

**IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
FAMILY LAW DIVISION**

IN RE: The Marriage of:
MONICA CARDONE
Petitioner/Wife

CASE NO.: 20-9807-FD
DIVISION: 25

and

GARY CARDONE
Respondent/Husband

CARDONE SOLUTIONS AND
TECHNOLOGY, LLC
Corporate Defendant

WIFE'S AMENDED MOTION FOR ORDER PRESERVING MARITAL ASSETS

COMES NOW, the Petitioner/Wife, MONICA EATON CARDONE, by and through her undersigned attorney, and files this Amended Motion for Order Preserving Marital Assets and in support thereof states as follows:

1. The parties were married on October 10, 2006, in Pinellas County, Florida.
2. On December 15, 2020, Wife filed her Petition for Dissolution of Marriage.

Husband's Misappropriation of Marital Assets

3. During the parties' marriage, Husband acquired a five percent (5%) membership interest in AP&G Holdings, LLC (the "AP&G Stock"). The AP&G Stock is a marital asset, and this is not in dispute.

4. The AP&G Stock has consistently paid the parties very substantial periodic distributions. These distributions have always been and continue to be regular and recurring passive marital income.

5. In 2018, the parties received over \$4,000,000 in distribution income from the

AP&G Stock.

6. In 2019, the parties received over \$3,000,000 in distribution income from the AP&G Stock.

7. In 2020, the parties received over \$2,100,000 in distribution income from the AP&G Stock.

8. In 2021, the AP&G Stock generated over \$2,300,000 in distribution income.

9. In just the first two months of 2022, the AP&G Stock generated almost \$1,800,000 in distribution income.

10. Prior to the Wife's commencement of this action in December 2020, all distribution income from the AP&G Stock was deposited into the parties' joint money market account at SunTrust Bank ending in ...9724 (the "9724 Account"). This distribution income was used to pay the parties' living expenses, among other things, and was always shared by the parties for the benefit of the family.

11. Within two months of the filing of this action, beginning with the February 5, 2022 AP&G Stock distribution, Husband directed all of the distribution income received from AP&G to a Truist Bank account in his sole name and under his sole control (the "Truist Account"). Since directing 100% of the AP&G income to himself, Husband has spent or otherwise disposed of this marital income as he pleases and without consulting Wife or obtaining her consent in any way.

12. At his deposition on August 18, 2022, Husband confirmed that the parties relied on the AP&G distributions to fund their lifestyles. Specifically, he testified that the AP&G distributions have "been fueling this company and the family for many, many years." (Transcript of Gary Cardone's Deposition Testimony (relevant pages only), dated August 18, 2022, attached hereto as **Composite Exhibit A**, at p. 130, lines 14-16).

13. Since February 5, 2021, however, Husband has caused more than \$3,600,000 in AP&G distributions to be deposited into his individual Truist Account, which as of the filing of this Amended Motion, remains under his sole and absolute control. During the same time period – February 5, 2021 to the present - Husband has not permitted Wife to use or access any portion of the AP&G Stock distributions that he placed under his control.

14. At his deposition, Husband provided false and misleading testimony concerning the parties' historical treatment of the AP&G Stock distributions. This false and misleading testimony will be presented to the Court at the hearing on this Motion, along with the overwhelming and indisputable evidence that refutes it. This testimony, alone, is sufficient to merit the relief requested in this Amended Motion.

15. Husband has engaged in more than one misleading act during the discovery process in order to conceal his unilateral use, and likely waste, of the AP&G Stock distributions. On May 5, 2022, Wife served a document request that asked Husband to produce account statements for his Truist Account for the period of time from February 26, 2022 through the date of Husband's responsive production. Husband refused to produce any account statements for the Truist Account (which, again, is in his sole name and under his sole control) and instead, asserted the following baseless objection:

“Documents responsive to this request are not in in the Husband’s possession and may be obtained via subpoena in accordance with Order on discovery matters entered on April 29, 2022.”

It is inconceivable that Husband could not obtain his own bank account statements for the identified time period. Frankly, Husband's objection is nothing short of frivolous and dilatory in nature.

16. It is not surprising that Husband is attempting to cover his tracks with respect to his

use of the improperly diverted AP&G Stock distributions. At his deposition, Husband testified to recently selling a large quantity of gold, which was acquired by the parties' during their marriage, to cover approximately \$1.3 million in margin calls. These margin calls resulted from Husband's risky investments in cryptocurrency (after this case began and, again, without discussing the matter with Wife or obtaining her consent) that precipitously declined in value. (Tr. 15:7-9) ("There's been two transfers of gold in the last, I'll call it, eight months to pay down margin calls at Truist Bank."). (See also Tr. 21:20-23:25). The gold that Husband liquidated earlier this year, without Wife's knowledge or consent, was a marital asset that this Court should deem wasted or dissipated and for which Wife should be given credit in any equitable distribution scheme adopted by the Court. In the meantime, Husband continues to dispose of all of the AP&G distribution income as he pleases, and Wife seeks the relief set forth below in order to stop the waste of assets from growing even larger and to preserve her share of marital assets.

17. Husband's self-dealing in and conversion of the parties' assets does not end with the misappropriated AP&G distributions or the parties' gold that was sold without Wife's consent. Wife also has a good faith belief that Husband is diverting additional amounts of passive income received by the parties through their investments in the Cardone Equity Fund, LLC ("Cardone Equity Fund"). The parties invested marital assets in the Cardone Equity Fund, during the course of their marriage. There is no dispute that the parties' investments in the Cardone Equity Fund are marital assets.

18. In 2019, the Cardone Equity Fund provided the parties with approximately \$240,949.00 in passive income. In 2021, the parties received \$230,701.00 in passive income from this marital investment.

19. Historically, all distributions from the Cardone Equity Fund (like the AP&G

distributions), were deposited into the parties' joint checking account at Truist/SunTrust Bank ending in ...6388 (the "6388 Account"). However, in November of 2021, at around the same time that Husband started to experience financial difficulties due to his high-risk investments in cryptocurrencies, Husband began transferring the monthly distributions from the joint 6388 Account to his individual Truist Account.

20. Husband engaged in the following transactions with respect to the distributions received from the Cardone Equity Fund:

- On November 15, 2021, a total of \$19,792.24 in distributions from the Cardone Equity Fund were deposited into the parties' joint 6388 Account. On November 22, 2021, Husband transferred a total of \$19,000.00 from the 6388 Account to his individual Truist Account.
- On December 15, 2021, a total of \$19,063.06 in distributions from the Cardone Equity Fund were deposited into the parties' joint 6388 Account. On December 27, 2022, Husband transferred at total of \$17,835.81 from the 6388 Account to his individual Truist Account.
- On January 14, 2022, a total of \$20,764.48 in distributions from the Cardone Equity Fund were deposited into the joint 6388 Account. On January 25, 2022, Husband transferred at total of \$20,235.36 from the 6388 Account to his individual Truist Account.

21. At his deposition, Husband again provided false and misleading testimony with respect to his use of the 6388 Account and the Cardone Equity Fund distributions. When questioned on his handling of the monthly distributions from the Cardone Equity Fund, Husband first testified that he "sometimes" transferred the distributions into his Truist Account. He then,

almost immediately changed course, and testified that “[i]f I get a cash call from Truist everything is swept, so—” (Tr. 131:15-132:11). Contrary to Husband’s testimony, if the Cardone Equity Fund distributions are transferred from the 6388 Account, they are in fact transferred at the Husband’s direction to his Truist Account. Due to Husband’s actions, he has unilaterally taken control of the Cardone Equity Fund distributions, again without Wife’s knowledge or consent.

22. In addition to all of the foregoing, at the hearing on this motion, Wife will present evidence of very significant sums of cash that Husband has used for his sole benefit, including a \$4,000,000 cash investment that he made in a start-up company that has never generated a profit during its five years of operations. In exchange for this investment, Husband received a 40% equity interest in the company and serves as the Chairman of its Board of Directors. Whether or not this \$4,000,000 investment is deemed wasted or dissipated, Wife should receive a credit for this sum that Husband has permanently removed from the marital estate and Wife seeks the relief set forth below in order to stop Husband from continuing to dispose of these massive sums of marital assets and to preserve her share of same.

23. Wife also believes that Husband recently sold a significant amount of stock that the parties owned in Nuvei Corp. (the “Nuvei Stock”), for approximately \$700,000. The parties acquired the Nuvei Stock during their marriage with marital assets. During the pendency of this action, Husband transferred the Nuvei Stock into a Truist investment account that was and still is titled solely in his name. The proceeds from this stock liquidation are also believed to be under Husband’s control, to the extent any such proceeds still exist.

24. As set forth in greater detail below, Wife has a good faith belief that Husband is also attempting to usurp the jurisdiction of this Court by seeking the judicial dissolution of the parties’ most valuable asset, Global E-Trading, LLC d/b/a Chargebacks911.com. She is also

concerned that Husband is taking steps to place marital assets outside of this Court's jurisdiction through his use of the recently discovered Gary T. Cardone 2022 Irrevocable Trust ("GTC 2022 Irrevocable Trust"), which is a trust that Husband formed in June of 2022. On October 21, 2022, immediately after discovering the existence of the GTC 2022 Irrevocable Trust, Wife's counsel requested documents relating to the GTC2022 Irrevocable Trust (See Request for Production, dated October 21, 2022, a copy of which is attached hereto as **Exhibit B**). In response to Wife's request, Husband filed a motion for extension of time and is apparently seeking to thwart Wife's efforts to obtain discovery regarding the GTC 2022 Irrevocable Trust prior to the hearing on this Motion. Wife is in need of an order that prevents Husband from transferring any assets into the GTC 2022 Irrevocable Trust during the pendency of this action.

