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Jose Vielma, individually and on behalf of the Estate of Luis S. Vielma, Carmen Capo, individually and on behalf of the Estate of Luis Omar Ocasio-Capo, Bernadette Cruz, individually and on behalf of the Estate of Peter O. Gonzalez Cruz, Dimarie Rodriguez, individually and on behalf of the Estate of Jean Carlos Nieves, Bernice DeJesus, individually and on behalf of the Estate of Frank Jimmy DeJesus Valasquez, Ismail Morales, individually and on behalf of the Estate of Angel Candelario Padro, Olga M. Disla-Mencia, individually and on behalf of the Estate of Anthony Laureano-Disla, Digna Rosa Fernandez, individually and on behalf of the Estate of Simon Adrian Carrillo Fernandez, Marely Menendez, individually and on behalf of the Estate of Gilberto R. Silva Menendez, Aracelis Maria Jimenez, individually and on behalf of the Estate of Gerado Antonio Ortiz-Jimenez, Carlos Sanfeliz and Maria Sanfeliz, individually and on behalf of the Estate of Christopher Sanfeliz, Diana Montes, individually and on behalf of the Estate of Rodolfo Ayala, Christine Leinonen, individually on behalf of the Estate of Christopher Leinonen, Jammy Valentin Ferndandez, individually and on behalf of the Estate of Leroy Valentin Ferndandez, Yazmin Reyes, individually and on behalf of the Estate of Javier J. Reyes, Juan Guerrero, individually and on behalf of the Estate of Juan Ramon Guerrero Jr., Jackson J. Josaphat, individually and on behalf of the Estate of Jason B. Josaphat,

Case No:

COMPLAINT FOR DAMAGES

JURY TRIAL DEMANDED

Donald Brown, individually and on behalf of the
Estate of Antonio Brown,

Plaintiffs,

-against-

GS4 PLC; G4 SECURE SOLUTIONS; and NOOR
SALMAN,

Defendants.

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**IN THE CIRCUIT COURT OF THE NINTH JUDICIAL DISTRICT
IN AND FOR ORANGE COUNTY, FLORIDA**

COMPLAINT

NOW COMES Plaintiffs, by and their attorneys KRISTOFFER BUDHRAM and THE LAW OFFICES OF CONRAD J. BENEDETTO, and allege the following against Defendants, G4S PLC; G4S SECURE SOLUTIONS; and NOOR SALMAN, as follows:

PRELIMINARY STATEMENT

1. On June 2, 2016, Omar Mateen opened fire in Pulse, a nightclub he was allowed to access while carrying long weapons, in Orlando, Florida. By the time his rampage ended more than three hours, later, 49 people were dead, and 53 others were wounded. It was the deadliest mass shooting by a single shooter in United States history. This tragedy, an unfathomable blow to Orlando's LGBT community, was rendered all the more unfortunate by the high number of ways that it could have- and should have- been prevented, saving the lives of those killed and rendering unnecessary all of the harm that was caused.

VENUE

2. Venue is proper in the Circuit Civil Court of Palm Beach County, Florida, pursuant to F.S. 47.011 and F.S. 47.051 because the cause of action accrued in Palm Beach County, and various parties to this action, including a domestic corporation and a foreign corporation,

reside, keep agents and representatives, and keep offices for the transaction of customary business within this county.

JURY DEMAND

3. Plaintiffs demand trial by jury in this action on each and every one of their claims.

PARTIES

A. Plaintiffs

4. Plaintiff Jose Vielma, as an individual and Personal Representative of the Estate of Luis S. Vielma, is a resident of Sandford, Florida. The decedent was at the Pulse nightclub the night of the shooting and was killed.
5. Plaintiff Carmen Capo, as an individual and Personal Representative of the Estate of Luis Omar Ocasio-Capo, is a resident of Kissimmee, Florida. The decedent was at the Pulse nightclub the night of the shooting and was killed.
6. Plaintiff Bernadette Cruz, as an individual and Personal Representative of the Estate of Peter O. Gonzalez Cruz, is a resident of Kissimmee, Florida. The decedent was at the Pulse nightclub the night of the shooting and was killed.
7. Plaintiff Dimarie Rodriguez, as an individual and Personal Representative of the Estate of Jean Carlos Nieves, is a resident of Kissimmee, Florida. The decedent was at the Pulse nightclub the night of the shooting and was killed.
8. Plaintiff Bernice DeJesus, as an individual and Personal Representative of the Estate of Frank Jimmy DeJesus Valasquez, is a resident of San Juan, Puerto Rico. The decedent was at the Pulse nightclub the night of the shooting and was killed.

