

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT  
TRIAL COURT DEPARTMENT

22-1641B

2022 JUL 20 P 12:59  
MICHIGAN / MAGISTRATE  
CLERK / CIVIL DEPARTMENT

CHRISTIAN NUNES, as the Personal  
Representative of the Estate of CHRISTIAN  
JEROME NUNES PERKINS.,

Plaintiff,

v.

CODMAN SQUARE NEIGHBORHOOD  
DEVELOPMENT CORPORATION,  
WINNRESIDENTIAL CORPORATION, and  
SECURITY SERVICE SPECIALISTS, INC.,

Defendants.

PLAINTIFF REQUESTS A  
JURY TRIAL

**COMPLAINT AND JURY DEMAND**

Plaintiff Christian Nunes ("Plaintiff"), as the Personal Representative of the Estate of Christian Jerome Nunes Perkins, hereby files this Complaint against the Defendants for the wrongful death.

**INTRODUCTION**

1. This action is against Codman Square Neighborhood Development Corporation, Winnresidential Corporation, and Security Service Specialists, Inc. for negligence that resulting in the death of Christian Jerome Nunes Perkins on July 28, 2019.

**PARTIES**

2. Plaintiff Christian Nunes is the Personal Representative of the Christian Jerome Nunes Perkins and resides in Dorchester, Massachusetts.

3. Defendant Codman Square Neighborhood Development Corporation (“CSN Development Corp.”) is a corporation with a principal place of business at 587 Washington St, Dorchester, MA 02124.

4. Defendant Winnresidential Corporation is a corporation with a principal place of business at One Washington Mall, Suite 500 Boston, Massachusetts 02108.

5. Security Service Specialists, Inc. (“Security Service Specialists”) is a corporation with a principal place of business at 968 Main St, Wakefield, MA 01880.

### FACTS

6. Christian Jerome Nunes Perkins was a kind, soft-spoken, and intelligent young man who worked hard and stayed out of trouble. (See Figure 1.) Christian Nunes Perkins was only a few weeks shy of his 21st birthday when he was murdered in front of 169 Columbia Road, a building Defendants collectively own and manage, and for which they provide security.



7. Defendant CSN Development Corp. is or was the owner of the development located at 143-180 Columbia Road and 144-148 Geneva Avenue in Dorchester, Massachusetts at all times relevant to this Complaint.

8. This development is often referred to as "Washington Columbia I."

9. Upon information and belief, at all times relevant to this Complaint, the building located at 165 Columbia Road, 169 Columbia Road, and 173 Columbia Road in Dorchester, Massachusetts ("165-173 Columbia Road") was one of the buildings in the Washington Columbia I development.

10. Defendant Winnresidential Corporation is or was the property manager of the CSN Development Corp. building located at 165-173 Columbia Road within the Washington Columbia I development at all times relevant to this Complaint.

11. Upon information and belief, either CSN Development Corp. or Winnresidential Corp., or both, contracted with Defendant Security Service Specialists to provide security at the Washington Columbia I development, including the residential building located at 165-173 Columbia Road.

12. Upon information and belief, at all times relevant to this Complaint, Security Service Specialists was responsible for providing security at the Washington Columbia I development, including the building located at 165-173 Columbia Road.

13. CSN Development Corp. touts "Safety" as one of the amenities of the housing at Washington Columbia I.

14. Winnresidential Corp. touts itself as "The Leader in Residential Property Management."

15. Security Service Specialists touts itself as the “premier organization in the entire New England region for armed and unarmed private security,” citing “the direct improvements that we have achieved in the communities that we service.”

16. Upon information and belief, 165-173 Columbia Road, within the Washington Columbia I development, has various fences which are intended to prevent people surreptitious access to the rear of the building from the street and *vice versa*.

17. Each doorway at 165-173 Columbia Road has a small courtyard, such as the one depicted below, which residents and their guests often use to socialize, especially in the warm summer months.



18. At all times relevant to this Complaint, there were gaps between the gate/fence structure surrounding 165-173 Columbia Road, which allowed surreptitious access to the front courtyards from concealed positions in the side or rear of the building.

