

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

GENERAL JURISDICTION DIVISION

Case No. \_\_\_\_\_

CLENES & MARCELINE ACCELUS, as  
parent and legal/natural guardian of D.A.,  
a minor  
Plaintiff (s),

vs.

SCHOOL BOARD OF PALM BEACH COUNTY  
FLORIDA  
Defendant(s).

\_\_\_\_\_/

**COMPLAINT**

COMES NOW, CLENES & MARCELINE ACCELUS, as parent and legal/natural guardian of D.A., a minor (hereinafter referred to as "Plaintiffs"), sues defendants, **SCHOOL BOARD OF PALM BEACH COUNTY FLORIDA**, (hereinafter referred to as "**Defendant**") and alleges:

**GENERAL ALLEGATIONS AS TO ALL COUNTS**

1. This is an action for damages that exceed \$50,000.00 exclusive of cost and interest.
2. That on or about April 17, 2024, **Plaintiffs** were residents of Palm Beach County, over the age of eighteen years of age.
3. Plaintiffs are the parents and natural guardians of Darlens Accelus (the Minor)
4. At all times material hereto, the Minor was under the age of eighteen (18) and was an enrolled student at Santaluces Community High School.

5. At all times material hereto, the Defendant was/is a an agency of the State, organized and existing under the laws of the State of Florida.

6. At all times material hereto, the defendant owned, operated, maintained and/or controlled, supervised and was otherwise fully responsible for the high school known as Santaluces Community High School, which is located at 6880 Lawrence Rd, Lantana, FL 33462.

7. Venue is proper in Palm Beach County, Florida because the incident which is the subject of this complaint occurred in Palm Beach County, Florida.

8. All Conditions precedent to the filing of this action have been performed or have occurred.

9. Plaintiff has complied with Fla. Stat § 768.28(6) by mailing the requisite letter to the Defendant as a condition precedent.

10. More than six (6) months have expired since the mailing of the requisite letter.

**COUNT I**  
**NEGLIGENCE SUPERVISION**

1. Plaintiff re-alleges and re-avers each and every allegation contained in Paragraphs One through ten as if these Paragraphs were contained herein verbatim.

2. On or about April 17, 2024, the minor was an invitee at the Premises and lawfully on the premises as an enrolled.

3. At all times material hereto, the defendant employed teachers and other School personnel to teach and care for the students.

4. At the aforesaid time and place, the Defendant trained its employed teachers and other school personnel to monitor the hallways and student gathering places before school begun, during class breaks, and after school to monitor the safety of the students.

5. On or about April 17, 2024, the minor child was inadequately and improperly supervised by the Defendant's employees which resulted in the minor being jumped and beaten to the ground resulting in personal injuries to the minor.

6. The Defendant owed a duty to the Plaintiff to reasonably supervise the students during all activities that are subject to the control of the school, which includes the students walking through the school's hallways during lunch and to class.

7. The Defendant breached this duty on April 17, 2024 by, amongst other breaches as will be revealed during discovery, the Defendant's teachers and school personnel were not monitoring the hallways and student gatherings during lunch.

8. As a direct and proximate result of the negligent supervision by defendant, the minor child was jumped, beaten and humiliated resulting in personal injuries to the minor; pain and suffering; mental anguish, emotional injury; loss of enjoyment of life; humiliation and embarrassment.

9. **WHEREFORE**, the plaintiff(s), request a judgment for damages in excess of fifty Thousand (50,000.00) Dollars as well as costs and disbursements of this action, prejudgment interest where applicable and a jury trial on all issues so triable.

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