25. Wife has a legitimate and good faith belief that Husband has disposed of and will continue to dispose of the parties' marital assets as detailed above, and given the lack of full disclosure by Husband and his evasion and/or delay with respect to simple and obviously proper discovery requests, Wife cannot even be sure, at this point, whether she has discovered the full extent of Husband's disposition of marital assets. Wife, therefore, requests an order requiring, at a minimum, the following:

- a. That all future AP&G distributions and Cardone Equity Fund distributions be equally divided between the parties or, in the alternative, deposited into a joint account, where they shall remain, pending further order of this Court;
- b. That Husband be required to remit to Wife a sum sufficient to pay the income taxes that are due with respect to the AP&G Stock distributions and the Cardone Equity Fund distributions he has received during the pendency of this case; and,
- c. That Husband be ordered to reimburse Wife for 50% of the distributions he has thus

far received and kept for himself.¹

Husband's Efforts to Dissolve Global and Diminish Its Value

26. In addition to misappropriating the parties' marital assets, Husband has taken affirmative steps to harm or destroy Global E-Trading, LLC ("Global"), which is an asset that comprises the vast majority of the marital estate and the parties' wealth.² Specifically, on February 11, 2022, Husband filed a Complaint in the Circuit Court of the Sixth Judicial Circuit in and for Pinellas County, Florida, Civil Division, which was assigned case number 22-000672-CI (the "Civil Action"). The defendants in the Civil Action are: (i) the Wife; (ii) GTMC, LLC; (iii) the Eaton 2017 Irrevocable Trust, dated January 1, 2017 and (iv) Global. The Civil Action is currently pending before the Honorable Amy Williams. The Civil Action remains under seal, so the details provided herein are limited, but not disputable.

27. In the Civil Action, Husband has sought various forms of declaratory and injunctive relief against the Wife, Global and others, based on alleged corporate governance issues. On August 4, 2022, Husband filed an Emergency Verified Motion to Appoint a Custodian *Pendente Lite*, seeking the appointment of a custodian or the judicial dissolution of Global, pursuant to Fla. Stat. § 605.0702. That motion was denied.

28. Notwithstanding the denial of Husband's meritless motion in the Civil Action, it should be noted by this Court that during the pendency of the instant dissolution of marriage action, in which this Court is being asked to value and distribute the parties' interests in Global, Husband

¹ If Husband has depleted so much of the cash he has possessed and controlled that he is unable to make this payment to Wife, then any dissipated amount should be equitably distributed to him so that Wife gets proper credit for same.

² For purposes of background, Husband holds his interest in Global through Cardone Solutions and Technology, LLC, which is a Florida Limited Liability Company, with its principal place of business in Pinellas County, Florida ("CST"). Husband is the sole manager of CST and has voting control of CST. Wife holds her interest in Global through GTMC, LLC, which is also a Florida Limited Liability Company ("GTMC"). Wife is the sole manager of GTMC and has voting control of GTMC. For purposes of this motion, the terms "Husband" and "CST" may be used synonymously for brevity and clarity purposes. Likewise, the terms "GTMC" and "Wife" are also synonymous and used interchangeably herein.

took affirmative steps, in a different forum, to dissolve Global and, thereby prevent this Court from exercising its authority and jurisdiction to equitably distribute the parties' most valuable marital asset.

29. On August 30, 2022, in an effort to combat Husband's reckless and destructive conduct Wife, through GTMC, exercised her elective right pursuant to Fla. Stat. § 605.0706 and provided statutory notice to Husband that she intends to purchase Husband's entire ownership interest in Global (the "First Election").

30. After failing in his efforts to disrupt or dissolve Global through the Civil Action, Husband has sought to do the same in the instant divorce proceeding. On September 6, 2022, Husband filed his Amended Counter-Petition for Dissolution of Marriage, in this proceeding, in which he again requested the judicial dissolution of Global, presumably on behalf of CST, pursuant to Fla. Stat. § 605.0702. Thereafter, on October 20, 2022, Wife again caused GTMC to exercise its right of election, pursuant to Fla. Stat. § 605.0706, to purchase Husband's interest in Global, but only to the extent it is argued that a proper election was not made in the Civil Action (the "Second Election").

31. Based on these elections, Husband is now irrevocably required to sell CST's interest in Global to the Wife, based on a statutory valuation date, which is the date that is one day prior to the statutory election.

32. In addition to seeking Global's dissolution, and both prior to and after the elections, Husband has carried out a number of unauthorized acts with respect to Global that have interfered with Global's value and operations. For example, on July 15, 2022, as part of this dissolution of marriage action, Husband served two of Global's employees with identical subpoenas duces tecum for deposition (the "Subpoenas") that directed both employees to appear for a deposition with their:

laptop, phone and/or other computers that are needed to be able to access business documents related to Global E-Trading/CB911 and/or other related business entities for purposes of answering questions related to business activities, business operations, and/or Gary or Monica's involvement with business operations, from January 1, 2019 to the present date.

On August 12, 2022, Global timely and properly objected to the Subpoenas. On August 15, 2022, Husband personally reached out to one of the employees, via email, "as CEO and co-owner/founder of [G]lobal" and attempted to circumvent the Court's authority to address Global's objections to the Subpoenas by insisting that the non-party employee comply with the Subpoena based on Husband's supervening authority. A true and correct copy of this email is attached hereto as **Exhibit C**.

33. In addition to threatening Global's employees to further his interests in this divorce proceeding, *Husband has unilaterally withdrawn hundreds of thousands of dollars from Global's bank accounts in order to fund his private and personal air travel*, which provides no benefit or value to Global. In August of 2020, for example, Husband used a private jet to retrieve a dog that he purchased for his personal use and enjoyment. When asked to explain how the retrieval of the dog, via private jet, furthered Global's business interests Husband testified that "everything I do is business." (Tr. 31:20-21). When pressed on this issue, Husband stated that his private airfare is "a cost of – to CB911 in compensation for what I do for the company, period. I don't think I need a justification for it." (Tr. 32:3-5). Most recently, when Global refused to pay for Husband's private jet expenses, Husband simply took the money from Global's bank account without authorization to do so. Husband has withdrawn funds from Global's bank account in this manner and for personal purposes on numerous occasions during the pendency of this action and has indicated that he will continue to do so at his pleasure. Wife and Global are in need of an order preventing Husband from engaging in such conduct.

34. Husband has also represented Global at conferences and industry events around the world without notice to Wife or authorization from her, in order to further his cryptocurrency business. Such conduct does not further or support Global's interests, especially given that Husband makes inaccurate and potentially embarrassing statements to third parties about Global's business and his role in the company. Because Husband's interest in Global will be purchased based on a fixed valuation date that is prior to the date of this Motion, any future decrease in Global's value, brought about by Husband's conduct, will only be realized by the Wife and not the Husband. In light of the impending buy-out of Husband's ownership interest in Global, Husband should not be holding himself out as the CEO of Global or otherwise taking actions that are harmful to its ongoing value.

35. In August of 2022, Husband also engaged in unilateral discussions with a third-party concerning a potential sale of Global, in which he appears to have disclosed Global's confidential information in the absence of a properly executed non-disclosure agreement. In carrying out these unauthorized discussions, Husband involved a former Global employee, who had recently been terminated by the company. Given that Husband currently lacks authority to dispose of any portion of his ownership interest in Global, he should be ordered to cease all communications directed at selling his interests in Global to anyone other than the Wife.

36. It also appears that Husband made affirmative misrepresentations to a financial institution, with whom Global does business, for purposes of securing a personal line of credit. Specifically, Global has a significant business relationship with Truist. On August 30, 2022, after the date of the First Election, Husband sent an email to a Truist representative, in which he expressed interest in obtaining credit from Truist in order purchase Wife's interests in Global (the "August 30th Email"). In the August 30th Email, a copy of which is attached hereto as **Exhibit D**,

Husband informed Truist that Wife's "attorneys have triggered the buyout provision of the company so this deal is definitely happening. Literally just received it. Do you guys have any interest in assisting..." Husband goes on to state that "[a]nything that has a number under 300 million total enterprise value I will be the buyer for [Wife's] stake..." Husband made these representations to Truist after the date of the First Election and, presumably with knowledge, that he was under a statutory obligation to sell his interests in Global to the Wife.

37. Contrary to his representations to Truist, as of August 30, 2022, Husband was not in need of credit to finance any transaction that would have allowed him to purchase the Wife's interests in Global. It would be catastrophic for Global and the Wife if Husband obtained a line of credit from Truist, or any financial institution, under false pretenses. Wife is in need of an order clearly establishing that Husband no longer has a role in Global and that he is not in a position to sell or dispose of any portion of Global during the pendency of this proceeding. Any such order should also restrict Husband from seeking or obtaining credit from any third-party for purposes of purchasing Wife's interest in Global, which at this point is a legal impossibility.

38. At his deposition, Husband emphasized his intent to continue to act as he pleases with respect to Global and revealed his basis for simply taking money out of the company's bank account and engaging in all of these improper actions by stating, "I own the company. I own 50 percent of the company. I'm the CEO I should be able to do whatever I want." (Tr. 141:11-14).

39. Husband has demonstrated that he will do whatever he wants to do with respect to the parties' marital assets and that he is willing to harm Global, including trying to literally destroy it through judicial dissolution or otherwise, to gain an advantage in this litigation.

