

**REQUEST FOR DOCUMENTS  
SCHEDULE "A"**

1. Federal Income Tax Returns for the last four (4) years whether the same be in your name individually or jointly with anyone else, in your possession or under your control, including W-2 Forms.
2. Records reflecting gross income and net income received by you either directly or indirectly since January 1, 1993, to the present, as well as your employee earning records prepared by your employer for the last twelve (12) months.
3. Any and all financial statements prepared within the last four (4) years, in your possession or under your control, whether in your name individually or jointly with anyone else.
4. Any and all of the following items which are in your possession or under your control, whether held individually or jointly with anyone else, or in which you have an interest, or any account in which you have the right to withdraw any funds, whether or not your name appears on said account, during the last four (4) years, involving any financial institutions,
  - a. Including but not limited to the following accounts:
    - (1) Checking Accounts
    - (2) Savings Accounts
    - (3) Certificates of Deposit
    - (4) Money Market Funds
    - (5) Ready Cash Accounts
    - (6) Credit Union Accounts
    - (7) Any other similar accounts.
  - b. All records and documents involving the above accounts, including but not limited to the following:
    - (1) All Monthly Statements
    - (2) All Deposit Slips
    - (3) All Withdrawal Slips
    - (4) All Canceled Checks
    - (5) Check Stubs and Check Registers
    - (6) All Savings Account Books

- (1) All Credit Union Account Books
- (2) Copies of all Certificates of Deposit
- (3) All other similar records.

5. All records, including but not limited to statements and other documents involving any stock ownership in which you either individually or jointly with anyone else (including your spouse) have or had an interest in during the last four (4) years.

6. All Bonds of any description in your possession or under your control, whether in your name individually or jointly with anyone else, for the last four (4) years.

7. All Notes or other securities either in your possession or under your control, whether in your name individually or jointly with anyone else, for the last four (4) years.

8. All records in regard to any security accounts in your possession or under your control, whether in your name individually or jointly with anyone else, for the last four (4) years.

9. All records in regard to any current outstanding obligations upon which you are individually or jointly liable with anyone else, in your possession or under your control, for the last four (4) years.

10. A completed Financial Affidavit required by the Florida Rules of Civil Procedure in the present type action.

11. All cashier's checks, money orders, or certified checks, in your possession or under your control, whether in your name individually or jointly with anyone else.

12. All life insurance policies and all medical, dental and hospitalization policies.

13. All receipts, records of payments, bills, invoices, checks evidencing payments, as well as any other documents, correspondence or memoranda in your possession or under your control involving all credit cards which you might have used within the last year, whether or not the specific charges were authorized or signed by you or by any other party, including but not limited to

the following: Visa, American Express, MasterCard, Diner's Club, all gasoline credit cards, and all department store credit cards.

14. All records and documents in regard to any retirement fund, trust fund, profit sharing plan, pension plan, IRA account, KEOGH plan, or any other similar plan involving you, including but not limited to the following documents:

- a. A copy of all of the plan and trust documents with all amendments, modifications and changes.
- b. Copies of 5500/500-C, 500-B and 5500-SSA, if applicable, for the past four (4) years.
- c. Copy of the trust asset statement as of the most recent plan anniversary.
- d. Copy of the most recent Summary Plan Description.
- e. If there are individual insurance or annuity contracts in force in the plan, a copy of the actual contracts.
- f. If this is a profit sharing or defined contribution plan, a copy of the record of the individual account balance as of the last valuation date.
- g. If this is a defined benefit pension plan, a copy of the latest actuarial valuation specifying cost methods and all actuarial assumptions being used.
- h. If there have been any loans made from the plan, a copy of the Note signed in support of the loan.

15. All records in regard to any real property, either owned or leased, either individually or jointly with anyone else, during the last five (5) years, including the Deed or an accurate copy of the same, all Closing Statements in regard to the purchase or sale of said property and all copies of any Notes and/or Mortgages, as well as all records in regard to any real property during the last four (4) years in which you were involved in the purchase in any way that was placed in someone else's name. Also all records and other documents of any

appraisals or evaluations of any of the above real property, including any appraisals done for ad valorem tax purposes by any governmental body.

16. All records of any person (including but not limited to a detective) who had your spouse or any other person who is or might be involved in this lawsuit under surveillance at any time during your marriage, together with their names, addresses, and telephone numbers. Further, any and all written documents, including reports, memoranda, or documentary evidence of any kind, together with a list of the names and addresses of the person or persons who have possession of the same. Further, any movies, video tapes, and/or recordings of any sort, involving your spouse or any other person who is or might be involved in this lawsuit, taken at any time during your marriage, along with the necessary equipment to listen to or observe or watch the same.

