

REQUEST TO PRODUCE

Wife, JANE DOE, pursuant to Rule 12.350 of the Florida Family Law Rules of Procedure, serves this demand for production of documents upon Husband, JOHN DOE.

You are required to produce all of the documents requested in the list attached as "Schedule A." Such production is to be made to Ashley Myers, P.A., 1301 Riverplace Boulevard, Suite 2405, Jacksonville, FL 32207, within no more than forty-five (45) days from the date of service hereof.

Schedule "A"

PARTY INFORMATION

1. **Mandatory Disclosures.** All mandatory disclosures pursuant to Rule 12.285 of the Florida Family Rules of Procedure.

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

3. **Financial Affidavit Supporting Documents.** Any documents relied upon by you in preparing your Financial affidavit, not otherwise produced pursuant to this Schedule.

4. **Tax Returns and Information**

A. **Federal Income Tax Returns.** Copies of all returns, including amended 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, as well as your 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.

B. **Partnership Tax Returns.** Copies of all partnership tax returns of any and all partnerships in which you hold an interest.

C. **Corporate Tax Returns.** Form 1120 and copies of all federal and state income tax returns and profit and loss statements for any and all private and closely held corporations, joint ventures, business entities, or other corporations where you have a shareholder's interest of ten percent (10%) of the. issued capital stock or professional associations in which you hold an interest.

D. **Income Records.** Records reflecting gross income and net income received by you either directly or indirectly since the last produced tax return, to the present, as well as your employee earning records prepared by your employer for the last twelve (12) months.

E. **Deferred Income Records.** All records in regard to any deferred income, deferred salary, and/or deferred commissions.

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

G. **Federal Gift Tax Returns.** Copies of all Federal Gift Tax Returns filed by you, and worksheets in connection therewith for the past four (4) years.

H. **Personal Property Tax Returns (intangible).** Copies of all returns filed in Florida or any other jurisdiction for or by you and worksheets in connection therewith, for the last four (4) years.

I. **Personal Property Tax Returns (tangible).** Copies of all returns filed in Florida or any other jurisdiction for or by you and worksheets in connection therewith, for the last four (4) years.

J. **Real Estate Tax Notice.** 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.

K. **Real Estate Taxes.** 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.

5. **Financial Statements.** 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.

6. **Financial Records.** All financial records of the business from inception to the present including, but not limited to:

A. **Financial Statements.** Audited, compiled, or reviewed financial statements, including income statements, balance sheets, profit and loss statements, statements of changes in financial position, or cash flow, including those submitted to any financial institution for any purpose.

B. **Interim Financial Statements.** Any interim financial statements for the most recently ended interim accounting period for which such statements are available, and the comparable financial statements for the corresponding period of the preceding year.

C. **Financial forecasts.** Any copies of financial forecasts or projections prepared either internally or by someone else.

D. **Ledgers.** General ledgers, accounts receivable and accounts payable ledgers and any interim period ledgers through and including the date of production.

E. **Cash Journals.** Cash receipts "day sheets" journals and cash disbursements journals.

F. **Payroll Journals.** All payroll journals.

G. **Repeat and Adjusting Journal Entries.** All repeating journal entries and adjusting journal entries.

H. **Appraisals.** Copies of any appraisals that have been made of the business or of any of its properties or assets, including all projections involving the value of the same in the future.

I. **Employment Agreements.** Copies of employment agreements with officers or other key employees.

J. **Leases.** Copies of all leases in which the business is lessor or lessee.

L. **Broker Statements.** Copies of all broker statements for all brokers.

L. **Credit Cards and Charge Accounts.** Copies of all credit cards and charge accounts held by the business and all statements, receipts, and individual charge slip records received by you in connection with the use of such credit cards and charge accounts, together with a list of all businesses where you are authorized to charge purchases to the account of another person or entity.

M. **Membership Cards.** Membership cards or documents identifying participation rights in any country clubs, private clubs, associations, or fraternal group organizations

7. **Banking Information.** 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. **Accounts.** 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. **Records.** 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.

C. **Checks and Money Orders.** 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.

8. **Investment and Obligation Information.**

A. **Brokerage Account Statements.** All records, including but not limited to statements and other documents involving any stock, bond, mutual fund, and note or security 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.

B. **Bonds.** 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.

C. **Notes or Securities.** All Notes or other securities either in your possession or under your control, whether in your name individually or jointly with anyone else, as well as all records with regard to security accounts involving any of your corporations, professional associations, joint ventures and/or partnerships for the last four (4) years.

