

IN THE CIRCUIT COURT OF THE 15<sup>th</sup>  
JUDICIAL CIRCUIT IN AND FOR PALM  
BEACH COUNTY, FLORIDA

CASE NO:

JUAN ALONSO,

Plaintiff,

v.

PALM BEACH COUNTY SHERIFF'S  
OFFICE,

Defendant.

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**COMPLAINT**

The Plaintiff, JUAN ALONSO, by and through his undersigned counsel, sues the Defendant, PALM BEACH COUNTY SHERIFF'S OFFICE ("PBSO"), hereinafter, and alleges as follows:

1. This is an action for damages in excess of \$50,000.00, exclusive of interest, attorney fees and costs, and is within the jurisdiction of this Court.
2. At all times mentioned herein, Plaintiff, JUAN ALONSO, resided in Palm Beach County, Florida.
3. At all times mentioned herein, Defendant, PBSO, is located in Palm Beach County, Florida and is a political subdivision of the State of Florida.
4. Plaintiff has complied with all conditions precedent to filing this lawsuit with respect to F.S. § 768.28.
5. On June 17, 2024, Plaintiff was traveling westbound in the 32000 Block of SR80. At the intersection of Hatton Hwy and SR80, Officer Lumbert of PBSO failed to yield the right-of-way to Plaintiff and entered Plaintiff's lane of travel southbound through the intersection causing a severe crash.
6. Officer Lumbert owed a duty to the Plaintiff and the public at large to operate his

vehicle in a reasonable manner.

7. Officer Lumbert breached that duty by negligently operating, maintaining and controlling his motor vehicle so that it collided with the motor vehicle driven by Plaintiff.

8. PBSO is vicariously liable for the actions of its deputies in the course and scope of their employment.

9. That as a direct and proximate result of the subject accident as aforementioned, Plaintiff, JUAN ALONSO, was severely injured and suffered bodily injuries resulting in pain and suffering, disability, disfigurement, loss of capacity for the enjoyment of life, aggravation of a pre-existing condition, pre-disposition to further injury, expenses of medical care and treatment, lost wages and ability to earn income, property damage and loss of use of his vehicle. The losses are either permanent or continuing in nature and Plaintiff will suffer the losses in the future.

WHEREFORE the Plaintiff demands judgment against the Defendant, PALM BEACH COUNTY SHERIFF'S OFFICE, for damages in excess of \$50,000.00, to be ascertained at the time of trial of this cause, costs, pre-judgment interest for paid un-reimbursed expenses, and any other and further relief as this Honorable Court may deem just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiff demands a trial by jury on all issues so triable as a matter of right.

Dated May 18, 2026.

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By: /s/John E. Schwencke

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