

IN THE CIRCUIT COURT OF _____ COUNTY, _____

NAME OF PLAINTIFF

V.

NAME OF DEFENDANT

NO. _____

COMPLAINT

Comes now, _____ Plaintiff, and files this complaint against _____ and for cause would show as follows:

1. Plaintiff is an adult resident of _____.
2. Defendant, _____, and may be served with process of this Court by personal service at _____.
3. On or about the ____ day of _____, _____, Defendant filed an Affidavit at the _____ Court at _____, _____, charging that Plaintiff willfully and unlawfully and maliciously entered upon the real property of _____ at _____, _____, _____. On the ____ day of _____, Defendant filed another Affidavit against Plaintiff charging him with trespass on _____, _____. As a result of Defendant's action, Plaintiff was arrested and required to pay administrative costs before he was released. The information contained in the Affidavits were not true and, upon the trial which was held on _____, _____, the case was dismissed. See Exhibit "A" three pages.
4. The actions of Defendant were wrongful, malicious, and designed to embarrass and damage Plaintiff. Plaintiff suffered extreme mental and emotional anguish as a result of Defendant's wrongful action. Plaintiff incurred attorney fees and loss of wages as a result of Defendant's deliberate and malicious conduct.
5. Plaintiff has suffered harm to his reputation, humiliation, embarrassment, mental anguish and distress by being arrested by the _____ Police Department on the false charges brought by Defendant.
6. Plaintiff would show that the actions of Defendant herein reflect a malicious, intentional, willful, and reckless disregard of the rights of Plaintiff herein and warrant an award of punitive damages to Plaintiff.
7. Plaintiff would show the willful intentional acts of Defendant constitute malicious

prosecution, false imprisonment, false arrest, intentional infliction of emotional distress and libel and slander and that Plaintiff is entitled to a Judgment of and against Defendant for compensatory and punitive damages.

WHEREFORE, Plaintiff brings this action against _____ and demands judgment in the sum of \$_____ compensatory damages and \$_____ punitive damages and attorney fees all costs of these proceedings.

Respectfully submitted,

ATTORNEY FOR PLAINTIFF