

# Complaint for Fraudulent Misrepresentation

**Plaintiff:** [Plaintiff Name]

**Address:** [Plaintiff Address]

**Defendant:** [Defendant Name]

**Address:** [Defendant Address]

**Court:** [Court Name]

**Case No.:** [Case Number]

## Complaint

### I. PARTIES

1. Plaintiff, [Plaintiff Name], is an individual residing at [Plaintiff Address].
2. Defendant, [Defendant Name], is an individual/entity with an address at [Defendant Address].

### II. JURISDICTION AND VENUE

3. This Court has jurisdiction over this matter because [State basis for jurisdiction].
4. Venue is proper in this Court because [State basis for venue].

### III. STATEMENT OF FACTS

- 5. On or about [Date], Defendant made certain statements to Plaintiff regarding [subject of representation].
- 6. Defendant represented that [describe the false statements made].
- 7. Defendant knew these representations were false at the time they were made.
- 8. Defendant intended for Plaintiff to rely upon these representations.
- 9. Plaintiff reasonably relied upon Defendant's representations and took action as a result.
- 10. As a direct and proximate result, Plaintiff suffered damages including [describe damages].

### IV. CAUSE OF ACTION: FRAUDULENT MISREPRESENTATION

11. Plaintiff re-alleges and incorporates by reference the preceding paragraphs.
12. Defendant made false representations of material fact.
13. Defendant knew the representations were false or made them recklessly.
14. Defendant intended for Plaintiff to rely on the misrepresentations.
15. Plaintiff did reasonably rely on the misrepresentations.
16. Plaintiff suffered damages as a result.

### V. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court:

- Award compensatory damages in an amount to be proven at trial;
- Award punitive damages;
- Award costs and attorneys' fees; and
- Grant such further relief as the Court deems just and proper.

Dated: \_\_\_\_\_

[Plaintiff Name], Plaintiff  
[Contact Information]