

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

IVENIE CINE,

CASE NO:

Plaintiff,

vs.

PALM BEACH COUNTY, a political  
subdivision of the State of Florida

Defendant.

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**COMPLAINT**

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**COMES NOW**, Plaintiff, IVENIE CINE, by and through the undersigned counsel, hereby  
sues Defendant, PALM BEACH COUNTY, a political subdivision of the State of Florida, and in  
support thereof states:

1. This is an action for negligence and damages which exceeds the sum of Fifty Thousand  
Dollars (\$50,000.00), exclusive of interest, costs and attorney's fees.
2. All conditions precedent to the filing of this action have been performed or have been  
waived.
3. At all times material hereto, Plaintiff, IVENIE CINE, was a resident of Palm Beach County,  
Florida, over the age of eighteen (18) and is otherwise *sui juris*.
4. At all times material hereto, Defendant, PALM BEACH COUNTY, was a county and/or  
political subdivision of the State of Florida.
5. Venue is proper in Palm Beach County, Florida because the acts and omissions referred to  
herein occurred in Palm Beach County, Florida, Defendant, PALM BEACH COUNTY, is

located within Palm Beach County, Florida.

**COUNT I – NEGLIGENCE AGAINST DEFENDANT, PALM BEACH COUNTY**

6. Plaintiff, IVENIE CINE, adopts and reincorporates by reference Paragraphs 1 through 5 as if more fully set forth herein.
7. On or about January 9, 2025, Defendant, PALM BEACH COUNTY, owned, registered, leased, and/or maintained a motor vehicle (Palm Tran bus) that was being operated with its consent by Alix Germinal.
8. On or about January 9, 2025, Alix Germinal was acting in the course and scope of employment and/or agency and/or further business interests of Defendant, PALM BEACH COUNTY.
9. On or about January 9, 2025, Alix Germinal was operating a motor vehicle (Palm Tran Bus) traveling eastbound on West Glades Road in Boca Raton, Palm Beach County, Florida.
10. At that time and place, Plaintiff, IVENIE CINE, was a lawful passenger on the motor vehicle (Palm Tran bus) being operated by Alix Germinal.
11. At that time and place, Alix Germinal negligently operated and/or maintained the motor vehicle (Palm Tran bus) by crashing into another motor vehicle traveling eastbound on West Glades Road in Boca Raton, Palm Beach County, Florida.
12. As a direct and proximate result of the aforementioned collision, Plaintiff, IVENIE CINE, suffered serious, permanent bodily injuries and resulting pain and suffering, disability, physical impairment, disfigurement, mental anguish, inconvenience, loss of capacity for the enjoyment of life, incurred expenses of hospitalization, medical, chiropractic and nursing care and treatment, loss of earnings, loss of ability to earn money and aggravation of a

previously existing condition, disease or physical defect. Plaintiff, IVENIE CINE, shall suffer additional losses in the future.

13. Plaintiff, IVENIE CINE, has complied with all conditions precedent pursuant to Fla. Stat. §768.28 prior to the filing of this action and Defendant, PALM BEACH COUNTY, has received notice of this claim within the timeframe and manner as prescribed by law, with carbon copies of said notices directed to the Department of Financial Services of the State of Florida. True and correct copies of said notices are attached hereto as Plaintiff's "Composite Exhibit A".

WHEREFORE, Plaintiff, IVENIE CINE, demands judgment for all damages allowable under Florida law against Defendant, PALM BEACH COUNTY, in an amount in excess of the jurisdictional limits of this Honorable Court, together with Plaintiff, IVENIE CINE's, costs and for any and all further relief this Honorable Court deems just and proper.

**PLAINTIFFS DEMAND TRIAL BY JURY ON ALL ISSUES SO TRIABLE.**

Respectfully submitted this 9<sup>th</sup> day of January, 2026.

*(s) Matthew R. Naparstek*

Matthew R. Naparstek, Esquire  
Florida Bar # 36296  
Ehrlich & Naparstek  
1330 SE Federal Highway  
Stuart, FL 34994  
(772) 842-8822 - Telephone  
(772) 286-9893 - Facsimile  
Primary Email - [Matt@ENinjurylaw.com](mailto:Matt@ENinjurylaw.com)  
Secondary Email - [Melissa@ENinjurylaw.com](mailto:Melissa@ENinjurylaw.com)

# EXHIBIT A

NOT A CERTIFIED COPY

***Steinger, Greene & Feiner®***  
**INJURYLAWYERS.COM**

REPLY TO:  
1645 Palm Beach Lakes Blvd, 8th Floor  
West Palm Beach, FL 33401  
(561) 616-5550

**IN RE: THE PRE-SUIT NOTICE OF CLAIM  
PURSUANT TO FLORIDA STATUTE 768.28 (6)(A)**

IVENIE CINE

Prospective Claimant,

vs

BOARD OF COUNTY COMMISSIONERS  
PALM BEACH COUNTY,

Prospective Defendant.

