V I R G I N I A:

IN THE CIRCUIT COURT OF

\*

\*

Complainant \*

\*

vs. \* Chancery No.

\*

\*

\*

Defendant \*

COMPLAINT FOR DIVORCE

(Adultery)

COMES NOW the Complainant, by counsel, and in support of this Complaint for Divorce against the Defendant, states the following:

1. The complainant is an actual and bona fide resident and domiciliary of , Commonwealth of Virginia, and has been such for more than six months immediately preceding the institu­tion of this suit.

2. The parties last cohabited as husband and wife at .

3. The parties were legally married on in .

4. There were children born of the marriage, namely:

a. , born .

5. Both parties hereto are over the age of eighteen (18) years.

6. Neither of the parties hereto is an active duty member of the Armed Forces of the United States.

7. The parties did separate with it being the intent of at least one of the parties to terminate the marriage on or about .

8. The defendant has engaged in adulterous conduct during the marriage with a person to be identified as part of the informal discovery process in this action, with the dates of this behavior to be likewise so identified.

9. There has been no resumption of marital cohabitation between the parties since the date the complainant discovered the above referenced behavior and, further, there is now no hope or probability of a reconciliation between the parties.

WHEREFORE, these premises considered, the complainant requests:

a. Entry of a final decree of divorce a vinculo matrimonii from the defendant on the grounds of adultery.

b. Custody of the minor children of the parties.

c. Spousal support/alimony, support for the minor children of the parties, court costs and counsel fees.

d. This Court grant such other relief that the complainant is entitled to under Virginia Code 20-107.3.

e. This Court grant such other and further relief as may be appropriate.

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