

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

JASON GONZALEZ,

CASE NO.:

Plaintiff,

v.

FLORIDA ELITE SOUTH, INCORPORATED,
A Florida Not for Profit Corporation,

Defendant.

_____ /

COMPLAINT

Plaintiff, JASON GONZALEZ, (hereinafter "Plaintiff"), by and through undersigned counsel, hereby sues Defendant, FLORIDA ELITE SOUTH, INCORPORATED, and in support thereof, states as follows:

JURISDICTION, PARTIES & VENUE

1. This is an action for damages in excess of Fifty Thousand (\$50,000.00) Dollars, exclusive of interest and costs.
2. At all times material hereto, Plaintiff is and was a resident of Palm Beach County, Florida and is otherwise *sui juris*.
3. At all times material hereto, Defendant, FLORIDA ELITE SOUTH, INCORPORATED, is a Florida Not for Profit Corporation, authorized to and conducting business in the State of Florida, specifically in Palm Beach County, Florida.
4. At all times material hereto, Defendant, FLORIDA ELITE SOUTH, INCORPORATED, operated, managed, maintained, directed, and/or controlled the sports league at issue.

5. Venue is proper in Palm Beach County, Florida, as the incident and events that resulted in Plaintiff's injuries that are the subject matter of this lawsuit occurred there.

GENERAL ALLEGATIONS

6. On or about October 18, 2025, Plaintiff was watching his son's football game in Boca Raton, Palm Beach County, Florida.

7. The game was organized, sanctioned, supervised, and controlled by the Defendant, FLORIDA ELITE SOUTH, INCORPORATED.

8. The game involved two (2) youth football teams, the "Goulds", a Miami-based team and another youth football team from Boca Raton, both of which were participating under the authority and control of Defendant, FLORIDA ELITE SOUTH, INCORPORATED.

9. During the course of the game, one of the referees threw a flag for unsportsmanlike conduct, which is a routine and foreseeable aspect of officiating a youth football game.

10. Immediately following the call, a parent affiliated with the Goulds team aggressively charged the referee, attempting to initiate a physical altercation with him.

11. In response, the referee attempted to defend himself.

12. As the referee attempted to defend himself, several other parents and spectators affiliated with the Goulds team also joined in the confrontation, surrounded the referee and violently attacked him.

13. The Plaintiff ran to the field to try and diffuse the situation when he was punched in the neck by one of the parties from the Goulds team, knocking him unconscious.

14. As a direct result of the attack, the Plaintiff suffered bodily injuries requiring medical treatment, lost time at work, and significant pain, emotional distress and trauma.

15. At all relevant times, Defendant, FLORIDA ELITE SOUTH, INCORPORATED, knew or should have known that youth football games, particularly those involving the Goulds team, posed a heightened risk of violent confrontations involving parents and spectators.

16. Prior to October 18, 2025, FLORIDA ELITE SOUTH, INCORPORATED, was put on notice of multiple violent and dangerous incidents involving the Goulds team, including but not limited to, prior fights and physical altercations at Goulds team games, multiple ejections for unsportsmanlike and aggressive behavior, serious safety incidents including shootings at prior games or locations where the Goulds team played, and objections and safety concerns raised by other parks, leagues and organizations regarding participating with the Goulds team.

17. Despite the above, Defendant, FLORIDA ELITE SOUTH, INCORPORATED, continued to allow the Goulds team to participate in its league, without implementing adequate safety measures to protect referees, players, or spectators.

18. Defendant, FLORIDA ELITE SOUTH, INCORPORATED, failed to provide reasonable security, crowd control, supervision or enforcement mechanisms at the game, even though it knew, or in the exercise of reasonable care, should have known of the existence of the potential for violence at the subject football game.

19. Furthermore, prior to the incident, Defendant, FLORIDA ELITE SOUTH, INCORPORATED, failed to remove or even discipline the Goulds team, despite repeated violent incidents. Moreover, Defendant, FLORIDA ELITE SOUTH, INCORPORATED, despite notice of the violent actions related to the Goulds team, failed to provide trained security personnel at games involving the Goulds team, enforce spectator conduct policies, implement procedures to immediately intervene in or prevent violent confrontations or at a minimum protect other patrons, such as Plaintiff, from foreseeable assaults arising out of these known dangers.

20. The violent attack on the Plaintiff was foreseeable, preventable, and a direct result of Defendant, FLORIDA ELITE SOUTH, INCORPORATED's failure to take reasonable steps to address dangers that it knew, or in the exercise of reasonable care, should have been aware of.

COUNT I – NEGLIGENCE

The Plaintiff realleges and reavers each and every allegation contained in Paragraphs 1 through 20 above as if fully alleged herein, and further alleges:

21. At all relevant times, Defendant, FLORIDA ELITE SOUTH, INCORPORATED, owed the Plaintiff a duty of reasonable care, including the duty to provide a reasonably safe environment, to protect him from foreseeable violent acts, to implement reasonable security and safety measures in light of known risks, and properly supervise and control the participants, spectators, and affiliated individuals at games.

22. The Defendant knew, or in the exercise of reasonable care, should have known, that violent confrontations involving parents and spectators were a foreseeable risk, particularly in games involving the Goulds team, given the documented history of prior violent incidents.

23. The Defendant breached its duty of care by, among other things, allowing the Goulds team to participate in its league despite repeated prior violent incidents and safety objections; by failing to provide adequate security or crowd control at its' games; by failing not enforce spectators' conduct, rules or remove aggressive individuals; by failing to implement safety protocols to protect other spectators; by failing to intervene promptly when the initial confrontation occurred; and by placing the Plaintiff in a dangerous situation without reasonable protections despite known and foreseeable danger.

24. The Defendant's breach of duty created an unreasonable risk of harm to the Plaintiff.

25. As a direct and proximate result of Defendant's negligence, the Plaintiff suffered bodily injuries and resulting pain and suffering, disability, physical impairment, disfigurement, mental anguish, loss of capacity for the enjoyment of life, loss of wages, and expense of medical and related care and treatment. The losses are either permanent or continuing in nature, and the Plaintiff will suffer these losses in the future.

WHEREFORE, Plaintiff, JASON GONZALEZ, demands judgment against Defendant, FLORIDA ELITE SOUTH, INCORPORATED, in an amount in excess of Fifty Thousand (\$50,000.00) Dollars, plus taxable costs and for any such other relief the Court may deem just and proper.

PLAINTIFF DEMANDS A TRIAL BY JURY.

DATED this 30th day of June, 2026.

**THE LAW OFFICES OF
BERMAN & BERMAN, P.A.**

Attorneys for Plaintiff

Post Office Box 272789

Boca Raton, FL 33427

Telephone (561) 826-5200

Facsimile (561) 826-5201

By: /s/ Aaron Williams

Aaron T. Williams, Esquire

FBN: 99224

service@thebermanlawgroup.com