9. Plaintiff Ismail Morales, as an individual and Personal Representative of the Estate of Angel Candelario Padro, is a resident of Moca, Puerto Rico. The decedent was at the Pulse nightclub the night of the shooting and was killed.
10. Plaintiff Olga M. Disla-Mencia, as an individual and Personal Representative of the Estate of Anthony Laureano-Disla, is a resident of Orlando, Florida. The decedent was at the Pulse nightclub the night of the shooting and was killed.
11. Plaintiff Digna Rosa Fernandez, as an individual and Personal Representative of the Estate of Simon Adrian Carrillo Fernandez, is a resident of Orlando, Florida. The decedent was at the Pulse nightclub the night of the shooting and was killed.
12. Plaintiff Marely Menendez, as an individual and Personal Representative of the Estate of Gilberto R. Silva Menendez, is a resident of Orlando, Florida. The decedent was at the Pulse nightclub the night of the shooting and was killed.
13. Plaintiff Aracelis Maria Jimenez, as an individual and Personal Representative of the Estate of Gerado Antonio Ortiz-Jimenez, is a resident of Bella Vista, Santa Domingo, Dominican Republic. The decedent was at the Pulse nightclub the night of the shooting and was killed.
14. Plaintiff Carlos Sanfeliz and Maria Sanfeliz, as an individuals and Personal Representatives of the Estate of Christopher Sanfeliz, is a resident of Tampa, Florida. The decedent was at the Pulse nightclub the night of the shooting and was killed.
15. Plaintiff Diana Montes, as an individual and Personal Representative of the Estate of Rodolfo Ayala, is a resident of Lajas, Puerto Rico. The decedent was at the Pulse nightclub the night of the shooting and was killed.

16. Plaintiff Christine Leinonen, as an individual and Personal Representative of the Estate of Christopher Leinonen, is a resident of Polk City, Florida. The decedent was at the Pulse nightclub the night of the shooting and was killed.
17. Plaintiff Jammy Valentin Ferndandez, as an individual and Personal Representative of the Estate of Leroy Valentin Ferndandez, is a resident of Ponce, Peurto Rico. The decedent was at the Pulse nightclub the night of the shooting and was killed.
18. Plaintiff Yazmin Reyes, as an individual and Personal Representative of the Estate of Javier J. Reyes, is a resident of Pontiac, Michigan. The decedent was at the Pulse nightclub the night of the shooting and was killed.
19. Plaintiff Juan Guerrero, as an individual and Personal Representative of the Estate of Juan Ramon Guerrero Jr., is a resident of Kissimmee, Florida. The decedent was at the Pulse nightclub the night of the shooting and was killed.
20. Plaintiff Jackson J. Josaphat, as an individual and Personal Representative of the Estate of Jason B. Josaphat, is a resident of Orlando, Florida. The decedent was at the Pulse nightclub the night of the shooting and was killed.
21. Plaintiff Donald Brown, as an individual and Personal Representative of the Estate of Antonio Brown, is a resident of Orlando, Florida. The decedent was at the Pulse nightclub the night of the shooting and was killed.

B. Defendants

22. G4S PLC is a corporation existing by and under the laws of England, with its principal place of business at 105 Victoria Street, London SW1E 6QT, United Kingdom.

23. G4S SECURE SOLUTIONS, a subsidiary of Defendant G4S PLC, is a corporation existing by and under the laws of the State of Delaware, with its principal place of business at 1395 University Boulevard, Jupiter, Florida, 33458.

24. Defendant NOOR SALMAN is a resident of Plantation, Florida.

FACTUAL BACKGROUND

A. Mateen and Noor Salman Plan and Execute the Attack

25. On June 12, 2016, OMAR MATEEN approached Pulse Nightclub (hereafter referred to as “Pulse”), armed with a SIG Sauer MCX semi-automatic rifle and a 9mm Glock 17 semi-automatic pistol.

26. MATEEN was able to enter Pulse shortly after 2:00 a.m., and opened fire on the patrons inside, including many of the Plaintiffs herein.

27. While within Pulse on his shooting spree, MATEEN was subsequently engaged by police officers, after a period of time had elapsed, and retreated further into Pulse, holding a number of patrons hostage in the Pulse restroom. Police officers then exited Pulse, and didn’t return inside Pulse until approximately three (3) hours later, after an extended period that allowed MATEEN to proceed with endangering the lives of patrons, including many of the Plaintiffs herein.

28. During this time, MATEEN made repeated claims to hostage and victims that he “wouldn’t stop his assault until America stopped bombing his country’ and that he had explosive devices and snipers stationed outside Pulse.

29. MATEEN phoned 911 at approximately 2:22 a.m., praising the Boston Marathon bombers Tamerlan and Dzhokar Tsarnaev, and Moner Mohammad Abu Salha, an American who died in a suicide bombing in Syria in 2014.

