

IN THE CIRCUIT COURT OF \_\_\_\_\_ COUNTY, WEST VIRGINIA

\_\_\_\_\_  
Plaintiff,

VS. \_\_\_\_\_ CIVIL ACTION NO. \_\_\_\_\_

\_\_\_\_\_  
Defendant.

DIVORCE COMPLAINT

TO THE HONORABLE JUDGE OF SAID COURT:

Your Plaintiff, \_\_\_\_\_, respectfully represents unto Your Honor:

I

That he/she is a bona fide resident of \_\_\_\_\_ County, West Virginia, and is and has been a bona fide resident of West Virginia for more than one (1) year last past, continuously, immediately preceding the filing of this Complaint.

II

That the Defendant is a resident of the State of West Virginia, and that his/her last known address is  
*[insert address of defendant].*

III

That he/she and the Defendant, \_\_\_\_\_, were duly and legally married on the \_\_\_th day of  
*[month], [year],* in \_\_\_\_\_ County, *[state],* as will more fully appear from the marriage records of said City and State for said day and year.

IV

That there were \_\_\_\_\_ (\_\_\_) *[insert number of children of the marriage]* living children born of the marriage of the Parties hereto, namely, \_\_\_\_\_, born \_\_\_\_\_, age \_\_\_\_\_; and \_\_\_\_\_, born \_\_\_\_\_, age \_\_\_\_\_, who are presently in the custody of the Plaintiff, the primary caretaker of said infants.

V