40. The Court has an affirmative obligation to ensure that the parties' marital assets are not wasted or unnecessarily dissipated during the pendency of this action, and, in furtherance of

that obligation, has discretion and authority to fashion equitable relief to prevent the waste or dissipation of marital assets. *See Woodrum v. Woodrum*, 590 So.2d 1093, 1094 (Fla. 3d DCA 1991); *Sandstrom v. Sandstrom*, 565 So.2d 914, 915 (Fla. 4th DCA 1990). *See also Leonard v. Leonard*, 678 So.2d 497, 497-98 (Fla. 5th DCA 1996) (“Examples abound [under Florida law] of the use of injunctions to prevent the dissipation of property which is or may later be determined to be marital property.”); *Monas v. Monas*, 665 So.2d 346, 347 (Fla. 4th DCA 1995) (“...the trial court has the authority to restrain the dissipation of marital assets ...”). Wife, therefore, requests that the Court exercise its authority and enter an order that prevents Husband’s ongoing waste of marital assets and further prevents him from interfering with Global’s operations and diminishing its value.

41. Wife has retained Older Lundy Koch & Martino (“OLK&M”) to represent her in this matter and has agreed to pay (“OLK&M”) a reasonable fee, plus costs, for their services. Wife has incurred reasonable fees and costs in bringing this motion, which is necessary due to Husband’s improper conduct during the pendency of this action.

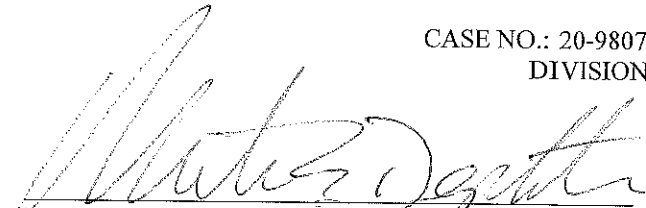
WHEREFORE, the Petitioner/Wife, MONICA CARDONE, respectfully requests the Court enter an Order, granting this motion and ordering:

- i. All future distributions paid to Husband by AP&G and the Cardone Equity Fund be equally divided between the parties;
- ii. If the Court does not grant the relief requested in the immediately preceding paragraph, then it should order that all future AP&G and Cardone Equity Fund distributions be deposited into and remain in a bank account, jointly titled in the names of the parties, until further order of this Court or written agreement of the parties;
- iii. Husband be required to remit to Wife a sum sufficient to pay the income taxes that are

- due with respect to the AP&G Stock distributions and the Cardone Equity Fund distributions he has received during the pendency of this case, and that Husband be ordered to reimburse Wife for 50% of the distributions he has thus far received and kept for himself or otherwise disposed of for his benefit;
- iv. Husband to refrain from charging the company for private air travel for any reason;
 - v. Husband to refrain from withdrawing any funds from any of Global's bank accounts without Wife's prior approval or in the absence of court order;
 - vi. Husband to refrain from contacting any of Global's current or former employees for purposes of obtaining "self-help" discovery in relation to the Civil Action or the divorce proceeding;
 - vii. Husband to refrain from contacting third parties to discuss a sale of Global or to obtain credit in relation to any such sale;
 - viii. Husband to refrain from representing Global at conferences and industry events or otherwise holding himself out to third parties as Global's CEO or other representative;
 - ix. Husband to return to Global all assets, rights and credentials he presently holds, including any intellectual property he controls, such as domain name accounts;
 - x. Husband to pay Wife's attorneys' fees and costs incurred by Wife in obtaining the relief set forth herein; and,
 - xi. Awarding any other relief this Court deems appropriate in order to protect Wife's rights and interests.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by automatic email generated by the Florida Courts E-Filing Portal to Peter N. Meros, Esquire, on this 10th day of November, 2022.



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cc: client

Composite Exhibit A to Wife's Amended Motion for
Order Preserving Marital Assets

1 Cardone and Kevin Brennan is also here on behalf of
2 Gary Cardone.

3 MR. LUNDY: And, for the record, we'll note that
4 our forensic accountant, Sasha Moore, is here from
5 CBIZ and Mr. Todd Burg is here on behalf Mr. Cardone,
6 as I understand, as a forensic accountant.

7 MR. KOCH: As well as Mr. Samarkos is on video
8 or on Zoom.

9 MR. LUNDY: Yeah, and Mrs. Cardone is also here.

10 THE VIDEOGRAPHER: The deponent may be sworn.

11 MR. BRENNAN: Who's Brigid Merenda?

12 MS. MERENDA: I'm counsel for Global from Trenam
13 Law.

14 MR. SAMARKOS: Charles Samarkos, I'm counsel for
15 Mrs. Cardone in other litigation. I'm just
16 observing.

17 MS. MERENDA: Same with me in other litigation,
18 I'm just observing.

19 MR. CARDONE: Who's the Brigid lady?

20 MR. BRENNAN: She's from -- she represents
21 Global, she says from Trenam.

22 MR. CARDONE: Really?

23 MR. BRENNAN: That's what she's indicated.

24 MR. CARDONE: She represents Global, the company
25 we own?

1 MRS. CARDONE: Um-hum.

2 MR. CARDONE: Does she represent me --

3 MRS. CARDONE: That's Charlie Harris.

4 MR. CARDONE: -- or does she represent the
5 company.

6 MR. BRENNAN: The company.

7 MRS. CARDONE: The company.

8 MS. MERENDA: The company.

9 MR. CARDONE: Who hired you?

10 MRS. CARDONE: The company.

11 MS. MERENDA: The company.

12 MR. CARDONE: Can we get a copy of that
13 agreement, maybe? I don't remember signing that.

14 MR. LUNDY: We'll address any of those types of
15 things at another time. Let's go ahead and proceed
16 and get him sworn in and proceed with the deposition.

17 Thereupon,

18 GARY CARDONE,
19 a witness, having been duly sworn to tell the truth,
20 the whole truth and nothing but the truth, was
21 examined and testified as follows:

22 **DIRECT EXAMINATION**

23 BY MR. LUNDY:

24 Q All right. Would you state your full, legal
25 name for the record, please?

1 **A Gary Cardone.**

2 Q And I have taken your deposition once before,
3 Mr. Cardone, do you recall that?

4 **A Yeah.**

5 Q Do you recall the ground rules that I gave you
6 at the outset of that deposition at all?

7 **A I think so.**

8 Q Did you read that deposition before you came
9 here today?

10 **A No.**

11 Q All right. Are you under the influence of any
12 medications, drugs or other substances that would impact
13 your ability to understand my questions?

14 **A No.**

15 Q And do you understand the difference between
16 telling the truth and not telling the truth?

17 **A Yes, sir.**

18 Q And do you understand the oath that just took?

19 **A Yes, sir.**

20 Q Have you ever testified under oath prior to
21 today and given false testimony?

22 **A No.**

23 Q When you send written communications to Monica
24 is it fair to say that the contents of those
25 communications are always truthful?

1 **A Yes, sir.**

2 Q How about to other third parties?

3 **A Yes, sir.**

4 Q For example -- so when you communicate in
5 writing you speak the truth?

6 **A When I communicate I'm communicating honestly in
7 all forms.**

8 Q Okay. So is it fair to say if we have a written
9 communication from you -- from you to anyone else it will
10 not contain any lies?

11 **A Yeah, that's correct.**

12 Q Okay.

13 MR. BRENNAN: Also, Gary, when you're answering
14 the questions just give a little break before you do
15 that in case we have any objections that way we can
16 get them on the record.

17 **A Sure. Sure. Okay.**

18 BY MR. LUNDY:

19 Q And to follow up on that point, Mr. Brennan or
20 Mr. Meros may make objections today for a variety of
21 reasons but unless they instruct you not to answer a
22 question you are required to answer it. Okay?

23 MR. BRENNAN: You also have to verbalize your
24 answers and say yes or no. You can't shake your head
25 one way or the other.

1 **A I understand.**
 2 BY MR. LUNDY:
 3 Q All right. Do you recall on July 20th, 2018 you
 4 sent an email to Bob Valdez stating "I am long hard cash
 5 at my house"?"
 6 **A Can I see that email, please? I don't remember**
 7 **it.**
 8 MR. LUNDY: Okay. I'm going to mark this as
 9 Exhibit One to the deposition. Do you have stickers?
 10 Thank you.
 11 (Thereupon, Petitioner/Wife's Exhibit Number One
 12 was marked for identification and attached to the
 13 deposition.)
 14 **A Okay.**
 15 BY MR. LUNDY:
 16 Q Do you recall sending that email?
 17 **A I don't recall sending it but it's from me.**
 18 Q In the same email you state that you wanted to
 19 give \$250,000 to a Scott Terry in cash but you were
 20 concerned about red flags?
 21 **A Um-hum.**
 22 Q What does that mean?
 23 **A Well, I was going to charter a quarter of a**
 24 **million dollars worth of planes from Scott Terry who is an**
 25 **aviation expert and the question was because the cash was**

1 **sitting in the house, it wasn't sitting in a bank it was**
 2 **hard, cold cash that if we transferred the cash and had an**
 3 **invoice for it would that raise any flags that would**
 4 **create a problem for Global. I just don't believe in**
 5 **getting audited so anything that looks funny why would you**
 6 **do that. I'd rather put the money back in the bank then**
 7 **write a check for it.**
 8 Q Why did you remove \$250,000 from the bank to
 9 hold in cash?
 10 MR. BRENNAN: Objection, form.
 11 **A I've been doing this my whole life so I've**
 12 **always held on to cash. I believe in cash. I don't think**
 13 **it's illegal to take money out of a bank, right?**
 14 BY MR. LUNDY:
 15 Q Where did the \$250,000 of cash come from?
 16 **A In 2018 I wouldn't have any idea.**
 17 Q Do you know if you took it from the company's
 18 bank account?
 19 **A There's been in -- I would be pretty sure that**
 20 **it never came from the company bank account.**
 21 Q And just so we're clear as we go forward today,
 22 when I say the company or Global I'm referring to the same
 23 thing. We're talking about the marital business that's at
 24 issue in this case, Global E-Trading. You understand?
 25 **A I do.**

1 Q Okay. Historically, you have taken the position
 2 that Global is to pay for your private air travel,
 3 correct?
 4 **A That's correct.**
 5 Q So why would you take \$250,000 out of a personal
 6 account to pay for your private air travel?
 7 **A I don't know what we were thinking at the time.**
 8 Q Who is "we"?
 9 **A Well, there was Bobby Valdez was on that email.**
 10 **Who else was on that email? This email was, oh, and Rex**
 11 **Roten who was serving as corporate counsel, I think, and**
 12 **that's why I included him. So we would be those three**
 13 **people.**
 14 Q Can you recall why Monica was not copied on this
 15 email?
 16 **A I don't know but I don't know why she would be**
 17 **copied on this.**
 18 Q How much total cash did you have on hand in your
 19 home at the time you sent this email?
 20 **A No idea.**
 21 Q Would it have been more than \$250,000?
 22 **A Most likely.**
 23 Q How much cash do you have on hand today?
 24 **A I don't know.**
 25 Q Do you have cash on hand today?

