

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

GRANT CARDONE, an individual

Plaintiff,

v.

GENERAL JURISDICTION DIVISION

CASE NO:

SOUTH FLORIDA MOTORSPORTS, LLC,
A Foreign Limited Liability Company,
SOUTH FLORIDA STADIUM LLC, a
Florida Limited Liability Company,
LIBERTY MEDIA CORPORATION, a
Foreign Profit Corporation, and WHELAN
EVENT STAFFING SERVICES, INC. d/b/a
BEST CROWD MANAGEMENT, a Foreign
Profit Corporation,

Defendants.

_____ /

COMPLAINT FOR DAMAGES

COMES NOW, the Plaintiff, GRANT CARDONE, by and through the undersigned counsel, and sues the Defendants, SOUTH FLORIDA MOTORSPORTS, LLC, SOUTH FLORIDA STADIUM LLC, LIBERTY MEDIA CORPORATION, and WHELAN EVENT STAFFING SERVICES, INC. d/b/a BEST CROWD MANAGEMENT, and pursuant to all applicable *Florida Rules of Civil Procedure* alleges as follows:

PARTIES, JURISDICTION, AND VENUE

1. This is an action for damages in excess of Seven Hundred and Fifty Thousand dollars (\$750,000.00) and is otherwise within the jurisdiction of this Court.

2. At all times material hereto, the Plaintiff, GRANT CARDONE (hereinafter “CARDONE”), was and is a resident of Miami-Dade County, Florida.

3. At all times material hereto, Defendant, SOUTH FLORIDA MOTORSPORTS LLC, was and is a Foreign Limited Liability Company authorized to transact business in the State of Florida with its principal place of business located at 347 Don Shula Drive Miami Gardens, Florida 33056.

4. At all times material hereto, Defendant, SOUTH FLORIDA MOTORSPORTS LLC, was responsible for the promotion and/or advertisement of the Formula One Race Event that took place on the weekend of May 6, 2022, formally known as the Crypto.com Formula 1 Miami Grand Prix 2022.

5. At all times material hereto, Defendant, SOUTH FLORIDA STADIUM, LLC (hereinafter “STADIUM”), was and is a Florida Limited Liability Company organized under the laws of the State of Florida with its principal place of business located at 347 Don Shula Drive Miami Gardens, Florida 33056.

6. At all times material hereto, Defendant, LIBERTY MEDIA CORPORATION (hereinafter “FORMULA ONE”), was and is a Foreign Profit Corporation organized under the laws of the State of Delaware. Defendant is authorized to transact business in the State of Florida.

7. At all times material, Defendant, LIBERTY MEDIA CORPORATION, was and is the owner of the “Paddock Club” and the “Formula One Group,” a group of companies responsible for the promotion of the Formula One Championship and exercising the sport’s commercial rights.

8. At all times material hereto, Defendant, WHELAN EVENT STAFFING SERVICES, INC. d/b/a BEST CROWD MANAGEMENT (hereinafter “BEST”), was and is a Foreign Profit Corporation organized under the laws of the State of Missouri. Defendant is authorized to transact business in the State of Florida.

9. At all times material hereto, Defendant, BEST, was the security service company hired for the Formula One Miami Grand Prix 2022 that took place on the weekend of May 6 through May 8, 2022 at the Hard Rock Stadium in Miami Gardens, Florida.

10. Venue is proper in Miami-Dade County as the incident giving rise to this action occurred in Miami-Dade County, Florida.

FACTUAL BACKGROUND

11. On or about May 8, 2022, Plaintiff, CARDONE, attended the Formula One Miami Grand Prix 2022 and entered the premises known and described as the Miami International Autodrome, located at the Hardrock Stadium in Miami Gardens, Florida.

12. Plaintiff, CARDONE, was attending as a guest of “Cushman & Wakefield” to watch the Formula One (F1) race, which was advertised as the “Crypto.com Formula 1 Miami Grand Prix 2022.”

13. CARDONE, and several other high-profile individuals, including David Beckham, Michael Jordan, and Pharell Williams, attended the F1 Race Event, where they lounged and watched the race from the “FORMULA ONE Paddock Club.”

