; BETTIE LINDSEY; SANDY ROBERTS; KASSANDRA MARQUEZ; KATHERINE PATRICIO; SYLVIA SERRANO; ROSAMARIA FEBO; NORMAN CASIANO-MOJICA; FRANCHESSKA MERCADO; LEYDIANA PUYARENA; FELIPE MARRERO SANCHEZ; COREY RIVERA; ILKA REYES; JEANETTE MCCOY; YVENS CARRENARD; EDWIN RIVERA ALVAREZ; CESAR RODRIGUEZ; MOHAMMED ISLAM; DAVID JOURDENAIS; RONISE CELESTIN; JOSEPH BRADLEY; BRIAN NUNEZ; CHRISTIAN ORTIZ CARDONA; LIZMARYOOE FINOL VILORIA; YORVIS CAMARGO ROMERO; CARLOS PEREZ ANGLERO; CARLEEN THOMAS; WERNEL E. MARTINEZ; JOSE M. DIAZ UBILES; JUAN JOSE CUFÍÑO RODRIGUEZ; KEINON CARTER; LEONEL MELENDEZ; JILLIAN AMADOR; ADRIAN LOPEZ; JAVIER NAVA; JOAQUIN ROJAS; RUBEN GARCIA-TEJADA; GEOFFREY RODRIGUEZ; CHRISOVALATOU TASSOPOULOS; ASACL ABAD; JAVIER ANTONETTI; JUAN ANTONETTI; PATIENCE CARTER; SONIA CEDENO; MERCEDES GARCIA; CHRISTOPHER HANSEN; JOSEPH NEGRON; NATHAN OROZCO; NICHOLAS PEREZ; JOSE RAMIREZ MARTINEZ; COREY RICHARDS; CHRISS WEST; OSMAN AGUILAR RAMSES; MARIELA BARAHONA; ANGELIQUE CARO; JACQUELINE ECHEVARRIA; MARITZA GOMEZ; VICTOR MALDONADO;

MICHAEL MORALES HERNANDEZ; ITZA ORTIZ; FRANCISCO PABON; MARIO PEREZ; MAGDA RIVERA; ROLANDO RODRIGUEZ; GEOFFREY RODRIGUEZ; CARLOS SANTO DOMINGO; CARLEEN THOMAS; and MIRIAM TORRES SANTIAGO demand judgment against Defendant G4S for compensatory damages, including pre-judgment interest on all out-of-pocket economic damages, and taxable costs.

COUNT II - Wrongful Death

(MARELY MENENDEZ, as Personal Representative of the Estate of GILBERTO SILVA MENENDEZ; ROSALIA RAMOS and STANLEY ALMODOVAR, as Personal Representatives of the Estate of STANLEY ALMODOVAR III; CARMEN NILDA CAPO-QUINONES, as Personal Representative of the Estate of LUIS OCASIO-CAPO; DIGNA ROSA FERNANDEZ DE CARRILLO, as Personal Representative of the Estate of SIMON CARRILLO FERNANDEZ; DIMARIE RODRIGUEZ LOZADA, as Personal Representative of the Estate of JEAN CARLOS NIEVES RODRIGUEZ; BERNADETTE CRUZ CARRION, as Personal Representative of the Estate of PETER GONZALEZ-CRUZ; EARL CROSBY and LISA CROSBY, as Personal Representatives of TEVIN CROSBY; OLGA MARIA DISLA as Personal Representative of the Estate of ANTHONY LAUEANO-DISLA; LYDIA ESTHER PEREZ, as Personal Representative of the Estate of JEAN CARLO MENDEZ PEREZ; IVAN EDUARDO DOMINGUEZ, as Personal Representative of the estate of ERIC IVAN ORTIZ-RIVERA; BERNICE DEJESUS VELAZQUEZ, as Personal Representative of the Estate of FRANKY DEJESUS VELASQUEZ; IRIS REYES SANTIAGO and PEDRO JORGE DIAZ, as Personal Representatives of the Estate of JAVIER JORGE REYES; DEBORAH RILEY, as Personal Representative of the Estate of KIMBERLY JEAN MORRIS; WILMARIEL TRINIDAD, as Personal Representative of the Estate of XAVIER SERRANO ROSADO; JAMMY VALENTIN FERNANDEZ, as Personal Representative of the Estate of LEROY VALENTIN-FERNANDEZ; and JOSE LUIS VIELMA, as Personal Representative of the Estate of LUIS VIELMA v. Defendant G4S)

269. Plaintiffs incorporate paragraphs 1-224 as though fully set forth herein.
270. Defendant G4S employed MATEEN as a security officer.
271. Defendant G4S trained MATEEN to use a firearm, making him an expert marksman.

