

IN THE _____ COURT OF _____ (County),
_____ (State)

PLAINTIFF

(Name of Plaintiff)

V.

CAUSE NO. _____, _____

DEFENDANTS

(Name of Director) Missouri Department of Revenue,
_____ and _____

COMPLAINT

COMES NOW _____ (Name of Plaintiff), Plaintiff in the
above-styled and numbered cause, and files this his Complaint against Defendants,
_____ (Names of Defendant), and in
support thereof would show unto the Court the following matters and facts:

1.

Plaintiff is an adult resident citizen of _____
_____ (street address, city, county, state, zip code).

2.

_____ (Defendant Alpha) is an adult resident citizen of

(street address, city, county, state, zip code).

3.

_____ (Defendant Beta) is an adult resident citizen of

(street address, city, county, state, zip code).

4.

Defendant _____ (Name of Director) Missouri Department
of Revenue, is being named a party to this suit so that he will issue a replacement
certificate of title to Plaintiff upon proof of Plaintiff's case and a ruling by this Honorable
Court in Plaintiff's favor. _____ (Name of Director) may be served
with process of this Court at his office located at _____
_____ (street address, city, county, state, zip code).

5.

On or about _____ (***date***), Plaintiff purchased an automobile from ***Defendant Alpha***, which automobile can be more particularly described as (***put as much of the following information in the complaint as you know***):

Make _____

Model _____

Year _____

VIN _____

6.

On or about _____ (***date***), Plaintiff discovered that Defendant Alpha did not have title to said automobile.

7.

Title to said automobile is listed in the name of ***Defendant Beta***, who has abandoned said title.

8.

Plaintiff submits that he is a good faith purchaser for value of said automobile and was defrauded by ***Defendant Alpha***. Plaintiff furthers offer as proof of ownership the following: (***cancelled check, bill of sale, letters, etc., that would show that you purchased the automobile from Defendant Alpha***) _____. Copies of the aforesaid are attached hereto as ***Exhibits A, B, C, etc.*** and made a part of this Complaint by reference thereto.

WHEREFORE, Plaintiff requests that this Honorable Court issue a judgment that he is the true and rightful owner of said Automobile and that Missouri Department of Revenue should issue to him a certificate of title pursuant to the laws of the state of Missouri to that effect.

Respectfully submitted,

Printed Name of Plaintiff

Signature of Plaintiff

State of Missouri
County of _____

Personally appeared before me, the undersigned authority in and for the aforesaid jurisdiction, the within named _____ **(Name of Plaintiff)**, who, after being by me first duly sworn, did depose and say that the facts set forth in the above and foregoing Complaint are true and correct as therein stated.

Printed Name of Plaintiff

Signature of Plaintiff

Sworn to and subscribed before me, this the ____ day of _____, 20____.

Notary Public or Deputy Clerk

My Commission Expires:

SEAL