IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT
DU PAGE COUNTY – WHEATON, ILLINOIS

IN RE THE MARRIAGE OF:

XXXX XXXXX,
Petitioner,

and

XXXX XXXXX,
Respondent.

Case No. 20XX D XXXX

NOTICE TO PRODUCE

TO: Opposing Counsel
Address
Address
Email Address

Pursuant to Supreme Court Rule 214, you are hereby requested to produce within twenty-eight (28) days from the date hereof, the following documents for examination and reproduction at the law offices of KULERSKI & CORNELISON, 1s660 Midwest Road, Suite 320, Oakbrook Terrace, IL 60181, the following: SEE ATTACHED RIDER.

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KULERSKI & CORNELISON

CERTIFICATE OF DELIVERY

Pursuant to Ill. S. Ct. Rule 12, a copy of this Notice to Produce was served to whom it is directed by mailing the same in the U.S. Mail at Oakbrook Terrace, IL, proper postage prepaid, on _____________2019, before the hour of 5:00 p.m. and via email to: ____________________.

____
J. RICHARD KULERSKI

KULERSKI & CORNELISON
Attorney for Petitioner
1s660 Midwest Road, Suite 320
Oakbrook Terrace, IL 60181
(630) 928-0600
staff@illinoislegal.com

RIDER

1. **Your principal business or income-producing activity:**
If you are an officer and/or principal stockholder in a closely held corporation, or if you own or operate a business as sole proprietor, a partner or a joint venture, or if you drive a significant part of your earned income from a single business activity, please provide the following, where applicable:

> partnership agreement(s), joint venture agreement(s), or stockholders agreement(s); corporate minute book; fictitious name statements; general ledger and journals; documents evidencing your capital or other monetary contributions thereto; documents evidencing your receipt of funds therefrom in the last three (3) years to date whether by way of salary, bonus, draw, dividend, allocations or profits or otherwise, including contributions to profit sharing or retirement plans; appraisals of your interest in each said entity, made at any time in the last three (3) years to date; appraisals of the value of said entity, made at any time in the last three (3) years to date; all financial statements prepared by or for each said entity in the last three (3) years, including profit and loss statements, balance sheets, statements of net worth and retained earnings; annual reports to stockholders, investors or partners; written offer by any person or entity to purchase all of a part of said business, made within the last three (3) years to date.

2. **Salary or regular monthly compensation:** To the extent not covered in the preceding request, please provide copies of your monthly paycheck stubs, indicating gross monthly pay, deductions, and net pay, from the last three (3) years to date.

3. **Personal tax returns:** Please provide complete copies of the last three (3) Federal and State personal income tax returns filed by you and/or your spouse, including W-2 and/or 1099 forms and all schedules.

4. **Business tax returns:** Please provide complete copies of the last three (3) Federal and State tax returns filed by your business.

5. **Personal financial statements:** Please provide copies of each personal financial statement prepared by or for you within the last three (3) calendar years, whether or not submitted to any bank, savings and loan, or any other financial institution.

6. **Asset Documents:** All records and other documentation of assets which are in possession of another person or entity in which Petitioner has an interest and all records and other documentation of assets to whom an interest of Petitioner was sold, transferred, assigned or pledged from the last three (3) years to date

7. **Retirement plan interest:** Please provide copies of the following:

(a) Retirement plan;

(b) "Summary Plan Description";

(c) Participant's annual retirement plan statements, provided to you, from the last three (3) years to date;

(d) Actuarial valuation or benefits statement of your retirement plan interests, calculated at any time within the last three (3) years to date;

(e) Profit sharing plan;

(f) "Summary Plan Description";

(g) Participant's annual profit sharing plan statements, provided to you, from the last three (3) years to date; and

(h) Actuarial or accountants' valuation or benefits statement of your profit sharing plan interests, calculated at any time within the last three (3) years to date.

8. **Interest in partnership:** For each interest you and/or your spouse have in a partnership, please provide the following:

partnership agreement(s) and amendments, revisions or additions thereto; last three (3) partnership income tax returns filed; last three (3) K-1 income tax forms filed and/or received; promissory notes; appraisals of value of your interest in said partnership, or of value of partnership as a whole or of its underlying assets, made within the last three (3) years to date; any correspondence or other writings evidencing the value of the partnership, its underlying assets, or of your interest therein at any time within the last three (3) years.

9. **Interest in corporations and stocks:** For each interest you and/or your spouse have in stock in closely held corporation, or in stock which is not traded over the counter or on an exchange, please provide the following; copies of all such stock certificates; correspondence from any person or entity which places a value on share of said stock, or which contains information which could lead to a valuation of said shares.

10. **Stocks and bonds:** For each account maintained by you and/or your spouse with a brokerage or securities firm with the last three (3): please furnish monthly account statements from the last three (3) years to date, and copies of all stock certificates or other documents evidencing ownership which contain your name, or your spouse's name as an owner of securities.

11. **Certificate of deposit and similar instruments:** For each certificate of deposit, time deposit, and money market fund shares, and similar instrument owned by you and/or your souse, please provide a copy of each document evidencing your interest in said instrument, the amount invested, maturity date, and rate of interest.

12. **Checking account:** For each checking account currently maintained by you and/or your spouse, or in which you and/or your spouse have (or have had) an interest in the last three (3) years, please provide the following: monthly bank statements, canceled checks, check registers, and duplicate deposit slips, from the last three (3) years to date.

13. **Savings account:** For each savings account in which you and/or your spouse have deposited money in the last three (3) years, please furnish the passbook for each said account.