19. Upon information and belief, all Defendants were aware of these gaps and the resulting insecure perimeter but took no steps to fix them.

20. These gaps and insecure perimeter represented a known security risk because they allowed "cut-through" access to the front of the building from unguarded and/or concealed position on the side or rear of the building.

21. On the night of July 28, 2019, Christian Jerome Nunes Perkins was in front of the 169 Columbia Road with a friend, who was a resident of Washington Columbia I.

22. At the time, Christian Jerome Nunes Perkins and his friend were socializing in front 169 Columbia Road. This area is lit by streetlights.

23. Upon information and belief, Defendant Security Service Specialists should have provided a security presence at Washington Columbia I on the night of July 28, 2019 but failed to do so.

24. It was well known to Defendants that violent crimes were a regular occurrence at or near the Washington Columbia I property.

25. At around 11 pm on July 28, 2019, a gunman emerged from the shadows through at least one of the gaps in the fences from the side of the building and gained access to the front area of the building next to the courtyard of 173 Columbia Road. He was unseen by the congregants, including Christian Jerome Nunes Perkins.

26. The gunman immediately fired multiple gunshots, striking Christian Jerome Nunes Perkins and his friend. A shell casing was later found in the flowerbed next to the 173 Columbia Road courtyard. (See Figure 2.)

27. The gunman then was able to flee on foot as there were no security personnel to pursue or apprehend him. The gunman has never been identified.

28. Police were immediately called and arrived shortly after 11 pm.

29. Christian Jerome Nunes Perkins was declared dead at the scene. (See Figure 3.) His friend was transported to the hospital and survived.



30. Upon information and belief, the shooter mistook Christian Jerome Nunes Perkins to be the intended target of the shooting. The real target was a resident of the Washington Columbia I property who had been involved in various criminal and/or gang-related activities.

31. Defendants knew or should have known that such resident, due to multiple, documented incidents in the past involving his criminal and/or gang-related activities, posed a safety and security risk to other residents and their guests. Upon information

and belief, however, Defendants took no action against this resident until after the shooting, when the resident was forced to move out.

32. During this entire time, Defendant Security Services Specialists was absent from the scene.

33. Further, at all times relevant to this Complaint, of the Washington Columbia I development was considered a "high crime area." Shootings, violent crimes, threats, and gang-related activities were frequent and regular occurrences.

34. Defendants CSN Development Corp., Winnresidential Corp., and Security Service Specialists, Inc. were aware, or should have been aware, that the area of 169 Columbia Road and the Washington Columbia I development was considered a "high crime area" and that at least one or more residents, due to their behavior, posed a safety and security risk to the other residents and their guests.

35. At all times relevant to this Complaint, violent crime frequently occurred in the area of Columbia Road and the Washington Columbia I development.

36. Defendants CSN Development Corp., Winnresidential Corp., and Security Service Specialists were aware, or should have been aware, that violent crime frequently occurred in the area of the Columbia Washington I development, including the building located at 169 Columbia Road, at all times relevant to this Complaint.

37. Defendants CSN Development Corp., Winnresidential Corp., and Security Service Specialists were aware of shooting deaths in close proximity to the Columbia Washington I development, including the building located at 169 Columbia Road.

38. Just two weeks earlier, a 22-year-old man had been shot and killed on Columbia Road about a mile away. This earlier shooting was by no means an isolated incident.

39. On September 29, 2017, there was a fatal shooting of another man located in the area of Washington Street and Park Street in Dorchester, Massachusetts.

40. Upon information and belief, the location of the September 29, 2017 shooting is approximately one block from Defendant CSN Development Corp.'s property located at 169 Columbia Road.

41. On January 11, 2019, there was a fatal shooting of another man in a Burger King parking lot located at Columbia Road and Washington Street in Dorchester, Massachusetts.

42. Upon information and belief, the location of the January 11, 2018 shooting is in close proximity to Defendant CSN Development Corp.'s property at 169 Columbia Road.

43. On January 14, 2018, there was a fatal beating and shooting of a teen in the area of Kenwood and Washington Streets in Dorchester, Massachusetts.

