

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

MARISOL MOHAMED,

CASE NO.

Plaintiff,
vs.

BOCA RATON PREPARATORY SCHOOL, INC.
and SEK INSTITUTIONAL COMMUNICATIONS,
CORPORATION,

Defendants.

COMPLAINT

Plaintiff, MARISOL MOHAMED, by and through counsel, hereby sues Defendants, BOCA RATON PREPARATORY SCHOOL, INC. and SEK INSTITUTIONAL COMMUNICATIONS, CORPORATION, and as grounds therefore alleges the following:

PARTIES, JURISDICTION & VENUE

1. This is an action for damages which exceeds Fifty Thousand (\$50,000.00) dollars, exclusive of fees and costs.

2. Plaintiff, MARISOL MOHAMED, at all times material to this cause, was a resident of Broward County, Florida, and is otherwise *sui juris*.

3. Defendant, BOCA RATON PREPARATORY SCHOOL, INC., at all times material to this cause, was authorized to conduct and was conducting business in Palm Beach County, Florida.

4. Defendant, SEK INSTITUTIONAL COMMUNICATIONS, CORPORATION, at all times material to this cause, was authorized to conduct and was conducting business in Palm Beach County, Florida.

5. The events giving rise to this Complaint occurred in Palm Beach County, Florida.

COUNT I – NEGLIGENCE CLAIM AGAINST DEFENDANT
BOCA RATON PREPARATORY SCHOOL, INC.
(Premises Liability)

Plaintiff, MARISOL MOHAMED, adopts and realleges paragraphs one (1) through four (4) as if fully set forth herein and further alleges as follows:

6. On January 22, 2025, Defendant, BOCA RATON PREPARATORY SCHOOL, INC., owned, possessed, operated, maintained and/or controlled the premises located at 10333 Diego Drive South, Boca Raton, Palm Beach County, Florida.

7. On January 22, 2025, and at all times material hereto, Plaintiff, MARISOL MOHAMED, was on said premises as a guest/invitee of BOCA RATON PREPARATORY SCHOOL, INC., located at 10333 Diego Drive South, Boca Raton, Palm Beach County, Florida when she was injured.

8. At all times material hereto, Plaintiff was on said premises when she slipped and fell due to unreasonably slippery and defective painted asphalt in the school pickup area of the school parking lot causing her to sustain severe injuries.

9. At all times material hereto, the slippery and defective painted asphalt created an unreasonably dangerous and unsafe condition.

10. At all times material hereto, BOCA RATON PREPARATORY SCHOOL, INC., by and through its employees, agents, and/or apparent agents, had actual or constructive notice of the existence of the slippery and defective painted asphalt.

11. At all times material hereto, Defendant, BOCA RATON PREPARATORY SCHOOL, INC., owed Plaintiff a non-delegable duty to maintain a reasonably safe premises and to warn of latent dangers it knew or should have known existed.

12. At all times material hereto, Defendant, BOCA RATON PREPARATORY SCHOOL, INC., by and through its employees, agents, and/or apparent agents, breached that duty by, *inter alia*:

- a. Failing to properly maintain the subject premises in a reasonably safe condition; by allowing the subject premises to become dangerous, defective and unsafe, and in creating a slipping hazard for the Plaintiff and other, similar invitees;
- b. Failing to adequately train and supervise its employees and/or agents to locate and repair such hazards at the subject property;

- c. Failing to restrict access to the subject area that contained dangerous conditions;
- d. Failing to warn Plaintiff of dangerous conditions that existed at the subject premises, that the Defendant knew or should have known existed;
- e. Failing to correct a dangerous condition it knew or should have known existed;
- f. In other ways to be determined during discovery.

