

**IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA**

ROYER BORGES and EMELY DELFIN, CASE NO.:
as the natural parents and guardians
of ANTHONY BORGES,

Plaintiff,

vs.

NIKOLAS JACOB CRUZ; JAMES SNEAD;
KIMBERLY SNEAD; HENDERSON
BEHAVIORAL HEALTH, INC., a Florida
not for profit corporation; JEROME GOLDEN
CENTER FOR BEHAVIORAL HEALTH, INC.,
a Florida not for profit corporation; SOUTH
COUNTY MENTAL HEALTH CENTER, INC.,
a Florida not for profit corporation; and the
ESTATE OF LYNDA CRUZ,

Defendants.

COMPLAINT AND DEMAND FOR JURY TRIAL

ROYER BORGES and EMELY DELFIN, as the natural parents of the Plaintiff,
ANTHONY BORGES, a minor, by and through his undersigned counsel, file this his Complaint
and Demand for Jury Trial, and, as grounds therefor, states the following:

Jurisdiction

1. This is an action for damages in excess of \$15,000.00, exclusive of interest, costs,
and attorney's fees, thereby vesting this Court with proper jurisdiction pursuant to sections
26.012(2)(a) and 34.01(1)(c) of the Florida Statutes.

Venue

2. The causes of action set forth herein accrued in Broward County, Florida, thereby
vesting this Court with proper venue pursuant to Chapter 47 of the Florida Statutes.

Conditions Precedent

3. All conditions precedent to the bringing of the causes of action set forth herein have occurred, been waived, or have otherwise been excused.

Parties

4. The Plaintiff, ANTHONY BORGES, is the minor child of ROYER BORGES and EMELY DELFIN, who have brought this action on his behalf as his natural parents and guardians.

5. The Defendant NIKOLAS JACOB CRUZ, is over the age of 18 years, *sui juris*, and a beneficiary of Defendant, the ESTATE OF LYNDA CRUZ.

6. The Defendant JAMES SNEAD, is over the age of 18 years, *sui juris*, and the husband of Defendant, KIMBERLY SNEAD.

7. The Defendant KIMBERLY SNEAD, is over the age of 18 years, *sui juris*. and the wife of Defendant, JAMES SNEAD.

8. The Defendant, HENDERSON BEHAVIORAL HEALTH, INC., is a Florida not for profit corporation that was at all times material hereto licensed to and doing business in Broward County, Florida.

9. The Defendant, JEROME GOLDEN CENTER FOR BEHAVIORAL HEALTH, INC., is a Florida not for profit corporation that was at all times material hereto licensed to and doing business in Palm Beach County, Florida.

10. The Defendant, SOUTH COUNTY MENTAL HEALTH CENTER, INC., is a Florida not for profit corporation that was at all times material hereto licensed to and doing business in Palm Beach County, Florida.

11. The Defendant, the ESTATE OF LYNDA CRUZ, Case No.: 062018CP000799A001CE in the Probate Court in and for the Seventeenth Judicial Circuit in and

for Broward County, Florida, consists of the assets of Lynda Cruz, the adoptive mother of the Defendant, NIKOLAS JACOB CRUZ, as of her death on November 1, 2017, and names NIKOLAS JACOB CRUZ as a beneficiary.

Facts Common to all Counts

12. At all times material hereto, NIKOLAS JACOB CRUZ suffered from and was subject to severe mental illness and was prone to violence.

13. At all times material hereto until her death, NIKOLAS JACOB CRUZ resided with his adoptive mother, Lynda Cruz.

14. The following chronological summary sets forth relevant events that occurred during the period in which NIKOLAS JACOB CRUZ resided with Lynda Cruz:

- a. In November, 2012, Lynda Cruz reported that NIKOLAS JACOB CRUZ attacked her with a plastic vacuum cleaner hose.
- b. In January, 2013:
 - Lynda Cruz reported that NIKOLAS JACOB CRUZ threw her against a wall because she took his Xbox video game system away from him.
 - On other occasions she told police that NIKOLAS JACOB CRUZ suffered from ADHD, OCD, and anger issues.
 - A counselor with HENDERSON BEHAVIORAL HEALTH, INC. determined that NIKOLAS JACOB CRUZ did not warrant hospitalization for mental health evaluation.
- c. During the 2013 school year, NIKOLAS JACOB CRUZ accrued 26 disciplinary incidents at the middle school he attended, averaging almost 3 per month.
- d. In February, 2014, NIKOLAS JACOB CRUZ enrolled in Cross Creek, a school for students with emotional and behavioral disorders.
- e. In June, 2015, school records note that NIKOLAS JACOB CRUZ was distracted on more than one occasion by other students' inappropriate conversations concerning guns, people being killed, or armed forces.