1 **A Yeah, I've got some in my briefcase.**
 2 Q Would it be more than \$250,000?
 3 **A I don't know.**
 4 Q Do you know if you are in possession of more
 5 than \$500,000 of cash as we sit here today?
 6 **A I don't know.**
 7 Q Do you know if you are in possession of more
 8 than a million dollars of cash as we sit here today?
 9 **A I don't think so.**
 10 Q So you think it's less than a million but you
 11 just don't know how much?
 12 **A I don't know.**
 13 Q What's the most cash that you've had in your
 14 possession outside of a bank at any one time in the last
 15 five years?
 16 **A No idea.**
 17 Q You have no idea whatsoever?
 18 **A (Witness nods side to side.)**
 19 Q I need a verbal answer?
 20 **A No, sir.**
 21 Q Could it have been 10 million dollars?
 22 **A No.**
 23 Q Okay. So what is the most that it could have
 24 been?
 25 **A I don't know.**

1 Q But you know it could not have been 10 million
2 dollars?

3 A **Yeah, well, I'm pretty sure I've never had
4 10 million dollars in cash.**

5 Q Could it have been a million dollars?

6 A **I don't know.**

7 Q Around the time of this email did you also have
8 gold stored at your home?

9 A **2018 we were in England most of the time. There
10 wouldn't have been -- I can't remember, I don't even know
11 what home we were living in. 2018 we would have been
12 at -- between England and 220 Gulf Boulevard. The
13 question again?**

14 Q At the time of this email did you also have gold
15 in your home?

16 A **I don't know.**

17 Q Where -- which home would this cash that you
18 refer to in this email have been stored in?

19 A **Every home I've ever lived in there's been cash,
20 including England, including 220, including the one we
21 live in now, including every house she's ever lived in
22 with me there's been cash in those homes.**

23 Q So you could have had \$250,000 of cash that you
24 brought into England?

25 A **Oh, for sure.**

1 Q Did you declare that when you entered England?

2 A **I can't remember.**

3 Q Do you have gold stored in your house now?

4 A **Yes.**

5 Q How much?

6 A **I don't know.**

7 Q Where is it stored?

8 A **In a vault.**

9 Q The vault is in your home?

10 A **(Witness nods up and down.)**

11 Q I need a verbal answer.

12 A **Yes, sir.**

13 Q Okay. And what else is stored in that vault?

14 A **Some Class 3 weapons and some normal weapons,
15 some ammo, scopes, silencers.**

16 Q Do you have silver stored in that vault?

17 A **I have a tiny amount of silver in there.**

18 Q Other than guns, gun equipment, ammunition, gold
19 and silver can you tell me what else is stored in that
20 vault?

21 A **Um, that's really about it.**

22 Q When is the last time that you entered the
23 vault?

24 A **Weeks ago.**

25 Q And for what purpose did you enter it?

1 A **To get a gun.**

2 Q When is the last time that you removed any gold
3 or silver from the vault?

4 A **Um, I don't know the exact dates.**

5 Q You can approximate?

6 A **I hate to make a mistake here and then somebody
7 say that I lied later. There's been two transfers of gold
8 in the last, I'll call it, eight months to pay down margin
9 calls at Truist Bank.**

10 Q Can you tell me, approximately, how much you had
11 to pay down for these margin calls in each instance?

12 A **We have the records, so I don't know exactly.**

13 Q And when you say "transfers of gold" can you
14 explain what you mean by "transfer"?

15 A **I sold two chunks of gold to a company called
16 Gainesville Gold Company, owner is Joe. I brought the
17 gold to him, he gave me an invoice, they wired the funds
18 to the bank. Very clear, sold gold over \$1,800. It's an
19 extremely transparent transaction. You guys will get
20 copies of the transactions, I'm sure.**

21 Q What did you use the margin loans to purchase?

22 A **The margin.**

23 Q I don't understand.

24 A **Well, you don't get a margin call to purchase
25 anything, you get a margin call to --**

1 Q No, my question was, you had a call on a margin
2 loan which means that you borrowed money, right, to make
3 some kind of investment or purchase and then something
4 happened that caused the bank to ask you to pay down that
5 loan --

6 A **Yeah.**

7 Q -- correct? Okay. What did you originally
8 borrow the money to purchase?

9 A **I don't know. What did I -- maybe, could you
10 ask the question a little differently?**

11 Q Yeah. Let's, kind of, go back to the beginning.
12 The bank that made the margin call was Truist, correct?

13 A **Yeah, that's right.**

14 Q All right. What investment accounts did you
15 have at Truist against which they allowed you to borrow?

16 A **I don't know because I can't look at the
17 records. So it's all the GenSpring investment accounts
18 that you guys are extremely familiar with.**

19 Q And you took a margin loan against those
20 accounts at some point, correct?

21 A **Um, when we bought the house at 2131 Oceanview
22 Drive Truist gave us around 8.6, 12 or 13 million dollars.
23 One part was for the mortgage and another was for a credit
24 line to do whatever I wanted with. Part of that was
25 buying 1906. They were aware of 1906 Oceanview Drive that**

1 we bought at 1.7 million dollars in March of 2021. The
2 concept to buy 1906 was to either give it to the family
3 and let the kids live down the street.

4 Q Mr. Cardone --

5 A When that didn't happen I tried to sell it and
6 then found out there was a lien --

7 Q I'm sorry.

8 A -- I got a margin call from Truist because the
9 stock market went down about 40 percent.

10 Q Okay. So, and just in the interest of time,
11 because I do want to respect everybody's time and I'd like
12 to get as far as I can today try to really hone in on my
13 question.

14 A Okay.

15 Q My question is, what asset or thing did you
16 purchase with the money that you borrowed on margin from
17 Truist Bank? Is it the 1906 property?

18 A Do you mean what's all in the investment
19 portfolio of Truist?

20 Q No, that's not what I mean.

21 A Okay. I don't understand your question then,
22 I'm sorry.

23 Q What I mean is you borrowed money from the bank
24 on margin. You understand what I mean by that phrase,
25 correct?

1 A Well, I understand what I did with the bank,
2 I'm not sure what you're meaning but I understand what I
3 did with the bank.

4 Q Let's see if we can get a mutual understanding
5 then. When we talk about a margin loan are we on the same
6 page that a margin loan --

7 A I have a credit line. Okay. I have a credit
8 line with a bank. Okay. They allow me to extend that
9 credit out. When the market corrects 30 or 40 percent
10 everybody got a margin call. I was not the only person on
11 the planet that got a margin call.

12 Q So the margin call was a result of the value of
13 your accounts going down --

14 A Yeah.

15 Q -- and the bank requiring you to pay down the
16 money you had borrowed on the line of credit?

17 A Or liquidate the position.

18 MR. BRENNAN: Okay. Just so that you're clear
19 also on the rules is, you have to wait for him to
20 finish his question even if you anticipate --

21 A Okay.

22 MR. BRENNAN: -- what his question is going to
23 be just so that it's clear what his question is and
24 so you're not answering a wrong question.

25 A Okay.

1 BY MR. LUNDY:

2 Q How much -- strike that. What asset did you use
3 the line of credit to purchase? I should say, what asset
4 or assets did you use the line of credit to purchase?

5 A I don't know. I think SunTrust looks at me as
6 the asset, quite frankly, but I don't know. It's
7 everything that's wrapped up in that entire GenSpring
8 portfolio.

9 Q The GenSpring portfolio is the asset against
10 which the bank allows you to borrow on the line of credit,
11 correct?

12 A I think I under -- yes, I think I'm tracking
13 with you, yeah.

14 Q What is the total amount of the line of credit
15 that they made available to you initially?

16 A Twelve-ish million.

17 Q So you had a 12-million-dollar line of credit
18 you could go out and you could buy up to 12 million
19 dollars worth of assets using the line of credit, is that
20 correct?

21 A I don't think, like, if we're being specific
22 here I don't think it's all line of credit. I think some
23 of it's a mortgage, so it's a complex structure but for --
24 I've got 12 million dollars worth of debt facilities to
25 do, pretty much, what I want with.

1 Q And of that 12 million dollars of debt
2 facilities how much has been borrowed by you as we sit
3 here today?

4 A It's fully utilized.

5 Q So you've borrowed, approximately, 12 million
6 dollars --

7 A Um-hum.

8 Q -- from Truist, correct?

9 A Yeah.

10 Q Now tell me what you have purchased with the
11 12 million dollars that you've borrowed?

12 A An 8.6 million dollar house at 2131 Oceanview
13 Drive. A 1.7 million dollar home at 1906 Oceanview Drive.
14 Fifty odd thousand shares of Grayscale Capital and then
15 another 25,000 shares of Grayscale Ethereum Trust. And
16 then there's another -- there's another, I can't remember
17 the volume, Todd has it in his fingertips but it's a bunch
18 of treasury notes.

