

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

CASE NO.:
DIV.:

SANDRA JULMICE,

Plaintiff,

v.

PALM BEACH COUNTY SHERIFFS OFFICE,

Defendant.

_____ /

PLAINTIFF'S COMPLAINT AND DEMAND FOR JURY TRIAL

COMES NOW Plaintiff, SANDRA JULMICE, by and through the undersigned counsel and hereby sues Defendant, PALM BEACH COUNTY SHERIFFS OFFICE, and alleges as follows:

GENERAL ALLEGATIONS

1. This is an action for damages in excess of Fifty Thousand (\$50,000.00) Dollars, exclusive of costs, interest and attorney's fees.
2. At all relevant times, SANDRA JULMICE, was a resident of Royal Palm Beach in Palm Beach County, State of Florida and is otherwise *sui juris*.
3. At all times relevant, Defendant PALM BEACH COUNTY SHERIFFS OFFICE, is a corporation, licensed to do business in the State of Florida and is otherwise *sui juris*.
4. All damages and any other further relief claimed in this Complaint arose out of an incident which occurred on or about April 16, 2024, in Palm Beach County, State of Florida.

5. Pursuant to 768.28, SANDRA JULMICE presented her claim against PALM BEACH COUNTY SHERIFFS OFFICE on or about August 18, 2025, and otherwise complied with the provisions of the said statute. Proof of mailing is attached as Exhibit "A" and incorporated as reference herein.

6. Pursuant to Florida Statute 768.28, Plaintiff made a demand to the PALM BEACH COUNTY SHERIFFS OFFICE on or about August 18, 2025, and otherwise complied with the provisions of the said statute.

7. To date, PALM BEACH COUNTY SHERIFFS OFFICE has failed to make a timely determination as to compensating Sandra Julmice for her injuries sustained in the April 16, 2024, incident.

JURISDICTION AND VENUE

8. Defendant PALM BEACH COUNTY SHERIFFS OFFICE, has submitted to the jurisdiction of the courts of the State of Florida under Section 47.011 and 64.022 of the Florida Statutes because Defendant PALM BEACH COUNTY SHERIFFS OFFICE, has operated, conducted, engaged in, or carried on a business or business venture in this State.

9. Venue in Palm Beach County, Florida is proper in this action under Section 47.011 of the Florida Statutes because the subject matter giving rise to this action occurred in this county.

COUNT I - NEGLIGENCE OF DEFENDANT PALM BEACH COUNTY SHERIFFS OFFICE (VICARIOUS LIABILITY)

10. Plaintiff re-alleges the allegations of Paragraphs 1 through 9 as if restated herein.

11. At all times material hereto, JAKIE CISSON was an employee of Defendant PALM BEACH COUNTY SHERIFFS OFFICE.

12. At all times material hereto, JAKIE CISSON was acting within the course and scope of his employment with Defendant PALM BEACH COUNTY SHERIFFS OFFICE.

13. At all times material hereto, Defendant PALM BEACH COUNTY SHERIFFS OFFICE is vicariously liable for the negligent acts of JAKIE CISSON while working within the course and scope of his employment with Defendant PALM BEACH COUNTY SHERIFFS OFFICE.

14. At all times material hereto, JAKIE CISSON had a duty to operate the subject motor vehicle with reasonable care.

15. At all times material hereto, JAKIE CISSON failed to use reasonable care in the operation of the subject motor vehicle.

16. On or about April 16, 2024 JAKIE CISSON rear-ended the vehicle driven by Plaintiff in Palm Beach County, Florida.

17. As a direct and proximate cause of the negligence of JAKIE CISSON, which is legally attributable to Defendant PALM BEACH COUNTY SHERIFFS OFFICE, SANDRA JULMICE suffered bodily injury and resulting pain and suffering, disability, mental anguish, loss of capacity for the enjoyment of life, expenses of hospitalization, medical and nursing care and treatment, loss of earnings, loss of ability to earn money, and aggravation or activation of a previously existing condition. The losses are permanent and continuing within a reasonable degree of medical probability and SANDRA JULMICE will suffer the losses in the future.

WHEREFORE, SANDRA JULMICE, demands judgment for damages against Defendant PALM BEACH COUNTY SHERIFFS OFFICE, including damages, costs, interest, and such other relief as this Court deems just and proper.

JURY DEMAND

SANDRA JULMICE hereby demands a trial by jury of all issues so triable.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing will be served upon Defendant PALM BEACH COUNTY SHERIFFS OFFICE, and original was filed via Electronic Service via the Florida Courts E-Filing Eportal pursuant to the Supreme Court Administrative Order AOSC13-490 this 26 day of January, 2026.

/s/ Marko Drago Nikitovic, Esq.

MARKO NIKITOVIC/FL Bar No. 1033214

CHRISTOPHER SPEZIOK/FL Bar No. 1003695

CAREY MELDON/ FL BAR No. 18494

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Email: eservice@meldonlaw.com


mnikitovic@meldonlaw.com

jmontgomery@meldonlaw.com

Counsel for Plaintiff

EXHIBIT "A"

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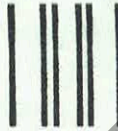
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<p>1. Article Addressed to: <i>Dept of Transportation Office of General Counsel Claims 605 Lawrence St. Tallahassee FL 32301</i></p> <p> 9590 9402 9019 4122 2368 41</p>	<p>3. Service Type</p> <table border="0"><tr><td><input type="checkbox"/> Adult Signature</td><td><input type="checkbox"/> Priority Mail Express®</td></tr><tr><td><input type="checkbox"/> Adult Signature Restricted Delivery</td><td><input type="checkbox"/> Registered Mail™</td></tr><tr><td><input type="checkbox"/> Certified Mail®</td><td><input type="checkbox"/> Registered Mail Restricted Delivery</td></tr><tr><td><input type="checkbox"/> Certified Mail Restricted Delivery</td><td><input type="checkbox"/> Signature Confirmation™</td></tr><tr><td><input type="checkbox"/> Collect on Delivery</td><td><input type="checkbox"/> Signature Confirmation™ Restricted Delivery</td></tr><tr><td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td><td></td></tr></table> <p><input type="checkbox"/> Mail Restricted Delivery (0)</p>	<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™ Restricted Delivery	<input type="checkbox"/> Collect on Delivery Restricted Delivery	
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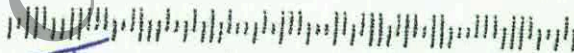


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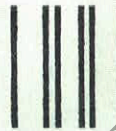
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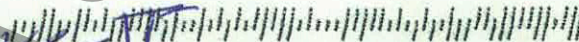
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