14. The Paddock Club is advertised by FORMULA ONE as an exclusive, private, and limited access trackside viewing area where VIP guests benefit from prime viewing from above the pit lane and team garages, pit lane walkabouts, VIP private parking, gourmet meals, and open bar.

15. Attendees, including Plaintiff, CARDONE, were invited into the Paddock Club lounge—one of the most prestigious VIP level lounges in the world—and were encouraged to bring significant funds and sport the most expensive jewelry in the world under the false

impression that security would be sufficient to protect the safety and personal possessions of such attendees.

16. F1 Paddock Club Miami Grand Prix Tickets cost as high as \$50,000.00 to \$100,000.00, and yet, on or about May 8, 2022, adequate security at the Paddock Club lounge, where Plaintiff, CARDONE, and several other affluent VIP guests were present, was nonexistent.

17. At all times material, Defendant, FORMULA ONE, was in possession and complete control of the promotion, operation, security, maintenance and/or management of the Paddock Club suite where Plaintiff, CARDONE, and several other affluent attendees watched the F1 Race Event.

18. With high-net-worth individuals present, FORMULA ONE's Paddock Club was under a duty to provide adequate and sufficient security personnel to ensure the safety of these individuals and their personal property.

19. On May 8, 2022, Plaintiff, CARDONE, was wearing his rare Richard Mille Watch. The watch was especially rare as only fifteen (15) were ever made and CARDONE had the 10th/15.

20. CARDONE's Richard Mille watch is valued in excess of \$750,000.00.

21. As CARDONE, his wife, and a friend were leaving the track, a group of thieves orchestrated a massive distraction to steal CARDONE's rare Richard Mille watch.

22. The thieves took advantage of the poor mode of operation on the premises that led to pedestrian bottlenecks in the areas of ingress and egress.

23. The team of thieves followed CARDONE and his wife through the Paddock Club to the exit ramps. The thieves then created a commotion and distraction, at which point they proceeded to rob CARDONE of his Richard Mille watch while on the Defendants' premises.

24. Upon information and belief, the band of thieves that stole CARDONE's Richard Mille were staking out the FORMULA ONE Paddock Club from within the lounge and had access to other VIP track side viewing areas at the Formula One Miami Grand Prix 2022.

25. This criminal scheme was accomplished as a direct result of Defendants' negligence in failing to hire adequate security guards to mitigate this kind of harm.

26. The Defendants were on notice of prior identical criminal incidents at this and other events, including other FORMULA ONE events, where high-profile individuals such as CARDONE routinely attend and are robbed of their belongings.

27. Defendants knew, or in the exercise of reasonable care should have known of the presence of organized crime and criminal activity targeting unsuspecting affluent guests at events such as F1 Grand Prix Race Event.

28. Plaintiff, CARDONE, was an unsuspecting affluent guest of the Formula One Miami Grand Prix 2022 who was targeted by organized criminal activity.

29. As a direct result of the negligence of the Defendants, CARDONE's ultrarare and expensive watch was stolen in an act of organized crime that the Defendants knew based on prior incidents was a real and significant threat.

COUNT I: NEGLIGENT SECURITY AS TO SOUTH FLORIDA MOTORSPORTS LLC

Plaintiff re-adopts and reallages paragraphs 1 through 29 and further states:

30. At all times material, Defendant, SOUTH FLORIDA MOTORSPORTS LLC, through its agents, employees, and affiliates, owed a duty to the attendees, invitees, and licensees of the Miami International Autodrome located at the Hardrock Stadium in Miami Gardens, Florida. Specifically, Defendant owed a duty to exercise reasonable and ordinary care to take precautions

as were reasonably necessary to protect these attendees, invitees, and licensees, including Plaintiff, CARDONE, from reasonably foreseeable criminal attacks.

31. At all times material, Defendant, through its agents, employees, and affiliates, knew or in the exercise of reasonable care should have known that identical thefts have occurred at this and other events that include some of the world's most wealthy and influential people as invited guests.

32. Defendant, through its agents, employees, and affiliates, knew or should have known that each invited guest would forego providing their own security on the subject premises after reasonably relying on Defendants to act within their duty to protect their guests from foreseeable criminal harm.