- f. In January, 2016, NIKOLAS JACOB CRUZ enrolled as a full-time student at Marjory Stoneman Douglas High School in Parkland, Florida.
- g. In February 2016, police received a report that NIKOLAS JACOB CRUZ had posted a photograph of himself with guns on Instagram, stating to the effect that he planned “to shoot up the school”. A deputy responded to the house, found that he had knives and a BB gun, and subsequently passed the information to Broward Sheriff’s Deputy Scot Peterson, the School Resource Officer (“SRO”).
- h. In September, 2016:
- NIKOLAS JACOB CRUZ was suspended from school and referred to social workers after getting into a fight following a break-up with his girlfriend.
 - NIKOLAS JACOB CRUZ turned 18 years of age.
 - A student reported to SRO Deputy Scot Peterson that NIKOLAS JACOB CRUZ, while depressed, had cut himself and ingested gasoline in an attempt to kill himself. The student further stated that NIKOLAS JACOB CRUZ wanted to buy a gun for hunting, had drawn a swastika on his backpack next to the words “I hate n-----s”.
 - Counselors from HENDERSON BEHAVIORAL HEALTH, INC., advised police that NIKOLAS JACOB CRUZ “was not a risk to harm himself or anyone else” because he was on a treatment plan for ADHD, depression, and autism.
 - The Florida Department of Children and Families opened an investigation of NIKOLAS JACOB CRUZ, calling him a “vulnerable adult due to mental illness”. The report notes that he plans to buy a gun, but “it is unknown what he is buying the gun for.”
- i. In November, 2016, The Florida Department of Children and Families closed its investigation of NIKOLAS JACOB CRUZ. It reported that his “final level of risk [was] low”, noting that his mental health clinician stated that he took his medication regularly and kept his appointments. The report further found that he suffered from depression, ADHD, and autism.
- j. In January, 2017, NIKOLAS JACOB CRUZ is suspended for “low assault” and referred for a threat assessment.
- k. In February, 2017:
- NIKOLAS JACOB CRUZ was expelled from school after fighting and told not to return.

- NIKOLAS JACOB CRUZ purchased the AR-15 rifle that he would use approximately one year later in committing the massacre at Marjory Stoneman Douglas High School. This was one of at least ten guns he purchased after his 18th birthday.

1. In September, 2017, the Federal Bureau of Investigation received a report from Mississippi that a commenter identifying himself as “nikolas cruz” had left a message on a YouTube channel stating “I’m going to be a professional school shooter.”

15. On November 1, 2017 Lynda Cruz died after a short illness.

16. That same day, a cousin of Lynda Cruz’ called the police to report that NIKOLAS JACOB CRUZ had weapons and requested that they be removed.

17. Shortly thereafter, NIKOLAS JACOB CRUZ moved in with a family friend, Roxanne Deshamps and her son, Rock.

18. The Deschamps forbade NIKOLAS JACOB CRUZ from bringing or otherwise possessing any guns on the property, and after arguments and at least one fight, NIKOLAS JACOB CRUZ vacated the Deshamps’ residence and, in late November, 2017, moved in with a friend from school and his parents, JAMES SNEAD and KIMBERLY SNEAD (collectively, “the SNEADS”).

19. The SNEADS allowed NIKOLAS JACOB CRUZ to bring and possess his guns on their property, including the AR-15 rifle that he subsequently used in committing the massacre at Marjory Stoneman Douglas High School.

20. At all times material hereto, the SNEADS undertook to maintain exclusive control over said guns by placing them in their locked gun safe to which JAMES SNEAD has asserted he possessed the only key.

21. At all times material hereto, contrary to said assertion by JAMES SNEAD, NIKOLAS JACOB CRUZ had access to one or more of his guns, while residing at the SNEADS' residence; and specifically, the AR-15 rifle that he subsequently used in committing the massacre at Marjory Stoneman Douglas High School.