272. Defendant G4S assisted MATEEN in obtaining security licensure permitting him to carry concealed firearms.

273. Defendant G4S assisted MATEEN in maintaining security licensure permitting him to carry concealed firearms.

274. Defendant G4S knew that MATEEN repeatedly made terroristic threats and threats of mass violence against members of the general public.

275. Defendant G4S has a duty to use due care in providing firearm training, but failed to do so with regard to MATEEN.

276. Defendant G4S has a duty to use due care in obtaining/maintaining its employees' security licensure, but failed to do so with regard to MATEEN.

277. Defendant G4S has a duty to report to local, state, and federal law enforcement known terroristic threats and threats of mass violence against members of the general public, but failed to do so with regard to MATEEN.

278. By obtaining/maintaining MATEEN's gun license and providing ongoing firearms training, Defendant G4S assumed a duty to appropriately advise local, state, and federal governmental agencies or departments of any known concerns with MATEEN's psychological fitness.

279. By obtaining/maintaining MATEEN's security firearms license and providing him ongoing firearms training, Defendant G4S assumed a duty to appropriately advise local, state, and federal governmental agencies or departments, including local, state, and federal law enforcement, of any known terroristic threats or threats of mass violence to the general public made by MATEEN.

280. By obtaining/maintaining MATEEN's security firearms license and providing him ongoing firearms training, Defendant G4S assumed a duty to appropriately advise local, state, and federal governmental agencies or departments, including local, state, and federal law enforcement, of any known terroristic ideations or actions by MATEEN.

281. By obtaining/maintaining MATEEN's gun license and providing him ongoing firearms training, Defendant G4S assumed a duty to appropriately advise local, state, and federal governmental agencies or departments, including local, state, and federal law enforcement, of any known suspicious activities by MATEEN.

282. By obtaining/maintaining MATEEN's gun license and providing him ongoing firearms training, Defendant G4S assumed a duty to appropriately advise local, state, and federal governmental agencies or departments, including local, state, and federal law enforcement, of any known risk MATEEN posed to the general public.

283. In breach of these duties, prior to hiring and training MATEEN, Defendant G4S failed to conduct an appropriate psychological evaluation of MATEEN that was reviewed and approved by a licensed psychologist.

284. In breach of these duties, prior to obtaining/maintaining MATEEN's Class G firearms license, Defendant G4S failed to conduct an appropriate psychological evaluation of MATEEN that was reviewed and approved by a licensed psychologist.

285. In breach of these duties, Defendant G4S fraudulently represented to the Florida Department of Agriculture and Consumer Services that MATEEN was given and passed a psychological assessment.

286. In breach of these duties, Defendant G4S failed to accurately report to the Florida Department of Agriculture and Consumer Services that MATTEN was not given the required psychological evaluation.

287. In breach of these duties, Defendant G4S failed to accurately report to the Florida Department of Agriculture and Consumer Services that MATTEN's psychological evaluation was not reviewed by any licensed psychologist.

288. In breach of these duties, Defendant G4S failed to accurately report to the Florida Department of Agriculture and Consumer Services that MATTEN's psychological evaluation was not approved by any licensed psychologist.

289. In breach of these duties, Defendant G4S failed to appropriately report to any state, local, or federal governmental department or agency, including local, state, and federal law enforcement, that MATEEN made terroristic threats and threats of mass violence against members of the general public.

290. In breach of these duties, Defendant G4S failed to appropriately report to any state, local, or federal governmental department or agency, including local, state, and federal law enforcement, that MATEEN demonstrated a propensity to threateningly carry weapons into unauthorized locations.

291. In breach of these duties, Defendant G4S failed to appropriately report to any state, local, or federal governmental department or agency, including local, state, and federal law enforcement, that MATEEN made violent threats against his coworkers and their families.

292. In breach of these duties, Defendant G4S failed to appropriately report to any state, local, or federal governmental department or agency, including local, state, and federal law enforcement, that MATEEN professed an allegiance with, and sympathy for, terrorists.

