

5 MAY 05

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**SHARON R. BOCK**  
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**FAMILY DIVISION**

**IN THE CIRCUIT COURT OF THE  
FIFTEENTH JUDICIAL CIRCUIT IN  
AND FOR PALM BEACH COUNTY,  
FLORIDA**

**Family Division**  
**Case No. 50197 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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**Motion to Object to Notice of Production From Non-Party**

Comes now WILLIAM A. CABANA, pro se, respectfully objecting to Respondent's Notice of Production From Non-Party of financial bank documents. In support he offers,

1. The SouthTrust Bank records requested is for the personal account and sole use of the Petitioner's 88 year old Mother. In addition to the Petitioner's name on the account, is the name of the Mother's sister who resides in Rhode Island. Both Petitioner and Sister are on the account for the sole reason of administering the Mother's account in the event of her death.
2. The Petitioner in no way uses this account for any reason for his personal purposes.
3. Personal financial documents and information are of the utmost privacy to a Floridian.

4. Sharon Mayo request for my personal financial records is a violation of my Florida Constitutional Right of Privacy (Article I Section 23).
5. All assets in my personal financial accounts are the result of my own earnings.
6. All assets in my personal financial accounts are for my personal benefits.
7. The state lacks a compelling state interest to require the Petitioner to disclose personal financial information over 30 years after dissolution of his marriage.
8. The state lacks a compelling state interest to require the Petitioner to disclose personal financial information when a fairly recent financial affidavit on record with this court indicates the Petitioner's 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. The financial affidavit indicates his assets and liabilities and income.

Respectfully submitted,



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Certificate of Service

I certify that a copy of this Motion to Object to Notice of Production From Non-Party 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 5 day of May, 2005

William A. Cabana

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