

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

CASE NO.:

JORDAN TONIETTO,

Plaintiff,

v.

ISRAM DELRAY JV, LLC, a Foreign  
Limited Liability Company, and  
UNKNOWN PARTY #1,

Defendants.

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**COMPLAINT**

**COMES NOW**, Plaintiff, JORDAN TONIETTO (hereinafter “Plaintiff TONIETTO” or “Plaintiff”), by and through the undersigned counsel, and hereby sues Defendants, ISRAM DELRAY JV, LLC (hereinafter “ISRAM”), a Foreign Limited Liability Company, and UNKNOWN PARTY #1, and, in support thereof, would allege as follows:

**FACTS COMMON TO ALL COUNTS**

1. That this is an action in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and is within the jurisdiction of this Court.
2. Venue is proper in Palm Beach County pursuant to section 47.011, Florida Statutes, because the cause of action accrued in Palm Beach County, Florida.
3. At all times material hereto, Plaintiff, JORDAN TONIETTO, was and still is a resident of Palm Beach County, Florida and is otherwise sui juris.
4. That Defendant, ISRAM, was and still is a Foreign Limited Liability Company, licensed and authorized to do business within the State of Florida, and, at all times material hereto,

owned, co-owned, controlled, possessed, or maintained the parking lot located directly outside of 14530 S Military Trl., Ste. A6-7, Delray Beach, FL 33484 (hereinafter the “Subject Premises”).

5. That at all times material hereto, Defendant, UNKNOWN PARTY #1, was an agent, employee, representative, or contractor of Defendant, ISRAM, and acting within the course and scope of its employment, agency, or capacity as a representative.

6. On or about October 13, 2024, Plaintiff was lawfully present on the Subject Premises as a business invitee.

7. While on the Subject Premises, Plaintiff slipped and fell on a ramp located on the Subject Premises, causing Plaintiff to sustain serious bodily injuries.

8. At the time of the incident, the subject ramp constituted a dangerous and hazardous condition on the Subject Premises because the walking surface of the ramp was unreasonably slick, particularly when exposed to rain and ordinary outdoor conditions.

9. The subject ramp lacked adequate slip resistance and/or contained unsafe surface materials, improper design characteristics, improper maintenance, excessive slope, inadequate non-slip treatment, deterioration, or other dangerous conditions that rendered the ramp unsafe for persons lawfully using the Subject Premises.

10. On or about October 13, 2024, while on the Subject Premises, Plaintiff TONIETTO was injured as a result of the dangerous and hazardous condition of the subject ramp, including its unreasonably slick condition, which condition was caused by the negligence of Defendant, ISRAM, and/or its employees, agents, or representatives.

**COUNT I - NEGLIGENCE CLAIM AGAINST ISRAM**

11. Plaintiff, JORDAN TONIETTO, re-alleges and incorporates by reference each of the allegations contained in paragraphs 1–10, as if fully reproduced herein, and in addition would allege as follows:

12. That at the time Plaintiff was injured, ISRAM, maintained, controlled, possessed, owned, and/or co-owned the Subject Premises.

13. That at the time Plaintiff was injured, ISRAM, and its representatives, agents, servants, and/or employees, including, but not limited to, Defendant, UNKNOWN PARTY #1, owed Plaintiff, JORDAN TONIETTO, the legal duties to maintain and keep the Subject Premises in a reasonably safe condition for individuals, like Plaintiff, JORDAN TONIETTO, whose presence on the Subject Premises was foreseeable to ISRAM and to warn invitees of dangerous, concealed conditions which existed on the Subject Premises that are known or should be known.

14. ISRAM and its representatives, agents, servants, and/or employees breached its duties to Plaintiff by, inter alia:

- a. Creating or permitting a dangerous condition involving an unreasonably slick ramp;
- b. Failing to remove or remedy the condition within a reasonable time;
- c. Failing to conduct reasonable inspections of the premises;
- d. Failing to warn Plaintiff of the dangerous condition.

15. Said dangerous condition was unknown to Plaintiff.

16. The dangerous condition was created by ISRAM and/or its employees, or alternatively existed for a sufficient length of time that Defendant knew or should have known of it through the exercise of reasonable care, including routine inspection procedures. The condition was also reasonably foreseeable.

17. That as direct and proximate result of ISRAM's, negligence, Plaintiff, JORDAN TONIETTO, was injured in and about his body and extremities and/or aggravated a pre-existing condition, suffered pain therefrom, suffered physical handicap, suffered disfigurement, suffered mental pain and suffering, suffered loss of income in the past and will do so in the future, loss of

capacity for the enjoyment of life, incurred medical expenses for the care and treatment of his injuries, said injuries are permanent and are continuing in nature, and Plaintiff will continue to suffer these losses and impairments in the future.