17. All records in regard to any deferred income, deferred salary, and/or deferred commissions.

18. Copies of Estimated Quarterly Income Tax Statements for the current year.

19. Personal property tax returns (intangible) for the last four (4) years.

20. Personal property tax returns (tangible) for the last four (4) years.

21. The most recent Real Estate Tax Notice indicating the assessed values for tax purposes of any and all real property held by you either individually, jointly with any other person or entity, or under your control.

22. Documents of title, including Bills of Sale, for all personal property, owned individually or with other persons, including automobiles, boats, airplanes, furniture, antiques, stamps and coin collections, during the current year and the past five (5) years.

23. All records, inventories and particularly any appraisals of any collections, such as but not limited to coin collections, stamp collections, gem collections, etc.

24. All records, inventories and particularly any appraisals of any gold, silver or platinum in your possession or under your control whether the same be held in your name individually or jointly with anyone else.

25. Schedule of all personal furniture, fixtures, furnishing and equipment owned individually or jointly during the current year and past five (5) years.

26. All records, including notes, mortgages or any other evidence of any security or collateral, in regard to any obligations which are owing to you either individually or jointly with any person, firm or corporation.

27. Any Trust, along with any amendments and modifications thereto, in which you individually or jointly with anyone else have an interest or in which you are a Trustee, along with the most up-to-date financial records in regard to said Trust which list the assets, liabilities and income.

28. All of the following records in regard to any Trust in which you have been a Trustee, Co-Trustee, to-wit:

- a. Records of all accounts in any financial institutions, money market funds, ready cash accounts, or other similar accounts, including monthly statements, deposit slips, withdrawal slips, canceled checks, savings accounts, certificates of deposit, and all other similar records for the last three (3) years.
- b. All financial statements, all annual accountings, all lists of inventories of assets, and Federal and State tax returns involving said Trust for the last three (3) years.

29. Any and all charts, graphs, records, documents, ledgers, drawings, or any other similar items, which have either been prepared by you or prepared by someone else, that you have in your possession or under your control, involving any of the issues involved in this action, including but not limited to any such items indicating the amount of personal expenses or costs incurred by you or your spouse, during the last five (5) years.

30. All records and documents in regard to any disability pension or other income or any other similar plan involving you, including but not limited to the following documents:

- a. A copy of all of the plan and trust documents with all amendments, modifications and changes.

- b. A copy of all documents which you initially signed, as well as any similar documents or amendments thereto involving any disability plan or income.
- c. If there are individual insurance or annuity contracts in force in the plan, a copy of the actual contracts.
- d. A copy of the most recent account balances as of the last valuation date.
- e. If there have been any loans made from the plan, a copy of all documents, including Notes signed in support of the loan.
- f. If you have cashed in, or received any lump sum payment, or any other similar type action involving any disability plan or income, a copy of all documents relating to the same.
- g. A copy of all documents indicating whether you did or did not elect to provide survivor's benefits to any person, as well as any amendments thereto.
- h. All documents evidencing your rights in regard to providing survivor benefits.

31. A copy of all Powers of Attorney or similar instruments involving you or your spouse and any recession, amendments or cancellation of the same.

32. A list setting forth the names and addresses of all persons who were witnesses to or have knowledge or information of any relevant facts relating to this action or who possess proof of the incidents or acts involved, their relationship to you and indicating which were eyewitnesses; all written memoranda and reports and photographs submitted to you or your attorney by any such person; and all tape recording or other evidence prepared from tape recordings made in connection with any wiretapping or other electronic surveillance conducted by you or others on your behalf.

33. A list of the names and addresses of all proposed expert witnesses and copies of all written reports rendered to you or your attorney by any such proposed expert witnesses.

34. Copies of all records concerning any safe deposit box used or maintained by the husband or wife during the current year and the past five (5) years, and all records of the contents of such box(es).
35. Records pertaining to any gifts received by you or your spouse during the marriage (limit to gifts with a value of \$1,000 or more).
36. Records pertaining to any inheritance received by you or your spouse during the marriage.
37. Any appraisal made within the last three (3) years.