19 Q When you got the margin call from Truist how
20 much did they demand that you pay back?

21 A I can't tell you specifically. There were three
22 margin calls, though.

23 Q Was it more than a million dollars?

24 A I can't remember.

25 Q You can't remember if they required you to pay

1 back more than a million dollars in the last eight months?
 2 **A We have the records. You'll get them. I don't**
 3 **want to make a mistake. These are large --**
 4 Q My question is --
 5 **A These are large numbers, sir. Okay. I have a**
 6 **very complex life, I'm sorry, but I can't remember what I**
 7 **did with a bank eight months ago. So it's -- we have the**
 8 **data and you guys will be able to see it.**
 9 Q Can you tell me if the bank required you to pay
 10 back more than a million dollars as a margin call within
 11 the last eight months?
 12 **A If we can break I can give you the exact number.**
 13 Q I'm happy to do that.
 14 **A Sure. Todd, if you can just look at what I gave**
 15 **you earlier.**
 16 THE VIDEOGRAPHER: Off the record 10 a.m.
 17 (Whereupon, a recess was taken.)
 18 THE VIDEOGRAPHER: Back on the record 10:04 a.m.
 19 BY MR. LUNDY:
 20 Q Okay. Mr. Cardone, are you able to tell me now
 21 after consulting with Mr. Burg and Mr. Brennan how much
 22 you paid down as a result of the margin call that you said
 23 occurred within the last eight months?
 24 **A I said there were margin calls, three of them**
 25 **since February, about 1.3 million.**

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1 Q And did you use anything other than gold to fund
 2 that payment?
 3 **A I can't remember what I used.**
 4 Q Do you have gold, silver or cash anywhere other
 5 than at your current residence?
 6 **A I don't know.**
 7 Q You mentioned purchasing, I want to say it was,
 8 50,000 shares of Grayscale Capital and 25,000 shares of
 9 Grayscale Ethereum Trust, am I correct on those two
 10 things?
 11 **A Well, the volumes may be different. I mean, I**
 12 **may be wrong on the volumes, so I have -- part of that**
 13 **investment was Grayscale Trust and Grayscale Ethereum**
 14 **Trust and a bunch of treasury notes.**
 15 Q How much did you purchase in treasury notes?
 16 **A I don't know the exact number.**
 17 Q Where are those treasury notes being held?
 18 **A At BB&T.**
 19 Q And the two Grayscale Trust Investments that you
 20 mentioned are those purchases of cryptocurrencies,
 21 essentially?
 22 **A They're public shares. I don't know what their**
 23 **prospective says but the BTC Grayscale Trust is made up of**
 24 **one of the largest Bitcoin holdings in the world and I**
 25 **think the same is true for the Ethereum Trust.**

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1 Q So an investment in the Grayscale BTC Trust is
 2 an investment in Bitcoin, essentially, correct?
 3 **A It's a bet, it's a bet on Bitcoin, correct.**
 4 Q And does the Grayscale BTC Trust own anything
 5 other than Bitcoin?
 6 **A I don't know.**
 7 Q How much did you invest in that trust?
 8 **A There's, roughly -- how much did I invest?**
 9 Q Yes, initially?
 10 **A I can't remember the -- I can't remember the**
 11 **input number.**
 12 Q Do you know if it was more than a million
 13 dollars?
 14 **A Oh, I'm sure.**
 15 Q Was it more than two million dollars?
 16 **A I don't know.**
 17 Q Can you tell me how much it's worth today?
 18 **A No, sir.**
 19 Q Is it worth less than when you originally
 20 invested?
 21 **A Oh, absolutely.**
 22 Q Can you give me a rough percentage of decrease
 23 in value?
 24 **A Um, it could be 75 percent, I don't know exactly**
 25 **the price today.**

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1 Q In some of your email communications you use the
 2 term "Fiat currency," can you tell me what you mean by
 3 that term?
 4 **A It's what -- how Fiat's defined, liquid**
 5 **currency.**
 6 Q How do you define it?
 7 **A Any federal government, any institution that can**
 8 **create its own currency. It's just paper. It's called**
 9 **Fiat is the definition.**
 10 Q Okay. Have you sold any of the guns or
 11 ammunition that you had at the beginning of this case?
 12 **A Never.**
 13 Q Do you still own a large collection of, I want
 14 to say it's, AR-15s?
 15 **A Yes, sir.**
 16 Q Approximately, how many do you have?
 17 **A Over 200.**
 18 Q Do you have a service animal?
 19 **A I have two of them.**
 20 Q And why do you have a need for service animals?
 21 **A Because I like really high, well-trained**
 22 **animals.**
 23 Q Have you received any diagnosis that you have
 24 cited in having your animals classified as a service
 25 animal?

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1 **A No.**
 2 Q Do you use either of your dogs as a means of
 3 treating any condition that you have?
 4 **A They bring me a lot of joy.**
 5 Q But do you use them for the purpose of treating
 6 any mental health condition that you have?
 7 **A They make me feel better so, maybe, I don't know**
 8 **I like them. I like animals around me.**
 9 Q That's not my question.
 10 **A I've had animals around me my whole life.**
 11 Q My question is, when you register a dog as a
 12 service animal, my understanding --
 13 **A I don't think these dogs are officially**
 14 **registered as service animals, actually.**
 15 Q Okay.
 16 **A I don't know who told you that but I don't know**
 17 **that they're officially registered as service animals.**
 18 Q Have you been diagnosed with PTSD?
 19 **A Never.**
 20 Q Can you tell me how much you spent on these
 21 dogs?
 22 **A Not, not accurately.**
 23 Q When did you purchase -- I believe you had the
 24 first dog when this case started, correct? You already
 25 had one dog?

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1 **A The family had a dog, correct, back in February**
 2 **of '21, March of '21.**
 3 Q And you have subsequently purchased a second
 4 dog, correct?
 5 **A Well, I purchased a second one on December the**
 6 **6th, 2021. The family, everybody in the family knew that**
 7 **we were buying another dog.**
 8 Q How much did you pay for the second dog on
 9 December 6th, 2021?
 10 **A I don't remember what I paid as the deposit but**
 11 **I paid, roughly, \$3,500 a month to have him trained.**
 12 Q For how long have you paid that?
 13 **A Two years.**
 14 Q Trained to do what?
 15 **A To do anything I want, like, anything.**
 16 Q Who did you purchase that dog from?
 17 **A Um, Dave Harris out of Kentucky owns a very**
 18 **large protection dog training system.**
 19 Q Is that who provides the monthly training?
 20 **A He does everything. He builds them, verse them,**
 21 **trains them.**
 22 Q Right. The \$3,500 a month that you've been
 23 paying for dog training for two years has that been paid
 24 to Dave Harris?
 25 **A Yeah.**

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1 Q How do you make those payments?
 2 **A Oh, I think I wrote him -- I think she sent a**
 3 **check on December the 6th from me or maybe I sent that.**
 4 **There was a check out on December the 6th, 2021, the night**
 5 **of the intervention, to acquire that dog. And then I had**
 6 **to make -- a year later I had to make subsequent payments**
 7 **for, you know, the training but I can't remember exactly**
 8 **what we paid, the initial check.**
 9 Q Okay. I think we're confused about the dogs
 10 we're talking about. You referenced December 6th, 2021.
 11 That was not when the intervention occurred, that was
 12 December 6th, 2020?
 13 MR. BRENNAN: I didn't want to jump in.
 14 MR. LUNDY: It's okay.
 15 MR. BRENNAN: But you guys were crossing dates
 16 there, so --
 17 **A Yeah, 2020. Okay.**
 18 BY MR. LUNDY:
 19 Q That's the first dog. I am --
 20 **A No, no, you're wrong, that's not the first dog.**
 21 Q That's the second dog?
 22 **A Correct.**
 23 Q Okay. How many dogs do you have today?
 24 **A Two.**
 25 Q And what is the name of the dog that you

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1 purchased last?
 2 **A Woodrow.**
 3 Q When did you purchase Woodrow?
 4 **A December the 6th, 2020 --**
 5 Q Okay. When did you take --
 6 **A -- the night of the intervention.**
 7 Q When did you take possession of Woodrow?
 8 **A Ten days ago.**
 9 Q So you purchased the dog December 6th, 2020 and
 10 did not take possession until August of 2022, is that
 11 correct?
 12 **A Yeah, that's right.**
 13 Q And you've been paying \$3,500 a month during
 14 that period of time for Mr. Harris to train that dog,
 15 correct?
 16 **A Yes and I honored the contract that I committed**
 17 **to two years ago, correct.**
 18 Q You have a written contract?
 19 **A Oh, yeah.**
 20 Q When did you sign that?
 21 **A December the 6th, 2020.**
 22 Q Is when you signed the contract?
 23 **A Yes, give or take a day or two. Okay. I**
 24 **probably signed the contract before I wrote the check.**
 25 **That, typically, is the way it works, so --**