33. In light of the foregoing, the criminal attack on Plaintiff, CARDONE, by a team of thieves that targeted him was reasonably foreseeable and Defendant was in the superior position to appreciate such hazards and take necessary steps to prevent said harm.

34. Defendant, SOUTH FLORIDA MOTORSPORTS LLC, by and through its agents, employees, and affiliates, breached its duty to exercise reasonable care for the safety and protection of its guests, attendees, invitees, and/or licensees including Plaintiff, CARDONE, and acted in a careless and negligent manner through the following acts and/or omissions:

- a. Failing to have sufficient and adequate security guards per guests for the type of attendees that were present on the premises on or about May 8, 2022;
- b. Failing to prepare a security plan that acknowledges the presence of extremely affluent attendees on the premises on or about May 8, 2022;
- c. Misleading attendees in believing adequate security would be present so that they felt safe enough to wear expensive jewelry, including rare and expensive watches;
- d. Failing to properly investigate the theft as soon as it happened so that the subject watch could have, and should have, been recovered;

- e. Failing to provide a safe mode of operation for ingress and egress on the premises so that guests, like Plaintiff, CARDONE, can safely enter and exit the premises;
- f. Failing to have sufficient and adequate security guards despite having actual knowledge and/or notice that affluent attendees, like Plaintiff, CARDONE, have been targets of organized criminal activity at similar events;
- g. Failing to provide adequate security for invited guests of event rooms at the Miami International Autodrome;
- h. Failing to warn guests, both ticketholders and invited guests, of the lack of adequate security when it knew, or in the exercise of reasonable care should have known, that identical criminal incidents have occurred at this and other events involving high-profile attendees;
- i. Failing to hire and/or retain adequate security personnel to patrol and/or monitor the premises, including the Paddock Club and exit ramps leading out of the premises;
- j. Failing to police, patrol, guard, deter, and otherwise provide adequate protection for Defendant's ticketholders and invited attendees;
- k. Failing to warn, protect, guard, and otherwise secure the safety of Defendant's ticketholders and invited attendees;
- l. Failing to have and/or hire a sufficient and adequate number of guards in visible areas to deter crime;
- m. Failing to hire and/or retain competent security guards to protect Defendant's ticketholders and invited attendees;
- n. Failing to properly train security guards to be reasonably skillful, competent, and/or qualified to exercise appropriate and proper security measures so that they could protect Defendant's ticketholders and invited attendees;
- o. Failing to properly exercise reasonable care to prevent the threat of a stampede at the exit ramps leading out of the premises;
- p. Failing to take additional security measures after being put on notice that the security measures in force were inadequate;
- q. Failing to adequately provide an overall security plan that would meet the known industry standard and customs for safety at the Miami International Autodrome for the Formula One Miami Grand Prix 2022;

35. As a direct and proximate result of the negligence of Defendant, SOUTH FLORIDA MOTORSPORTS LLC, Plaintiff, CARDONE, has suffered a loss in excess of \$750,000.00, plus Attorney's fees, and Court Costs.

WHEREFORE, Plaintiff, CARDONE, demands judgment against Defendant, SOUTH FLORIDA MOTORSPORTS LLC, for damages, costs of this action and other further equitable and legal relief as this Court may deem appropriate. Plaintiff requests a trial by jury on all issues so triable.

COUNT II: NEGLIGENT SECURITY AS TO STADIUM

Plaintiff re-adopts and reallages paragraphs 1 through 29 and further states:

36. At all times material, Defendant, STADIUM, through its agents, employees, and affiliates, owed a duty to the attendees, invitees, and licensees of the Miami International Autodrome located at the Hardrock Stadium in Miami Gardens, Florida. Specifically, Defendant owed a duty to exercise reasonable and ordinary care to take precautions as were reasonably necessary to protect these attendees, invitees, and licensees, including Plaintiff, CARDONE, from reasonably foreseeable criminal attacks.

37. At all times material, Defendant, through its agents, employees, and affiliates, knew or in the exercise of reasonable care should have known that identical thefts have occurred at this and other events that include some of the world's most wealthy and influential people as invited guests.