**ALL RECORDS WITH REGARD TO YOUR CORPORATIONS, PROFESSIONAL ASSOCIATIONS (P.A.), JOINT VENTURES, AND/OR PARTNERSHIPS**

1. Entire Federal and/or State Income Tax Returns, Form 1065 and Schedule K-1, and Form 1120S and Schedule K-1 for the past five (5) years.
2. Records reflecting gross income and net income for the past five (5) years.
3. All Financial Statements prepared during the past five (5) years.
4. Any and all of the following items which are in your possession or under your control, whether held individually or jointly with anyone else, or in which you have an interest, or any account in which you have the right to withdraw any funds, whether or not your name appears on said account, during the last four (4) years, involving any financial institutions,
  - a. Including but not limited to the following accounts:
    - (1) Checking Accounts
    - (2) Savings Accounts
    - (3) Certificates of Deposit
    - (4) Money Market Funds
    - (5) Ready Cash Accounts

- (6) Credit Union Accounts
  - (7) Any other similar accounts.
- b. All records and documents involving the above accounts, including but not limited to the following:
- (1) All Monthly Statements
  - (2) All Deposit Slips
  - (3) All Withdrawal Slips
  - (4) All Canceled Checks
  - (5) Check Stubs and Check Registers
  - (6) All Savings Account Books
  - (7) All Credit Union Account Books
  - (8) Copies of all Certificates of Deposit
  - (9) All other similar records.
5. All stock certificates, notes or other securities for the past three (3) years.
6. All cashier's checks, money orders and certified checks in your possession or under your control.
7. All life insurance policies or medical, doctor, hospital or dental policies involving you, which are in your possession or under your control.
8. Your expense account or other similar account for the last two (2) years.
9. Books or original entry, including, but not limited to cash receipts and disbursement journal, general ledger accounts receivable and payable ledger.
10. If a corporation, the stock ledger book and the corporate minutes or record book.
11. Any written agreement or other writing setting forth the ownership and organization of the business or professional interest.
12. Contract or agreement for current or future employment.
13. Report of any audit conducted by a governmental agency.
14. Buy-sell agreements.

15. All records for the past three (3) years reflecting the persons or firms which have a stock ownership interest in, or any ownership interest in any of your corporations, professional associations, joint ventures and/or partnerships.

16. All records with regard to any income earned, but as of now, unpaid to you (deferred income, commissions, etc.).

17. All records with regard to any sale in which a commission was taken in some form, such as interest in the property being sold, as opposed to cash, for the past three (3) years.

18. All annual profit and loss statements for the past five (5) years that have been prepared, as well as all monthly and quarterly profit and loss statements that have been prepared since the last annual profit and loss statement.

19. All balance sheets for the past five (5) years that have been prepared, as well as all monthly and quarterly balance sheets that have been prepared since the last annual balance sheet.

20. All cash flow statements for the past three (3) years.

21. All Bonds of any description in your possession or under your control, whether in your name individually or jointly with anyone else, for the past three (3) years.

22. All records with regard to Notes or other securities, as well as all records with regard to security accounts involving any of your corporations, professional associations, joint ventures and/or partnerships.

23. All records and documents in regards to any retirement fund, trust fund, profit sharing plan, pension plan, IRA account, KEOGH plan, or any other similar plan involving you, including but not limited to the following documents:

- a. A copy of all of the plan and trust documents with all amendments, modifications and changes.
- b. Copies of 5500/500-C, 500-B and 5500-SSA, if applicable, for the past four (4) years.

- c. Copy of the trust asset statement as of the most recent plan anniversary.
- d. Copy of the most recent Summary Plan Description.
- e. If there are individual insurance or annuity contracts in force in the plan, a copy of the actual contracts.
- f. If this is a profit sharing or defined contribution plan, a copy of the record of the individual account balance as of the last valuation date.
- g. If this is a defined benefit pension plan, a copy of the latest actuarial valuation specifying cost methods and all actuarial assumptions being used.
- h. If there have been any loans made from the plan, a copy of the Note signed in support of the loan.

24. All records in regards to any real property, either owned or leased, either individually or jointly with anyone else, during the last five (5) years, including the Deed or an accurate copy of the same, all Closing Statements in regards to the purchase or sale of said property and all copies of any Notes and/or Mortgages, as well as all records in regards to any real property during the last four (4) years in which you were involved in the purchase in any way that was placed in someone else's name. Also all records and other documents of any appraisals or evaluations of any of the above real property, including any appraisals done for ad valorem tax purposes by any governmental body.

25. The most recent real estate tax notices indicating the assessed values for tax purposes of any and all real property held by you either individually or jointly with any other person or entity.

26. All Financial Statements which were submitted to any financial institution for any purpose during the last five (5) years.

27. All documents prepared during the last five (5) years appraising any of the corporations, professional associations, joint ventures and/or partnerships in which you are involved, including all projections involving the value of the same in the future.

28. Agreements affecting life insurance proceeds or policies.
29. Written offers to sell the business or professional interest.
30. All business and property insurance policies including schedules and riders.
31. Copies of all sales tax reports filed in the current year and the past five (5) years.
32. Schedule of all business furniture, fixtures, furnishings and equipment owned individually or jointly during the current year and the past five (5) years.
33. Any appraisals involving any of the above entities or any of their assets within the last three (3) years.