

19 APR 05

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

IN RE: THE MARRIAGE OF

CASE NO: 501971DR004137XXDIFD

WILLIAM A. CABANA,
Petitioner/Former Husband,

FAMILY DIVISION

and

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

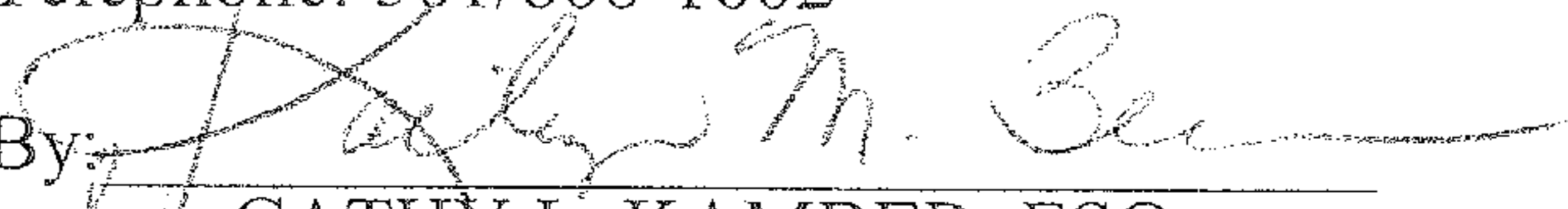
REQUEST TO PRODUCE

COMES NOW the Former Wife, SHARON ANN MAYO, by and through her undersigned counsel, and, pursuant to Rule 1.350 Florida Rules of Civil Procedure, hereby requests the Former Husband, WILLIAM A. CABANA, to produce the following documents at the office of the undersigned, located at 1675 Palm Beach Lakes Blvd., Suite 700, West Palm Beach, FL 33401, within 30 days of the date hereof, for the purpose of inspection and copying:

See List of Documents Attached Hereto

I HEREBY CERTIFY that a true copy of the foregoing was furnished by mail to: Mr. William A. Cabana, Pro Se, 1050 Capri Isles Blvd., #F105, Venice, FL 34292, on the 19th day of April, 2005.

CATHY L. KAMBER, P.A.
Attorneys for Former Wife
1675 Palm Beach Lakes Blvd.
Suite 700
West Palm Beach, FL 33401
Telephone: 561/868-1602

By: 
CATHY L. KAMBER, ESQ.
Florida Bar No. 312819

LIST OF DOCUMENTS

1. Bank statements, cancelled checks, check registers, and all other documents from any and all checking accounts owned by you, in your name alone, or jointly with others, accounts titled in other names but which are held for your benefit and custodial accounts of which you are the custodian or beneficiary, for the last 3 years through the date of actual production. Please have the checks arranged in numerical order, attached to corresponding monthly or quarterly bank statements and divided into groups according to account numbers. The request in this paragraph includes all corporate accounts and partnership accounts in which you have an ownership interest.
2. Statements of account from any savings account, credit union accounts, certificates of deposit or other similar account owned by you, in your name alone, or jointly with others or accounts titled in other names but which are held for your benefit for the last 3 years, through the date of actual production. The request in this paragraph includes all corporate accounts and partnership accounts in which you have an ownership interest.
3. All Federal, State, and other Income Tax Returns, including estimated tax worksheets or filings, W-2 forms, 1099 Forms, K-1 Forms and the like for the past three (3) years for yourself, individually, and for all corporations, partnerships or other entities in which you have an ownership interest, together with all K-1's associated with any partnership interest or Sub-Chapter S corporations and all fiduciary tax returns pertaining to any trust of which you are a beneficiary or grantor for the past three (3) years.
4. Copies of Intangible Personal Property Tax Returns including all schedules for the past three (3) years.
5. Copies of any and all Financial Statements and applications for credit made by you or made on your behalf for any purpose for the past 3 years, together with all Financial Statements, Profit and Loss Statements or Balance Sheets for any partnership, corporation or other entity in which you have an ownership interest, for the same period of time.
6. Any and all documents relating to the acquisition, financing, maintenance or sale concerning any real estate owned by you in your name alone, or jointly with others, or titled in other names, but are held for your benefit, or in which you have any interest. This request pertains to all real estate presently owned and all real estate in which you have had an ownership interest during the past three (3) years. As to any rental real estate, please produce all leases, books, and records regarding same during the past three (3) years.
7. All statements and individual charge slips and invoices for all charge accounts and/or credit accounts in your name or in the name of any corporation or partnership or other entity in which you have an ownership interest for the past 3 years.
8. Any and all personnel records that you have in your possession regarding your present employment, job description and duties, including all agreements on employment.
9. Any and all records and booklets which you may have which contain information as to any retirement program, insurance program, pension plans, compensation agreements or profit sharing plans which may have been provided to you by your present employer in which you are or have been a participant, together with all statements of account for the past 3 years.
10. All stock certificates, bonds or other securities in the name of the husband or wife,

individually or in conjunction with any other person or persons, or which may be held to the account of the husband or wife, individually or in conjunction with any other person or persons or held for the husband's or wife's benefit or in which either has any interest, in any corporation, domestic or foreign, or issued by the federal government or by any state, municipal or other governmental agency for the past three (3) years through the date of your compliance with this request.

