

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

CASE NO:

RONALD DAVID KRAUSS,

Plaintiff,

vs.

THE BOCA RATON, LLC,  
a Foreign Limited Liability Company,

Defendant.

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**COMPLAINT**

The Plaintiff, RONALD DAVID KRAUSS, by and through his undersigned counsel, sues the Defendant, THE BOCA RATON, LLC., a Foreign Limited Liability Company, (hereinafter “THE BOCA RATON”), and alleges as follows:

1. This is an action for damages in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), exclusive of interest and costs.
2. At all times material hereto, the Plaintiff RONALD DAVID KRAUSS, was and is a resident of Miami-Dade County, Florida.
3. At all times material hereto, Defendant, THE BOCA RATON, LLC., a Foreign Limited Liability Company, was licensed to do business and doing business in Palm Beach County, Florida as the owner and operator of a resort and club located at 501 East Camino Real, Boca Raton, Florida 33432.
4. At all times material hereto, Defendant, THE BOCA RATON, LLC., owned, operated, maintained and/or controlled all common areas, including but not limited to the resort lobby and its furniture, located at building 501 East Camino Real, Boca Raton, Florida 33432.

5. On or about August 2, 2025, the Plaintiff, RONALD DAVID KRAUSS, was a business invitee at the Defendant's, THE BOCA RATON, resort and club which is located at the above location. At said time and place, the Defendant, THE BOCA RATON, owed to the general public and to the Plaintiff, RONALD DAVID KRAUSS, in particular, the duty of keeping its premises in a reasonably safe condition so that people such as Plaintiff, RONALD DAVID KRAUSS, would not be injured on said premises.

6. The Defendant, THE BOCA RATON, breached its duty to the Plaintiff, RONALD DAVID KRAUSS, and that the Defendant, its agents, servants, and/or employees, while acting within the course and scope of their employment, created and/or allowed to be created a dangerous defective condition, to wit: a couch with an exposed wooden frame at the top of the couch that caused the Plaintiff, RONALD DAVID KRAUSS, to injure himself when he sat down on the couch and hit the back of his head on the wooden couch frame.

7. The Defendant, THE BOCA RATON, knew or should have known of said dangerous and defective condition; and failed to warn the general public, or the Plaintiff, RONALD DAVID KRAUSS, in particular, of any danger or, in the alternative, the Defendant allowed said dangerous and defective condition to exist for a length of time sufficient in which a reasonable inspection would have disclosed such condition.

8. That as a direct and proximate result of the aforementioned incident, the Plaintiff, RONALD DAVID KRAUSS, was injured in and about his body and extremities, suffered physical handicap and/or aggravation of a pre-existing condition, physical and mental pain and suffering, permanent disability and disfigurement, medical and maintenance expenses and wage loss; said injuries and losses are either permanent or continuing in nature and the Plaintiff will suffer such losses and impairments in the future.

WHEREFORE, Plaintiff, RONALD DAVID KRAUSS, sues the Defendant, THE BOCA RATON, LLC., a Foreign Limited Liability Company, and demands judgment for damages in excess of Fifty Thousand Dollars (\$50,000.00), and further demands a trial by jury of all issues so triable.

DATED this 16<sup>th</sup> Day of February 2026.

RAMON, RODRIGUEZ & BLANCO-HERRERA, LLP  
Attorney for Plaintiff  
1750 Coral Way, Second Floor  
Miami, FL. 33145  
Telephone: (305) 800-4663  
Email: [mbh@rrbhlaw.com](mailto:mbh@rrbhlaw.com)

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RAMON BLANCO-HERRERA, ESQ.  
Florida Bar No.: 11494