

**IN THE CIRCUIT COURT OF THE  
FIFTEENTH JUDICIAL CIRCUIT IN  
AND FOR PALM BEACH COUNTY,  
FLORIDA**  
Family Division  
Case No. 501971 DR004137XXDIFD

**In Re Marriage of  
WILLIAM A. CABANA**  
Petitioner, Former Husband, pro se

and

**SHARON ANN MAYO f/k/a  
SHARON ANN CABANA**  
Respondent/Former Wife.

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FAMILY DIVISION

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**Motion To Compel Former Wife's Full Financial Disclosure  
and Request to Produce**

**COMES NOW WILLIAM A. CABANA**, pro se, respectfully objecting to Former Wife's Financial Affidavit, Certificate of Mandatory Disclosure and Notice of Service of Answers to Standard Family Law Interrogatories for Original or Enforcement Proceedings. In support he offers,

1. On May 5, 2005, Former Husband filed a Motion to Compel Financial Affidavit and Interrogatories.
2. On June 9, 2005, Former Wife filed a First Amended Family Law Financial Affidavit (short form) hereinafter known as Affidavit.
2. On June 23, 2005, Former Wife filed a Certificate with Mandatory Disclosure hereinafter known as Disclosure.

3. On June 23, 2005, Former Wife filed a Notice of Service of Answers to Standard Family Law Interrogatories for Original or Enforcement Proceedings hereinafter known as Answers.

4. On May 16, 2005, Former Husband filed a Notice of Service of Standard Family Law Interrogatories along with 7 questions to be answered by Former Wife hereinafter known as Interrogatories.

5. On June 13, 2005, Former Husband filed a Notice to Produce that delineated a list of documents required for discovery hereinafter known as the List.

4. Former Wife has failed to comply with the applicable rules of discovery and has only submitted a sketchy outline of her financial details and in some cases has omitted them completely.

5. Former wife has failed to produce the following:

a. On the Affidavit, there is no documentation, statements, receipts, etc. to corroborate any of the entries.

b. On the Disclosure, a long form affidavit was required. She sent a short form.

c. On the Disclosure, 1040 tax returns for 2003 and 2004 were not supplied under the excuse that they hadn't been filed yet. No documentation supporting this claim was provided. IRS Tax extension rules only allow for a maximum extension until October 15 of the filing year. The failure to produce 1040's as corroboration of income raises questions about the accuracy and honesty of the financial affidavit.

d. On the Interrogatories, Former Wife indicates no self-employment in the face of the fact that there has been a phone book listing for “Sherry Cleaning” for at least two years. (See Former Husband’s Motion to Deny....Venue, Exhibit K, filed June 9, 2005)

6. On the Notice to Produce List were 3 pages of items required of which none have been submitted to date. These are needed to substantiate figures and statements claimed in the Former Wife’s Financial Affidavit and other financial documents. She has filed a Notice of Compliance before she has fulfilled all the requirements of the applicable rules for said documents and there are still financial records outstanding.

7. Former Husband has filed a recent financial affidavit and complied with all orders of this court to produce financial records indicating his financial status, i.e. he has income below the United States Department of Health and Human Services 2004 poverty income level for a single person.


**WHEREFORE** Former Husband prays that this Honorable Court enter an Order adjudicating Former Wife as follows:

1. Deny all former wife's motions until she submits accurate and complete financial affidavit and records to the Former Husband and this court. .

2. Former Wife’s intent to deliberately misrepresent or hide her true financial status with many erroneous entries represents unclean hands conduct such that her motions must be denied and any claims for attorney fees be denied.

3. Compel Former Wife to comply with the applicable rules of discovery and provide the required documents so this court can accurately determine her financial status.

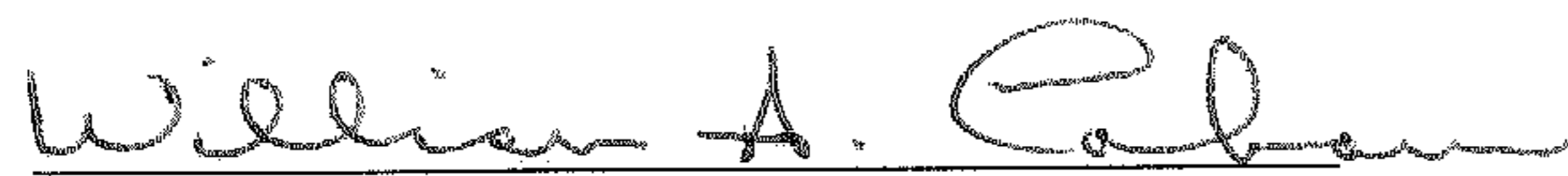
Respectfully submitted,



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Certificate of Service

I certify that a copy of this Motion to Compel Former Wife's Full Financial Disclosure and Request to Produce was mailed to Cathy L. Kamber, P.A., Attorneys for former wife., 1675 Palm Beach Lakes Boulevard, The Forum, Tower A, Suite 700, West Palm Beach, FL 33401 this 30th day of June, 2005



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