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**CLAIMANT'S NOTICE OF POTENTIAL LITIGATION  
AGAINST PALM BEACH COUNTY  
PURSUANT TO FLORIDA STATUTE 768.28**

TO: Board of County Commissioners  
2455 Vista Parkway  
West Palm Beach, Florida 33411  
and

Certified Mail Return Receipt

Florida Dept. Financial Services  
200 East Gaines Street  
Tallahassee, Florida 32399-03000

Certified Mail Return Receipt

Pursuant to Florida Statute §768.28, this letter will serve to notify you or otherwise place you on notice that claimant Ivenie Cine, has placed you on notice of intent to initiate litigation against a governmental entity.

Claimant: Ivenie Cine

Address: 124 Sunset Boulevard  
Boynton Beach, FL 33426  
United States

Date of Birth: February 18, 1982

Place of Birth: HAITI

Social Security Number: [REDACTED]

Marital Status: Married

No prior adjudicated unpaid claim in excess of Two Hundred Dollars (\$200.00) exists relative to this claimant.

This claim arises out of an injury incurred by Ivenie Cine on January 9, 2025. On that date, on W Glades Road near the Intersection with Jog Road, in an unincorporated Palm Beach County by its agents and employees negligently made an immediate left maneuver, causing a sideswipe collision with another vehicle, resulting in Ms. Cine being injured as a passenger on the Palm Beach County owned bus. As a result of the negligence, IVENIE CINE suffered significant and permanent injuries.

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished to the above-named addresses, this \_\_\_\_\_ day of January, 2025.

Sincerely,

STEINGER, GREENE & FEINER

By:

Gavin N. Vargas, Esquire  
Florida Bar # 127456



**KENNETH E. EHRLICH, ESQ. +^\***  
**MATTHEW NAPARSTEK, ESQ.**

+ALSO ADMITTED TO  
GEORGIA BAR

+SUPREME COURT CERTIFIED  
CIVIL MEDIATOR

\*FLORIDA BAR BOARD CERTIFIED

**WWW.ENINJURYLAW.COM**

1330 SE FEDERAL HIGHWAY  
STUART, FLORIDA 34994  
TELEPHONE: 772-842-8822  
FACSIMILE: 772-286-9893

PALM BEACH COUNTY  
TELEPHONE: 561-687-1717  
FACSIMILE: 561-687-1995

**REPLY TO STUART OFFICE**

EMAIL: IVY@ENINJURYLAW.COM

March 18, 2025

**Via Certified Mail RRR# 7012 2920 0000 0643 4604**

Palm Tran  
Ivan Maldonado, Executive Director  
3201 Electronics Way  
West Palm Beach, FL 33407

Plaintiff	:	Ivenie Cine
Defendant	:	Palm Tran and/or Palm Beach County
Our File No.	:	11982817
Incident Date	:	January 9, 2025
Location	:	W. Glades Road & Jog Road, West Palm Beach, Florida

To Whom It May Concern,

Please be advised that this law firm has been retained to represent Ivenie Cine relative to personal injuries she sustained in the incident which occurred on the above-referenced date.

This letter serves as our notice pursuant to Section 768.28, Florida Statutes and to advise of our intent to pursue the aforementioned claim and to initiate litigation on behalf of Ivenie Cine against Palm Tran and/or Palm Beach County.

On January 9, 2025, Ivenie Cine was a passenger on a bus being driven by Alix Germinal, which was traveling eastbound on West Glades Road and which crashed into another motor vehicle.

The subject bus was owned by Palm Tran and/or Palm Beach County, Mr. Germinal was in the course and scope of his employ with Palm Tran and/or Palm Beach County, and he was driving with the permission of Palm Tran and/or Palm Beach County.

As a result of the negligence of the Alix Germinal, and/or the negligence of Palm Tran and/or Palm Beach County and/or the negligence of their agents/employees, Ivenie Cine suffered severe and permanent personal injuries.

