

**IN THE CIRCUIT COURT OF THE  
17<sup>th</sup> JUDICIAL CIRCUIT IN AND FOR  
BROWARD COUNTY, FLORIDA**

**CASE NO.:**

**VOLODYMYR SLIEPYSHEV,**

**Plaintiff,**

**vs.**

**DESOTO PARK CONDOMINIUM  
ASSOCIATION, INC.,**

**Defendant.**

\_\_\_\_\_ /

**COMPLAINT**

COMES NOW the Plaintiff, **VOLODYMYR SLIEPYSHEV**, by and through his undersigned counsel and hereby sues the Defendant, **DESOTO PARK CONDOMINIUM ASSOCIATION, INC.**, and alleges as follows:

**GENERAL ALLEGATIONS**

1. That this is an action for damages in excess of Fifty Thousand and 00/100 Dollars (\$50,000.00), exclusive of interest and costs.
2. That at all times material hereto, the Plaintiff, **VOLODYMYR SLIEPYSHEV**, was and is resident of Hallandale Beach, Broward County, Florida.
3. That at all times material hereto, Defendant, **DESOTO PARK CONDOMINIUM ASSOCIATION, INC.**, was a Florida not for Profit Corporation qualified, authorized and licensed to do business and doing business in the State of Florida and specifically in Broward County, Florida.
4. That at all times material hereto, Defendant, **DESOTO PARK CONDOMINIUM ASSOCIATION, INC.**, owned, operated, maintained and/or otherwise controlled the property located at 2000 Atlantic Shores Boulevard in Hallandale Beach, Broward County, Florida.



**COUNT I**  
**NEGLIGENCE CLAIM AGAINST DEFENDANT, DESOTO PARK CONDOMINIUM ASSOCIATION, INC.**

Plaintiff adopts, realleges and incorporates by reference paragraphs 1 through 4 and further alleges:

5. That on or about January 14, 2026, the Plaintiff, **VOLODYMYR SLIEPYSHEV**, was an invitee of the Defendant, **DESOTO PARK CONDOMINIUM ASSOCIATION, INC.**, lawfully on the property owned, operated, maintained and/or otherwise controlled by the Defendant located at 2000 Atlantic Shores Boulevard in Hallandale Beach, Broward County, Florida.

6. That on or about January 14, 2026, the Plaintiff, **VOLODYMYR SLIEPYSHEV**, while exiting building #6 on the subject property located at 2000 Atlantic Shores Boulevard in Hallandale Beach, Broward County, Florida, was violently struck in the face/head by a metal door fastener that was broken and improperly maintained, constituting a dangerous condition on the property which caused him to be violently struck, causing severe and permanent injuries. The Defendant, **DESOTO PARK CONDOMINIUM ASSOCIATION, INC.**, knew or should have known this area of the subject property to be hazardous and it was improperly maintained by the Defendant, causing the Plaintiff to be violently struck, ultimately resulting in the injuries described below.

7. That Defendant, **DESOTO PARK CONDOMINIUM ASSOCIATION, INC.**, as owner/maintainer/operator of said property owed a duty of care to all persons, invitees and guests, including Plaintiff, **VOLODYMYR SLIEPYSHEV**, to keep the premises free from dangerous conditions and hazards of which the Defendant knew or should have known about.

8. That the Defendant, **DESOTO PARK CONDOMINIUM ASSOCIATION, INC.**, individually and by and through its agents and employees was careless and negligent and breached its duty to invitees on the premises described above and more particularly the Plaintiff, **VOLODYMYR SLIEPYSHEV**, in the following respects:

- (a) Failing to remove/remedy the dangerous condition which caused the Plaintiff's injuries, which the Defendant knew or should have known of, and/or in the alternative;
- (b) Failing to properly maintain the subject property where the Plaintiff was violently struck, which constituted a dangerous condition of the subject premises, which the

Defendant knew or should have known of, and/or in the alternative;

- (c) In failing to warn the public, including the Plaintiff, **VOLODYMYR SLIEPYSHEV**, of the dangerous condition on the subject property which the Defendant knew or should have known of;
- (d) In creating said dangerous condition that caused the Plaintiff's accident;
- (e) In failing to properly block off/mark the area of the subject property so as to forewarn persons of the dangerous condition;
- (f) In failing to properly light the area of Plaintiff's accident;
- (g) In failing to properly supervise/oversee other companies and their employees working on the subject property;
- (h) In failing to appropriately hire, train, supervise and retain its own employees in charge of the area of the subject property where Plaintiff fell; and/or
- (i) In other negligent actions to be discovered through discovery.

9. The Defendant, **DESOTO PARK CONDOMINIUM ASSOCIATION, INC.**, individually and by and through its agents, representatives and/or employees knew of the existence of said hazardous conditions, or in the exercise of reasonable care, should have known of the existence of said conditions or in the alternative created the dangerous conditions that caused Plaintiff to be violently struck.

10. As a direct and proximate result of the negligence of the Defendant, **DESOTO PARK CONDOMINIUM ASSOCIATION, INC.**, Plaintiff, **VOLODYMYR SLIEPYSHEV**, suffered bodily injury and resulting pain and suffering, disability or physical impairment, disfigurement, mental anguish, inconvenience, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, loss of earnings, loss of ability to earn money and aggravation of a previously existing condition. The losses are either permanent or continuing and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, **VOLODYMYR SLIEPYSHEV**, demands judgment against the Defendant, **DESOTO PARK CONDOMINIUM ASSOCIATION, INC.**, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) together with post-judgment interests and lawful costs of this suit and a trial by jury of all issues triable as a matter of right by a jury.

**DEMAND FOR JURY TRIAL**

Plaintiff, **VOLODYMYR SLIEPYSHEV**, hereby demands trial by jury of all issues so triable.

Dated this 3<sup>rd</sup> day of July, 2026.

**SOUTH FLORIDA LAW, PLLC**

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