38. Defendant, through its agents, employees, and affiliates, knew or should have known that each invited guest would forego providing their own security on the subject premises after reasonably relying on Defendants to act within their duty to protect their guests from foreseeable criminal harm.

39. In light of the foregoing, the criminal attack on Plaintiff, CARDONE, by a team of thieves that targeted him was reasonably foreseeable and Defendant was in the superior position to appreciate such hazards and take necessary steps to prevent said harm.

40. Defendant, STADIUM, by and through its agents, employees, and affiliates, breached its duty to exercise reasonable care for the safety and protection of its guests, attendees, invitees, and/or licensees including Plaintiff, CARDONE, and acted in a careless and negligent manner through the following acts and/or omissions:

- a. Failing to have sufficient and adequate security guards per guests for the type of attendees that were present on the premises on or about May 8, 2022;
- b. Failing to prepare a security plan that acknowledges the presence of extremely affluent attendees on the premises on or about May 8, 2022;
- c. Misleading attendees in believing adequate security would be present so that they felt safe enough to wear expensive jewelry, including rare and expensive watches;
- d. Failing to properly investigate the theft as soon as it happened so that the subject watch could have, and should have, been recovered;
- e. Failing to provide a safe mode of operation for ingress and egress on the premises so that guests, like Plaintiff, CARDONE, can safely enter and exit the premises;
- f. Failing to have sufficient and adequate security guards despite having actual knowledge and/or notice that affluent attendees, like Plaintiff, CARDONE, have been targets of organized criminal activity at similar events;
- g. Failing to provide adequate security for invited guests of event rooms at the Miami International Autodrome;
- h. Failing to warn guests, both ticketholders and invited guests, of the lack of adequate security when it knew, or in the exercise of reasonable care should have known, that identical criminal incidents have occurred at this and other events involving high-profile attendees;
- i. Failing to hire and/or retain adequate security personnel to patrol and/or monitor the premises, including the Paddock Club and exit ramps leading out of the premises;

- j. Failing to police, patrol, guard, deter, and otherwise provide adequate protection for Defendant's ticketholders and invited attendees;
- k. Failing to warn, protect, guard, and otherwise secure the safety of Defendant's ticketholders and invited attendees;
- l. Failing to have and/or hire a sufficient and adequate number of guards in visible areas to deter crime;
- m. Failing to hire and/or retain competent security guards to protect Defendant's ticketholders and invited attendees;
- n. Failing to properly train security guards to be reasonably skillful, competent, and/or qualified to exercise appropriate and proper security measures so that they could protect Defendant's ticketholders and invited attendees;
- o. Failing to properly exercise reasonable care to prevent the threat of a stampede at the exit ramps leading out of the premises;
- p. Failing to take additional security measures after being put on notice that the security measures in force were inadequate;
- q. Failing to adequately provide an overall security plan that would meet the known industry standard and customs for safety at the Miami International Autodrome for the Formula One Miami Grand Prix 2022;

41. As a direct and proximate result of the negligence of Defendant, SOUTH FLORIDA MOTORSPORTS LLC, Plaintiff, CARDONE, has suffered a loss in excess of \$750,000.00, plus Attorney's fees, and Court Costs.

WHEREFORE, Plaintiff, CARDONE, demands judgment against Defendant, STADIUM, for damages, costs of this action and other further equitable and legal relief as this Court may deem appropriate. Plaintiff requests a trial by jury on all issues so triable.

COUNT III: NEGLIGENT SECURITY AS TO FORMULA ONE

Plaintiff re-adopts and reallages paragraphs 1 through 29 and further states:

42. At all times material, Defendant, FORMULA ONE, through its agents, employees, and affiliates, owed a duty to the attendees, invitees, and licensees of the Miami International

Autodrome located at the Hardrock Stadium in Miami Gardens, Florida. Specifically, Defendant owed a duty to exercise reasonable and ordinary care to take precautions as were reasonably necessary to protect these attendees, invitees, and licensees, including Plaintiff, CARDONE, from reasonably foreseeable criminal attacks.

43. At all times material, Defendant, through its agents, employees, and affiliates, knew or in the exercise of reasonable care should have known that identical thefts have occurred at this and other events that include some of the world's most wealthy and influential people as invited guests.