11. All books, records, accounts, monthly statements, statements of transactions and all other papers and memoranda of stock brokerage accounts in the name of the husband or wife, individually or in conjunction with any other person or persons, or held for the husband's or the wife's benefit or in which either had any interest for the last three (3) years through the date of actual production.
12. Any and all contracts for the rental and/or lease of safe deposit boxes or vaults for the last three (3) years through the date of actual production.
13. Promissory notes and mortgages to which you are the payee or have been the payee for the past three (3) years.
14. Any and all records, documents, papers and memoranda pertaining to monies received for the past 3 years, through the date of your compliance with this request, from all sources including, but not limited to salaries, wages, drawings, dividends, bonuses, sick pay, pensions or retirement funds, reimbursed expenses, or rental income. This request includes, but is not limited to, all of your payroll stubs and other information furnished to you with regard to your pay for the last 3 years.
15. Any and all policies of insurance covering you, or in which you have any interest, whether as insured, beneficiary or owner, including, but not limited to life, endowment, annuity, theft, liability, health and accident and automobile and all records showing payments for premiums therefore for the past three (3) years through the date of your compliance with this request, including all documents which show the present cash values of all life insurance policies and the loan status upon such policies, if any.
16. Copies of all balance sheets and operating statements of any corporation in which you, during the last three (3) years were or are an owner or holder of more than ten percent (10%) of the outstanding stock.
17. Copies of all balance sheets and operating statements for the past three (3) years through the date of your compliance with this request of any partnership, joint venture or syndicate of which you were or are a partner or member.
18. Copies of all federal corporate income tax returns filed for any corporation of which you are a stockholder of at least ten percent (10%) of the stock for the past three (3) years.
19. All documents pertaining to any and all pension and/or profit sharing plan in which you are now, or have been a participant at any time during the past three (3) years.
20. All books, records, journals, cash receipts ledgers, receipts and disbursements journals for all corporations, partnership or other business entities in which you, during the past three (3) years were, or are, the holder of 10% or more of the outstanding stock.
21. For any entity in which you own more than 10% of the outstanding stock or interest be it partnership or otherwise, all buy-sell agreements regarding the transfer of that ownership interest and all agreements demonstrating the creation of that.

22. Notes and mortgage statements showing current balances. Notes payable and mortgages payable showing current balances and terms of payment.
23. All bills, receipts or other papers or documents to substantiate the expenses which you list upon your Financial Affidavit in this cause.
24. Any and all deeds, title certificates, stocks, bonds and other securities, notes, mortgages, security agreements and all other evidence of ownership of all property, real and personal, tangible and intangible, owned by you, individually and jointly, to the extent not hereinabove set forth.
25. Any and all contracts, agreements and the like, whether employment, purchase or sale, or otherwise, entered into by you, or on your behalf during the last three (3) years.
26. All other papers, documents, letters, correspondence, contracts, reports and writings, pertaining to any matter that is or might be involved in this controversy.
27. All documents specified in Florida Family Law Rules of Procedure 12.285(d)(1)-(17), including the long form of the Financial Affidavit.
28. Any and all retainer agreements and/or bills with counsel regarding the instant matter, as well as any evidence of payments made to said counsel, from you individually, from any one on your behalf, or from a corporation or entity, including, but not limited to, canceled checks, receipts and notes.
29. Any reports or photographs you have received from a detective, investigator, or any other person or business, based upon investigation and/or surveillance of the parties and/or the child(ren). Any recordings or telephone conversations to which the parties and/or the child(en) are a party, and transcripts thereof if they have been transcribed.
30. Complete copies of all bills and/or documents, regarding all telephones, cellular phones, facsimiles, pagers, beepers and the like, showing all numbers dialed, charge and the like, thereon, in which you own, use or have an interest in, for/during the last three years, whether personal or business,
31. All documents and tangible evidence supporting any claim of special equity or nonmarital status of an asset or debt for the time period from the date of acquisition of the asset or debt to the date of production or from the date of marriage, if based on premarital acquisition.
32. Any court orders directing a party to pay or receive spousal or child support.
33. All books or records or accounts maintained on your separate properties, assets and liabilities, including, but not limited to receivable ledgers (including handwritten manual ledgers for all clients) for/during the last three years, whether personal or business.
34. All fictitious name affidavits and registrations filed or caused to be filed by you or in your behalf for any business venture in which you own for yourself or any other person, or have any propriety interest, for/during the last three years, whether personal or business.
35. All computer discs and the like containing the documents/records requested herein, whether personal or business.
36. Any and all records whatsoever evidencing payment of monies by Former Husband,

William A. Cabana, to Sharon Ann Mayo, f/k/a Sharon Ann Cabana, from January 2, 1991 through the present time.