

1 [ INSERT CAPTION ]  
2

3 COMPLAINT

4 (NEGLIGENCE-INNKEEPER LIABILITY-CRIMINAL ACTIVITY)

5 COMES NOW the Plaintiff(s), \_\_\_\_\_, by counsel, and for his/her  
6 Complaint against the Defendant(s), \_\_\_\_\_, alleges and states:  
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8 I. THE PARTIES

9 1. The Plaintiff(s), \_\_\_\_\_, (hereinafter referred to as Plaintiff), is  
10 an adult citizen of \_\_\_\_\_ County, State of \_\_\_\_\_, and resides at 123 Main Street,  
11 in the City of Small Town.

12 2. The Defendant, \_\_\_\_\_, (hereinafter referred to as Defendant  
13 One), is a corporation incorporated under the laws of the State of \_\_\_\_\_, whose principal  
14 place of business is at 321 Elm Street, in the City of Small Town, and is subject to service of  
15 process by and through its registered agent: [insert registered agent's name and address].  
16

17 II. THE FACTS

18 3. Plaintiff was a business invitee and registered guest at Defendant's hotel.  
19 On \_\_\_\_\_, 20\_\_, at approximately \_\_\_\_\_ o'clock \_\_.m., Plaintiff left her hotel room  
20 and walked through the hotel parking lot to some nearby shops. When Plaintiff was returning to  
21 the hotel she was assaulted, battered and forcibly raped by an unknown assailant in the hotel  
22 parking lot.

23 4. The Defendant had actual or constructive notice that criminal activity of the  
24 kind complained of herein and similar criminal activity had previously occurred at Defendant's  
25 hotel and that the assault, battery and rape of Plaintiff was reasonably foreseeable.  
26 At the aforesaid time and place, the Defendant did not employ any  
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1 security staff or post any warnings to its business invitees as to the lack of security staff on the  
2 premises, thereby creating a dangerous and hazardous condition on the premises

### 3 III. THE CLAIMS

4 5. Defendant a duty to maintain its business premises in a reasonably safe  
5 and secure condition a duty to take steps reasonably calculated to remove the aforesaid  
6 hazardous and dangerous condition. The Defendant also had a duty to warn its business invitees  
7 of the aforesaid dangerous and hazardous condition.  
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9 1. The Defendant breached its duties delineated hereinabove by failing to employ a  
10 security staff when Defendant knew, or should have known, from the aforesaid  
11 prior criminal activity occurring on its premises, that

12 6. The Defendant breached its duties delineated hereinabove proximately  
13 causing Plaintiff to suffer the following damages: [insert types of damages, *e.g.*, severe and  
14 permanent personal injuries; past, present and future pain and suffering; past, present and future  
15 mental anguish and other emotional damages; temporary and/or permanent disability; past,  
16 present and future medical and/or psychological/psychiatric expenses and costs; past and present  
17 lost wages; lost wage earning capacity; etc.].  
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### 19 IV. DEMAND FOR RELIEF

20 7. The Plaintiff prays for the following relief:

21 (1) Trial by jury;

22 (2) Judgment for Plaintiff and against the Defendant;

23 (3) An award of damages which will fully and fairly compensate Plaintiff for [insert  
24 types of damages, *e.g.*, [insert types of damages, *e.g.*, severe and permanent  
25 personal injuries; past, present and future pain and suffering; past, present and  
26 future mental anguish and other emotional damages; temporary and/or permanent  
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- disability; past, present and future medical and/or psychological/psychiatric expenses and costs; past and present lost wages; lost wage earning capacity; etc.].
- (4) Such other and further relief deemed just and proper in the premises.