

## COMPLAINT FOR UNFAIR BUSINESS PRACTICES

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

(Violation of Business and Professions Code # 17200 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.

<>. [---Describe fraudulent, deceptive, unfair, other wrongful conduct---]

<>. By reason of Defendant\_\_\_\_, \_\_\_\_\_, fraudulent, deceptive, unfair, and other wrongful conduct as herein alleged, said Defendant\_\_\_\_ has\_\_\_\_ violated California

Business and Professions Code #17200\et seq.\ by consummating an unlawful, unfair, and fraudulent business practice, designed to deprive plaintiff\_\_ of \_\_\_\_\_.

<>. By reason of the foregoing, Plaintiff\_\_ has\_\_\_ suffered and continues\_\_\_ to suffer damages in a sum which is, as yet unascertained. Plaintiff\_\_\_ will ask leave of court to amend \_\_\_ complaint when the true nature and extent of \_\_\_ damages have been ascertained.

WHEREFORE, plaintiff\_\_ pray\_\_ judgment against defendant\_\_ and each of them, as follows:

1. For damages in the amount of \$\_\_\_\_\_
2. For interest from \_\_\_\_\_ at 10% per annum from \_\_\_\_\_.
3. For punitive damages according to proof,
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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