293. In breach of these duties, Defendant G4S failed to appropriately report to any state, local, or federal governmental department or agency, including local, state, and federal law enforcement, that MATEEN expressed an appreciation for gruesome terrorist attacks on Americans.

294. In breach of these duties, Defendant G4S failed to appropriately report to any state, local, or federal governmental department or agency, including local, state, and federal law enforcement, that MATEEN was behaving unhinged and unstable.

295. In breach of these duties, Defendant G4S failed to appropriately report to any state, local, or federal governmental department or agency, including local, state, and federal law enforcement, that MATEEN was engaging in homophobic and racist rants.

296. In breach of these duties, Defendant G4S failed to appropriately report to any state, local, or federal governmental department or agency, that MATEEN had talked about his desire to kill people while at work.

297. In breach of these duties, Defendant G4S trained MATEEN to use a firearm when it knew or should have known that MATEEN had been dismissed by the Florida Department of Corrections for making threats against his training class and had demonstrated a propensity to threateningly carry weapons into unauthorized locations.

298. In breach of these duties, Defendant G4S obtained MATEEN's Class G firearms license when it knew or should have known that MATEEN had been dismissed by the Florida

Department of Corrections for making threats against his training class and had demonstrated a propensity to threateningly carry weapons into unauthorized locations.

299. In breach of these duties, Defendant G4S maintained MATEEN's Class G firearms license when it knew or should have known that MATEEN had been dismissed by the Florida Department of Corrections for making threats against his training class and had demonstrated a propensity to threateningly carry weapons into unauthorized locations.

300. In breach of these duties, Defendant G4S maintained MATEEN's Class G firearms license when it knew or should have known that MATEEN made violent threats against his coworkers and their families.

301. In breach of these duties, Defendant G4S provided firearms training to MATEEN when it knew or should have known that MATEEN made violent threats against his coworkers and their families.

302. In breach of these duties, Defendant G4S maintained MATEEN's Class G firearms license when it knew or should have known that MATEEN professed an allegiance with, and sympathy for, terrorists.

303. In breach of these duties, Defendant G4S provided firearms training to MATEEN when it knew or should have known that MATEEN professed an allegiance with, and sympathy for, terrorists.

304. In breach of these duties, Defendant G4S maintained MATEEN's Class G firearms license when it knew or should have known that MATEEN idolized the commission of gruesome terrorist attacks on Americans.

305. In breach of these duties, Defendant G4S provided firearms training to MATEEN when it knew or should have known that MATEEN idolized the commission of gruesome terrorist attacks on Americans.

306. In breach of these duties, Defendant G4S maintained MATEEN's Class G firearms license when it knew or should have known that MATEEN was behaving unhinged and unstable.

307. In breach of these duties, Defendant G4S provided firearms training to MATEEN when it knew or should have known that MATEEN was behaving unhinged and unstable.

308. In breach of these duties, Defendant G4S maintained MATEEN's Class G firearms license when it knew or should have known that MATEEN was engaging in homophobic and racist rants.

309. In breach of these duties, Defendant G4S provided firearms training to MATEEN when it knew or should have known that MATEEN was engaging in homophobic and racist rants.

310. In breach of these duties, Defendant G4S maintained MATEEN's Class G firearms license when it knew or should have known that MATEEN was talking about his desire to kill people while at work.

311. In breach of these duties, Defendant G4S provided firearms training to MATEEN when it knew or should have known that MATEEN was talking about his desire to kill people while at work.

312. As a direct and proximate result of the aforementioned negligence of Defendant G4S, Plaintiffs suffered bodily injury and resulting pain and suffering, disability, disfigurement,

mental anguish, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, loss of earnings, loss of ability to earn money, and/or aggravation of a previously existing condition. The losses are either permanent or continuing and Plaintiffs will suffer the losses in the future.

313. As a direct and proximate result of the aforementioned negligence of Defendant G4S, GILBERTO SILVA MENENDEZ; STANLEY ALMODOVAR III; LUIS OCASIO-CAPO; SIMON CARRILLO FERNANDEZ; JEAN CARLOS NIEVES; PETER GONZALEZ-CRUZ; TEVIN CROSBY; ANTHONY LAUEANO-DISLA; JEAN CARLO MENDEZ PEREZ; ERIC IVAN ORTIZ-RIVERA; FRANKY DEJESUS VELASQUEZ; JAVIER JORGE REYES; KIMBERLY JEAN MORRIS; XAVIER SERRANO ROSADO; LEROY VALENTIN-FERNANDEZ; and LUIS VIELMA died, and Defendant G4S is responsible for the damages set forth below.