14. **Safety deposit boxes:** For each safety deposit box in which you and/or your spouse have had an interest in the last three (3) years, please provide all writing, correspondence, or other documents evidencing your ownership, rental or interest, in each said box, and the contents therein.

15. **The principal marital residence:** Deed(s) of Trust; promissory note(s); escrow documents; tax bills from the last three (3) years; documents listing improvements (or value of same) from the date of purchase to the present date.

16. **Other Real Property:** For each other parcel or real property, whether improved or unimproved, which is owned wholly, fully or in part by you and/or your spouse or in which you and/or your spouse have any option or other interest, please provide the following: deeds, promissory notes, escrow documents; purchase documents; financing documents; tax bills for the last six (6) years to date; documents listing improvements (or value of same), from the date of purchase to the present date; appraisals of value made at any time within the last three (3) years to date.

17. **Jewelry, antiques, personal property of value not previously listed** (Please provide the following):

> insurance or third party appraisals of any of the above; copies of insurance policies listing the above for which coverage was provided; any other documents listing and/or valuing the above.

18. **Furniture and furnishings at the principal marital residence:** List of same submitted for insurance purposes; appraisals of value; documents indicating source of funds or date of purchase.

19. **Real property leases:** For each parcel of real property which you and/or your spouse lease, whether for personal or business purposes, please provide copies of each such lease.

20. **Automobiles and other vehicles:** For each automobile, motorcraft, motorcycle or other vehicle owned, in whole or in part, by you and/or your spouse, please provide the following: current Department of Motor Vehicle registration card; purchase documents, financing documents; and appraisals.

21. **Country club or social club memberships:** For each said membership, please provide the following: documents evidencing membership; purchase price of membership; annual dues and other assessments; value of membership or transfer price; appraisal or membership interest.

22. **Life and medical insurance:** For each policy of life or medical insurance in which you and/or your spouse is the named owner or beneficiary, or in which you, your spouse or your employer pay all or part of the premium please provide a copy of each said policy and any cash surrender value documentation.

23. **Unsecured debts and obligations:** For each debt or obligation (unsecured by real property) which is owned by you and/or your spouse to any third person or entity, please provide all writings, correspondence, billings, notices or other documents evidencing said debt or obligation, the date incurred, date due and payable, nature of said debt or obligation, defenses to payment or liability thereon.

24. **Charge card accounts:** All charge or credit card and transaction statements from accounts maintained in Respondent's name, individually or with any other person, or on which Petitioner presently has or previously had charge privileges for any corporation, partnership, or other entity at any time from the last three (3) years to date of production, including but not limited to the name of the charge card company, the account number and the outstanding balance.

25. **Pre-marriage written agreements:** If you and your spouse entered into any written pre-marriage agreement, or if same was drafted but not signed, please provide: a copy of each such document; correspondence between you and your spouse concerning same; correspondence between yourself and your attorney, accountant or other person concerning same; any other writings referring to same, made at any time.

26. **Written agreements affecting property acquired during marriage:** If you and your spouse entered into any written agreement, or if such was drafted but not signed, which affected or affects the character of property acquired during the marriage, either by transmuting separate property into community property, or vice versa, please provide: a copy of each such documents; correspondence between you and your spouse concerning same; any other writings referring to same, made at any time.

27. **Bank accounts in foreign countries:** For each bank account held by you and/or your spouse, or by a person in your behalf, please provide all statements of account for the last six (6) years, all passbooks for the last three (3) years, and any other documentation relating thereto.

28. **Contracts:** For each contract entered into between you or anyone representing you or in which you have any interest, please provide a copy of that contract and any statement of accounts or payments due on these contracts.

29. **Trust:** For each trust of which you are a settlor, grantee or beneficiary, please provide all statements of condition and statements of trust corpus, together with any and all trust documents covering any such trust from its inception to the present.

30. **Monthly expenses:** Any and all documentation including but not limited to: paid bills, receipts evidencing payment, records of outstanding debts, and canceled checks relative to all monthly expenses incurred by you on behalf of yourself or your children relating to rent, mortgage payments, real estate taxes, homeowner's insurance, telephone charges, electricity charges, heating or other utility gas charges, automobile expenses, clothing expenses, medical and dental expenses, educational expenses, water,

refuse, child care, maid laundry, dry cleaning, and any other living expenses within the past twenty-four (24) months.

31. **Medical reports:** Any and all medical reports supporting your contention, if any, that you presently are having or have had in the past, a medical problem, evidence of medication taken and documented evidence of physical limitations, disabilities or serious illnesses as a result thereof.

32. **Inheritance:** Any and all documentation evidencing your receipt of inheritance at any time during the marriage, and disposition of said inheritance.

33. **Affidavit of Completeness:** An affidavit pursuant to Supreme Court Rule 214 signed under oath by Petitioner stating that his production of documents is completed in accordance with this request for production of documents.

This notice shall be deemed to be continuing so as to require supplemental production of documents from this date until the date of production is completed and thereafter as additional documents become available.

AFFIDAVIT OF COMPLIANCE

MARIA J. WIBERT, being duly sworn on oath, states that the foregoing itemized production that accompanies this affidavit is complete, to the best of her information and belief, as of this the _____ day of _______________, 2019; however, the investigation is continuing, and the production will be supplemented, as is necessary.

____
MARIA J. WIBERT

SUBSCRIBED and SWORN to before me

this _____ day of _______________, 2019.

____
Notary Public