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

E. **Obligation Records.** 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.

9. **Insurance Policies.** All insurance policies, including schedules and riders, of the business from inception to the present including, but not limited to:

A. **Life Insurance.** All personal life insurance policies, Life insurance or certificates of insurance currently in existence, whether owned by you or the business and agreements affecting life insurance proceeds or policies.

B. **Medical Insurance.** All medical, dental and hospitalization policies.

C. **Assets.** Copies of all policies of insurance covering any assets of the business including, but not limited to inventory, fixed assets, loss of business, including appraisal reports, inventory lists, and insurance application forms.

D. **Other.** All insurance policies held by you personally, policies obtained by or for the benefit of the business in any way, including, but not limited to all policies of all motor vehicles or boats driven or used by the business, all policies covering in any way casualty, liability, theft, or otherwise, all property including real or personal, all hospital, medical, income, or disability policies.

10. **Monies owed to You/Monies Owed by You.** All Correspondence, promissory notes, contracts, or other writings, or copies thereof, that show or document any monies owed to you or monies that you presently owe or have owed any other person or entity regardless of whether said monies are still due and owing.

11. **Judgments You Hold/Judgments Against You.** Copies of all judgments you presently hold against any other person or entity or which you held against any other person or entity and judgments that have been or are now held by any other person or entity against you, regardless of whether said judgments have been satisfied.

12. **Monies Owed to the Business.** All correspondence, promissory notes, contracts, or other writings or copies thereof, which show or document any monies owed to the business by any other person or entity regardless of whether said monies are still due and owing from the inception of the business to the present.

13. **Monies the Business Owes.** All correspondence, promissory notes, contracts, or other writings or copies thereof, which show or document any monies the business presently owes to any other person or entity or monies the business owed to another person or entity regardless of whether said monies are still due and owing from the inception of the business to the present.

14. **Credit Cards.** 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.

15. **Pension Plans.** 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.

16. **Real Estate.** 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.

17. **Surveillance Records.** 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 or 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.

18. **Personal Property.** 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.

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

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

19. **Mortgages and Notes.** 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.

20. **Fictitious Names.** A list of any and all fictitious names under which you are presently doing business or have been doing business and the states and counties where said names are registered.

21. **Partnership and Joint Venture Agreements.** Any and all agreements to which you have been a party.

22. **Employment Records/Contracts.** All correspondence, documents, statements, contracts, or other writings showing the amounts you have received as salary or dividends from any business that has employed you or in which you have an interest within the last five (5) years, and all employment contracts under which you are performing services and /or merchandise and materials already finished, including a list or description of any oral contracts.

23. **Fringe Benefits.** All records evidencing any benefits available to you from any company that has employed you or business entity in which you have a legal or equitable ownership interest, including, without limitation to auto, travel, entertainment, educational, and personal living expenses.

24. **Legal Services Rendered.** Produce copies of all statements for services rendered to you in connection with these proceedings and copies of all canceled checks in payment of your legal fees in this cause, together with any contract or memoranda setting forth your agreement as to payment of legal fees.

25. **Passport.** Your original passport or passports which you have held in the last four (4) years.

26. **Trusts.**

A. **Documents.** 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.

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

(1) 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.

(2) 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.

27. **Charts, Graphs, etc.** 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.

28. **Disability Pension.** 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 benefits to any person, as well as any amendments thereto.

H. All documents evidencing your rights in regard to providing survivor benefits.

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

30. **Witnesses and Evidence.** 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.

31. **Expert Witnesses.** 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.

32. **Safe Deposit Box.** 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).

33. **Gifts.** 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).

34. **Inheritance.** Records pertaining to any inheritance received by you or your spouse during the marriage.

35. **Appraisals.** Any appraisal made within the last three (3) years.

36. **Diaries, Memorandum, Etc.:** All diaries and/or memorandum or writings in the nature of diaries for the recordation of the time, place, events and/or persons by date and/or time kept by yourself or for and on behalf of yourself for a period of 3 years next preceding the date of production.

37. **Audio, Video, Computer Tapes, Etc.:** Any and all audio, video and computer tapes, photographs, phone messages, records or documents which involve any of the issues in these proceedings not heretofore included above.