The following information is being provided regarding our client:

Name:	Ivenie Cine
Address:	124 Sunset Blvd, Boynton Beach, FL
Date of Birth:	02/18/1982
Place of Birth:	Haiti
Social Security Number:	██████████

This is to further advise you that our client does not have any prior adjudicated unpaid claims to any government entity in excess of \$200.00.

Please acknowledge in writing your receipt of this notice and advise us as to the identity of the individual who will be handling this matter. If you have any questions concerning the above or require additional information/documentation, please contact the undersigned immediately.

Thank you for your anticipated cooperation and courtesies in this matter.

Sincerely,

*/s/ Matthew R. Naparstek*  
Matthew R. Naparstek, Esq.

cc:

Department of Financial Services  
200 East Gaines Street  
Tallahassee, Florida 32399  
**Via Certified Mail – 7012 2920 0000 0643 4611**

Palm Beach County Board of County Commissioners  
301 N. Olive Avenue  
West Palm Beach, FL 33401  
**Via Certified Mail – 7012 2920 0000 0643 4628**

Palm Beach County Board of County Commissioners  
Verdenia C. Baker, County Administrator  
301 N. Olive Avenue  
West Palm Beach, FL 33401  
**Via Certified Mail – 7012 2920 0000 0643 4635**

Palm Beach County Board of County Commissioners  
Maria G. Marino, Mayor  
301 N. Olive Avenue, Suite 1201  
West Palm Beach, FL 33401  
**Via Certified Mail – 7012 2920 0000 0643 4642**

Palm Beach County Risk Management  
100 Australian Avenue  
Suite 200  
West Palm Beach, FL 33406  
**Via Certified Mail – 7012 2920 0000 0643 4659**

**SENDER: COMPLETE THIS SECTION**

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**1. Article Addressed to:**

Dept. of Financial Svcs.  
200 East Gaines St.  
Tallahassee, FL 32391



9590 9402 0305 4295 5754 20

**2. Article Number (Transfer from service label)**

7012 2920 0000 0643 494 320

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Agent  
 Addressee

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D. Is delivery address different from item 1?  Yes  
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**3. Service Type**

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 Certified Mail®  
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 Collect on Delivery Restricted Delivery  
 Insured Mail  
 Insured Mail Restricted Delivery (over \$500)

Priority Mail Express®  
 Registered Mail™  
 Registered Mail Restricted Delivery  
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Matthew Naparstek  
1330 SE Federal Hwy  
Stuart FL 34994-3434

Cine

11982817

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1. Article Addressed to:

PBC RISK Mgmt  
100 Australian Ave  
Suite 200  
West Palm Bch, FL 33401



9590 9402 9305 4295 5754 68

2. Article Number (Transfer from service label)

2012 2920 0000 0643 4659

PS Form 3811, July 2020 PSN 7530-02-000-9053

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 Agent Addressee

B. Received by (Printed Name)

 Date of Delivery

2/24/25

C. Is delivery address different from item 1?

 Yes

If YES, enter delivery address below:

 No

## 3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Insured Mail
- Insured Mail Restricted Delivery (over \$500)

## Priority Mail Express®

- Registered Mail™
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- Signature Confirmation™
- Signature Confirmation Restricted Delivery

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24 MAR 2025 PM 9 L

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Matthew Naparstek  
1330 SE Federal Hwy  
Stuart FL 34994-3434

cine

11982817

4-343430

Matthew  
1330 S B  
Stuart F

4-343430

NOT A CERTIFIED COPY



**KENNETH E. EHRLICH, ESQ.+^\***  
**MATTHEW NAPARSTEK, ESQ.**

<sup>^</sup>ALSO ADMITTED TO  
GEORGIA BAR

<sup>+</sup>SUPREME COURT CERTIFIED  
CIVIL MEDIATOR

<sup>\*</sup>FLORIDA BAR BOARD CERTIFIED

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TELEPHONE: 772-842-8822  
FACSIMILE: 772-286-9893

PALM BEACH COUNTY  
TELEPHONE: 561-687-1717  
FACSIMILE: 561-687-1995

**REPLY TO STUART OFFICE**

EMAIL: MELISSA@ENINJURYLAW.COM

August 11, 2025

**Via Certified Mail RRR# 7012 2920 0000 0642 4902**

Palm Tran  
Ivan Maldonado, Executive Director  
100 N. Congress Avenue  
Delray Beach, FL 33445

Plaintiff :	Ivenie Cine
Defendant :	Palm Tran and/or Palm Beach County
Our File No. :	11982817
Incident Date :	January 9, 2025
Location :	W. Glades Road & Jog Road, West Palm Beach, Florida

To Whom It May Concern,

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This letter serves as our notice pursuant to Section 768.28, Florida Statutes and to advise of our intent to pursue the aforementioned claim and to initiate litigation on behalf of Ivenie Cine against Palm Tran and/or Palm Beach County.

