

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 current 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, whether the same be in your name individually or jointly with anyone else, in your possession or under your control, including W-2 Forms, 1099's, and K-1's.
 - 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.
 - 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.
 - G. **Federal Gift Tax Returns.** Copies of all Federal Gift Tax Returns filed by you, and worksheets in connection therewith.
 - 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.

- 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.
 - 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.
5. **Financial Statements.** Any and all financial statements in your possession or under your control, whether in your name individually or jointly with anyone else.
6. **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, 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.

7. **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.
- B. **Bonds.** All Bonds of any description in your possession or under your control, whether in your name individually or jointly with anyone else.
- 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.
- 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.
- 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.

8. **Insurance.**

- A. **Life Insurance.** All life insurance policies.
- B. **Medical Insurance.** All medical, dental and hospitalization policies.
- C. **Other Insurance.** All insurance policies held by, obtained by or for the benefit of you in any way, including but not necessarily limited to all policies of all motor vehicles or boats driven or used by you, all policies covering in any way casualty, liability, theft or otherwise, all property including real or personal, all jewelry floaters, all hospital, medical, income, or disability policies.

9. **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.

10. **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.

11. **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.
12. **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.
 - 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 balances 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.
13. **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.

14. **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.
15. **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.
 - 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.
16. **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.
17. **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.
18. **Partnership and Joint Venture Agreements.** Any and all agreements to which you have been a party.
19. **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, 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.

20. **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.
21. **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.
22. **Passport.** Your original passport or passports
23. **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.
 - (2) All financial statements, all annual accountings, all lists of inventories of assets, and Federal and State tax returns involving said Trust.
24. **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.

25. **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.

26. **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.

27. **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.

28. **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.

29. **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).
30. **Gifts.** Records pertaining to any gifts received by you.
31. **Inheritance.** Records pertaining to any inheritance received by you or your spouse during the marriage.
32. **Appraisals.** Any appraisal made on any property you own or are in control of.
33. Copies of any and all invoices issued by any attorneys that have represented you in this matter, along with copies of all payments made by you payable to said attorneys.

Schedule "B"
BUSINESS RECORDS

1. Tax Returns:

All tax returns of the business, including but not limited to:

- A. All federal corporate income tax returns Forms 1120/1120S, of any and all corporations or LLC's in which you hold an interest. All State income tax returns for any and all corporations, LLC's, in which you hold an interest.
- B. All partnership tax returns form 1065 of any and all partnerships in which you hold an interest.
- C. All copies of IRS Form W-2, W-3 and Form 940.
- D. All federal, state and local payroll returns.
- E. All intangible tax returns.
- F. All tangible property tax returns.
- G. All documents provided to accountant/bookkeeper/tax preparer/CPA for the preparation of any and all tax returns for any and all corporations, LLC's, in which you hold an interest.

2. FINANCIAL RECORDS

All financial records and financial statements of the business, including, but not limited to:

- A. Audited, compiled or reviewed financial statements, including income statements, balance sheets, and profit and loss statements, statements of changes in financial position or cash flow.
- B. 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. Any copies of any financial forecasts or projections prepared either internally or by someone else.
- D. General ledgers, accounts receivable and accounts payable ledgers plus any interim period ledgers through and including the date of production.

- E. Cash receipts "day sheets" journals and cash disbursements journals.
- F. Payroll journals.
- G. Repeating journal entries and adjusting journal entries.
- H. Copies of any appraisals that have been made of the business or of any of its properties or assets.
- I. Copies of employment agreements with officers or other key employees.
- J. Copies of all leases in which the business is lesser or Lessee.
- K. All monthly bank statements check stubs or registers, cancelled checks, and money market account for all banks at which the company does business.
- L. Copies of broker statements from all brokers.
- M. 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 business where you are authorized charge purchases to the account of another person or entity.
- N. Membership cards or documents identifying participation rights in any Country clubs, private clubs, associations and/or fraternal group organizations.
- O. QuickBooks back up disc for all entities or any other computer disc backup for the software utilized by the business to maintain its records.
- P. Articles of Incorporation or organization, bylaws and any amendments to these documents.
- Q. Operating agreement of all any and all corporations, limited liability Companies, partnerships, etc., in which you hold an interest in.
- R. Notes payable and/or notes receivables related to any and all entities in which you hold an interest, including mortgages on all properties.
- S. Commission agreements with agents.
- T. Any and all HUD closing statements.

U. Intercompany agreements.

3. Pension/Profit Sharing Plans

- A. A copy of the plan and trust documents and amendments thereto:
- B. Copies of most recent summary plan description.
- C. Copies of the trust asset statement as of the most recent plan anniversary.
- D. Copies of current profit and loss statement of operations.
- E. Any statements or record of individual account balances as of the last valuation date.
- F. Copies of Forms 5500, 5500C, 5500A, 5500B, 4400SSA, if applicable.
- G. Any documents indicating any loans made from the plan enclosing copies of notes signed in support of the loan.
- H. Copies of any appraisals or actuarial evaluations for any purpose prepared by an actuary, plan administrator or trustee.

4. Printed Materials

Copies of any catalogs or brochures or other sales literature of the business that have been printed published or circulated at any time.

5. Legal Proceeding

Copies of any pleadings, documents or correspondence for any legal proceedings in which the business is currently involved or which have been threatened.

6. Judgments

Copies of any final judgments, settlement agreements or stipulations for settlement for any lawsuit which the business has been involved.

7. Insurance Policies

All insurance policies of the business including but not limited to:

- A. 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 list and insurance application forms.
- B. Life insurance or certificated of life insurance currently in existence, including

any disability insurance currently in existence, whether owned by you or the business.

- C. All insurance policies held by, 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.

8. Assets Inventory

Copies of each and every document or inventory which describes or lists or values assets of the corporation, regardless of whether or not the corporation still owns or controls said asset and or any schedule showing fixed assets and depreciation.

9. Inventory Purchase and Sale

Each bill, receipt or contract for the purchase and sale of inventory and ledger books or journals recording same.

10. Financial Statements

Copies of each and every financial statement provided to a lending institution or other credit application.

11. Monies Owed to the Business

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 money the business owed to another person or entity regardless of whether said monies are still due and owing.

12. 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 money the business owed to another person or entity regardless of whether said monies are still due and owing.

13. Notes

Documents reflecting descriptions or details of financial accounting methods, inventory, taxes, depreciation, bad debt estimates.

14. Valuation Procedure

Copies of the most recent edition of any publication upon which you rely to ascertain the value of the inventory of the business.

15. Deferred Income

Copies of all records regarding any deferred income deferred salary or deferred commissions.

16. Real Property

Copies of all documents regarding real property and the most recent county real estate tax notices which show the assessed values for tax purposes of all real property owned by the business.