30. MATEEN claimed during a call to hostage negotiators that he had bombs strapped onto his body.
31. At approximately 4:29 a.m., Mateen told negotiators that he planned to strap explosive vests to four hostages and detonate them.
32. Upon information and belief, Defendant NOOR SALMAN communicated with MATEEN on more than one occasion during his siege and shooting spree.
33. By the time MATEEN was fatally shot by police, ending his rampage, 49 people were dead or dying, and 53 others received permanent injuries and scarring due to wounds from MATEEN's gunfire.
34. MATEEN's wife, Defendant NOOR SALMAN was arrested by federal officials on January 16, 2017, in connection with her role in the killings and related mayhem.
35. Upon information and belief, on more than one occasion prior to June 12, 2016, SALMAN observed MATEEN watching violent Islamic State of Iraq and the Levant ("ISIL") recruiting videos in their home.
36. Upon information and belief, on more than one occasion prior to June 12, 2016, OMAR MATEEN and NOOR SALMAN visited Pulse premises to "scout out" the club, part of the plan of action resulting in the June 12, 2016 mass shootings.
37. SALMAN was aware MATEEN spent thousands of dollars in the weeks preceding the attack on weapons and ammunition, inclusive of the weapons and the ammunition MATEEN used during the June 12, 2016 mass shootings.
38. Upon information and belief, SALMAN accompanied MATEEN when he purchased ammunition, knowing then and or/prior that MATEEN would use the same as part of the plan of action for the June 12, 2016 mass shootings.

39. Less than one week prior to the June 12, 2016 mass shootings, MATEEN asked SALMAN questions including “How bad would it be if a club got attacked?” and “What would make people more upset- an attack on Downtown Disney, or a club?”
40. The day prior to the attack, SALMAN witnessed MATEEN storm out of the house carrying a bag of weapons, portending what would ultimately follow.
41. SALMAN told federal officials that she had known her husband had wanted to carry out a large-scale attack of violence involving the use of weapons against members of the public months, weeks and/or days before the Pulse nightclub shootings.

B. G4S Inadequately Investigates Mateen

42. Defendant G4S PLC is the world’s largest security company, employing thousands of individuals as armed security guards.
43. Defendant G4S advertises itself as follows on its website:

G4S provides the best security and safety officers

G4S officers are consistently ranked as the best in the security business. Our security officers are specially selected and trained specialists who understand the unique environments in which they work. Every day, thousands of G4S officers protect locations across the United States – financial, healthcare, education, energy & chemical, transit, retail & commercial, government and more.

Drawing on more than 100 years of history, G4S is proud of its distinct culture and strong values

These values – listed below – guide how we conduct our business and develop positive relationships with all our stakeholders, including customers, employees, investors and the communities in which we work.

Each value has a senior executive ‘champion’ within the Group who is responsible for ensuring that it is embedded into the way G4S conducts its business throughout the world.

Our values

- **Customer Focus** – we have close, open relationships with our customers that generate trust and we work in partnership for the mutual benefit of our organizations.
- **Expertise** – we develop and demonstrate our expertise through our innovative and leading-edge approach to creating and delivering the right solution.
- **Performance** – we challenge ourselves to improve performance year-on-year and to create long-term sustainability
- **Best People** – we always take care to employ the best people, develop their competence, provide opportunities and inspire them to live our values
- **Integrity** – we can always be trusted to do the right thing.
- **Teamwork & Collaboration** – we collaborate for the benefit of G4S as a whole.
- **Safety** – the health and safety of our employees is of paramount importance

44. Defendant G4S SECURE SOLUTIONS is an American subsidiary of G4S PLC.

45. Upon information and belief, Defendants G4S PLC and G4S SECURE SOLUTIONS (collectively, “G4S DEFENDANTS”) administered a single psychological examination to its hires, including MATEEN, before employing them as armed security guards.

46. The ostensible purpose of such evaluations was to determine its employees’ fitness to carry a firearm in the course of their duties, and includes sections in which a psychologist must attest to the applicant’s mental and emotional stability.

47. In 2009, G4S PLC was made aware of failures in the vetting of its employees when Danny Fitzsimons, a G4S security guard, shot and killed two colleagues after displaying signs of psychological imbalance. At the time G4S PLC hired Fitzsimons, he had a criminal record and had been accused of assault and firearms offenses. Investigations revealed that G4S PLC had previously received an email from a member of the public expressing concerns over Fitzsimons’ mental stability and stating Fitzsimons should not be given a weapon. Despite being dismissed from a contract in Iraq for punching a client during his employment, and despite Fitzsimons experiencing flashbacks and other symptoms of post-traumatic stress disorder during his employments, G4S PLC continued to employ

Fitzsimons. After the shooting, an English court ruled that G4S PLC had not adequately vetted Fitzsimons, and continued to employ him despite being warned on multiple occasions that Fitzsimons was not fit for duty.