44. Upon information and belief, the location of the January 14, 2018 shooting is in close proximity to Defendant CSN Development Corp.'s property at 169 Columbia Road.

45. On October 12, 2018, there was a fatal shooting of another man located in the area of Columbia Road and Geneva Avenue in Dorchester, Massachusetts.



46. Upon information and belief, the location of the October 12, 2018 shooting is in close proximity to Defendant CSN Development Corp.'s property at 169 Columbia Road.

47. On June 23, 2019, just over one month prior to the shooting death of Christian Jerome Nunes Perkins, there were four shooting-related incidents in Dorchester, Massachusetts in the span of just 80 minutes.

48. One of the shootings on June 23, 2019, was at 197 Columbia Road, less than a one-minute walk from the CSN Development Corp. property located at 169 Columbia Road.

49. Upon information and belief, Defendant Security Service Specialists was contractually obligated to provide additional protection to residents and their guests at least in part due to the increased risk of harm to individuals in the area of the Washington Columbia I development, at least in part due to the known gaps in the fencing and gates to the side and rear of the 169-173 Columbia property, and at least in part because of the known safety and security risk posted by one of the residents.

**COUNT ONE**  
*Wrongful Death, G.L. Ch. 229 § 2*  
*against All Defendant*

50. Plaintiff re-alleges the allegations in paragraphs 1 to 49 of this Complaint which are incorporated by reference herein.

51. On or about July 28, 2019, Defendants owed a duty of care and a duty to assure reasonable safety and provide reasonable security measures for residents and their guests at the Washington Columbia I development.

52. On July 28, 2019, Defendants knew or had reason to know of frequent violent crime in the area of the Washington Columbia I development, including the property and courtyard located at 169 Columbia Road.

53. On July 28, 2019, Defendants knew or had reason to know that one of the residents at the Washington Columbia I development posed a safety and security risk to other residents and their guests, but they had negligently failed to take any actions to remove this resident until after the fatal shooting on July 28, 2019.

54. On July 28, 2019, while on the property of the Washington Columbia I development, in the front courtyard at 169 Columbia Road, Christian Nunes Perkins was shot and killed as a result of the Defendants' negligence.

55. Defendant CSN Development Corp. was the owner of the Washington Columbia I development and had a duty to ensure reasonable safety and security for its residents and their guests.

56. Defendant Winnresidential Corp. was the property manager for the Washington Columbia I development and had a duty to provide reasonable safety and security for its residents and their guests.

57. Defendant Security Service Specialists was contracted by either Defendant CSN Development Corp. or Winnresidential Corp., or both, to provide security at the Washington Columbia I development, including 169 Columbia Road, but wholly abdicated its duties on the night of July 28, 2019.

58. By July 28, 2019, Defendants were well aware of the documented pattern of crime occurring at Washington Columbia I.

59. By July 28, 2019, Defendants were well aware of the need for better security measures at Washington Columbia I but negligently chose not to implement such measures.

60. Christian Jerome Nunes Perkins died as a direct and proximate cause of the Defendants' negligence.

WHEREFORE, the Plaintiff requests that judgment enter in his favor and that fair and reasonable compensation be awarded for all compensable injuries under the wrongful death statute.

#### **REQUESTS FOR RELIEF**

WHEREFORE, Plaintiff requests this Court:

1. Enter judgment against Defendants;
2. Enter an award against Defendants for all available damages under the Wrongful Death Statute; and
3. For such other and further relief as the Court deems the Plaintiff to be entitled, according to justice and equity.

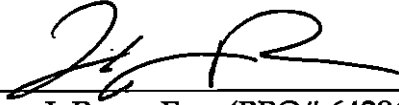
#### **JURY DEMAND**

**PLAINTIFF DEMANDS A TRIAL BY JURY.**

Respectfully Submitted,

PLAINTIFF CHRISTIAN NUNES, AS THE  
PERSONAL REPRESENTATIVE OF THE  
ESTATE OF CHRISTIAN JEROME NUNES  
PERKINS,

By his attorneys,



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