38. **Corporations and LLCs:**

A. Certificate of information, Articles of Incorporation, Articles of Organization, LLCs Operating Agreements, Shareholder Agreements, annual reports, stock certificates, minute books, stock ledgers, books of account, bank statements, payroll ledger, sales ledger, cash receipts journal, cash disbursements journal, general ledger, sales invoices, income tax returns, both state and federal, all corporate reports, financial statements, operation statements, profit and loss statements, petty cash vouchers, inventory records, deposit slips, leases, deeds, notes, mortgages, receipts, bills and invoices for credit cards, current as well as those which may have been canceled or closed, for any closely held corporation or LLC in which you have or had ownership interest or are an officer and/or director. Include any items containing all references to loans, advances, salaries, draws, pension plans, IRA, Keogh, and other documents setting forth advances, benefits or contributions to or from you.

B. Include any and all insurance policies on inventory, machinery, property, building and/or keyman insurance.

C. Include any and all books and records showing payments for entertainment, travel, or like expenses.

D. Include any and all quarterly payroll reports submitted to the Internal Revenue Service. Forms 941, 940, and state quarterly payment tax reports, from UTC-6.

E. Include any and all records, books, correspondence, and any and all other evidence pertaining to and of the amount of inventory submitted by management to any accounting firm, and a physical inventory taken by the corporation and provided to any accounting firm.

F. Include any and all expense reports submitted by you or someone on your behalf to the corporation or LLC, and any and all records of reimbursement of expenses made by the corporation, current as well as those which may have been canceled or closed.

G. Any and all deeds to real estate transactions for or on the corporation's or LLC's behalf on your behalf, or in the corporation's name, or LLC's name, or any other fictitious name used by the corporation, including any partnership of which the corporation or LLC is a member, and the same material for any corporation or LLC in which the corporation or LLC has any interest by stock ownership or otherwise, and the same material for any closely held corporation in which the corporation owns any stock or beneficial interest.

H. Also any and all notes, mortgages, or other receivables in which the corporation or any of the above or below stated corporations, partnerships, joint ventures, syndicates, or other entities has any interest.

I. Also any bank books, passbooks, checkbooks, check stubs, deposit slips, canceled checks from all accounts and statements in the name of any of the above stated corporations, professional associations, partnerships, joint ventures, or other entities and any and all other passbooks to any bank account. All savings certificates, certificates of deposit, stocks, bonds, owned by the corporation or any of the above or below described entities in which the corporation or professional association has an interest or in each of the entities.

J. A list of receivables from each of the above or below named entities and any and all evidence of such receivables due and owing.

K. To the extent not previously produced, produce all the books of account used in connection with the operation of the corporation's or professional association's business, including bank statements, payroll records, canceled checks, accounts payable ledger, accounts receivable ledger, appointment logs, books or notes including fees charged and receipts of payment. A schedule of all bank accounts and addresses of each bank and account numbers and the name of the signatory on each of the said bank accounts, maintained by the corporate entities and a listing of all signatures on such bank accounts. Evidence of keyman insurance and the value thereof, and any evidence of income protection insurance for you and the value thereof.

L. To the extent not previously produced, produce all the receipts, vouchers, payments, canceled checks made by the corporation or professional association, whether past

or present, in connection with any investment in stock funds, mutual funds, government bonds, municipal bonds or other stocks, bonds, certificates, current as well as those which may have been canceled or closed.

39. **Airline Statements:** All statements from all airlines received within a period of one year next preceding the date of production, which reflect all frequent flyer miles earned or to which you are entitled from any airline, whether in your individual name, or in the name of any entity from which you have the right to fly on the frequent flyer mileage.

40. **Lawyers, Accountants, Etc.:** With reference to all lawyers, accountants, appraisers and other experts (including their firms) you have retained, hired, used or of whom you have availed yourself for services, directly or indirectly, with reference to these proceedings, all retainer agreements, engagement agreements or contracts, and all statements, bills, invoices and other documents representing services rendered from any of the foregoing lawyers, accountants, appraisers and other experts.

41. **Loan Applications:** Copies of any and all application for credit or loans and all financial statements given to any bank, credit union or lending institution, or issuer of credit cards whether done individually or through any corporation or professional association in which the husband/wife owns 10% or more of the stock and of any financial statements prepared by you or on your behalf within the past three (3) years.

42. **Loans:** Records of any and all loans made to others from you individually, jointly, under an assumed name, or from the corporation or entity, current as well as those which may have been canceled, closed or satisfied. All statements of account, correspondence, promissory notes, contracts or other writings related to this paragraph.