44. Defendant, through its agents, employees, and affiliates, knew or should have known that each invited guest would forego providing their own security on the subject premises after reasonably relying on Defendants to act within their duty to protect their guests from foreseeable criminal harm.

45. In light of the foregoing, the criminal attack on Plaintiff, CARDONE, by a team of thieves that targeted him was reasonably foreseeable and Defendant was in the superior position to appreciate such hazards and take necessary steps to prevent said harm.

46. Defendant, FORMULA ONE, by and through its agents, employees, and affiliates, breached its duty to exercise reasonable care for the safety and protection of its guests, attendees, invitees, and/or licensees, including Plaintiff, CARDONE, and acted in a careless and negligent manner through the following acts and/or omissions:

- a. Failing to have sufficient and adequate security guards per guests for the type of attendees that were present on the premises on or about May 8, 2022;
- b. Failing to prepare a security plan that acknowledges the presence of extremely affluent attendees on the premises on or about May 8, 2022;

- c. Misleading attendees in believing adequate security would be present so that they felt safe enough to wear expensive jewelry, including rare and expensive watches;
- d. Failing to properly investigate the theft as soon as it happened so that the subject watch could have, and should have, been recovered;
- e. Failing to provide a safe mode of operation for ingress and egress on the premises so that guests, like Plaintiff, CARDONE, can safely enter and exit the premises;
- f. Failing to have sufficient and adequate security guards despite having actual knowledge and/or notice that affluent attendees, like Plaintiff, CARDONE, have been targets of organized criminal activity at similar events;
- g. Failing to provide adequate security for invited guests of event rooms at the Miami International Autodrome;
- h. Failing to warn guests, both ticketholders and invited guests, of the lack of adequate security when it knew, or in the exercise of reasonable care should have known, that identical criminal incidents have occurred at this and other events involving high-profile attendees;
- i. Failing to hire and/or retain adequate security personnel to patrol and/or monitor the premises, including the Paddock Club and exit ramps leading out of the premises;
- j. Failing to police, patrol, guard, deter, and otherwise provide adequate protection for Defendant's ticketholders and invited attendees;
- k. Failing to warn, protect, guard, and otherwise secure the safety of Defendant's ticketholders and invited attendees;
- l. Failing to have and/or hire a sufficient and adequate number of guards in visible areas to deter crime;
- m. Failing to hire and/or retain competent security guards to protect Defendant's ticketholders and invited attendees;
- n. Failing to properly train security guards to be reasonably skillful, competent, and/or qualified to exercise appropriate and proper security measures so that they could protect Defendant's ticketholders and invited attendees;
- o. Failing to properly exercise reasonable care to prevent the threat of a stampede at the exit ramps leading out of the premises;

- p. Failing to take additional security measures after being put on notice that the security measures in force were inadequate;
- q. Failing to adequately provide an overall security plan that would meet the known industry standard and customs for safety at the Miami International Autodrome for the Formula One Miami Grand Prix 2022;

47. As a direct and proximate result of the negligence of Defendant, SOUTH FLORIDA MOTORSPORTS LLC, Plaintiff, CARDONE, has suffered a loss in excess of \$750,000.00, plus Attorney's fees, and Court Costs.

WHEREFORE, Plaintiff, CARDONE, demands judgment against Defendant, FORMULA ONE, for damages, costs of this action and other further equitable and legal relief as this Court may deem appropriate. Plaintiff requests a trial by jury on all issues so triable.

COUNT IV: NEGLIGENT SECURITY AS TO BEST

Plaintiff re-adopts and reallages paragraphs 1 through 29 and further states:

48. At all times material, Defendant, BEST, through its agents, employees, and affiliates, owed a duty to the attendees, invitees, and licensees of the Miami International Autodrome located at the Hardrock Stadium in Miami Gardens, Florida. Specifically, Defendant owed a duty to exercise reasonable and ordinary care to take precautions as were reasonably necessary to protect these attendees, invitees, and licensees, including Plaintiff, CARDONE, from reasonably foreseeable criminal attacks.

49. At all times material, Defendant, through its agents, employees, and affiliates, knew or in the exercise of reasonable care should have known that identical thefts have occurred at this and other events that include some of the world's most wealthy and influential people as invited guests.

