

Peter Simpson

Plaintiff,

VERIFIED COMPLAINT

-against-

ACTION FOR DIVORCE

Samantha Simpson

Defendant.

X

ACTION FOR A DIVORCE

FIRST:

Plaintiff herein complaining of the Defendant, alleges that the parties are over the age of 18 years and;

SECOND:

The Plaintiff has resided in New York State for a continuous period in excess of two years immediately preceding the commencement of this action.

THIRD:

The Plaintiff and the Defendant were married on 11/11/1995 in Buffalo, Erie, New York
The marriage was performed by a clergyman, minister or by a leader of the Society for Ethical Culture.

To the best of my knowledge I have taken all steps solely within my power to remove any barrier to the Defendant's remarriage.

FOURTH:

There are no children of the marriage.

The Plaintiff resides at 123 Lower Street New York, NY 12345 United States

The Defendant resides at 888 Upper Street New York, NY 12455 United States

FIFTH:

The grounds for divorce that are alleged as follows:

Abandonment (DRL 170(2)):

That commencing on or about 11/11/1999, and continuing for a period of more than one (1) year immediately prior to commencement of this action, the Defendant left the marital residence of the parties located at 123 Lower Street New York, NY 12345 United States, and did not return. Such absence was without cause or justification, and was without Plaintiff's consent.

SIXTH:

There is no judgment in any court for a divorce and no other matrimonial action between the parties pending in this court or in any other court of competent jurisdiction.

WHEREFORE, Plaintiff demands judgment against the Defendant as follows: A judgment dissolving the marriage between the parties and

marital property to be distributed pursuant to the annexed separation agreement;
and any other relief the court deems fitting and proper.

Dated: _____

Plaintiff **Peter Simpson**
Address: **123 Lower Street**
New York, NY 12345
United States
Phone No.: **111-222-3333**

STATE OF NEW YORK, COUNTY OF **BROOME**

I, **Peter Simpson**, am the Plaintiff in the within action for a divorce. I have read the foregoing complaint and know the contents thereof. The contents are true to my own knowledge except as to matters therein stated to be alleged upon information and belief, and as to those matters I believe them to be true.

Subscribed and Sworn to
before me on:

Plaintiff's Signature
Peter Simpson

NOTARY PUBLIC