

“SCHEDULE A”

<u>Documents to be produced</u>	<u>Produced</u>	<u>Not Produced-Why</u>
<p>1. <u>INCOME TAX.</u> Full, complete and true copies of any and all federal income tax returns, or any and all returns to any other governmental entity levying an income tax on your income, together with any and all accompanying schedules, accounts, and other information submitted, or about to be submitted, to the United States Government or any other governmental authority as party of an income tax return, W-2 forms, and any and all income information for the current year if the return is not yet filed, including evidence of any pre-payment of taxes not yet due.</p>		
<p>2. <u>OTHER TAXES.</u> Full, complete and true copies of any and all gift, tangible or intangible tax returns made to any governmental entity, together with any and all schedules, accounts, and other information submitted on or about to be submitted to any government authority, or as part of a gift, tangible or intangible tax return. Evidence of any pre-payment of taxes not yet due. Copies of any fiduciary income tax returns (Form 1041) with any and all schedules attached, including, but not limited to, schedule 1 for which the corporation or you personally are beneficiary.</p>		
<p>3. <u>CHECKING ACCOUNTS.</u> Any and all canceled checks, checkbook stubs, bank books, monthly bank statements, deposit slips of any bank or banks or savings and loan associations, or savings banks, or financial institutions of whatever nature whatsoever, current as well as those which may have been canceled or closed, held either individually, jointly with any other person or persons, or under an assumed name, or held by anyone on your behalf, in any account of whatever nature in which there was or is the authority to withdraw or deposit. Please have the items arranged in numerical order, attached to the corresponding monthly or quarterly bank statements and divided into groups according to bank account numbers. Please be certain to include the check register for each account.</p>		
<p>4. <u>SAVINGS.</u> All accounts, passbooks, savings accounts, share certificates, or certificates of deposit, however held, individually or jointly with any other person or persons, or under an assumed name, or held by anyone on your behalf, in any account of whatever nature in which there was or is the authority to withdraw or deposit, current as well as those which may have been canceled or closed. Please have the items arranged in numerical order, attached to the corresponding monthly or quarterly bank statements and divided into groups according to bank account numbers.</p>		

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<p>5. ASSET AND INCOME. Any and all books and records with respect to your assets and income. These would include any records whatsoever to which you have access indicating your assets, including security investments, stocks, bonds, mutual funds, and any other form of investments without limitation, stock certificates, statements of account, records of purchase or sale, investment contracts or any other actual evidence of ownership with respect thereto, current as well as those which may have been canceled or closed. Copies of any documents evidencing the income producing nature of assets, such as oil and gas leases, timber leases, grounds leases, or rental contracts. All statements from any employer, debtor, fiduciary, stock broker, or other individual or entity containing records of income, including, but not limited to, interest income, dividend income, salary, perks, bonuses, sick pay, unemployment benefits, expense account, auto benefit, or income from any other source, taxable or exempt, list whether receivables are already received.</p>		
<p>6. TRUSTS AND WILLS. Any and all trust agreements and amendments thereto, wills, codicils, and living wills made by you, or in which you are a trustee or beneficiary or were a trustee or beneficiary which may have been canceled or closed.</p>		
<p>7. FOR ANY AND ALL TRUSTS. Copies of all federal fiduciary income tax returns (Forms 1041) for the trust, including copies of all K-1's which were prepared in connection with those tax returns, showing amounts of taxable income and deductions allocated to the beneficiary. Copies of all Florida intangible tax returns for the trust. Copies of any other state income tax or intangible tax returns for the trust. Copies of any accounting or schedules of assets and distributions prepared by the trustee showing the respective shares of various beneficiaries of the trust including the amounts due and/or distributed to the various beneficiaries. Copies of any real estate tax bills paid by or charged against assets of the trust. Copies of any appraisals of assets held by the trust. A list of all property, whether tangible, intangible or real, over which the trust has control or in which the trust holds any interest. This list should include a description of the type of interest (i.e., securities, mortgages, pensions, annuities, personal property, real property, etc.), the fair market value of each asset, the date of such valuation, the location of the assets, the legal description of any real property, and the date the trust acquired its interest in the property. Copies of any deeds of conveyance to the trustee. Copies of any documents evidencing the income producing nature of assets, such as oil and gas leases, timber leases, ground leases, or rental contracts. Copies of any brokerage account statements or bank statements into which trust assets were deposited and from which trust monies were disbursed. Copies of the tax forms 1099. Copies of all checks and other documentation evidencing any distributions of trust income or other assets to the beneficiary. Copies of any closing statements for any purchase, sales, loans, or other similar transactions between the trustee and the adverse party/beneficiary or any other beneficiary of the trust. Copies of any minutes of any meetings of the trustee, if such exist. Copies of any joint checking accounts, savings accounts or other banking or brokerage account statements which may be co-owned between the trustee and the beneficiary. If any purchases, sales, loans or other similar transactions between the trustee and the adverse party/beneficiary or any other beneficiary of the trust, copies of all promissory notes, contracts, mortgages, or security agreements, if any, between the trustee and the beneficiary. Copies of any amortization schedules for any loans which may be made between the trustee and the beneficiary.</p>		