43. **Federal Gift Tax Return:** Copies of all Federal gift tax returns filed for and by you in connection therewith for each of the last three (3) years to date of production.

44. **Health Care Treatment:** All records, documents, or papers reflecting any health care treatment received by you during the immediate past 60 months, specifically including, without limitation, any records relating to mental health care, treatment and/or substance abuse treatment.

45. **Retirement Plan Withdrawals:** All records reflecting or relating to any request by you to obtain any funds from or any cashing in of any retirement plan, tax deferred account or similar account within the past twenty-four (24) months.

46. **Financing:** All records reflecting or relating to any application for or obtaining of any financing by you within the past twenty-four (24) months, including, without limitation, any loan, mortgage, advance, or hypothecation of any type or form.

47. **Removed Items:** Any and all tangible items removed from the marital home without your spouse's written consent and/or removed from your spouse's possession (whether individual or joint) without his/her written consent.

48. **Relevant Documents:** Any and all documents which are relevant in any way to the issues as plead including

- A. Any and all agreements between the parties that you intend to introduce in this action.
- B. Any and all copies made of documents from your spouse's file and records.
- C. Any and all documents removed from your spouse's files and records.
- D. All documents which you intend to introduce at trial.

49. **Documents Relating to Children:** Any and all documents of any type or nature whatsoever which relate to the minor children of the parties which are under the jurisdiction of this Court including, but not limited to the following items:

- A. Report cards;
- B. Parent-teacher conference notes;
- C. Correspondence of any type or nature whatsoever from any school or day care which has been received;
- D. Any document of any type or nature whatsoever relating to the minor children's religious or extra-curricular activities which has been received or is in your possession or control;
- E. Any and all medical reports, correspondence, prescriptions, medical billing information relating to the minor children of the parties;
- F. Any and all psychological reports, correspondence, prescription and billing records or other information relating to the minor children of the parties;
- G. Any and all therapeutic reports, correspondence, billing records or the like relating the minor children of the parties.

50. **Resumes and Job Applications:** Provide copies of any and all resumes and job applications or any other documentation of any type or nature whatsoever regarding any and all attempts you have made obtaining or trying to obtain employment during the past three years.

51. **Telephone Records:** Provide copies of any and all telephone records of any type or nature whatsoever whether billing, records of calls made or received, invoices, correspondence (either to or from your telephone service provider), documents evidencing payment to any telephone service provider you may have, or any other document relating, in any way, to your telephone service in your possession or control for the past two (2) years.

52. **Correspondence:** Any and all correspondence of any type or nature whatsoever including, but not limited to, e-mails, letters, telegrams and the like between you and your spouse written or received within the past five (5) years.

53. **Credit Report:** Your current credit report. Your credit report may be obtained online for free (and is therefore in your possession and control) by contacting the following website: freecreditreport.com

54. **Unique Equities:** If you assert any asset is non marital, pre-marital, or subject to a claim of special equity or unequal distribution, produce all documentation upon which you base such assertion.

55. **Additional Income:** Any and all documents of any type or nature whatsoever which show reimbursed expenses or in kind payments for the past 24 months to the extent they reduce living expenses as paid by either and individual or any business entity for which you are employed or which you have any ownership interest.

56. **Perks:** Any and all evidence of the amount of any annual bonus determined at the end of the corporation's or entity's fiscal year, which fiscal year shall be stated, as well as any and all annual bonuses determined at the entity's or corporation's year end. Any and all evidence of the date that the bonus was determined and/or distributed. Any and all documentation evidencing any loan account, perks, expense accounts, etc., for you individually, or jointly with another person, or for another person on your behalf, including ledgers, books or other records. Any and all documents or evidence relating to any and all payments made or sums expended by you or by someone authorized by you or on your behalf or for your behalf and/or to your children, directly or indirectly.

57. **Business Income:** Any and all documents of any type or nature whatsoever which show your business income from sources such as self-employment, partnership, closed corporations and independent contracts for the past 24 months (business income means gross receipts minus ordinary and necessary expenses required to produce income).

58. **Health Insurance:** Any and all documents of any type or nature, whatsoever that provide an explanation or a breakdown of your health insurance plan. Specifically, information regarding what portion of the total premium paid is for yourself, your spouse, or for minor children.

59. Documentation reflecting each and every entry on your Financial Affidavit.

60. **Other Assets or Liabilities:** All contracts or documents, or other writings which relate to, or show your interest in, any other asset or liability which is not covered by the proceeding requests for production of documents.