

**IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA
FAMILY DIVISION**

IN RE:

Case No.:

Division:

and

_____ /

REQUEST FOR PRODUCTION

The _____, by and through the undersigned attorney and in accordance with Rule 12.285, Fla. Fam. L. R. P., and Rule 1.350, Fla. R. Civ. P., requests the _____, to produce at the Law Firm of Sanchez & Associates, P.A. 1006 N. Armenia Ave., Tampa, FL 33607., within thirty (30) days the documents and things as described in Attachment "A".

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the _____, a true and correct copy of the foregoing was e-mailed mailed, faxed, or hand delivered to:

NILO J. SANCHEZ, JR., ESQUIRE
Florida Bar No.: 991521
SANCHEZ & ASSOCIATES, P.A.
1006 N. Armenia Avenue
Tampa, FL 33607
Phone (813) 879-4600/ Fax (813) 879-4650
nilo.sanchez@sanchezandassociates.org
Attorney for

ATTACHMENT "A"

1. Copies of the federal and state income tax returns filed by you, together with accompanying work sheets including W-2 forms; copies of federal and state income tax returns and profit and loss statements for any and all corporations, joint ventures, partnerships or other corporation or business associations in which you hold an interest, during the past three (3) years and up to the date of compliance with this Request to Produce.

2. All records indicating any and all income received by you from any and all sources, for the last three (3) years and up to date of compliance with this Request to Produce.

3. All employment information, including without limitation, wages, salaries, bonuses, stock options, commission earnings, income, employment contracts, pay raises, promotions, payroll deductions, other deductions of any kind which are, were previously, or which may be in the future paid, available, accepted, rejected, credited, offered, withheld for any purpose by any individual, agency, department, company, or otherwise, or to which you are, were or may become entitled in the future at any time, which you now have or which have accrued to you during the past three (3) years up to the date of compliance with this Request to Produce.

4. Records that relate to any secured or unsecured personal loan made to you during the last three (3) years next before the date of compliance with this Request to Produce, whether from a member of your family, a banking institution or any individual or entity.

5. All savings account, credit union or other passbooks of yours, including those held by you in your name or in your name jointly with any person or entity, or in your name as trustee for any other person, during the last three (3) years next before the date of compliance with this Request to Produce.

6. All checking accounts in your name individually, with another, as trustee or guardian, or in which you may have an interest, including checkbooks or checks (regardless of whether or not the accounts have been closed) for the last three (3) years up to the date of compliance with this Request to Produce.

7. All records pertaining to real estate in which you have acquired or may have acquired an interest during the period of your marriage, including any leases or mortgages relating thereto (including monthly payments and present outstanding balance of principal and interest) together with any evidence showing all contributions in cash or otherwise made by you to the acquisition of such real estate.

8. Copies of all sales agreements and/or options for any real estate owned by you and those held by you in your name, or in your name jointly with any other person, or in your name in trust, or in your name as guardian for any other person.

9. Copies of any and all brokerage account statements or securities owned by you individually, jointly with any person or entity, or as trustee, guardian or custodian during the last three (3) years next before compliance with this Request to Produce.

10. All records pertaining to the acquisition, transfer and sale of all securities during the last three (3) years next before compliance with this Request to Produce, such records to include any and all information relative to gains or losses realized from transactions involving such securities.

11. Copies of any and all securities and investments owned by you and not reflected in any brokerage account records or statements.

12. All records indicating all interest of any kind held by you in any and all corporations (foreign and domestic) or any other entities not evidenced by certificates or other instruments.

13. All records pertaining to stock options in any corporation or other entity, exercised or not yet exercised.

14. Copies of all mortgages, notes receivable or other evidence of debts due you individually, or otherwise, executed or payable for the last three (3) years next before compliance with this Request to Produce.

15. All records of all estates of decedents from which benefits have been received, are being received or will be received by you, whether such trusts are revocable or irrevocable.

16. All records of all estates of decedents from which you have received, are receiving or will receive any inheritance in either personal property, real property, assets, in trust or otherwise or monetary assets of any kind since the date of your marriage.

17. Copies of all financial statements, balance sheets and income statements received by you with respect to any and all proprietorships, joint ventures, partnerships, realty trusts, corporation or other legal entities in which you hold a legal or equitable ownership interest, individually or otherwise, during the last three (3) years next before compliance with this Request to Produce.

18. Copies of all partnership and/or joint venture agreements in which you are a party.

19. Copies of declarations of trust, and minute books for all trusts, to which you are a party.

20. Copies of all corporate records (articles of organization, by-laws and minute books) for every corporation in which you have a legal or equitable ownership interest.

21. All books and records for the last three (3) years up to the date of compliance with this Request to Produce, showing any fringe benefits available to you from any business entity in which you have a legal or equitable ownership interest, including without limitation, auto expenses, travel expenses, personal living and entertainment expenses, life insurance, bonuses, health, accident and hospital insurance.