22. On or about January 5, 2018, the Federal Bureau of Investigation received a report from "a person close to NIKOLAS [JACOB] CRUZ" who was worried about him "getting into a school and just shooting the place up". The caller reported concerns about his "gun ownership, desire to kill peoples, erratic behavior, and disturbing social media posts, as well as the potential of him conducting a school shooting".

23. Sheriff Scott Israel reported that his office has responded to or been involved in some way with 23 type calls involving NIKOLAS JACOB CRUZ or his family prior to the shooting. However, based on logs of the original calls and additional records obtained by CNN, it appears that the Broward County Sheriff's Office actually received 45 calls in the past decade related to the Cruz home, NIKOLAS JACOB CRUZ or his brother. Descriptions of those calls range from "mentally ill person" to "child/elderly abuse", "domestic disturbance", "missing person" and more. The vast majority of the calls resulted in "no written report".

24. At the time of the shooting Broward County Public School's had enacted the PROMISE program and the Behavioral Intervention Program for troubled students.

25. On February 14, 2018, NIKOLAS JACOB CRUZ removed the AR-15 from the gun safe at the home of the SNEADS and, employing an UBER driver, travelled to Marjory Stoneman Douglas High School in Parkland, Broward County, Florida.

26. On said date, at approximately 2:22 p.m., NIKOLAS JACOB CRUZ entered the school and began shooting both students and teachers alike.

27. NIKOLAS JACOB CRUZ used his AR-15 rifle to kill 17 students and teachers, and shooting and wounding more, including ANTHONY BORGES, whom NIKOLAS JACOB CRUZ attempted to kill by shooting 5 times, three times in the legs and twice in the torso.

28. As a result of having been shot by NIKOLAS JACOB CRUZ, ANTHONY BORGES was hospitalized for over a month, during which he underwent multiple surgeries, was placed into a clinically-induced coma, and suffered extreme physical pain and suffering.

29. ANTHONY BORGES is now, and for the foreseeable future, confined to a wheelchair and requires constant care, until he is able to move on his own.

30. As a result of having been shot by NIKOLAS JACOB CRUZ, ANTHONY BORGES suffered bodily injury, and resulting pain and suffering, disability, disfigurement, mental anguish, loss of the capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, and loss of the ability to earn money. The losses are either permanent or continuing and ANTHONY BORGES will suffer the losses in the future.

COUNT I
ASSAULT AGAINST NIKOLAS JACOB CRUZ

29. ROYER BORGES and EMELY DELFIN, as the natural parents of the Plaintiff, ANTHONY BORGES, a minor, hereby reaver and reallege paragraphs 1 through 5, and 23 through 28, as if same were set forth herein.

30. NIKOLAS JACOB CRUZ intended to cause and did cause ANTHONY BORGES to suffer apprehension of an immediate harmful contact.

31. ANTHONY BORGES did not consent to NIKOLAS JACOB CRUZ' actions.

32. As a direct and proximate result of NIKOLAS JACOB CRUZ' conduct, ANTHONY BORGES suffered expense of hospitalization, medical and nursing care and

treatment, and loss of the ability to earn money. ANTHONY BORGES has also suffered extreme mental anguish, and, upon information and belief, asserts that he has suffered a permanent disability.

33. As a direct and proximate result of NIKOLAS JACOB CRUZ' conduct, ANTHONY BORGES was required to obtain medical services and treatment, and will, in the future, upon information and belief, be compelled to incur additional obligations for medical treatment.

WHEREFORE, ROYER BORGES and EMELY DELFIN, as the natural parents of the Plaintiff, ANTHONY BORGES, a minor, hereby seeks judgment against the Defendant, NIKOLAS JACOB CRUZ, for general damages, medical and related expenses, past and future lost earnings, and impairment of earning capacity, together with costs, interest, and any other and further relief that this Honorable Court deems appropriate.

COUNT II
BATTERY AGAINST NIKOLAS JACOB CRUZ

34. ROYER BORGES and EMELY DELFIN, as the natural parents of the Plaintiff, ANTHONY BORGES, a minor, hereby reaver and reallege paragraphs 1 through 5, and 23 through 28, as if same were set forth herein.