314. As a direct and proximate result of Defendant G4S's negligence, GILBERTO SILVA MENENDEZ suffered fatal injuries and Defendant G4S is responsible for his death and damages as set forth below:

a. MARELY MENENDEZ, the surviving parent, of GILBERTO SILVA MENENDEZ, deceased, has suffered and will continue to suffer the loss of her child's support and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

b. RAMON E. SILVA RIVERA, the surviving parent, of GILBERTO SILVA MENENDEZ, deceased, has suffered and will continue to suffer the loss of his child's support

and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future; and

c. The Estate of GILBERTO SILVA MENENDEZ has lost prospective net accumulations and has incurred medical and funeral expenses due to the decedent's injury and death.

329. As a direct and proximate result of Defendant G4S's negligence, STANLEY ALMODOVAR III suffered fatal injuries and Defendant G4S is responsible for his death and damages as set forth below:

a. ROSALIA RAMOS, the surviving parent, of STANLEY ALMODOVAR III, deceased, has suffered and will continue to suffer the loss of her child's support and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

b. STANLEY ALMODOVAR, the surviving parent, of STANLEY ALMODOVAR III, deceased, has suffered and will continue to suffer the loss of his child's support and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

c. The Estate of STANLEY ALMODOVAR III has lost prospective net accumulations and has incurred medical and funeral expenses due to the decedent's injury and death.

330. As a direct and proximate result of Defendant G4S's negligence, LUIS OCASIO-CAPO suffered fatal injuries and Defendant G4S is responsible for his death and damages as set forth below:

a. CARMEN NILDA CAPO-QUINONES, the surviving parent, of LUIS OCASIO-CAPO, deceased, has suffered and will continue to suffer the loss of her child's support and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

b. LUIS OCASIO, the surviving parent, of LUIS OCASIO-CAPO, deceased, has suffered and will continue to suffer the loss of his child's support and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

c. The Estate of LUIS OCASIO-CAPO has lost prospective net accumulations and has incurred medical and funeral expenses due to the decedent's injury and death.

331. As a direct and proximate result of Defendant G4S's negligence, SIMON CARRILLO FERNANDEZ suffered fatal injuries and Defendant G4S is responsible for his death and damages as set forth below:

a. DIGNA ROSA FERNANDEZ DE CARRILLO, the surviving parent, of SIMON CARRILLO FERNANDEZ, deceased, has suffered and will continue to suffer the loss of her child's support and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

b. The Estate of SIMON CARRILLO FERNANDEZ has lost prospective net accumulations and has incurred medical and funeral expenses due to the decedent's injury and death.

332. As a direct and proximate result of Defendant G4S's negligence, JEAN CARLOS NIEVES RODRIGUEZ suffered fatal injuries and Defendant G4S is responsible for his death and damages as set forth below:

a. DIMARIE RODRIGUEZ LOZADA, the surviving parent, of JEAN CARLOS NIEVES RODRIGUEZ, deceased, has suffered and will continue to suffer the loss of her child's support and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

b. FEDERICO NIEVES, the surviving parent, of JEAN CARLOS NIEVES RODRIGUEZ, deceased, has suffered and will continue to suffer the loss of his child's support and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

c. The Estate of JEAN CARLOS NIEVES RODRIGUEZ has lost prospective net accumulations and has incurred medical and funeral expenses due to the decedent's injury and death.

333. As a direct and proximate result of Defendant G4S's negligence, PETER GONZALEZ-CRUZ suffered fatal injuries and Defendant G4S is responsible for her/his death and damages as set forth below:

a. BERNADETTE CRUZ CARRION, the surviving parent, of PETER GONZALEZ-CRUZ, deceased, has suffered and will continue to suffer the loss of her child's support and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

b. RAFAEL ANTONIO GONZALEZ, the surviving parent, of PETER GONZALEZ-CRUZ, deceased, has suffered and will continue to suffer the loss of his child's support and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

c. The Estate of PETER GONZALEZ-CRUZ has lost prospective net accumulations and has incurred medical and funeral expenses due to the decedent's injury and death.

