V I R G I N I A

 IN THE CIRCUIT COURT OF

 \*

Plaintiff \*

 \*

v. \* Case No.

 \*

 \*

 \*

Defendant \*

 COMPLAINT

 (Malicious Prosecution)

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

3. On or about the day of , 199 the defendant did falsely, maliciously, and without any reasonable or probable cause appear before a magistrate of this jurisdiction and requested him to issue a warrant for the arrest of the plaintiff on the charge of . Such warrant was issued based upon the allegations made by the defendant.

4. On or about the day of , 199 , the plaintiff was arrested pursuant to said warrant, was detained in jail and was subsequently released upon his giving bond. At the trial of this criminal charge the plaintiff was found not guilty by the court and the charge against him was dismissed.

5. The defendant procured this prosecution falsely, maliciously, and with the intent to injure the plaintiff's reputation and with full knowledge that there was no reasonable or probable cause to have him arrested.

6. As a result of the defendant's actions the plaintiff has been greatly injured and his reputation has been brought into public disrepute, has been hindered in the practice of his occupation, and has been required to spend substantial time away from his business and to expend substantial sums of money to defend himself against the allegations referenced above. In addition the plaintiff has been caused much mental anguish, suffering, and humiliation.

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

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 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

*Counsel for*

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