

IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT
IN AND FOR VOLUSIA COUNTY, FLORIDA

_____,
Plaintiff(s),

vs.

CASE NO. _____

_____,
Defendant(s).

**COMPLAINT TO QUIET TITLE BASED ON FRAUDULENT CONVEYANCE
UNDER SECTION 65.091, FLORIDA STATUTES**

The plaintiff(s), _____, sue(s) defendant(s), _____, defendant's unknown spouse, heirs, devisees, grantees, judgment creditors, and all other parties claiming by, through, under, or against defendants or parties or claiming to have any right, title, or interest in the property described in this complaint, and alleges:

1. This is an action to quiet and confirm title of plaintiff in and to lands located in _____ County, Florida.
2. Plaintiff owns the following real property:

3. Plaintiff shows entitlement to (detrains) title as follows (must show chain of title for at least the past 7 years):
Plaintiff obtained ownership by deed or instrument dated _____, recorded on _____, in official records book _____, page _____ of the public records of _____ County, Florida. The property description in that deed is as follows:

4. The deed or instrument purported to have been signed by plaintiff(s), or purporting to convey the property to defendant(s), dated _____, recorded _____, in official records book _____, page _____ of the public records of _____ County, Florida, is fraudulent.

5. Plaintiff did not execute the deed and has not conveyed the property to any person since obtaining the conveyance(s) described in paragraph (3).
6. The deed or instrument described in paragraph (4) did not convey title to defendant because the grantor had no title, but the recording of the deed casts a cloud on plaintiff's title.

WHEREFORE, the plaintiff(s) respectfully request (requests) the court to enter an order to quiet title in and award the plaintiff(s) with the same title and rights to the land that the plaintiff enjoyed before the attempted conveyance.

Date: _____

Plaintiff

Address

City, State, Zip Code

Phone

Email

(Include Signature for each Plaintiff)

Plaintiff Signature

Plaintiff Signature

Plaintiff Signature