48. G4S DEFENDANTS hired MATEEN as a security guard on September 10, 2007.
49. Upon information and belief, MATEEN was hired by G4S DEFENDANTS as a Custom Protection Officer, a role granted a higher level security clearance than other security guards employed by G4S DEFENDANTS.
50. Upon information and belief, MATEEN's hiring occurred at G4S Secure Solutions, in Jupiter, Palm Beach County, Florida.
51. In October of 2006, prior to being hired by G4S DEFENDANTS, MATEEN worked as a recruit for the Florida Department of Corrections.
52. Following the mass shooting at Virginia Tech in April 2007, MATEEN suggested in a corrections officer training class that he would bring a gun to class. MATEEN was dismissed only days later on April 27, 2007.
53. Upon information and belief, G4S DEFENDANTS knew of this dismissal, and of MATEEN's propensity to carry weapons into unauthorized locations before employing MATEEN as an armed security guard.
54. Shortly after his hiring by G4S DEFENDANTS, MATEEN's psychological evaluation was submitted by G4S to the Florida Department of Agriculture and Consumer Services, the state agency responsible for issuing gun permits, to secure approval for MATEEN's firearms licenses.

55. Upon information and belief, in reliance on such evaluation, The Florida Department of Agriculture and Consumer Services issued MATEEN a Class G firearms license, which armed MATEEN to carry concealed weapons.
56. G4S DEFENDANTS represented to the Florida Department of Agriculture and Consumer Services that this psychological assessment was given, reviewed, and signed by one Dr. Carol Nudelman.
57. In 2013, while working as an armed guard for G4S DEFENDANTS at the St. Lucie Courthouse, MATEEN repeatedly threatened his colleagues, including an instance in which he told a deputy sheriff that he, MATEEN, would have the terror group al-Qaeda kill the coworker's family.
58. During this time period, MATEEN bragged to a co-worker about being associated with the Boston Marathon bombers.
59. During this time period, MATEEN told colleagues that he had family connections to al-Qaeda and Hezbollah, and that he hoped law enforcement would raid his home so he could martyr himself.”
60. During this time period, MATEEN praised Nidal Hasan the Army major who shot forty-five people at the Fort Hood, to his coworkers.
61. Upon information and belief, these instances were reported to G4S DEFENDANTS' management by other employees.
62. The St. Lucie County Sheriff's Department reported MATEEN's conduct to G4S DEFENDANTS' management, requested MATEEN's immediate and permanent removal from the St. Lucie County Courthouse, and reported these instances to federal authorities,

including the Federal Bureau of Investigation. As a result of MATEEN was interviewed two times by the FBI.

63. Upon information and belief, G4S DEFENDANTS knew MATEEN was being investigated by federal law enforcement authorities, including the FBI, prior to the Pulse attack.

64. Upon information and belief, after learning of the incidents described above, G4S DEFENDANTS declined to administer to MATEEN any new psychological evaluation or assessment to determine whether he was fit for duty, required behavioral intervention, required additional training, or should simply be dismissed, nor did G4S DEFENDANTS suspend MATEEN's ability to carry a weapon, though any of these actions may have resulted in MATEEN's dismissal and/or revocation of his firearms licensure.

65. Upon information and belief, G4S DEFENDANTS did not take away MATEEN's service weapon.

66. Upon information and belief, G4S DEFENDANTS did not recommend to the State of Florida that MATEEN's licensure to carry a weapon as security guard be retracted.

67. Defendant G4S DEFENDANTS did not terminate MATEEN, merely transferring him to a different position within the company, all the while allowing him to retain his license to carry firearms.

68. An official and agent of G4S DEFENDANTS has since stated that this transfer did not occur for disciplinary or precautionary reasons, stating "It's not as if a decision was taken that he was never again going to be given an armed position."

69. After MATEEN's transfer, Daniel Gilroy, a former police officer and MATEEN's coworker, repeatedly reported to G4S DEFENDANTS that he was concerned with

MATEEN's behavior, stating MATEEN was "unhinged and unstable," had "constant anger," went on frequent homophobic and racist rants, and "talked about killing people."

70. MATEEN's behavior was sufficiently threatening for Gilroy to make repeated requests that G4S transfer Gilroy to a new position. When G4S DEFENDANTS refused to do so, Gilroy left his position with G4S rather than continue to work alongside MATEEN.

71. Due to MATEEN's repeated threats, G4S DEFENDANTS knew or should have known MATEEN was likely to cause bodily harm to others if not controlled.

72. Upon information and belief, G4S DEFENDANTS did not administer to MATEEN any new psychological evaluation or assessment.

73. Upon information and belief, G4S DEFENDANTS did not take away MATEEN's service weapon at this time.

74. Upon information and belief, G4S DEFENDANTS did not recommend to the State of Florida that MATEEN's licensure to carry a weapon as a security guard be retracted.

