

COMPLAINT FOR CONSPIRACY

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.

FIRST CAUSE OF ACTION

(For Conspiracy Against ____)

<>. Defendant __, __ is __, and at all times herein mentioned was __, a resident __ of the City of __, County of __, State of California.

<>. Defendant __, __, is __, and at all times herein mentioned, was __ a Corporation organized and existing under the laws of the State of California with principle offices located at __, in the City of __, County of __.

<>. Plaintiff __ is __ ignorant of the true names and capacities of defendants sued herein as DOES I through X, inclusive, and therefore sues __ these defendants by such fictitious names. Plaintiff __ will amend this complaint to allege their true names and capacities when ascertained.

<>. Plaintiff __ is __ informed and believes __ and thereon alleges __ that, at all times herein mentioned, each of the defendants sued herein was the agent and employee of each of the remaining defendants and was at all times acting within the purpose and scope of such agency and employment.

<>. On or about __, 19 __, Defendant __ and each of them knowingly and willfully conspired and agreed among themselves to _____.

<>. [----Here and in subsequent paragraphs as necessary, allege facts

constituting the tort or other civil wrong committed by defendants and the injury caused thereby to plaintiff.----]

<>. Defendant___ and each of them did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and above-alleged agreement.

<>. Defendant___ , furthered the conspiracy by cooperation with [---or--- lent aid and encouragement to----or---ratified and adopted the acts of----] defendants, ___ in that _____.

<>. As a proximate result of the wrongful acts herein alleged plaintiff___ has___ been generally damaged in the sum of \$_____.

<>. [---Here and in subsequent paragraphs, allege items of special damages----]

<>. Defendant___ did the things herein alleged maliciously and to oppress plaintiff___. Plaintiff___ is__ therefore entitled to exemplary or punitive damages in the sum of \$_____.

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

1. _____
2. _____
3. _____
4. For such other and further relief as the court may deem proper.

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

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