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- 1 Q How did you pick up the dog?
 2 A **How did I pick up the dog? Me and the kids went**
 3 **to Kentucky, I put him on an airplane and brought him**
 4 **back.**
 5 Q Did you use a private jet to pick up the dog?
 6 A **Yes, sir.**
 7 Q And how much did that cost?
 8 A **I don't know.**
 9 Q You went 10 days ago, correct?
 10 A **Yeah.**
 11 Q You don't recall how much the private jet
 12 expense was from 10 days ago?
 13 A **Well, I don't get a bill as soon as I fly it.**
 14 Q Don't you know how much the trip is going to
 15 cost before you book it?
 16 A **Um, maybe there's not a full appreciation on --**
 17 **I don't book a plane, I call the pilots and say, hey,**
 18 **we're going to Kentucky. So they send me a bill a month**
 19 **later. Um, three grand an hour to fly there, so 12 grand**
 20 **to fly there, I don't know and fly back.**
 21 Q So when you book private air travel you just
 22 call the pilot and set up the flight and you have no idea
 23 how much it's going to cost until a month later when you
 24 get the bill?
 25 A **Well, if --**

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- 1 MR. BRENNAN: I'm going to object to form. You
 2 can answer.
 3 A **Thank you. The reason for that is that you get**
 4 **hit with a lot of fees that you don't -- if a tire blows**
 5 **up that could be \$8,000, a windshield blows out, that's**
 6 **40,000 so, I can't tell you what any flight is going to**
 7 **cost until the end of the flight. How much did the pilot**
 8 **spend in hotel rooms. So it's a little more complicated**
 9 **than booking Delta.**
 10 BY MR. LUNDY:
 11 Q But my question is, when you call the pilots and
 12 arrange a flight is it fair to say you have no idea how
 13 much that flight is going to cost until after you return
 14 and a bill comes a month later or do you have some sense
 15 of what this flight is going to cost with the
 16 understanding that there may be additional things if
 17 there's damage to the plane or one of the other examples
 18 that you gave?
 19 A **I have a general understanding of what it's**
 20 **going to cost me.**
 21 Q So when you booked that flight what was your
 22 general understanding --
 23 A **Well --**
 24 Q -- of how much it was going to cost?
 25 A **-- I didn't think about what it's going to cost**

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- 1 **me because that's the way I travel. So I'm not -- I'm**
 2 **not -- I'm going to travel that way. So it costs about**
 3 **\$2,500 an hour to run that airplane.**
 4 Q Did you have any complications with your flight?
 5 A **I think I did, actually. I can't remember, I**
 6 **travel so much but I thought I got stuck in Kentucky for a**
 7 **couple hours.**
 8 Q Did you ask for the company to reimburse you for
 9 this flight?
 10 A **The company will pay for this flight.**
 11 Q Did you ask for the company to reimburse you for
 12 this flight?
 13 A **I don't know, I think Macomus sends a bill to**
 14 **the company and we just pay the bill.**
 15 Q Is this a business expense?
 16 A **It is, absolutely.**
 17 Q Explain to me how your travel to Kentucky to
 18 retrieve this dog with your children was related to the
 19 business of the company?
 20 A **Well, everything I do is business. So, like,**
 21 **whether it's CB911 or any other business I know people all**
 22 **over the world that end up doing business with me or the**
 23 **company, so --**
 24 Q Tell me how this trip related to the business of
 25 the company? In specific terms, what about this trip --

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- 1 A **The company has paid for my expenses for travel**
 2 **for eight years. They've always done this. This is the**
 3 **way I build businesses. It's a cost of -- to CB911 in**
 4 **compensation for what I do for the company, period. I**
 5 **don't think I need a justification for it.**
 6 Q I'm going to come back to that in a minute.
 7 A **Sure.**
 8 Q But tell me how this dog, your ownership of this
 9 dog or anything relating to this dog benefits the company
 10 on any level?
 11 MR. BRENNAN: Objection to form.
 12 A **I'm a better leader, hows that.**
 13 BY MR. LUNDY:
 14 Q You can give me whatever answer you want?
 15 A **That's what I said.**
 16 Q Okay. A better leader of who?
 17 A **I'm a better leader at any of the companies**
 18 **because those dogs are there. If you're going to ask me**
 19 **what specific value, dollar value that me making that trip**
 20 **for Chargeback I can't tell you what that value is.**
 21 Q I'm not asking you for a dollar value. I just
 22 want you to tell me even in qualitative terms how this
 23 trip had anything to do with the business and operations
 24 of the company?
 25 MR. BRENNAN: Objection, form.

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1 **A I don't think I can answer your question.**
 2 BY MR. LUNDY:
 3 Q Did your plane break down and you had to hire a
 4 different plane?
 5 **A I can't remember. That is why I can't tell you**
 6 **what it cost because that does happen and it has happened**
 7 **on multiple occasions.**
 8 Q You mentioned that this trip was, approximately,
 9 10 days ago, is that correct?
 10 **A Yeah.**
 11 Q Are you telling me that you cannot remember
 12 whether your plane broke down and you needed to hire a
 13 different plane, approximately, 10 days ago? And if the
 14 answer is yes I'll move on.
 15 **A I've had three different trips in the last two**
 16 **weeks, so I don't write a journal about every trip I have,**
 17 **when it took off and when it didn't, so I cannot remember.**
 18 **I thought we came home on the Hawker.**
 19 Q What other two trips have you had in the last
 20 two weeks?
 21 **A What other two trips. How is that relevant to**
 22 **this? Is it relevant?**
 23 Q You just told me that the reason you can't
 24 answer my question is that you've had three trips in the
 25 last two weeks --

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1 **A Yeah.**
 2 Q -- so I'm asking --
 3 **A I just can't remember if the Hawker broke down**
 4 **when I picked up the dogs.**
 5 Q What were the other two trips that you took in
 6 the last two weeks?
 7 **A Is that relevant? Is it relevant?**
 8 MR. LUNDY: Remember what I told you if your
 9 lawyer doesn't tell you --
 10 **A Is it relevant?**
 11 MR. LUNDY: I'm not going to argue with you, Mr.
 12 Cardone.
 13 MR. BRENNAN: Mr. Lundy is not able to answer
 14 questions at your deposition. So it's up to you if
 15 you answer that or not.
 16 **A So in the last two weeks I've been to New York**
 17 **and I think I was in Lake Charles two or three weeks ago.**
 18 BY MR. LUNDY:
 19 Q So if I am understanding your answer correctly
 20 you've taken three trips in the last two weeks, one to
 21 Kentucky to retrieve the dog, one to New York and one to
 22 Lake Charles?
 23 **A I think that's correct.**
 24 Q Okay. Where is Lake Charles?
 25 **A Louisiana.**

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1 Q And what was the purpose of the trip to Lake
 2 Charles?
 3 **A To go see my sister.**
 4 Q How long were you there?
 5 **A I can't remember.**
 6 Q How much was that trip?
 7 **A I don't know.**
 8 Q What was the purpose of the trip to New York?
 9 **A To see some business people.**
 10 Q Who?
 11 **A A bunch of different business people.**
 12 Q All right. Who?
 13 **A I don't think that's any of your business, quite**
 14 **frankly.**
 15 Q Are you asking the company --
 16 **A I'm saying, no, I'm not answering your question.**
 17 Q Okay. But you told me earlier that everything
 18 you do is for business --
 19 **A Yeah.**
 20 Q -- correct? And the business is at issue in
 21 this case, correct?
 22 **A Okay.**
 23 Q So who are the business people that you went to
 24 New York to talk to?
 25 **A I met with three groups of people and I don't,**

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1 **like, one of them was a group called NODE40.**
 2 Q Called what?
 3 **A A company called NYDIG and another group called**
 4 **Growth Curve Capital.**
 5 Q All right. Can you give me those three, again,
 6 because I didn't catch them?
 7 **A NYDIG.**
 8 Q Spell that, please?
 9 **A NYDIG, N-Y-D-I-G.**
 10 Q Okay.
 11 **A NODE40 and Growth Curve Capital.**
 12 Q What was the purpose of these business meetings?
 13 Was it the time same purpose for all three groups?
 14 **A Nope.**
 15 Q Okay. What was the purpose of your meeting with
 16 NYDIG?
 17 **A Meeting the CFO.**
 18 Q For what purpose?
 19 **A To talk to him about his business.**
 20 Q What is their business?
 21 **A They're one of the largest financial**
 22 **institutions, the custodian of digital assets.**
 23 Q And what is the potential deal or transaction
 24 that you're working on with them?
 25 MR. BRENNAN: Objection, form.

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- 1 **A Nope.**
 2 Q When was the last time you were in communication
 3 with your brother, Grant?
 4 **A Is communication him sending me something ?**
 5 Q Yeah, that's a form of communication?
 6 **A Yeah, about two weeks ago.**
 7 Q Okay. Have you sent any communications from you
 8 to him since this case started?
 9 **A Since the case started, well you showed me a**
 10 **letter that I sent him. I sent him a couple of those**
 11 **fuck-off letters but that's about it.**
 12 Q Have you done any business dealings with him --
 13 **A No.**
 14 Q -- during the pendency of this case?
 15 **A No. Our relationship has been completely**
 16 **fucking destroyed because of this shit.**
 17 Q Do you have any investment in any entity or
 18 vehicle that he owns or operates?
 19 **A Yep.**
 20 Q What is that?
 21 **A All the real estate holdings that you guys see**
 22 **every month.**
 23 Q And do those investments pay any dividends?
 24 **A Um-hum.**
 25 Q Yes?

