V I R G I N I A

IN THE CIRCUIT COURT OF

\*

Plaintiff \*

\*

v. \* Case No.

\*

\*

\*

Defendant \*

COMPLAINT

(False Imprisonment)

COMES NOW the plaintiff, by counsel, and in support of this Complaint states as follows:

1. The plaintiff resides at the address listed in the caption of this matter.

2. The corporate defendant is the employer and/or principal of the individual defendant and the individual defendant was at all times acting within the scope of the employment/agency of the corporate defendant.

3. On or about the day of , 199 the plaintiff was a customer in the store owned/operated by the corporate defendant located at .

4. As the plaintiff was preparing to leave the above referenced premises after completing his shopping he was restrained, without any sufficient legal cause by the individual defendant and taken to an office where he was searched and accused of theft of an article of merchandise having an approximate value of $ . The plaintiff was detained for a period of hours before being released.

5. The individual defendant's restraint of the plaintiff was without just cause and constituted a false imprisonment. As a proximate result of the actions of the individual defendant, the plaintiff was injured in his reputation, was subjected to public scorn and ridicule and has been caused great mental anguish and anxiety.

WHEREFORE, these premises considered, the plaintiff requests judgment against the defendants jointly and severally in the amount of $ in compensatory damages, plus an award of costs, and interest.

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*Counsel for*

**Interrogatories and Request for Documents are served along with this Complaint**