

IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT IN AND FOR
VOLUSIA COUNTY, FLORIDA

DEBORAH ALONSO,

CASE NO:

Plaintiff,

vs.

CITY OF DAYTONA BEACH,

Defendant.

_____ /

COMPLAINT

Plaintiff, DEBORAH ALONSO, by and through his undersigned attorneys, sues
Defendant, CITY OF DAYTONA BEACH, and alleges the following:

(1) This is a civil action for damages in excess of Fifty Thousand And
No/00(\$50,000.00) Dollars, exclusive of interest and costs.

(2) At all times material hereto, Plaintiff, DEBORAH ALONSO, was a resident of
Daytona Beach, Volusia County, State of Florida.

(3) At all times material hereto, Defendant, CITY OF DAYTONA BEACH, was a
legal and proper subdivision of the County of Volusia, State of Florida.

(4) On 9/25/2024, Defendant, CITY OF DAYTONA BEACH, by and through its
agent and/or employee, Brian Carrero, operated, maintained and controlled a police vehicle, for
purposes of serving and protecting the citizens of Daytona Beach, and was traveling through the
intersection of S. Ridgewood Avenue and Wilder Road in Daytona Beach, Volusia County, State
of Florida.

(5) At said time and place, Defendant's agent and/or employee, Brian Carrero, operated the police vehicle with the consent of its owner, Defendant, CITY OF DAYTONA BEACH.

(6) At that time and place, Plaintiff, DEBORAH ALONSO, was operated a motor vehicle and was traveling through the intersection of S. Ridgewood Avenue and Wilder Road in Daytona Beach, Volusia County, State of Florida.

(7) At the above-mentioned time and place, Defendant's agent and/or employee, Brian Carrero, negligently operated and/or maintained Defendant's vehicle so that it collided with the motor vehicle owned and operated by Plaintiff, DEBORAH ALONSO.

(8) As a proximate result of the foregoing, Plaintiff, DEBORAH ALONSO, sustained bodily injuries resulting in pain and suffering, disability, aggravation of a pre-existing condition, mental anguish, inconvenience, loss of capacity for the enjoyment of life, medical care and treatment, and expenses for and related to medical care and treatment. The losses are either permanent or continuing in nature and Plaintiff, DEBORAH ALONSO, will suffer these losses in the future.

(9) Plaintiff, DEBORAH ALONSO, has incurred and/or will incur in the future medical expenses not payable by Personal Injury Protection (PIP) Insurance pursuant to Chapter 627, Florida Statute.

(10) That as a result of the above-mentioned automobile collision, Plaintiff, DEBORAH ALONSO, suffered permanent injury within a reasonable degree of medical probability or was injured in a manner that meets or exceeds the threshold requirements of Section 627.737, Florida Statutes.

(11) Plaintiff, DEBORAH ALONSO, presented his claim in writing to the CITY OF DAYTONA BEACH, and the Department of Financial Services of the State of Florida on 06/16/2025, as is evidenced by the correspondence attached hereto as **Exhibit A**.

(12) More than six (6) months have lapsed since notice was provided to Defendant, CITY OF DAYTONA BEACH, and the Department of Financial Services of the State of Florida without final resolution of the claim.

WHEREFORE, Plaintiff, DEBORAH ALONSO, sues Defendant, CITY OF DAYTONA BEACH, for damages in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) excluding costs, and demands trial by jury on all issues so triable.

/s/ Spencer Jorgensen

Spencer Jorgensen, Esquire

Florida Bar No. 1011802

Grady Jorgensen, Esquire

Florida Bar No. 116420

JORGENSEN LAW, P.A.

4455 Central Ave.

St. Petersburg, FL 33713

(727) 347-7733

Attorney for Plaintiff

Service E-Mail: service@jorgensenlawoffice.com

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Sharon P. Jorgensen Grady R. Jorgensen Spencer J. Jorgensen

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4455 Central Avenue

St. Petersburg, FL 33713

Phone: 727-347-7733 Fax: 727-327-6125

EMAIL: info@jorgensenlawoffice.com

June 16, 2025

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

City of Daytona Beach
301 So. Ridgewood Ave.
Daytona Beach, FL 32114

RE: Client : Deborah Alonso
Date of Incident : 9/25/2024
Location of Incident : US 1 (S RIDGEWOOD AVE) &
WILDER ROAD DAYTONA BEACH
FLORIDA

Dear Sir or Madam:

Please be advised that this firm represents Ms. Deborah Alonso in connection with injuries sustained on the above stated date. Said damages were as a result of an incident that occurred near **US 1 (S RIDGEWOOD AVE) & WILDER ROAD DAYTONA BEACH FLORIDA**

Please treat this letter as a claim pursuant to Florida Statute Section 768.28 (6).

Ms. Deborah Alonso's personal information as required under Florida Statute 768.28(6) is as follows:

Date of Birth : 2/25/1954
Social Security Number : [REDACTED]
Place of Birth : Clarkston, WA

Ms. Deborah Alonso does not have any outstanding penalties, fees or judgments owed to the State, its agency, officer or subdivision.

I request at this time that your agency undertake an immediate investigation of this matter. We are presenting a demand for payment of all damages incurred, including but not limited to, medical expenses, lost wages and loss of earning capacity, physical and mental pain and suffering, disability and physical impairment, inconvenience and loss of ability for enjoyment of life. Said damages include a significant and permanent loss of an important bodily function and/or disfigurement. Such damages are continuing in their nature and it is expected that Ms. Deborah Alonso will suffer such losses and impairment in the future.

Exhibit A

In addition, it is our understanding that there may be video surveillance of the incident and the surrounding conditions. You are hereby requested to preserve any and all video surveillance evidence. Do not alter, destroy or otherwise modify any such video evidence.

A letter of notification is also being sent to the Jimmy Patronis, Chief Financial Officer, Florida Department of Financial Services.

All future correspondence and notices should be directed to Spencer Jorgensen, attorney for claimant, at Jorgensen Law, P.A., 4455 Central Avenue, St. Petersburg, FL 33713.

Should you require any additional information please contact me promptly. Thank you for your attention to this matter.

Sincerely,

Spencer Jorgensen

SJJ/jmp

cc:

Sent via U.S. Certified Mail with Return Receipt Requested

Jimmy Patronis, Chief Financial Officer
Florida Department of Financial Services
200 East Gaines Street
Tallahassee FL 32399

Sharon P. Jorgensen Grady R. Jorgensen Spencer J. Jorgensen

www.jorgensenlawoffice.com

4455 Central Avenue

St. Petersburg, FL 33713

Phone: 727-347-7733 Fax: 727-327-6125

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June 16, 2025

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Florida Department of Financial Services
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Tallahassee FL 32399

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City of Daytona Beach
301 So. Ridgewood Ave.
Daytona Beach, FL 32114