

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF _____**

1

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23

Plaintiff,
-against-

Index No.:

VERIFIED COMPLAINT

ACTION FOR DIVORCE

4

Defendant.

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5

FIRST:

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

6

SECOND:

A) The *Plaintiff* / *Defendant* has resided in New York State for a continuous period of at least two years immediately preceding the commencement of this divorce action.

OR

B) The *Plaintiff* / *Defendant* resided in New York State on the date of commencement of this divorce action and for a continuous period of one year immediately preceding the commencement of this divorce action

AND:

a. the parties were married in New York State.

or

b. the parties have resided as married people in New York State.

OR

C) The cause of action occurred in New York State and *Plaintiff* / *Defendant* resided in New York State for a continuous period of at least one year immediately preceding the commencement of this divorce action.

OR

D) The cause of action occurred in New York State and both parties were residents at the time of commencement of this divorce action.

7

THIRD: The Plaintiff and the Defendant were married on _____ in (city, town or village; and state or country) _____.

8 The marriage was *not* performed by a clergyman, minister or by a leader of the Society for Ethical Culture.

(If the word "not" is deleted above check the appropriate box below).

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

I will take prior to the entry of final judgment all steps solely within my power to the best of my knowledge to remove any barrier to the Defendant's remarriage. **OR**

The Defendant has waived in writing the requirements of DRL §253 (Barriers to Remarriage).

9 **FOURTH:** There are no children of the marriage (see definition on p.7 of Instructions) **OR**

There *is (are)* _____ child(ren) of the marriage (see definitions on p.7 of Instructions), namely:

<u>Name</u>	<u>Date of Birth</u>	<u>Address</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

10 The Plaintiff resides at _____.
The Defendant resides at _____.

11 The parties are covered by the following group health plans:

Plaintiff

Defendant

Group Health Plan: _____

Group Health Plan: _____

Address: _____

Address: _____

Identification Number: _____

Identification Number: _____

Plan Administrator: _____

Plan Administrator: _____

Type of Coverage: _____

Type of Coverage: _____

12 **FIFTH:** The grounds for divorce that are alleged as follows:

Cruel and Inhuman Treatment (DRL §170(1)):

At the following times Defendant committed the following act(s) which endangered the Plaintiff's physical or mental well being and rendered it unsafe or improper for Plaintiff to continue to reside with Defendant.

(State the facts that demonstrate cruel and inhuman conduct giving dates, places and specific acts. Conduct may include physical, verbal, sexual or emotional behavior.)

(Attach an additional sheet, if necessary).