75. Again, G4S DEFENDANTS did not terminate MATEEN.

76. Prior to the assault, MATEEN purchased a Sig Sauer MCX semiautomatic rifle, a Glock 17 handgun.

77. The owner of the dealership from which MATEEN purchased the weapons cited MATEEN's security licensures as a reason for his decision to sell MATEEN the weapons.

78. After the shooting at Pulse Nightclub, Dr. Carol Nudelman claimed in a statement to the media through her attorneys that she had never evaluated or even met MATEEN, had not signed his psychological evaluation, was not living in Florida at the time this psychological assessment was allegedly taken, and had closed her Florida practice two years prior to the

date of MATEEN's alleged evaluation; indeed, she referred to the evaluation submitted by G4S to the State of Florida as a "false document."

79. Subsequent investigation by the Florida Department of Agriculture and Consumer Services suggested that Nudleman's name was falsely listed on 1,514 forms that G4S submitted between 2006 and 2016; as a result, the Department fined Defendant G4S.

CAUSES OF ACTION

FIRST CAUSE OF ACTION
STATE LAW – CIVIL CONSPIRACY
(Plaintiffs v. NOOR SALMAN)

80. Plaintiffs adopt by reference each and every paragraph of this complaint as if fully copied and set forth at length herein.

81. At all relevant times, Defendant NOOR SALMAN owed a duty of care to Plaintiffs and Decedents to refrain from conduct which would endanger the safety of others, including Plaintiffs.

82. Prior to the June 12, 2016, Defendant NOOR SALMAN made an agreement with Defendant OMAR MATEEN to commit or aid in the commission of acts, including but not limited to:

- a. Assault and battery;
- b. Intentional infliction of emotional distress;
- c. Homicide; and
- d. Attempted homicide.

83. Prior to June 12, 2016, Defendant NOOR SALMAN committed a number of overt acts in furtherance of this conspiracy, including but not limited to:

- a. Assisting MATEEN in purchasing firearms and ammunition;

- b. Assisting MATEEN in conducting surveillance of Pulse Nightclub; and
- c. Knowingly assisting MATEEN in planning the assault on Pulse Nightclub.

84. As a proximate result of one or more of these intentional acts or omissions of Defendant OMAR MATEEN, Plaintiffs sustained severe and extreme emotional distress, accrued extensive expenses, lost and will lose financial gains, were and will be kept from their ordinary cares and duties, and experienced and will experience mental and physical pain and suffering, all of which damages are continuing.

WHEREFORE, Plaintiffs demand judgment against Defendant, NOOR SALMAN, for damages, costs, disbursements, attorney's fees, interests, and for any further relief that this Court deems fair and just.

SECOND CAUSE OF ACTION
STATE LAW – WRONGFUL DEATH
(Plaintiffs v. NOOR SALMAN)

85. Plaintiffs adopt by reference each and every paragraph of this complaint as if fully copied and set forth at length herein.

86. At all relevant times, Defendant NOOR SALMAN owed a duty of care to Plaintiffs and Decedents to refrain from negligent and/or willful and wanton conduct which would endanger the safety of others, including decedents.

87. Defendant NOOR SALMAN breached the aforementioned duty by committing negligent and/or willful and wanton acts, including but not limited to:

- a. Assisting MATEEN in purchasing firearms and ammunition;
- b. Assisting MATEEN in conducting surveillance of Pulse Nightclub, and
- c. Knowingly assisting MATEEN in planning the assault on Pulse Nightclub.

88. As a direct and proximate result of the misconduct of Defendant NOOR SALMAN, Decedents died, and Defendant NOOR SALMAN is responsible for their death and damages as set forth below:

- a. The survivors of Luis S. Vielma, Luis Omar Ocasio-Capo, Peter O. Gonzalez-Cruz, Jean Carlos Nieves, Franky Jimmy Dejesus Valasquez, Angel Candelario Padro, Anthony Laureano-Disla, Simon Adrian Carrillo Fernandez, Gilbert R. Silva Menendez, Gerado Antonio Ortiz-Jimenez, Christopher Sanfeliz, Rodolfo Ayala, Christopher Leinonon, Leroy Valentin Ferndandez, Javier J. Reyes, Juan Ramon Guerrero, Jr., Jason B. Josaphat, and Antonio Brown have incurred past and future loss of support and services.
- b. The Estates of Luis S. Vielma, Luis Omar Ocasio-Capo, Peter O. Gonzalez-Cruz, Jean Carlos Nieves, Franky Jimmy Dejesus Valasquez, Angel Candelario Padro, Anthony Laureano-Disla, Simon Adrian Carrillo Fernandez, Gilbert R. Silva Menendez, Gerado Antonio Ortiz-Jimenez, Christopher Sanfeliz, Rodolfo Ayala, Christopher Leinonon, Leroy Valentin Ferndandez, Javier J. Reyes, Juan Ramon Guerrero, Jr., Jason B. Josaphat, and Antonio Brown have lost prospective net accumulations and have incurred medical and funeral expenses due to their injuries and death.