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<p>8. CORPORATE OR PROFESSIONAL ASSOCIATION. Certificate of information, 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 professional association 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. Include any and all insurance policies on inventory, machinery, property, building and/or keyman insurance. Include any and all books and records showing payments for entertainment, travel, or like expenses. 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. 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. Include any and all expense reports submitted by you or by someone on your behalf to the corporation or professional association, and any and all records of reimbursement of expenses made by the corporation or professional association, current as well as those which may have been canceled or closed. Any and all deeds to real estate transactions for or on the corporation's behalf on your behalf, or in the corporation's name or any other fictitious name used by the corporation or professional association, including any partnership of which the corporation or professional association is a member, and the same material for any corporation or professional association in which the corporation or professional association has an 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. 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. 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. A list of receivables from each of the above or below named entities and any and all evidence of such receivables due and owing.</p>		
<p>9. CORPORATE. 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.</p>		

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<p>10. CORPORATE. All 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.</p>		
<p>11. CREDIT CARDS. Credit card numbers, transaction statements, charge slips and/or bills, and statements of charges for any and all credit cards or charge accounts whether in your name individually, jointly or in another person's name, or under an assumed name or in a corporation's or entity's name over which you have had use or ever had use, or have the ability to use from any credit card user whether paid for by you, by the corporation, or any other person or entity, such as, without limitation, Bank Americard, Visa, American Express, and Mastercard. Please have the items arranged by account, in numerical order and divided into groups.</p>		
<p>12. PARTNERSHIP. The same documents as set forth in paragraph numbers 8, 9, 10 and 11, if any, for any partnership, general or limited, or which you are or were a member.</p>		
<p>13. JOINT VENTURE AND/OR SYNDICATE. The same documents as set forth in paragraph numbers 8, 9, 10 and 11, if any, for any joint venture and/or syndicate of which you are or were a member.</p>		
<p>14. SOLE PROPRIETORSHIP OR OTHER ENTITY. The same documents as set forth in paragraph numbers 8, 9, 10 and 11, if any, if applicable for any sole proprietorship or other entity owned by you totally or in part, past or present.</p>		
<p>15. INSURANCE. Any and all policies of insurance covering you, or your spouse, and/or children of the parties, including, but not limited to, life, homeowners, renters, endowment, annuity, disability, death, keyman, liability, health, accident and automobile, and any and all insurance policies in which you have an interest of any nature. Any documents reflecting any change or request for change in any of the above items or riders or endorsement to date.</p>		
<p>16. EMPLOYMENT. Employment agreements with any person, firm, corporation, or entity by which you are employed or from which you receive any compensation whatsoever, current as well as which may have been canceled or closed, or from which you receive any compensation and/or any buy sell agreements. Any documents reflecting any change or amendment or request for change or amendment.</p>		
<p>17. RETIREMENT. Copies of any pension, IRA, Keough, retirement, or profit sharing or other employee benefit plan, including employee stock option plan, current as well as those which may have been canceled or closed. Include any changes in actuarial tables, and dates of changes. All statements showing extent of interest as of latest statements received, and any disbursements on any account. Any and all documents reflecting any change or amendment or request for change or amendment in any of the items in this paragraph to date.</p>		
<p>18. SAFE DEPOSIT. The key to and the number and location of any safe deposit box to which the corporation has access or you have access individually. Any identification cards or badges necessary to gain access to safe deposit boxes. Any and all documents reflecting any change or amendment or request for change or amendment.</p>		

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<p>19. <u>BROKERAGE</u>. Current or past statements of account with any brokerage houses, corporate, personal, partnership, or for any entity.</p>		
<p>20. <u>FINANCIAL STATEMENTS AND LOAN APPLICATIONS</u>. Full, complete, and true copies of any and all financial statements, loan applications, applications for credit, or documents of the like or similar nature submitted to any financial or lending institutions, either individually, or jointly with someone else, or under an assumed name or made by the corporation, or other entity, whether prepared externally or internally.</p>		
<p>21. <u>INVESTMENTS</u>. With respect to investment in real estate funds made by the corporation or professional association or you personally as well as any other investments of any nature whatsoever in which you, the corporation or entity may have, please produce copies of any limited or general partnership agreements, copies of any other documentary evidence memorializing the statements, balance sheets, profit and loss statements, income and expense statements, tax returns, other books, records or documents showing the current financial status of a particular investment.</p>		
<p>22. <u>LOANS</u>. 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.</p>		
<p>23. <u>ATTORNEY'S FEES</u>. Any and all retainer agreements with present counsel regarding the instant matter, as well as any and all statements for services rendered, evidence of payments made to said counsel, from you individually, from any one on your behalf, from the corporation or entity, including, but not limited to, canceled checks, receipts and notes.</p>		
<p>24. <u>PERKS</u>. 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.</p>		
<p>25. <u>RECEIVABLES</u>. All books and records reflecting the names, addresses or persons who owe you or any entity money, and the amounts thereof, and the dates of such indebtedness, or the nature thereof, current or those which may have been canceled or closed or satisfied. Copies of all contracts on which you or your corporation or entity are now performing services or rendering materials or upon which someone is indebted to you for services or materials already furnished. Any and all documents reflecting any change or amendment or request for change of amendment.</p>		