35. NIKOLAS JACOB CRUZ, intended to cause and did cause a harmful contact with ANTHONY BORGES' person.

36. ANTHONY BORGES did not consent to NIKOLAS JACOB CRUZ' actions.

37. As a direct and proximate result of NIKOLAS JACOB CRUZ' conduct, ANTHONY BORGES suffered expense of hospitalization, medical and nursing care and treatment, and loss of the ability to earn money. ANTHONY BORGES has also suffered extreme

mental anguish, and, upon information and belief, asserts that he has suffered a permanent disability.

38. As a direct and proximate result of NIKOLAS JACOB CRUZ' conduct, ANTHONY BORGES was required to obtain medical services and treatment, and will, in the future, upon information and belief, be compelled to incur additional obligations for medical treatment.

WHEREFORE, ROYER BORGES and EMELY DELFIN, as the natural parents of the Plaintiff, ANTHONY BORGES, a minor, hereby seeks judgment against the Defendant, NIKOLAS JACOB CRUZ, for general damages, medical and related expenses, past and future lost earnings, and impairment of earning capacity, together with costs, interest, and any other and further relief that this Honorable Court deems appropriate.

COUNT III
NEGLIGENCE AGAINST JAMES SNEAD AND KIMBERLY SNEAD

39. ROYER BORGES and EMELY DELFIN, as the natural parents of the Plaintiff, ANTHONY BORGES, a minor, hereby reaver and reallege paragraphs 1 through 28 as if same were set forth herein.

40. At all times material hereto, JAMES SNEAD and KIMBERLY SNEAD each know or should have known that NIKOLAS JACOB CRUZ suffered from mental illness and was a threat to others.

41. At all times material hereto, JAMES SNEAD and KIMBERLY SNEAD, jointly and severally, owed a duty to the public, including ANTHONY BORGES, to exercise reasonable

and ordinary care to keep any and all guns in their care, custody, and control secure from use in a crime, and specifically from any such foreseeable use by NIKOLAS JACOB CRUZ.

42. JAMES SNEAD and KIMBERLY SNEAD, jointly and severally, were negligent and breached their duty of reasonable care for the safety and protection of the public and ANTHONY BORGES by allowing NIKOLAS JACOB CRUZ to have access to his guns over which the SNEADS had asserted exclusive control as a condition of his residing in their house.

43. As a direct and proximate result of the above-described negligence of the SNEADS, ANTHONY BORGES was placed in fear for his life and shot 5 times by NIKOLAS JACOB CRUZ, thereby sustaining severe physical injuries, mental pain and suffering, psychological injuries, scarring, disability, disfigurement, and the loss of the capacity for the enjoyment of life.

44. As a direct and proximate result of the above-described negligence of the SNEADS, ANTHONY BORGES has also incurred significant past and future past medical expenses, and the loss of past income and future earning capacity.

45. All of the aforementioned damages are permanent and continuing in nature.

WHEREFORE, ROYER BORGES and EMELY DELFIN, as the natural parents of the Plaintiff, ANTHONY BORGES, a minor, hereby seeks judgment against the Defendants, JAMES SNEAD and KIMBERLY SNEAD, jointly and severally, for general damages, medical and related expenses, past and future lost earnings, and impairment of earning capacity, mental pain and suffering, psychological injuries, scarring, disability, disfigurement, loss of the capacity for the enjoyment of life, together with costs, interest, and any other and further relief that this Honorable Court deems appropriate.

COUNT IV
NEGLIGENCE AGAINST HENDERSON BEHAVIORAL HEALTH, INC.

46. ROYER BORGES and EMELY DELFIN, as the natural parents of the Plaintiff, ANTHONY BORGES, a minor, hereby reaver and reallege paragraphs 1 through 28 as if same were set forth herein.

47. At all times material hereto, HENDERSON BEHAVIORAL HEALTH, INC. knew or should have known that NIKOLAS JACOB CRUZ suffered from mental illness and was a threat to others.

48. At all times material hereto, HENDERSON BEHAVIORAL HEALTH, INC. owed a duty to the public, including ANTHONY BORGES, to exercise reasonable and ordinary care to (a) properly diagnose and treat NIKOLAS JACOB CRUZ; and (b) take reasonable steps to inform the proper authorities and the public of any threat that NIKOLAS JACOB CRUZ may foreseeably pose to anyone.