334. As a direct and proximate result of Defendant G4S's negligence, TEVIN CROSBY suffered fatal injuries and Defendant G4S is responsible for his death and damages as set forth below:

a. EARL E. CROSBY, the surviving parent, of TEVIN CROSBY, deceased, has suffered and will continue to suffer the loss of his child's support and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

b. LISA B. CROSBY, the surviving parent, of TEVIN CROSBY, deceased, has suffered and will continue to suffer the loss of her child's support and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

c. The Estate of TEVIN CROSBY has lost prospective net accumulations and has incurred medical and funeral expenses due to the decedent's injury and death.

335. As a direct and proximate result of Defendant G4S's negligence, ANTHONY LAUEANO-DISLA suffered fatal injuries and Defendant G4S is responsible for his death and damages as set forth below:

a. OLGA MARIA DISLA, the surviving parent, of ANTHONY LAUEANO-DISLA, deceased, has suffered and will continue to suffer the loss of her child's support and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

b. LUIS LAUEANO RODRIGUEZ, the surviving parent, of ANTHONY LAUEANO-DISLA, deceased, has suffered and will continue to suffer the loss of his child's support and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

c. The Estate of ANTHONY LAUEANO-DISLA has lost prospective net accumulations and has incurred medical and funeral expenses due to the decedent's injury and death.

336. As a direct and proximate result of Defendant G4S's negligence, JEAN CARLO MENDEZ PEREZ suffered fatal injuries and Defendant G4S is responsible for his death and damages as set forth below:

a. LYDIA ESTHER PEREZ, the surviving parent, of JEAN CARLO MENDEZ PEREZ, deceased, has suffered and will continue to suffer the loss of her child's support and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

b. ANGEL MENDEZ, the surviving parent, of JEAN CARLO MENDEZ PEREZ, deceased, has suffered and will continue to suffer the loss of his child's support and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

c. The Estate of JEAN CARLO MENDEZ PEREZ has lost prospective net accumulations and has incurred medical and funeral expenses due to the decedent's injury and death.

337. As a direct and proximate result of Defendant G4S's negligence, ERIC IVAN ORTIZ-RIVERA suffered fatal injuries and Defendant G4S is responsible for his death and damages as set forth below:

a. IVAN EDUARDO DOMINGUEZ, the surviving spouse, of ERIC IVAN ORTIZ RIVERA, deceased, has suffered and will continue to suffer the loss of his husband's support and services and his companionship and society;

b. The Estate of ERIC IVAN ORTIZ RIVERA has lost prospective net accumulations and has incurred medical and funeral expenses due to the decedent's injury and death.

338. As a direct and proximate result of Defendant G4S's negligence, FRANKY DEJESUS VELASQUEZ suffered fatal injuries and Defendant G4S is responsible for his death and damages as set forth below:

a. AIDA LUZ VELASQUEZ VASQUEZ, the surviving parent of FRANKY DEJESUS VELASQUEZ, deceased, has suffered and will continue to suffer the loss of her child's support and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

b. The Estate of FRANKY DEJESUS VELASQUEZ has lost prospective net accumulations and has incurred medical and funeral expenses due to the decedent's injury and death.

339. As a direct and proximate result of Defendant G4S's negligence, JAVIER JORGE REYES suffered fatal injuries and Defendant G4S is responsible for his death and damages as set forth below:

a. The beneficiaries of JAVIER JORGE REYES, deceased, have suffered and will continue to suffer the loss of his support and services, companionship, instruction, and guidance, have experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

b. The Estate of JAVIER JORGE REYES has lost prospective net accumulations and has incurred medical and funeral expenses due to the decedent's injury and death.

340. As a direct and proximate result of Defendant G4S's negligence, KIMBERLY JEAN MORRIS suffered fatal injuries and Defendant G4S is responsible for her death and damages as set forth below:

a. The beneficiaries of KIMBERLY JEAN MORRIS, deceased, have suffered and will continue to suffer the loss of her support and services, companionship, instruction, and guidance, have experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

b. The Estate of KIMBERLY JEAN MORRIS has lost prospective net accumulations and has incurred medical and funeral expenses due to the decedent's injury and death.