**WHEREFORE**, Plaintiff, JORDAN TONIETTO, prays for entry of a judgment against Defendant, ISRAM, in an amount in excess of Fifty Thousand (\$50,000.00) dollars, plus costs.

**COUNT II - NEGLIGENCE CLAIM AGAINST DEFENDANT, UNKNOWN PARTY #1**

18. Plaintiff, JORDAN TONIETTO, re-alleges and incorporates by reference each of the allegations contained in paragraphs 1–10, as if fully reproduced herein, and in addition would allege as follows:

19. That at the time Plaintiff was injured, UNKNOWN PARTY #1, maintained, controlled, or possessed the Subject Premises.

20. That at the time Plaintiff was injured, UNKNOWN PARTY #1, owed Plaintiff, JORDAN TONIETTO, the legal duties to maintain and keep the Subject Premises in a reasonably safe condition for individuals, like Plaintiff, JORDAN TONIETTO, whose presence on the Subject Premises was foreseeable to said Defendant and to warn invitees of dangerous, concealed conditions which existed on the Subject Premises that are known or should be known.

21. UNKNOWN PARTY #1 breached its duties to Plaintiff by, inter alia:

- a. Creating or permitting a dangerous condition involving an unreasonably slick ramp;
- b. Failing to remove or remedy the condition within a reasonable time;
- c. Failing to conduct reasonable inspections of the premises;
- d. Failing to warn Plaintiff of the dangerous condition.

22. Said dangerous condition was unknown.

23. The dangerous condition was created by UNKNOWN PARTY #1 or its employees, or alternatively existed for a sufficient length of time that Defendant knew or should have known of it through the exercise of reasonable care, including routine inspection procedures. The condition was also reasonably foreseeable.

24. That as direct and proximate result of UNKNOWN PARTY #1's, negligence, Plaintiff, JORDAN TONIETTO, was injured in and about his body and extremities and/or aggravated a pre-existing condition, suffered pain therefrom, suffered physical handicap, suffered disfigurement, suffered mental pain and suffering, suffered loss of income in the past and will do so in the future, loss of capacity for the enjoyment of life, incurred medical expenses for the care and treatment of his injuries, said injuries are permanent and are continuing in nature, and Plaintiff will continue to suffer these losses and impairments in the future.

**WHEREFORE**, Plaintiff, JORDAN TONIETTO, prays for entry of a judgment against Defendant, UNKNOWN PARTY #1, in an amount in excess of Fifty Thousand (\$50,000.00) dollars, plus costs.

**COUNT III – VICARIOUS LIABILITY CLAIM AGAINST DEFENDANT, ISRAM**

25. Plaintiff, JORDAN TONIETTO, re-alleges and incorporates by reference each of the allegations contained in paragraphs 1–10, as if fully reproduced herein, and in addition would allege as follows:

26. That at all times material hereto, UNKNOWN PARTY #1 was an employee, agent, and/or representative of Defendant, ISRAM, who was under the direct supervision, employ, and control of Defendant, ISRAM.

27. UNKNOWN PARTY #1 engaged in the wrongful and negligent conduct pled herein and committed the acts alleged within the course and scope of its employment and/or apparent

authority arising from its agency with Defendant, ISRAM, and/or said conduct was ratified by Defendant, ISRAM.

28. That as direct and proximate result of UNKNOWN PARTY #1's, negligence, as pled herein and which is imputed to Defendant, ISRAM, through the doctrine of respondeat superior and vicariously liable, Plaintiff, JORDAN TONIETTO, was injured in and about his body and extremities and/or aggravated a pre-existing condition, suffered pain therefrom, suffered physical handicap, suffered disfigurement, suffered mental pain and suffering, suffered loss of income in the past and will do so in the future, loss of capacity for the enjoyment of life, incurred medical expenses for the care and treatment of his injuries, said injuries are permanent and are continuing in nature, and Plaintiff will continue to suffer these losses and impairments in the future.

**WHEREFORE**, Plaintiff, JORDAN TONIETTO, prays for entry of a judgment against Defendant, ISRAM, in an amount in excess of Fifty Thousand (\$50,000.00) dollars, plus costs.

**DEMAND FOR JURY TRIAL**

Plaintiff demands trial by jury of all issues in this cause so triable as a matter of right.

Dated this 5th day of June 2026.

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*/s/ Devin P. Tison, Esq.*  
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