

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

CIVIL DIVISION

RAMONA SPADONI,

CASE NO.:

Plaintiff,

vs.

JUPITER GOLF CLUB LLC,
a Delaware limited liability company,
d/b/a TRUMP NATIONAL GOLF
CLUB JUPITER,

Defendant.

PLAINTIFF'S COMPLAINT AND DEMAND FOR JURY TRIAL

COMES NOW, the Plaintiff, RAMONA SPADONI, by and through undersigned counsel and hereby sues Defendant, JUPITER GOLF CLUB, LLC, a Delaware limited liability company, d/b/a TRUMP NATIONAL GOLF CLUB JUPITER ("JUPITER GOLF"), and alleges:

1. This is an action for damages that exceeds Fifty Thousand Dollars (\$50,000.00) exclusive of interest, costs and attorney's fees.
2. At all times material hereto, and at the time of the incident complained of, Plaintiff was a resident of St. Lucie County, Florida and was *sui juris*.
3. At all times material hereto, and at the time of the incident complained of, Defendant, JUPITER GOLF was a Delaware limited liability company licensed to do business in the State of Florida and in fact doing business in Palm Beach County, Florida.
4. At all times material, Defendant, JUPITER GOLF, maintained its principal place of business in Palm Beach County, Florida.

5. JUPITER GOLF is subject to the jurisdiction of the Courts of the State of Florida as it:

- a. Operated, conducted, engaged in and/or carried on a business venture in the State of Florida and/or maintained an office in the State of Florida; and
- b. Committed a tortious act within this State as set forth below.

6. On or about May 4, 2024, Defendant, JUPITER GOLF, owned, possessed, maintained and/or exercised control over a property located at 115 Eagle Tree Terrace, Jupiter, Florida (“Premises”).

7. On or about May 4, 2024, Plaintiff, RAMONA SPADONI, was lawfully on the Premises.

8. At the aforementioned date and time, while walking through the clubhouse on said Premises, Plaintiff was caused to slip and fall due to a liquid substance which had accumulated on the floor.

9. As a direct and proximate result of Defendant’s negligence, Plaintiff suffered serious bodily injuries as explained in further detail below.

10. Venue is proper in Palm Beach County, Florida as this incident occurred in Palm Beach County, Florida.

COUNT I – STATUTORY NEGLIGENCE

Plaintiff, RAMONA SPADONI, realleges and reavers the allegations contained in Paragraphs 1 through 10 above as though fully set forth herein and further states:

11. On the aforementioned time, date and place, Defendant, JUPITER GOLF, by and through its agents and employees, owed a non-delegable duty to Plaintiff to maintain and keep the aforescribed premises in a reasonably safe condition.

12. At the aforescribed time, date and place, Defendant, JUPITER GOLF, acted negligently and carelessly, and breached its duty of care in one or more of the following ways:

- a. By improperly and carelessly allowing a liquid substance to get on and remain on the floor, thereby creating a dangerous and hazardous condition;
- b. By failing to detect or remove the liquid substance from the floor, although it knew or in the exercise of reasonable care, should have known of the existence of said liquid on the floor, and it further represented to its invitees that its premises was safe and suitable when, in fact, it was not because of the presence of the hazardous condition;
- c. By failing to provide adequate reasonable notice of the aforescribed unsafe, dangerous and hazardous condition to its invitees, including but not limited to Plaintiff, although Defendant knew, or in the exercise of reasonable care, should have known about the existence of said condition, and it further represented to its invitees that its premises was safe and suitable when in fact it was not, because of the presence of the hazardous condition;
- d. By failing to properly maintain and inspect its floors and premises;
- e. By creating the dangerous condition and failing to timely remove it;
- f. By failing to comply with applicable Florida Building Codes, ADA, Life Safety Codes and other applicable local and municipal codes, regulations and laws and/or the reasonable standard of care.

13. Additionally, the condition occurred with regularity and was therefore foreseeable on Defendant's premises, and as a result, Defendant, JUPITER GOLF, was on constructive notice of the dangerous and hazardous condition.

14. As a direct and proximate cause of Defendant, JUPITER GOLF's negligence, Plaintiff, RAMONA SPADONI, suffered serious injuries and permanent bodily injuries and damages, resulting pain therefrom, pain and suffering, exacerbation of a pre-existing injury, mental anguish, past and future medical expenses, lost wages, diminished capacity for future earnings, loss of capacity for the enjoyment of life, inconvenience, scarring and disfigurement. These

damages are either permanent or continuing in nature and Plaintiff will suffer these losses into the future.

WHEREFORE, Plaintiff, RAMONA SPADONI, demands judgment against Defendant, JUPITER GOLF CLUB LLC, in an amount in excess of Fifty Thousand Dollars (\$50,000.00), exclusive of interest and costs, which are prayed for in addition thereto. Plaintiff further demands trial by jury on all issues so triable by right.

RESPECTFULLY submitted on April 27, 2026.

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