# IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT

# IN AND FOR HILLSBOROUGH COUNTY, FLORIDA

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Case Number: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Division: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Plaintiff(s)

vs

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

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

Defendant(s)

## COMPLAINT TO QUIET TITLE

## (Forged Deed)

Plaintiff (s) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ sues Defendant(s) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, and alleges as follows:

1. This is an action to quiet title to real property pursuant to Chapter 65, Florida Statutes in \_\_\_\_\_\_\_\_\_\_\_\_\_\_ County, Florida that exceeds \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ in value.
2. Plaintiff(s) owns (own) the following described real property (the “Property”) in \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ County, Florida: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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

[LEGAL DESCRIPTION OF PROPERTY]

1. Plaintiff(s) deraigns (deraign) title as follows:

**NOTE: A STATEMENT OF PLAINTIFF’S CHAIN OF TITLE FOR AT LEAST THE PAST 7 YEARS MUST BE ATTACHED.**

4. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ purported to have been signed by the Plaintiff(s) and purporting to convey the Property to \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ by that certain deed dated \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, and recorded on \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ in Official Records Book \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ at page \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ /OR \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Instrument Number of the public records of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ County, Florida.

5. Plaintiff(s) did not execute the deed for the Property set forth in Paragraph 4.

6. Upon delivery of the deed described in Paragraph 2, Plaintiff(s) immediately went into possession of the Property and continuously maintained possession of the Property adverse to Defendant(s). Possession by the Plaintiff(s) and the Plaintiff's(s’) predecessors in title has lasted for more than seven years, and Plaintiff(s) or Plaintiff's(s’) predecessors in title have paid all of the taxes accruing on the Property for more than seven years.

7. Plaintiff(s) has/have not conveyed the Property to any person since obtaining the conveyance described in Paragraph 2.

8. The deed described in Paragraph 4 did not convey title to defendant(s) because Defendant's(s’)/ fraudulent Grantor(s) had no title, but the recording of the deed casts a cloud on Plaintiff's(s’) title.

WHEREFORE, Plaintiff(s) demands (demand) judgment against Defendant(s) quieting title to the Property in Plaintiff by removing the cloud from the title to the Property and adjudging Plaintiff to have good fee simple title to the Property.

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[NAME OF PLAINTIFF] [NAME OF PLAINTIFF]

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

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

[MAILING ADDRESS OF PLAINTIFF] [MAILING ADDRESS OF PLAINTIFF]

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

[TELEPHONE NUMBER OF PLAINTIFF] [TELEPHONE NUMBER OF PLAINTIFF]

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

[E-MAIL ADDRESS OF PLAINTIFF] [E-MAIL ADDRESS OF PLAINTIFF]