341. As a direct and proximate result of Defendant G4S's negligence, XAVIER SERRANO ROSADO suffered fatal injuries and Defendant G4S is responsible for his death and damages as set forth below:

a. KELVYN EMMANUEL SERRANO LOZANO, the surviving child of XAVIER SERRANO ROSADO, deceased, has suffered and will continue to suffer the loss of his father's support and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

b. The Estate of XAVIER SERRANO ROSADO has lost prospective net accumulations and has incurred medical and funeral expenses due to the decedent's injury and death.

342. As a direct and proximate result of Defendant G4S's negligence, LEROY VALENTIN-FERNANDEZ suffered fatal injuries and Defendant G4S is responsible for his death and damages as set forth below:

a. LIDIO VALENTIN, the surviving parent of LEROY VALENTIN-FERNANDEZ, deceased, has suffered and will continue to suffer the loss of his child's support and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

d. LOURDES LIZZETTE FERNANDEZ, the surviving parent of LEROY VALENTIN-FERNANDEZ, deceased, has suffered and will continue to suffer the loss of her child's support and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

e. The Estate of LEROY VALENTIN-FERNANDEZ has lost prospective net accumulations and has incurred medical and funeral expenses due to the decedent's injury and death.

343. As a direct and proximate result of Defendant G4S's negligence, LUIS VIELMA suffered fatal injuries and Defendant G4S is responsible for his death and damages as set forth below:

a. JOSE LUIS VIELMA, the surviving parent of LUIS VIELMA, deceased, has suffered and will continue to suffer the loss of his child's support and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

b. ROBERTINA ASTUDILLO MOJICA, the surviving parent of LUIS VIELMA, deceased, has suffered and will continue to suffer the loss of her child's support and services, companionship, instruction, and guidance, has experienced mental pain and suffering in the past and will continue to suffer such losses in the future;

c. The Estate of LUIS VIELMA has lost prospective net accumulations and has incurred medical and funeral expenses due to the decedent's injury and death.

WHEREFORE, Plaintiffs, MARELY MENENDEZ, as Personal Representative of the Estate of GILBERTO SILVA MENENDEZ; ROSALIA RAMOS and STANLEY ALMODOVAR, as Personal Representatives of the Estate of STANLEY ALMODOVAR III; CARMEN NILDA CAPO-QUINONES, as Personal Representative of the Estate of LUIS OCASIO-CAPO; DIGNA ROSA FERNANDEZ DE CARRILLO, as Personal Representative of the Estate of SIMON CARRILLO FERNANDEZ; DIMARIE RODRIGUEZ LOZADA, as Personal Representative of the Estate of JEAN CARLOS NIEVES RODRIGUEZ; BERNADETTE CRUZ CARRION, as Personal Representative of the Estate of PETER GONZALEZ-CRUZ; EARL CROSBY and LISA CROSBY, as Personal Representatives of the

Estate of TEVIN CROSBY; OLGA MARIA DISLA, as Personal Representative of the Estate of ANTHONY LAUEANO-DISLA; LYDIA ESTHER PEREZ, as Personal Representative of the Estate of JEAN CARLO MENDEZ PEREZ; IVAN EDUARDO DOMINGUEZ, as Personal Representative of the estate of ERIC IVAN ORTIZ-RIVERA; BERNICE DEJESUS VELAZQUEZ, as Personal Representative of the Estate of FRANKY DEJESUS VELASQUEZ; IRIS REYES SANTIAGO and PEDRO JORGE DIAZ, as Personal Representatives of the Estate of JAVIER JORGE REYES; DEBORAH RILEY, as Personal Representative of the Estate of KIMBERLY JEAN MORRIS; WILMARIEL TRINIDAD, as Personal Representative of the Estate of XAVIER SERRANO ROSADO; JAMMY VALENTIN FERNANDEZ, as Personal Representative of the Estate of LEROY VALENTIN-FERNANDEZ; and JOSE LUIS VIELMA, as Personal Representative of the Estate of LUIS VIELMA, as Personal Representatives of the Estates of Decedents, for the benefit of their Estates and their statutory survivors, demand judgment for compensatory damages and taxable costs against Defendant G4S.

REQUEST FOR JURY TRIAL

Plaintiffs request a jury trial on all issues so triable as a matter of right.

Respectfully submitted,

s/ Theodore J. Leopold

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of February, 2018, I electronically filed a true and correct copy of the foregoing via the Florida Courts E-Filing Portal with the Clerk of the Court and served all counsel of record via the Florida Courts E-Filing Portal.

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