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- 1 **A Distributions.**
 2 Q And who receives them?
 3 **A I do.**
 4 Q Do you receive 100 percent of the distributions?
 5 MR. BRENNAN: Objection, form.
 6 **A I don't own 100 percent of any of the funds.**
 7 BY MR. LUNDY:
 8 Q A hundred percent of the distributions that
 9 would be allocable to your and Monica's marital equity
 10 interest in those vehicles?
 11 **A No, they wouldn't have any idea how to send her**
 12 **money. She's not on the deal, so --**
 13 Q The deal is in your name?
 14 **A They send the money to me and those**
 15 **distributions along with AP&G have been fueling this**
 16 **company and the family for many, many years.**
 17 Q Have you given any portion of any of the
 18 distributions to Monica during the pendency of this case?
 19 **A She's been using them for years and years.**
 20 Q During the pendency of this case?
 21 **A She's been using those funds during this case,**
 22 **absolutely.**
 23 Q How so?
 24 **A Well, let's see, I think, six -- we're talking**
 25 **about the funds from Grant, specifically?**

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- 1 Q Yes.
 2 **A Yeah, those funds go into 6388 and 6388 would**
 3 **get pulled on from time to time, so absolutely.**
 4 Q I don't understand. Are you saying Monica has
 5 withdrawn those funds from the account ending in 6388?
 6 **A Yeah.**
 7 Q When is the last time that Monica made a
 8 withdrawal from 6388 of those funds?
 9 **A That I don't know. That I don't know. You**
 10 **asked me during this case.**
 11 Q Okay. When is the last time that she made a
 12 withdrawal of those funds?
 13 **A I can check and get you an answer when you**
 14 **continue this.**
 15 Q When the funds come in to 6388 is that a jointly
 16 titled account?
 17 **A Um-hum.**
 18 Q Yes?
 19 **A Um-hum.**
 20 Q I need a verbal answer, sir?
 21 **A Yes.**
 22 Q Okay. With what frequency do the funds come in;
 23 quarterly, monthly, some other period?
 24 **A Usually monthly, I think, yeah.**
 25 Q Okay. And in the last 12 months when the funds

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- 1 have gone into that account do you then go in and transfer
 2 them into your individual account?
 3 **A Sometimes.**
 4 Q Do you leave them in the joint account?
 5 **A Sometimes.**
 6 Q For how long do you leave them in the joint
 7 account when you leave them in there?
 8 **A I'll have to check how long they've been in**
 9 **there since the last draw, it could be a couple months, it**
 10 **could be four months. If I get a cash call from Truist**
 11 **everything is getting swept, so --**
 12 Q And how about the funds that you've received
 13 from AP&G where do those funds go?
 14 **A They go to 1671.**
 15 Q Is that an individual account --
 16 **A Yeah.**
 17 Q -- or a jointly titled account?
 18 **A Individual.**
 19 Q And has Monica had access to any of those funds
 20 during the pendency of this case?
 21 **A Yes.**
 22 Q When?
 23 **A When she would put it on credit cards or from**
 24 **6388 but she has had access to some of those funds during**
 25 **this.**

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1 Q When?
 2 **A I don't know the exact dates.**
 3 Q Have you transferred any of the AP &G dividend
 4 monies to Monica?
 5 **A As in, like, send her money?**
 6 Q Correct.
 7 **A No.**
 8 Q Have you paid taxes on the AP&G money that you
 9 received?
 10 **A Yeah.**
 11 Q How have you paid those taxes?
 12 **A We pay taxes every year as a married couple.**
 13 Q How have you paid taxes is my question? Have
 14 you taken money from --
 15 **A How have I paid taxes?**
 16 Q I'll rephrase the question, have you set aside
 17 any of the monies that you've received from AP&G for tax
 18 purposes?
 19 **A Have I set aside any of the money? I don't know**
 20 **that we've ever set aside, we've only co-mingled which is**
 21 **what makes it --**
 22 Q I'm asking you since this case started and
 23 you've been receiving the AP&G dividend monies into your
 24 individual account --
 25 **A As we always have.**

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1 Q -- have you taken any portion of those dividend
 2 monies that are received and paid them directly to the IRS
 3 or the Department of Treasury?
 4 **A Neither one of us have paid anything directly to**
 5 **the IRS, so, no, the answer would be no.**
 6 Q Have you taken any portion of those monies and
 7 contributed them to any payment that was, ultimately, made
 8 to the IRS for tax purposes?
 9 **A I would have to check with my tax guy, okay, I**
 10 **really don't know what you're getting at but if you're**
 11 **saying that we literally pulled money from one little**
 12 **bucket and identified that bucket I don't know that we did**
 13 **that. Our entire lives have been co-mingled. So maybe**
 14 **you can ask that question a little differently as to what**
 15 **you're trying get to --**
 16 Q Okay.
 17 **A -- that would help.**
 18 Q I'll do that. It is my understanding that in
 19 the year 2021 you received over 2.3 million dollars of
 20 deposits from AP&G Holdings?
 21 **A Okay.**
 22 Q What from that 2.3 million dollars that was
 23 received specifically from AP&G Holdings was contributed
 24 for tax purposes?
 25 **A I don't know.**

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1 Q Did you send any of those monies to either
 2 Monica, your accountant or the federal government to pay
 3 the taxes that would be due on those dividends?
 4 MR. BRENNAN: Objection, form.
 5 **A I don't know.**
 6 BY MR. LUNDY:
 7 Q When is the last time that you individually
 8 initiated any form of a payment to the Department of
 9 Treasury for tax purposes?
 10 **A Never in my entire life.**
 11 Q Okay. When is the last time that you
 12 individually took monies from one of your joint accounts
 13 or other accounts and provided them so that somebody else
 14 could make a tax payment?
 15 **A My whole life.**
 16 Q Have you done that during this case?
 17 **A What exactly?**
 18 Q Taken any of the monies that are in your
 19 individual accounts and contributed them so that somebody
 20 else could make a tax payment?
 21 **A I'm a little lost as to where you're going**
 22 **but --**
 23 Q Here's where I'm going --
 24 **A -- funds have come out of my grass to pay taxes**
 25 **to the US government.**

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1 Q When?
 2 **A I'm hoping they have been done correctly.**
 3 Q When? When did funds come out --
 4 **A When was the last time, I think we made a**
 5 **payment just three months ago.**
 6 Q You're missing the question.
 7 **A Yeah, I must be.**
 8 Q I'm not asking about "we." I'm not asking about
 9 a business bank account or a jointly titled account. I
 10 am asking you when you have made a payment or a
 11 contribution to a payment from one of your individual
 12 accounts during the pendency of this case?
 13 **A I don't know the answer.**
 14 Q How many times have you taken money from Diane
 15 Cardone during the course of this case?
 16 **A Once.**
 17 Q How about prior to this case, have you been
 18 receiving funds from your sister?
 19 **A No.**
 20 Q Have you ever received a check or other form of
 21 money from your sister relating to this case?
 22 **A Relating to this case, if you're asking me has**
 23 **she funded this case or can you ask the question a little**
 24 **bit --**
 25 Q I'll ask it more broadly, prior to the \$300,000

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1 that she just loaned you for the purposes of making your
2 NODE40 investment when is the last time that you received
3 funds from your sister for any purpose?

4 **A Like, hey, here's a thousand bucks because she
5 bought a tire?**

6 Q More than \$10,000, more than \$10,000.

7 **A I can't remember. I don't even think I did do
8 any transactions with her.**

9 Q Have you ever received a check from your sister
10 for \$200,000?

11 **A Maybe. Maybe if you have an instance you could,
12 actually, say on this date did you and give me some
13 memory.**

14 Q Do you recall ever receiving a check from your
15 sister for \$200,000?

16 **A No.**

17 Q You'd agree with me that's a fairly significant
18 sum of money, right?

19 **A Well, I mean, I hear you. I hear that it's a
20 big sum of money to you but, like, I tend to forget, like,
21 six months, oh, I did a deal. It's not that relevant to
22 me. So do I -- does it burn a memory in my brain that,
23 oh, wow, we did this deal in December it's just not that
24 meaningful to me, I'm sorry.**

25 Q Okay. When is the last time that you from any

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1 of your individually titled accounts provided any amount
2 of money to anyone for taxes that were owed by your family
3 to the federal government?

4 MR. BRENNAN: Objection, form.

5 **A I don't think I've ever done my taxes. I think
6 somebody else has always taken care of all that stuff for
7 me throughout my entire career.**

8 BY MR. LUNDY:

9 Q I didn't ask you if you do your own taxes. So
10 listen carefully to my question, I asked you when is the
11 last time that you provided any funds from one of your
12 individually titled accounts to cover some or all of the
13 taxes that are owed by your family to the federal
14 government?

15 MR. BRENNAN: Objection, form.

16 **A I'm not aware of doing that.**

17 MR. LUNDY: What is unclear about that question?

18 MR. BRENNAN: You've asked it --

19 **A Well, I've answered the question.**

20 MR. BRENNAN: Hold on. You've asked it, like,
21 five times or six times so it's really asked and
22 answered.

23 MR. LUNDY: Okay. But you said form.

24 MR. BRENNAN: You've asked it many times. Well,
25 form would be asked and answered.

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1 MR. LUNDY: I have asked it many times.

2 MR. BRENNAN: Right.

3 MR. LUNDY: And many times I haven't gotten an
4 answer.

5 MR. BRENNAN: I understand you're not getting
6 the answer you want but you got an answer.

7 MR. LUNDY: No, I'm not getting an answer to the
8 question. Okay.

9 MR. BRENNAN: I understand your position but
10 that's the objection.

11 BY MR. LUNDY:

12 Q What is the answer to the question, when is the
13 last time that you took money from your individual account
14 or any of your individual accounts and provided it to
15 anyone for the purposes of making a partial or complete
16 payment to the federal government for tax purposes?

17 **A My answer is going to be I don't remember, I
18 don't know.**

19 Q Can you recall any instance during this case
20 where you took any portion of the funds that you have
21 received from AP&G or your brother's real estate vehicles
22 and contributed any portion of those funds for tax
23 purposes?