12. That as a direct and proximate result of Defendant, BOCA RATON PREPARATORY SCHOOL, INC's negligence, Plaintiff, MARISOL MOHAMED, sustained injuries resulting in pain and suffering, disability, disfigurement, mental anguish, loss of the capacity for enjoyment of life, expenses of hospitalization, medical and nursing care and treatment, loss of earnings and loss of the ability to earn money in the future, and aggravation of a previously existing condition, if any. These losses are either permanent or continuing in nature and the Plaintiff, MARISOL MOHAMED, will suffer these losses in the future.

COUNT II – NEGLIGENCE CLAIM AGAINST DEFENDANT
SEK INSTITUTIONAL COMMUNICATIONS, CORPORATION
(Premises Liability)

Plaintiff, MARISOL MOHAMED, adopts and realleges paragraphs one (1) through four (4) as if fully set forth herein and further alleges as follows:

13. On January 22, 2025, Defendant, SEK INSTITUTIONAL COMMUNICATIONS, CORPORATION, owned, possessed, operated, maintained and/or controlled the premises located at 10333 Diego Drive South, Boca Raton, Palm Beach County, Florida.

14. On January 22, 2025, and at all times material hereto, Plaintiff, MARISOL MOHAMED, was on said premises as a guest/invitee of SEK INSTITUTIONAL COMMUNICATIONS, CORPORATION located at 10333 Diego Drive South, Boca Raton, Palm Beach County, Florida, when she was injured.

15. At all times material hereto, Plaintiff was on said premises when she slipped and fell due to unreasonably slippery and defective painted asphalt in the school pickup area of the school parking lot causing her to sustain severe injuries.

16. At all times material hereto, the slippery and defective painted asphalt created an unreasonably dangerous and unsafe condition.

17. At all times material hereto, SEK INSTITUTIONAL COMMUNICATIONS, CORPORATION, by and through its employees, agents, and/or apparent agents, had actual or constructive notice of the existence of the slippery and defective painted asphalt in the parking lot.

18. At all times material hereto, Defendant, SEK INSTITUTIONAL COMMUNICATIONS, CORPORATION, INC., owed Plaintiff a non-delegable duty to maintain a reasonably safe premises and to warn of latent dangers it knew or should have known existed.

19. At all times material hereto, Defendant, SEK INSTITUTIONAL COMMUNICATIONS, CORPORATION, by and through its employees, agents, and/or apparent agents, breached that duty by, *inter alia*:

- a. Failing to properly maintain the subject premises in a reasonably safe condition; by allowing the subject premises to become dangerous, defective and unsafe, and in creating a slipping hazard for the Plaintiff and other, similar invitees;
- b. Failing to adequately train and supervise its employees and/or agents to locate and repair such hazards at the subject property;
- c. Failing to restrict access to the subject area that contained dangerous conditions;
- d. Failing to warn Plaintiff of dangerous conditions that existed at the subject premises, that the Defendant knew or should have known existed;
- e. Failing to correct a dangerous condition it knew or should have known existed;
- f. In other ways to be determined during discovery.

20. That as a direct and proximate result of Defendant, SEK INSTITUTIONAL COMMUNICATIONS, CORPORATION's, negligence, Plaintiff, MARISOL MOHAMED, sustained injuries resulting in pain and suffering, disability, disfigurement, mental anguish, loss of the capacity for enjoyment of life, expenses of hospitalization, medical and nursing care and treatment, loss of earnings and loss of the ability to earn money in the future, and aggravation of a previously existing condition, if any. These losses are either permanent or continuing in nature and the Plaintiff, MARISOL MOHAMED, will suffer these losses in the future.

WHEREFORE, Plaintiff, MARISOL MOHAMED, demands judgment and damages against the Defendants, BOCA RATON PREPARATORY SCHOOL, INC. and SEK INSTITUTIONAL COMMUNICATIONS, CORPORATION, for damages in excess of Fifty Thousand Dollar (\$50,000.00), plus costs, and further demands trial by jury on all issues so triable as a right by jury.

DATED on this 4th day of FEBRUARY 2026.

GOLDMAN & DASZKAL, P.A.

Attorneys for Plaintiff

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BY: /s/ Joseph F. Stallone

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