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<p>26. <u>TITLES.</u> Title certificates, registration certificates, and any and all documents reflecting any and all chattel mortgages or any other encumbrances upon automobiles, airplanes, and/or boats and/or other vehicles owned by you individually, or in which you presently have an interest, held by someone on your behalf, in an assumed name, by and entity, or by a corporation. Any and all insurance policies in connection therewith.</p>		
<p>27. <u>PETS.</u> Any and all documents reflecting pet and animal ownership and any and all documents reflecting expenditures for same.</p>		
<p>28. <u>MEMBERSHIPS AND CONTRIBUTIONS.</u> Any and all records of any memberships in and/or contribution to any charity or any other organization or association, including private or professional clubs or associations, either from you individually, or by someone on your behalf or by an entity, or by the corporation.</p>		
<p>29. <u>PERSONAL PROPERTY.</u> Schedule of any and all personal furniture, fixtures, furnishings, jewelry, equipment or tools owned individually by you or jointly with another person or held for you on your behalf indicating whether they are currently owned or owned in the past. Copies of all written inventories, appraisals, lists and/or descriptions.</p>		
<p>30. <u>PLEADINGS.</u> Any and all documents, books, memos, records and any and all other papers in the possession of you or in control of you, or any of your employees, agents or attorneys which in any way show, or support the allegations contained in your pleading or financial affidavit before the Court.</p>		
<p>31. <u>POWER OF ATTORNEY.</u> Any power of attorney which has been given to you or by you.</p>		
<p>32. <u>JUDGMENTS.</u> Copies of all judgments which you presently hold against any person or entity or which you hold against any other person, regardless of whether said judgments have been satisfied during the past five (5) years to date hereof. Copies of all judgments which have been or are now held by any other person or entity against you, regardless of whether they have been satisfied, during the past five (5) years to date hereof.</p>		
<p>33. <u>INVESTIGATIONS.</u> Any reports or photographs you have received from a detective, investigator or any other person based upon surveillance of your spouse. Any recordings or telephone conversations to which your spouse is a party, and transcripts thereof if they have been transcribed.</p>		

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<p>34. REAL PROPERTY. Any and all records, deeds, or other instrument creating your interest in any real estate or entity in which you own any interest or did own any interest whatsoever to the date hereof. Notes, mortgages, and papers whether the same reflect asset or liability, current as well as those which may have been closed or canceled. The originals or copies of all real estate tax bills and paid tax receipts for any and all real property which you presently own or have any interest in, either individually, or jointly with some other person, wherever located, or that you have owned or had any interest in within the past five (5) years to date hereof. All real property, homestead exemption receipts, title insurance policies, bills of sale, mortgages, promissory notes, deposit receipt contracts, and all closing statements in regard to the sale or purchase of any real or personal property which you bought or sole within the last five (5) years to date hereof. A schedule of all interest, personal or real property, foreign or domestic, in respect of which you or any entity have transferred, deeded or conveyed away any interest of any kind or nature. Any appraisal reports which you have received for any realty in which you have held any interest in.</p>		
<p>35. TELEPHONE. All telephone bills, or copies thereof, showing the date, place, telephone number, and amount charged for long distance telephone calls made by you, whether from your marital residence, present residence, or place of business, during the past two (2) years to date hereof. Any telephone book or address books or a combination of both, kept and maintained by you, your agents, servants or employees.</p>		
<p>36. OTHER CHECKS. All receipts and stubs for each and every money order, bank check, cashier's check, certified check, and American Express or other Traveler's check, or the like, which you purchased or were the remitter of during the last five (5) years to date.</p>		
<p>37. 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.</p>		
<p>38. CONTRACTS. All employment contracts, purchase or sale contracts, real and personal, and all other contracts, agreements and the like, entered into by you during the last three (3) years.</p>		
<p>39. FINANCIAL AFFIDAVIT. The Financial affidavit required by Family Law Form 12.901 (e) of Rule 12.285 of the Florida Family Law Rules.</p>		
<p>40. COMPUTER INFORMATION: Any and all information in this request to produce together with the name of any software required to access said computerized data to be produced by transferring said data/information to a disk formatted in Word Perfect.</p>		