24 **A I'm not aware.**

25 Q Okay. Have you initiated wire transfers from

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1 the Global bank account to your individual account --

2 MR. BRENNAN: Objection, form.

3 BY MR. LUNDY:

4 Q -- in the last 24 months?

5 **A I do not believe so.**

6 Q Have you wired any money for any purpose out of
7 the Global bank accounts while this case has been pending?

8 **A I have not physically done the wires. I was
9 forced on two occasions to contact SunTrust to get Into
10 Air, which is the entity that manages our jet, paid
11 because Monica advised treasury not to pay into Air for
12 certain travel. I asked twice, nobody wanted to do it. I
13 called the bank up, release the funds on Into Air. We owe
14 them the money. That's two wires in, literally, eight
15 years that I've ever even called the bank about.**

16 Q Okay. So you've given me two answers that, in
17 my mind, are in conflict?

18 **A I've given you one answer. Okay. The answer
19 is, Mike, that I've done two wires this year, called
20 SunTrust, emailed them, instructed them to pay our vendors
21 that we have a legal obligation to pay because Monica and
22 her team refused to do it. We've been doing this for five
23 years. This is not new practice for us. So it's just
24 irritating our clients, our vendors. It's not productive.
25 That's the only time I've done physically, mechanically**

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1 **done the wires myself.**

2 Q Are you sure that you've only done this two
3 times?

4 A **Now when you say "are you sure" no, I'm not
5 sure, okay, but it's --**

6 Q Do you recall --

7 A **-- it's not a large number.**

8 Q Do you think that you have the right to go to
9 the bank and initiate wire transfers from the corporate
10 bank account for your personal private air travel?

11 A **I own the company. I own 50 percent of this
12 company. I'm the CEO I should be able to do whatever I
13 want. See, if we had a really good operating agreement it
14 would define what we can and cannot do.**

15 Q You know what, let's touch on that?

16 A **Let's do.**

17 Q What corporate governance do you think this
18 company is lacking that would cause its value to
19 immediately increase to between eight and 12-and-a-half
20 times topline revenue?

21 MR. BRENNAN: Objection, form.

22 A **Immediately?**

23 BY MR. LUNDY:

24 Q Did you tell me that earlier?

25 A **No, you have more hyperbole than I do. I never**

Exhibit B to Wife's Amended Motion for
Order Preserving Marital Assets

**IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
FAMILY LAW DIVISION**

IN RE: The Marriage of:
MONICA CARDONE
Petitioner/Wife

CASE NO.: 20-9807-FD
DIVISION: 25

and

GARY CARDONE
Respondent/Husband

CARDONE SOLUTIONS AND
TECHNOLOGY, LLC
Corporate Defendant

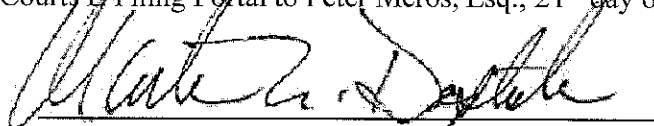
REQUEST FOR PRODUCTION OF DOCUMENTS

TO: Gary Cardone

COMES NOW, Wife, MONICA CARDONE, by and through her undersigned attorney, and requests that, Husband, GARY CARDONE, produce for inspection, copying and photographing the documents designated on the attached **Exhibit A**, which relate to the issues and disputes between the parties. Pursuant to Fam. L. R. P. Rule 12.350 these documents are to be produced, within thirty (30) days of service hereof, at the office of Older Lundy Koch & Martino, 1000 West Cass Street, Tampa, Florida 33606.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by automatic email generated by the Florida Courts E-Filing Portal to Peter Meros, Esq., 21st day of October 2022.



MICHAEL L. LUNDY (FBN 0227500)

mlundy@olalaw.com

MARTIN G. DEPTULA (FBN 074141)

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Older Lundy Koch & Martino

1000 West Cass Street

Tampa, Florida 33606

Telephone: (813) 254-8998

Facsimile: (813) 839-4411

Counsel for the Petitioner/Wife

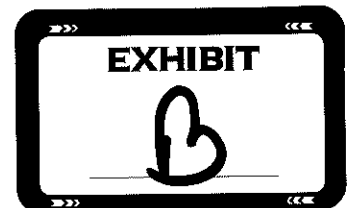


EXHIBIT A

1. A copy of all trust agreements and/or trust instruments created by or at the direction of Gary Cardone after December 1, 2020, for any trust in which Gary Cardone is a trustee, grantor or beneficiary, including, but not limited to, the trust agreement for the GTC 2022 Irrevocable Trust and/or the Gary T. Cardone 2022 Irrevocable Trust.

2. All documents, including but not limited to account statements from a banking or investment account, evidencing all transfers of assets into the GTC 2022 Irrevocable Trust and/or the Gary T. Cardone 2022 Irrevocable Trust, made after December 1, 2020.

3. All trust agreements and/or trust instruments concerning or in any way relating to the trust assigned Employer Identification Number 88-6653042.

4. All documents, including but not limited to account statements from a banking or investment account, evidencing all transfers of assets into the trust assigned Employer Identification Number 88-6653042.

5. All communications, including but not limited to email communications and text messages, between Gary Cardone and Diane Cardone from January 1, 2022 to the present concerning or in any way relating to any and all loans that Gary Cardone obtained from Diane Cardone, whether in his name individually or “on behalf of Gary T. Cardone of CardIVentures, LLC.”

6. The attachment to the email communication from Don Mandeville to Gary Cardone, sent on June 14, 2022, at approximately 11:35 a.m., titled, “Cardone 2022 Net Worth and ET Projection.xlsx”.

7. The attachment to the email communication from Gary Cardone to Don Mandeville, sent on June 14, 2022, at approximately 3:20 p.m., titled, “Cardone 2022 Net Worth and ET Projection.xlsx”.

8. All documents concerning or in any way relating to Gary Cardone's statement to Don Mandeville, made in an email sent by Mr. Cardone on June 14, 2022 at approximately 3:20 p.m., that Mr. Cardone "transferred 2.38 in crypto and 800k in cash for node 40."

9. All documents concerning or in any way relating to Gary Cardone's instructions to Brad Glover and Don Mandeville to "sell his entire nvidia position," which was made in an email sent by Mr. Cardone on June 17, 2022 at approximately 10:09 a.m.

10. All communications between Gary Cardone and Don Mandeville, concerning or in any way relating to any and all wire transfers executed by or on behalf of Gary Cardone from January 1, 2021 to the present.

11. All communications between Gary Cardone and Don Mandeville, concerning or in any way relating to Mr. Cardone's compliance and/or noncompliance with any and all loan covenants set forth in debt instruments to which Mr. Cardone is a party, signatory and/or debtor, during the period of time from June 1, 2021 to the present.

12. All communications between Gary Cardone and Don Mandeville, concerning or in any way relating to Mr. Cardone's payment of any and all margin loans and/or margin calls during the period of time from June 1, 2021 to the present.

Exhibit C to Wife's Amended Motion for
Order Preserving Marital Assets

From: Gary Cardone <gary@chargebacks911.com>

Sent: Monday, August 15, 2022 5:33 PM

To: Suraj Badlani <s.badlani@chargebacks911.com>; Gary Oceandrive <oceandrive2131@gmail.com>

Subject: cb911 business information for your deposition tmr

Suraj, as CEO and co-owner/founder of global, please be prepared for the deposition on Aug 16 and bring all your work materials and computer(s) used for the past two years of your employment with us to the deposition tomorrow so you can refer to your documents when asked a question.

If you don't bring those then this deposition will get dragged out and we will have to schedule more time (not fun or efficient).

My lawyers are very courteous and professional, that, you do not need to worry. The only coaching I can give you is to answer the questions to the best of your ability and tell the truth.

g



Exhibit D to Wife's Amended Motion for
Order Preserving Marital Assets

9/23/22, 4:31 PM

Gmail - Our Partnership

"The Chargeback Company™"

IMPORTANT NOTICE: The contents of this communication including any attachment(s) are confidential and may be privileged. Any unauthorized review, distribution, use of or reliance upon this information is prohibited. If you are not the intended recipient (or are not receiving this communication on behalf of the intended recipient), please notify the sender immediately and delete or destroy this communication without reading it and without making, forwarding or retaining any copy or record of it or its contents.

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[Quoted text hidden]

Miller, Skip <George.Miller@truist.com>
To: Gary Cardone <garycardone@gmail.com>

Wed, Aug 17, 2022 at 10:16 AM

Gary, that is kind of you and your preference on the food. I will see you at 12:30 and look forward to catching up.

[Quoted text hidden]

Gary Cardone <garycardone@gmail.com>
To: "Miller, Skip" <George.Miller@truist.com>

Tue, Aug 30, 2022 at 10:17 AM

Skip, just following up from our last meeting and providing updates.

Monica's attorneys have triggered the buy out provision of the company so this deal is most definitely happening. Literally just received it.

Do you guys have any interest in assisting; i have not seen what their offer is yet, i think they have ten days, but would like to know what your interest is so that I can determine next steps?

This thing is getting very interesting. Just need a sense if you guys can play a short term/mid term role to ensure we keep her honest. The company has nearly 11 million in bank will absolutely do 70 mill this year 5 large contracts with some of biggest names in payments; FIS, Paysafe, Barclays, Amadeus (travel), BoA, Fiserv

Anything that has a number under 300 million total enterprise value i will be a buyer for her stake, above that it becomes interesting. I think GC can and will get to 450m, irrespective of who is running the business me or her.

<https://mail.google.com/mail/u/0/?ik=56b7ad2680&view=pt&search=all&permthid=thread-f%3A1738252174009496978&siml=msg-f%3A1738252174009496978&siml=msg-a%3A%3A-5538351678848502471&sim...> 6/8