WHEREFORE, Plaintiffs, as personal representatives of the estates of Decedents, for the benefit of their Estates and their statutory survivors, demand judgment against DEFENDANT NOOR SALMAN for all damages allowed by law including compensatory damages and costs, and for such other further relief this Court deems appropriate and just.

THIRD CAUSE OF ACTION
STATE LAW – NEGLIGENCE – FAILURE TO SUPERVISE

(Plaintiffs v. G4S PLC and G4S SECURE SOLUTIONS)

89. Plaintiffs adopt by reference each and every paragraph of this complaint as if fully copied and set forth at length herein.
90. The Defendants, G4S PLC and G4S Secure Solutions, employed and armed security officers, and assisted these officers in obtaining licensures to carry firearms through the State of Florida.
91. Dr. Carol Nudelman, as an agent of Defendants G4S PLC and G4S Secure Solutions, assisted applicants to G4S PLC and G4S Secure Solutions in obtaining licensures from the State of Florida to carry firearms by conducting mental evaluations of applicants to G4S Defendants and attesting to their mental stability to the State of Florida.
92. Defendants G4S PLC and G4S Secure Solutions and/or their agents knew or had reason to know that they had the ability to supervise and control MATEEN, and knew or should have known of the necessity and opportunity to exercise such supervision and control.
93. Defendants G4S PLC and G4S Secure Solutions and/or their agents owed a duty of care to supervise and control MATEEN to prevent him from intentionally harming others, including Plaintiffs, or from conducting himself as to create an unreasonable risk of bodily harm to them.
94. Defendants G4S PLC and G4S Secure Solutions and/or their agents owed a duty of care to all persons likely to encounter its officers, including Plaintiffs, to ensure that such security officers were properly supervised and vetted and re-evaluated for behavior or psychological problems.

95. Defendants G4S PLC and G4S Secure Solutions breaches the duties owed to persons who encountered its agents, including Plaintiffs, by committing the following ongoing acts and/or omissions of negligence:

- a. Failure to conduct a thorough background check on MATEEN before hiring him;
- b. Failure to conduct an in-person psychological evaluation of MATEEN before hiring him;
- c. Failure to conduct an in-person psychological evaluation on MATEEN before attesting to his mental and emotional stability to the State of Florida;
- d. Failure to conduct more than one evaluation of MATEEN before attesting to his mental and emotional stability to the State of Florida;
- e. Failure to conduct a sufficient evaluation of MATEEN before attesting to his mental and emotional stability to the State of Florida;
- f. Approving and/or ratifying documentation submitted to the State of Florida attesting to his stability; and/or
- g. Failure to withdraw MATEEN's service weapon after threats of violence against coworkers and state officials;
- h. Failure to recommend to the state of Florida that MATEEN's firearms licensures be withdrawn after MATEEN's threats of violence against coworkers and state officials;
- i. Failure to recommend or implement a new psychological evaluation on MATEEN after MATEEN's threats of violence against coworkers and state officials;
- j. Failure to withdraw MATEEN's service weapon during or after the FBI's investigation in to his actions;

- k. Failure to recommend or implement a new psychological evaluation on MATEEN during or after the FBI's investigation into his actions; and
- l. Falsifying documents with the knowledge that these documents would be relied upon by government officials in their decisions to grant or deny firearm licensure;
- m. Insufficiently supervising agents conducting psychological reviews of MATEEN;
- n. Failure to otherwise control MATEEN.

96. Defendants G4S PLC and G4S Secure Solutions' conduct created a recognizable risk of harm to Plaintiffs.

97. Plaintiffs were injured and sustained severe personal injury and damages as a direct and proximate result of the Defendants' negligent acts and omissions listed above.

WHEREFORE, Plaintiffs demand judgment against Defendants, G4S PLC and G4S Secure Solutions, for damages, costs, disbursements, attorney's fees, interests, and for any further relief that his Court deems fair and just.

FOURTH CAUSE OF ACTION
STATE LAW – NEGLIGENT HIRING
(Plaintiffs v. G4S PLC and G4S SECURE SOLUTIONS)

98. Plaintiffs adopt by reference each and every paragraph of this complaint as if fully copied and set forth at length herein.

99. The Defendants, G4S PLC and G4S Secure Solutions, employed and armed security officers, including MATEEN, and assisted these officers in obtaining licensures to carry firearms through the State of Florida.

100. The Defendants, G4S PLC and G4S Secure Solutions, were required to make an appropriate investigation of their employees, including MATEEN.