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The subject bus was owned by Palm Tran and/or Palm Beach County, Mr. Germinal was in the course and scope of his employment with Palm Tran and/or Palm Beach County, and he was driving with the permission of Palm Tran and/or Palm Beach County.

As a result of the negligence of the Alix Germinal, and/or the negligence of Palm Tran and/or Palm Beach County and/or the negligence of their agents/employees, Ivenie Cine suffered severe and permanent personal injuries.

The following information is being provided regarding our client:

Name:	Ivenie Cine
Address:	124 Sunset Blvd, Boynton Beach, FL
Date of Birth:	02/18/1982
Place of Birth:	Haiti
Social Security Number:	██████████

This is to further advise you that our client does not have any prior adjudicated unpaid claims to any government entity in excess of \$200.00.

Please acknowledge in writing your receipt of this notice and advise us as to the identity of the individual who will be handling this matter. If you have any questions concerning the above or require additional information/documentation, please contact the undersigned immediately.

Thank you for your anticipated cooperation and courtesies in this matter.

Sincerely,

*/s/ Matthew R. Naparstek*  
Matthew R. Naparstek, Esq.

cc:  
Department of Financial Services  
200 East Gaines Street  
Tallahassee, Florida 32399  
Via Certified Mail – 7012 2920 0000 0642 4919

ALERT: WINTER WEATHER IN THE MIDWESTERN AND NORTHEASTERN US MAY DELAY FINA...

# USPS Tracking®

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#### Delivered

**Delivered, Left with Individual**

DELRAY BEACH, FL 33445

August 22, 2025, 11:34 am

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WEST PALM BEACH FL DISTRIBUTION CENTER

August 21, 2025, 8:08 am

[Hide Tracking History](#)[What Do USPS Tracking Statuses Mean?](https://faq.usps.com/s/article/Where-is-my-package)

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**COMPLETE THIS SECTION ON DELIVERY****A. Signature**

*X Willis Clark*

Agent  
 Addressee

**B. Received by (Printed Name)**

RECEIVED BY WILLIS CLARK  
DEPARTMENT OF FINANCIAL SERVICES

**C. Date of Delivery**

DEPT OF FINANCIAL SERVICES 32399-0617

**D. Is delivery address different from item 1?**  Yes  
YES, enter delivery address below:  No

Department of Financial Services  
200 E. Gaines Street  
Tallahassee, FL 32399



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- Signature Confirmation Restricted Delivery

Mail Restricted Delivery  
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Ehrlich & Naparstek  
1330 SE Federal Highway  
Stuart, FL 34994



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1. Article Addressed to:

Verdenia C. Bake  
Cty administrator  
301 N. Olive Ave.  
West Palm Bch FL 33401



9590 9402 9305 4295 5754 44

2. Article Number (Transfer from service label)

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PS Form 3811, July 2020 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

MINGO

Agent  
 Addressee

B. Received by (Printed Name)

C. Date of Delivery  
3/25/25

D. Is delivery address different from item 1?  Yes  
If YES, enter delivery address below:  No

3. Service Type

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- Collect on Delivery
- Collect on Delivery Restricted Delivery
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Matthew Naparstek  
1330 SE Federal Hwy  
Stuart FL 34994-3434

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**1. Article Addressed to:**

Maria G. Mariho, Mayor  
301 N. Olive Ave. Ste 120  
West Palm Beach, FL  
33401



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**2. Article Number (Transfer from service label)**

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PS Form 3811, July 2020 PSN 7530-02-000-9053

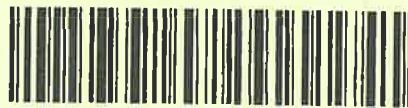
**COMPLETE THIS SECTION ON DELIVERY****A. Signature****MINGO** Agent  
 Addressee**B. Received by (Printed Name)****C. Date of Delivery**  
3/25/25**D. Is delivery address different from item 1?**  Yes  
If YES, enter delivery address below:  No**3. Service Type**

<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Restricted Delivery
<input type="checkbox"/> Insured Mail	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	

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Matthew Naparstek  
1330 SE Federal Hwy  
Stuart FL 34994-3434

Cine

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