22. All records and statements pertaining to any interest which you may have in any pension, retirement or profit sharing plans, including copies of the plans. If there is a claim that any asset is non-marital or for special equity provide statements indicating value of asset as of the date of marriage and the date of filing of the action.

23. Copies of all loan applications and statements of loan accounts for all loans applied for by you, whether or not taken or approved during the last three (3) years next before compliance with this Request to Produce.

24. Copies of any and all personal financial statements prepared by you, an accountant or any other person for you or for any business in which you have or had an interest during the last three (3) years next before compliance with this Request to Produce.

25. Any and all records pertaining to or being evidence of any current outstanding indebtedness, including any suits now pending or previously pending in any court whatsoever and all cases resolved without litigation or presently being negotiated.

26. Any and all documents, memoranda or writing relating to any interest you may have in real estate, whether as owner, co-owner, fiduciary trust beneficiary (vested or contingent), partner, limited partner, shareholder, joint venturer, mortgagee, developer, manager or otherwise.

27. Copies of all trusts in which you may have a present or contingent interest, including the certificates, if any, indicating such interests, together with copies of all statements, receipts, disbursements, investments and other transactions during the last three (3) years before compliance with this Request to Produce.

28. Copies of all real estate mortgages held by you, or by any entity (including but not limited to realty trusts, partnerships or corporations) in which you have or had a present or contingent interest during the last three (3) years next before the date of compliance with this Request to Produce.

29. Life insurance policies or certificates of life insurance currently in existence insuring the life of any other person in which you are an owner or are named as either primary or contingent beneficiary.

30. All credit cards and charge accounts held by you and all statements and receipts received by you in connection with the use of such credit cards and charge accounts during the last three (3) years before the date of compliance with this Request to Produce, together with a list of all businesses where you are authorized to charge purchases to the account of another person or entity.

31. A list of all household furniture, furnishings and antiques owned by you individually or jointly with any other person or entity; such list to include the purchase price of such item, the source of the funds used to purchase each item, and the current fair market value of each item. If no appraisal figures are available, include your opinion of the fair market value.

32. All registrations to motor vehicles currently owned or being used by you.

33. All records pertaining to the transfer by sale or gift or otherwise of any personal property by you during the last three (3) years next before the date of compliance with this Request to Produce.

34. All records pertaining to gifts of any kind made by you to any person, firm, trust, corporation or other entity during the last three (3) years next before the date of compliance with this Request to Produce.

35. A list of all gifts received by you from any person or entity of a cost or value in excess of \$300.00 and include the amount and date of each such gift from the period covering the last three (3) years next before the date of compliance of this Request to Produce.

36. All ledgers, books, accounts, cash receipt journals, accounts receivable, accounts payable and all other accounts kept, maintained by you (or under your supervision and directions) in connection with any business or businesses which you own or have an interest in during the last three (3) years next before the date of compliance with this Request to Produce.

37. Any and all books, receipts, records, checks or other tangible evidence of charitable donations made by you or on your behalf during the last three (3) years next before the date of compliance with this Request to Produce.

38. All employment records pertaining to persons employed by you during the last three (3) years next before the date of compliance with this Request to Produce, including, without limitation, the names and addresses of each such employee, the amount paid to each employee, the date of each payment and the nature of the services performed by each employee.

39. 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 recordings 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.

40. A list of the names and addresses of any and all proposed expert witnesses; and certified copies of all written reports rendered to you or your attorney by any such proposed expert witnesses.

41. Copies of any and all wills and trusts in effect at the time of the date of marriage, and/or which have been prepared by you, or on your behalf, since the date of marriage to present.

42. Copies of any and all wills of a decedent and/or trust wherein you are named, and/or wherein you are given any beneficial interest, and/or wherein you are named as Trustee and/or Executor, including but not limited to the wills and/or trust of your parents and/or close relatives, where the people are deceased and the probate of the estate is not complete and the estate is not closed.

43. All records pertaining to any account or accounts of every kind and nature wheresoever in which you have deposited certificates of deposit during the last three (3) years next before the date of compliance with this Request to Produce and *which* is not being produced under other paragraphs of this Request to Produce.

44. Copies of all records of all transactions involving assets of any kind, including without limitation, stocks, bonds, real and personal property of whatever nature and kind and wherever situated held by others for your benefit during the last three (3) years next before the date of compliance with this Request to Produce.

45. Copy of Warranty Deeds or other types of documents showing your purchase of the home in which you are presently residing.

46. Any and all business records for the last three (3) years, together with all credit cards, credit card slips, credit vouchers, etc., car titles, boat titles, titles to miscellaneous vehicles, income tax returns, tax returns to other states, and all other documents pertaining or applicable to business records.

47. Any and all records evidencing attorney's fees, costs, expert fees, and suit money incurred and/or paid to date by you, or on your behalf, in connection with this litigation.