

COMPLAINT FOR CONSTRUCTIVE TRUST

Sample Only
Use At Your Own Risk



INSTRUCTIONS: The following is a “cause of action” to be inserted after the heading of the complaint and common allegations. Include as many other causes of action as you have claims such as fraud, accounting, etc. Your “prayer” (request for relief) comes after your causes of action and must describe the relief you are seeking for each cause of action.

_____ CAUSE OF ACTION

(For _____ Against _____)

<>. As a proximate result of the defendant____ fraudulent misrepresentations and otherwise wrongful conduct as alleged herein, Plaintiff__ is__ [----state threatened damages---]

<>. By reason of the fraudulent and otherwise wrongful manner in which the defendants____, or any of them, obtained their alleged right, claim or interest in and to the property, defendant____, and each of them, have no legal or equitable right, claim or interest therein, but, instead, Defendant____, and each of them are involuntary trustees holding said property and profits therefrom in constructive trust for Plaintiff____ with the duty to convey the same to Plaintiff____ forthwith.

WHEREFORE, plaintiff__ pray__ judgment against defendant__ and each of them, as follows:

<>. For a declaration that Defendant____ hold the ____ as constructive trustees for the benefit of the Plaintiff____

<>. For costs of suit incurred herein; and

<>. F or such other and further relief as the court may deem proper.

Date: _____
_____ [Plaintiff's name]
Plaintiff *In Pro Per*

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