

## **New form 1.925 (Complaint to Quiet Title)**

The Florida Bar's Civil Procedure Rules Committee (Committee) has, in Case No. SC2023-1677, submitted to the Florida Supreme Court a report proposing the adoption of new form 1.925 (Complaint to Quiet Title). The new form is in response to the enactment of section 65.091, Florida Statutes, under which circuit court clerks are required to provide a simplified form for use in summary proceedings to quiet title based on an alleged fraudulent attempted conveyance. New form 1.925 directs a party seeking a summary proceeding under section 65.091 to identify in which county the subject land is located, what real property the plaintiff owns, the plaintiff's entitlement to the land over the last 7 years, and the location and date of the fraudulent deed or instrument that was purportedly signed by the plaintiff or purportedly conveys title to the defendant.

The Court invites all interested persons to comment on the proposed amendments, which are below and reproduced in full online at <https://www.floridasupremecourt.org/Case-Information/Rules-Cases-Proposed-Amendments>. All comments must be filed with the Court on or before March 4, 2024, with a certificate of service verifying that a copy has been served on the Committee Chair, Judson Lee Cohen, 14125 N.W. 80th Ave, Suite 400, Miami Lakes, Florida 33016-2350, [jcohen@weinsteincohen.com](mailto:jcohen@weinsteincohen.com), and on the Bar Staff Liaison to the Committee, Heather Savage Telfer, 651 E. Jefferson Street, Tallahassee, Florida 32399-2300, [rules@floridabar.org](mailto:rules@floridabar.org), as well as a separate request for oral argument if the person filing the comment wishes to participate in oral argument, which may be scheduled in this case. The Committee Chair has until March 25, 2024, to file a response to any comments filed with the Court. If filed by an attorney in good standing with The Florida Bar, the comment must be electronically filed via the Florida Courts E-Filing Portal (Portal). If filed by a nonlawyer or a lawyer not licensed to practice in Florida, the comment may be, but is not required to be, filed via the Portal. Any person unable to submit a comment electronically must mail or hand-deliver the originally signed comment to the Florida

Supreme Court, Office of the Clerk, 500 South Duval Street,  
Tallahassee, Florida 32399-1927.

**IN THE SUPREME COURT OF FLORIDA**

**IN RE: AMENDMENTS TO FLORIDA RULES OF CIVIL  
PROCEDURE – 2023 LEGISLATION, CASE NO. SC2023-1677**

**FORM 1.925. COMPLAINT TO QUIET TITLE**

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 (deraigns) 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

\_\_\_\_\_  
E-mail address

(Include signature for each Plaintiff)