49. HENDERSON BEHAVIORAL HEALTH, INC. was negligent and breached its duty of reasonable care as described herein.

50. As a direct and proximate result of the above-described negligence of HENDERSON BEHAVIORAL HEALTH, INC., ANTHONY BORGES was placed in fear for his life and shot 5 times by NIKOLAS JACOB CRUZ, thereby sustaining severe physical injuries, mental pain and suffering, psychological injuries, scarring, disability, disfigurement, and the loss of the capacity for the enjoyment of life.

51. As a direct and proximate result of the above-described negligence of HENDERSON BEHAVIORAL HEALTH, INC., ANTHONY BORGES has also incurred significant past and future past medical expenses, and the loss of past income and future earning capacity.

52. All of the aforementioned damages are permanent and continuing in nature.

WHEREFORE, ROYER BORGES and EMELY DELFIN, as the natural parents of the Plaintiff, ANTHONY BORGES, a minor, hereby seeks judgment against the Defendant, HENDERSON BEHAVIORAL HEALTH, INC., for general damages, medical and related expenses, past and future lost earnings, and impairment of earning capacity, mental pain and suffering, psychological injuries, scarring, disability, disfigurement, loss of the capacity for the enjoyment of life,, together with costs, interest, and any other and further relief that this Honorable Court deems appropriate.

COUNT V
NEGLIGENCE AGAINST JEROME GOLDEN CENTER
FOR BEHAVIORAL HEALTH, INC.

53. ROYER BORGES and EMELY DELFIN, as the natural parents of the Plaintiff, ANTHONY BORGES, a minor, hereby reaver and reallege paragraphs 1 through 28 as if same were set forth herein.

54. At all times material hereto, JEROME GOLDEN CENTER FOR BEHAVIORAL HEALTH, INC. knew or should have known that NIKOLAS JACOB CRUZ suffered from mental illness and was a threat to others.

55. At all times material hereto, JEROME GOLDEN CENTER FOR BEHAVIORAL HEALTH, INC. owed a duty to the public, including ANTHONY BORGES, to exercise reasonable and ordinary care to (a) properly diagnose and treat NIKOLAS JACOB CRUZ; and (b) take reasonable steps to inform the proper authorities and the public of any threat that NIKOLAS JACOB CRUZ may foreseeably pose to anyone.

56. JEROME GOLDEN CENTER FOR BEHAVIORAL HEALTH, INC. was negligent and breached its duty of reasonable care as described herein.

57. As a direct and proximate result of the above-described negligence of JEROME GOLDEN CENTER FOR BEHAVIORAL HEALTH, INC., ANTHONY BORGES was placed

in fear for his life and shot 5 times by NIKOLAS JACOB CRUZ, thereby sustaining severe physical injuries, mental pain and suffering, psychological injuries, scarring, disability, disfigurement, and the loss of the capacity for the enjoyment of life.

58. As a direct and proximate result of the above-described negligence of JEROME GOLDEN CENTER FOR BEHAVIORAL HEALTH, INC., ANTHONY BORGES has also incurred significant past and future past medical expenses, and the loss of past income and future earning capacity.

59. All of the aforementioned damages are permanent and continuing in nature.

WHEREFORE, ROYER BORGES and EMELY DELFIN, as the natural parents of the Plaintiff, ANTHONY BORGES, a minor, hereby seeks judgment against the Defendant, JEROME GOLDEN CENTER FOR BEHAVIORAL HEALTH, INC., for general damages, medical and related expenses, past and future lost earnings, and impairment of earning capacity, mental pain and suffering, psychological injuries, scarring, disability, disfigurement, loss of the capacity for the enjoyment of life,, together with costs, interest, and any other and further relief that this Honorable Court deems appropriate.

COUNT VI
NEGLIGENCE AGAINST SOUTH COUNTY MENTAL HEALTH CENTER, INC.

60. ROYER BORGES and EMELY DELFIN, as the natural parents of the Plaintiff, ANTHONY BORGES, a minor, hereby reaver and reallege paragraphs 1 through 28 as if same were set forth herein.

61. At all times material hereto, SOUTH COUNTY MENTAL HEALTH CENTER, INC. knew or should have known that NIKOLAS JACOB CRUZ suffered from mental illness and was a threat to others.

62. At all times material hereto, SOUTH COUNTY MENTAL HEALTH CENTER, INC. owed a duty to the public, including ANTHONY BORGES, to exercise reasonable and ordinary care to (a) properly diagnose and treat NIKOLAS JACOB CRUZ; and (b) take reasonable steps to inform the proper authorities and the public of any threat that NIKOLAS JACOB CRUZ may foreseeably pose to anyone.