50. Defendant, through its agents, employees, and affiliates, knew or should have known that each invited guest would forego providing their own security on the subject premises

after reasonably relying on Defendants to act within their duty to protect their guests from foreseeable criminal harm.

51. In light of the foregoing, the criminal attack on Plaintiff, CARDONE, by a team of thieves that targeted him was reasonably foreseeable and Defendant was in the superior position to appreciate such hazards and take necessary steps to prevent said harm.

52. Defendant, BEST, by and through its agents, employees, and affiliates, breached its duty to exercise reasonable care for the safety and protection of its guests, attendees, invitees, and/or licensees, including Plaintiff, CARDONE, and acted in a careless and negligent manner through the following acts and/or omissions:

- a. Failing to have sufficient and adequate security guards per guests for the type of attendees that were present on the premises on or about May 8, 2022;
- b. Failing to prepare a security plan that acknowledges the presence of extremely affluent attendees on the premises on or about May 8, 2022;
- c. Misleading attendees in believing adequate security would be present so that they felt safe enough to wear expensive jewelry, including rare and expensive watches;
- d. Failing to properly investigate the theft as soon as it happened so that the subject watch could have, and should have, been recovered;
- e. Failing to provide a safe mode of operation for ingress and egress on the premises so that guests, like Plaintiff, CARDONE, can safely enter and exit the premises;
- f. Failing to have sufficient and adequate security guards despite having actual knowledge and/or notice that affluent attendees, like Plaintiff, CARDONE, have been targets of organized criminal activity at similar events;
- g. Failing to provide adequate security for invited guests of event rooms at the Miami International Autodrome;
- h. Failing to warn guests, both ticketholders and invited guests, of the lack of adequate security when it knew, or in the exercise of reasonable care should have known, that identical criminal incidents have occurred at this and other events involving high-profile attendees;

- i. Failing to hire and/or retain adequate security personnel to patrol and/or monitor the premises, including the Paddock Club and exit ramps leading out of the premises;
- j. Failing to police, patrol, guard, deter, and otherwise provide adequate protection for Defendant's ticketholders and invited attendees;
- k. Failing to warn, protect, guard, and otherwise secure the safety of Defendant's ticketholders and invited attendees;
- l. Failing to have and/or hire a sufficient and adequate number of guards in visible areas to deter crime;
- m. Failing to hire and/or retain competent security guards to protect Defendant's ticketholders and invited attendees;
- n. Failing to properly train security guards to be reasonably skillful, competent, and/or qualified to exercise appropriate and proper security measures so that they could protect Defendant's ticketholders and invited attendees;
- o. Failing to properly exercise reasonable care to prevent the threat of a stampede at the exit ramps leading out of the premises;
- p. Failing to take additional security measures after being put on notice that the security measures in force were inadequate;
- q. Failing to adequately provide an overall security plan that would meet the known industry standard and customs for safety at the Miami International Autodrome for the Formula One Miami Grand Prix 2022;

53. As a direct and proximate result of the negligence of Defendant, SOUTH FLORIDA MOTORSPORTS LLC, Plaintiff, CARDONE, has suffered a loss in excess of \$750,000.00, plus Attorney's fees, and Court Costs.

WHEREFORE, Plaintiff, CARDONE, demands judgment against Defendant, BEST, for damages, costs of this action and other further equitable and legal relief as this Court may deem appropriate. Plaintiff requests a trial by jury on all issues so triable.

DEMAND FOR JURY TRIAL

The Plaintiff, CARDONE, in the above styled action, respectfully demands a trial by jury on all of the issues so triable.

Dated this 10th day of October, 2022.

GOLDBERG & ROSEN, P.A.

Counsel for Plaintiff

One Biscayne Tower

2 South Biscayne Blvd., Suite 3650

Miami, Florida 33131

Tel: (305) 374-4200 / Fax: (305) 374-8024

BY /s/ Judd G. Rosen

Judd G. Rosen, Esq. Fla. Bar No. 0458953

Primary E-mail: pleadings@goldbergandrosen.com
jrosen@goldbergandrosen.com