101. Defendants, G4S PLC and G4S Secure Solutions, knew or should have known that, prior to being hired by Defendants, MATEEN had been dismissed by the Florida Department of Corrections for threats against his training class.
102. Defendants, G4S PLC and G4S Secure Solutions, knew or should have known of MATEEN's propensity to carry weapons into unauthorized locations, before employing MATEEN as an armed security guard.
103. Upon information and belief, Defendants G4S PLC and G4S Secure Solutions conducted only one psychological evaluation on MATEEN before employing him as an armed security guard.
104. An appropriate investigation into MATEEN's background and appropriate psychological screening would have revealed MATEEN's unsuitability for armed security services.
105. In light of this information they possessed or should have possessed, it was unreasonable for Defendants G4S PLC and G4S Secure Solutions to hire MATEEN as an armed security guard.
106. Defendants G4S PLC and G4S Secure Solutions and/or their agents owed a duty of care to all persons likely to encounter its officers, including Plaintiffs, to ensure that such armed security officers were properly investigated and/or vetted and behavioral or psychological problems prior to their hiring.
107. Defendants G4S PLC and G4S Secure Solutions breached the duties owed to persons who encountered its agents, including Plaintiffs, by committing the following acts and/or omissions of negligence:
 - a. Failure to conduct a thorough background check on MATEEN before hiring him;

- b. Failure to conduct an in-person psychological evaluation on MATEEN before hiring him; and
 - c. Failure to conduct more than one evaluation of MATEEN before hiring him.
108. Defendants G4S PLC and G4S Secure Solutions' conduct created a recognizable risk of harm to Plaintiffs.
109. Plaintiffs were injured and sustained severe personal injury and damages as a direct and proximate result of the Defendant's negligent acts and omissions listed above.

WHEREFORE, Plaintiffs demand judgment against Defendants, G4S PLC and G4S Secure Solutions, for damages, costs, disbursements, attorney's fees, interests, and for any further relief that this Court deems fair and just.

FIFTH CAUSE OF ACTION
STATE LAW – NEGLIGENT RETENTION
(Plaintiffs v. G4S PLC and G4S SECURE SOLUTIONS)

110. Plaintiffs adopt by reference each and every paragraph of this complaint as if fully copied and set forth at length herein.
111. The Defendants, G4S PLC and G4S Secure Solutions, employed and armed security officers, including MATEEN, and assisted these officers in obtaining licensures to carry firearms through the State of Florida.
112. During MATEEN's employment, Defendants G4S PLC and G4S Secure Solutions knew or should have known that Defendant had made violent threats against his coworkers and their families.
113. During MATEEN's employment, Defendants G4S PLC and G4S Secure Solutions knew or should have known that Defendant indicated personal support for known terrorists and their acts.

114. During MATEEN's employment, Defendants G4S PLC and G4S Secure Solutions knew or should have known that Defendant indicated that he was associated with known terrorists.
115. During MATEEN's employment, Defendants G4S PLC and G4S Secure Solutions knew or should have known that Defendant showed repeated signs of mental instability, including, but not limited to, threats to harm others or commit violent acts.
116. Such problems indicated MATEEN's unfitness to serve as an armed security guard.
117. Defendants G4S PLC and G4S Secure Solutions and/or their agents owed a duty of care to take action with regard to employees, including MATEEN, whose behavior indicated unfitness to serve as an armed security guard, to prevent such employees from intentionally harming others, including Plaintiffs, or from conducting himself as to create an unreasonable risk of bodily harm to them.
118. Defendants G4S PLC and G4S Secure Solutions breached the duties owed to persons who encountered its agents, including Plaintiffs, by committing the following ongoing acts and/or omissions of negligence:
- a. Failure to conduct a thorough background check on MATEEN after hiring him;
 - b. Failure to conduct an in-person psychological evaluation on MATEEN after hiring him;
 - c. Failure to conduct an in-person psychological evaluation on MATEEN after attesting to his mental and emotional stability to the State of Florida;
 - d. Failure to conduct more than one evaluation of MATEEN after attesting to his mental and emotional stability to the State of Florida;

- e. Failure to withdraw MATEEN's service weapon after threats of violence against coworkers and state officials;
 - f. Failure to recommend to the state of Florida that MATEEN's firearms licensures be withdrawn after MATEEN's threats of violence against coworkers and state officials;
 - g. Failure to recommend or implement a new psychological evaluation on MATEEN after MATEEN's threats of violence against coworkers and state officials;
 - h. Failure to withdraw MATEEN's service weapon during or after the FBI's investigation into his actions;
 - i. Failure to recommend or implement a new psychological evaluation on MATEEN during or after the FBI's investigation into his actions; and
 - j. Falsifying the documents with the knowledge that these documents would be relied upon by government officials in their decisions to grant or deny firearm licensure.
 - k. Insufficiently supervising agents conducting psychological review of MATEEN;
 - l. Otherwise negligently retaining MATEEN.
119. Defendants G4S PLC and G4S Secure Solutions' conduct created a recognizable risk of harm to Plaintiffs.