63. SOUTH COUNTY MENTAL HEALTH CENTER, INC. was negligent and breached its duty of reasonable care as described herein.

64. As a direct and proximate result of the above-described negligence of SOUTH COUNTY MENTAL HEALTH CENTER, INC., ANTHONY BORGES was placed in fear for his life and shot 5 times by NIKOLAS JACOB CRUZ, thereby sustaining severe physical injuries, mental pain and suffering, psychological injuries, scarring, disability, disfigurement, and the loss of the capacity for the enjoyment of life.

65. As a direct and proximate result of the above-described negligence of SOUTH COUNTY MENTAL HEALTH CENTER, INC., ANTHONY BORGES has also incurred significant past and future past medical expenses, and the loss of past income and future earning capacity.

66. All of the aforementioned damages are permanent and continuing in nature.

WHEREFORE, ROYER BORGES and EMELY DELFIN, as the natural parents of the Plaintiff, ANTHONY BORGES, a minor, hereby seeks judgment against the Defendant, SOUTH COUNTY MENTAL HEALTH CENTER, INC. for general damages, medical and related expenses, past and future lost earnings, and impairment of earning capacity, mental pain and suffering, psychological injuries, scarring, disability, disfigurement, loss of the capacity for the enjoyment of life,, together with costs, interest, and any other and further relief that this Honorable Court deems appropriate.

COUNT VII
NEGLIGENCE AGAINST THE ESTATE OF LYNDA CRUZ

67. ROYER BORGES and EMELY DELFIN, as the natural parents of the Plaintiff, ANTHONY BORGES, a minor, hereby reaver and reallege paragraphs 1 through 28 as if same were set forth herein.

68. At all times material hereto prior to her death, LYNDA CRUZ knew or should have known that NIKOLAS JACOB CRUZ suffered from mental illness and was a threat to others.

69. At all times material hereto prior to her death, LYNDA CRUZ owed a duty to the public, including ANTHONY BORGES, to exercise reasonable and ordinary care to (a) properly supervise and obtain proper diagnosis and treatment for NIKOLAS JACOB CRUZ; (b) take appropriate steps to prevent NIKOLAS JACOB CRUZ from obtaining the means and/or opportunity to harm others; and (c) inform the proper authorities and the public of any threat that NIKOLAS JACOB CRUZ may foreseeably pose to anyone.

70. LYNDA CRUZ was negligent and breached her duty of reasonable care as described herein.

71. As a direct and proximate result of the above-described negligence of LYNDA CRUZ, ANTHONY BORGES was placed in fear for his life and shot 5 times by NIKOLAS JACOB CRUZ, thereby sustaining severe physical injuries, mental pain and suffering, psychological injuries, scarring, disability, disfigurement, and the loss of the capacity for the enjoyment of life.

72. As a direct and proximate result of the above-described negligence of LYNDA CRUZ, ANTHONY BORGES has also incurred significant past and future past medical expenses, and the loss of past income and future earning capacity.

73. All of the aforementioned damages are permanent and continuing in nature.

WHEREFORE, ROYER BORGES and EMELY DELFIN, as the natural parents of the Plaintiff, ANTHONY BORGES, a minor, hereby seeks judgment against the Defendant, THE ESTATE OF LYNDA CRUZ, for general damages, medical and related expenses, past and future lost earnings, and impairment of earning capacity, mental pain and suffering, psychological injuries, scarring, disability, disfigurement, loss of the capacity for the enjoyment of life,, together with costs, interest, and any other and further relief that this Honorable Court deems appropriate.

RESERVATION OF THE RIGHT TO SEEK PUNITIVE DAMAGES

ROYER BORGES and EMELY DELFIN, as the natural parents of the Plaintiff, ANTHONY BORGES, a minor, by and through his undersigned counsel, hereby expressly reserve his right to seek punitive damages in this matter.

DEMAND FOR JURY TRIAL

ROYER BORGES and EMELY DELFIN, as the natural parents of the Plaintiff, ANTHONY BORGES, a minor, by and through his undersigned counsel, hereby demand trial by jury of all issues set forth herein that are so available as a matter of right.

Dated: April 17, 2018

ARREAZA LAW FIRM, LLC

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