V I R G I N I A

IN THE CIRCUIT COURT OF

\*

Plaintiff \*

\*

v. \* Case No.

\*

\*

\*

Defendant \*

COMPLAINT

(Fraud & Negligent Misrepresentation)

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 the matter.

2. The defendant resides at the address listed in the caption of this matter.

3. The defendant did make certain representations to the plaintiff as to material existing or past facts, in that .

4. Such representations were made intentionally and with knowledge of the fact that they were untrue.

5. Such representations were made by the defendant to induce reliance by the plaintiff.

6. The plaintiff did rely on such representations in that

7. The plaintiff has now been damaged by this reliance in that

COUNT I - Actual Fraud

8. Paragraphs 1 through 7 above are incorporated herein by reference.

9. The defendant did fraudulently induce the plaintiff to enter into the contract referenced above in that the defendant made certain intentional misrepresentations of material existing facts which were made for the purpose of inducing reliance and which in fact did induce reliance to the detriment of the plaintiff.

COUNT II - Constructive Fraud

10. Paragraphs 1 through 9 above are incorporated herein by reference with the exception that such misrepresentations were not made intentionally.

COUNT III - Negligent Misrepresentation

11. Paragraphs 1 through 7 above are incorporated herein by reference with the exception that such misrepresentations were not made intentionally but were made negligently.

Wherefore, these premises considered, the plaintiff requests judgment against the defendant in the amount of $ compensatory damages as to Counts I, II and III and

$ punitive damages as to Count I, plus an award of costs and interest.

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Brien A. Roche, Esq., VSB No. 16165

Johnson & Roche

8355A Greensboro Drive

McLean, Virginia 22102

*Tel.:* (703) 821-3740

*Fax:* (703) 790-9462

[brienroche@aol.com](mailto:brienroche@aol.com)

*Counsel for*

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