120. Plaintiffs were injured and sustained severe personal injury and damages as a direct and proximate result of the Defendants' negligent acts and omissions listed above.

WHEREFORE, Plaintiffs demand judgment against Defendants, G4S PLC and G4S Secure Solutions, for damages, costs, disbursements, attorney's fees, interests, and for any further relief that this Court deems fair and just.

SIXTH CAUSE OF ACTION
STATE LAW – WRONGFUL DEATH

(Plaintiffs v. G4S PLC and G4S SECURE SOLUTIONS)

121. Plaintiffs adopt by reference each and every paragraph of this complaint as if fully copied and set forth at length herein.
122. At all relevant times, Defendants G4S PLC and G4S Secure Solutions owed a duty of care to Plaintiffs and Decedents to refrain from negligent and/or willful and wanton conduct which would endanger the safety of others, including decedents.
123. Defendants G4S PLC and G4S Secure Solutions and/or their agents owed a duty of care to supervise and control MATEEN to prevent him from intentionally harming others, including decedents, or from conducting himself as to create an unreasonable risk of bodily harm to them.
124. Defendants G4S PLC and G4S Secure Solutions breached the aforementioned duty by committing one or more of the following negligent and/or willful and wanton actions:
- a. Negligently and/or with utter indifference and conscious disregard, failed to conduct a thorough background check on MATEEN before hiring him;
 - b. Negligently and/or with utter indifference and conscious disregard, failed to conduct an in-person psychological evaluation on MATEEN before hiring him;
 - c. Negligently and/or with utter indifference and conscious disregard, failed to terminate MATEEN after threats of violence against coworkers and state officials;
 - d. Negligently and/or with utter indifference and conscious disregard, failed to withdraw MATEEN's service weapon after threats of violence against coworkers and state officials;
 - e. Negligently and/or with utter indifference and conscious disregard, failed to recommend to the state of Florida that MATEEN's firearms licensures be

withdrawn after MATEEN's threats of violence against coworkers and state officials;

- f. Negligently and/or with utter indifference and conscious disregard, failed to recommend or implement a new psychological evaluation on MATEEN after MATEEN's threats of violence against coworkers and state officials;
- g. With utter indifference and conscious disregard, failed to terminate MATEEN after the FBI's investigation into his actions;
- h. Negligently and/or with utter indifference and conscious disregard, failed to withdraw MATEEN's service weapon during or after the FBI's investigation into his actions; and
- i. Negligently and/or with utter indifference and conscious disregard, failed to recommend or implement a new psychological evaluation on MATEEN during or after the FBI's investigation into his actions.

125. As a direct and proximate result of the misconduct of Defendants, G4S PLC and G4S Secure Solutions, Decedents died, and Defendants G4S PLC and G4S Secure Solutions are responsible for their death and damages as set forth below:

- a. The survivors of Luis S. Vielma, Luis Omar Ocasio-Capo, Peter O. Gonzalez-Cruz, Jean Carlos Nieves, Franky Jimmy Dejesus Valasquez, Angel Candelario Padro, Anthony Laureano-Disla, Simon Adrian Carrillo Fernandez, Gilbert R. Silva Menendez, Gerado Antonio Ortiz-Jimenez, Christopher Sanfeliz, Rodolfo Ayala, Christopher Leinonon, Leroy Valentin Ferndandez, Javier J. Reyes, Juan Ramon Guerrero, Jr., Jason B. Josaphat, and Antonio Brown have incurred past and future loss of support and services.

- b. The Estates of Luis S. Vielma, Luis Omar Ocasio-Capo, Peter O. Gonzalez-Cruz, Jean Carlos Nieves, Franky Jimmy Dejesus Valasquez, Angel Candelario Padro, Anthony Laureano-Disla, Simon Adrian Carrillo Fernandez, Gilbert R. Silva Menendez, Gerado Antonio Ortiz-Jimenez, Christopher Sanfeliz, Rodolfo Ayala, Christopher Leinonon, Leroy Valentin Ferndandez, Javier J. Reyes, Juan Ramon Guerrero, Jr., Jason B. Josaphat, and Antonio Brown have lost prospective net accumulations and have incurred medical and funeral expenses due to their injuries and death.

WHEREFORE, Plaintiffs, as personal representatives of the estates of Decedents, for the benefit of her Estates and her statutory survivors, demand judgment against DEFENDANTS G4S PLC and G4S SECURE SOLUTIONS for all damages allowed by law including compensatory damages and costs, and for such other further relief this Court deems appropriate and just.

JURY DEMAND

Plaintiffs hereby demand a jury on all issues so triable.

Dated: June 12, 2018

Respectfully Submitted,

By: /s/ Kristoffer Budhram
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