

**IN THE SUPERIOR COURT OF _____ COUNTY
STATE OF GEORGIA**

	)	
_____ ,	)	
Plaintiff,	)	
	)	
v.	)	
	)	Civil Action File No. _____
_____ ,	)	
Defendant	)	
	)	
	)	

INTERROGATORIES

The ☐ Plaintiff or ☐ Defendant submits these interrogatories to the ☐ Plaintiff or ☐ Defendant, demanding that they be answered pursuant to O.C.G.A. section 9-11-33 and all other pertinent provisions of the Georgia Civil Practice Act.

1.

a. Please state your full name, giving all previous names, if any, by which you have been known: _____

b. What is the date of your birth? _____

c. Please state the country, city, county, and state of your birth: _____

d. Are you an American citizen? _____ If so, please state whether you acquired citizenship by birth or naturalization: _____

2.

Please give the following information with respect to your current residence and all locations at which you have previously resided since the date of your marriage to the .

a. Address (street or apartment number, state, city and county);

b. Type of residence (apartment, duplex, condominium, or single family dwelling);

c. Size of residence (number of square feet of living space, number of bedrooms, etc.);

d. Beginning and ending dates of your residence at each location;

e. Other persons besides yourself, including relatives and children, who now reside or have resided with you at each location.

3.

Please give the following information with respect to your educational background:

(a) High school from which you graduated and year of graduation;

(b) Any college or university degrees which you now hold, giving the date you received each degree, the college or university and field of concentration, i.e., major and minor;

(c) Name the location of each college or university which you have attended as a student, giving beginning and ending dates of such attendance;

(d) Any educational or vocational training other than the above which you have received, giving the names of the schools or institutions and the beginning and ending dates of your attendance as a student.

4.

Please give the following information with respect to your present and past employment:

(a) Present employer, giving the name, address and telephone number.

(b) Nature and description of your present job or employment.

(c) Gross income or earnings received from your present employer on an annual and monthly basis.

(d) If self-employed, please describe the nature of your work, giving the information requested in subparagraphs (a) through (c) above.

(e) Please list or describe all previous employers or self-employment, giving the information requested by subparagraphs (a) through (d) above.

(f) Do you have plans to change your present employment in the foreseeable future?

(g) Have you interviewed or consulted with anyone concerning a change in your employer or employment status within the past six months?

(h) If not employed, do you have any skills or training which will enable you to obtain a job?

(i) If not employed, have you ever attempted to obtain employment, and if so, when and where?

5.

Do you have the use or possession of an automobile or other motor vehicle? If so, please state the style and make of each automobile and the name of the respective owner.

6.

Do you have children born of a previous marriage or relationship with a party other than the Defendant? If so, please give the name, age, birthdate and birthplace of each child.

7.

Please list all charge accounts or credit cards which you now use or of which you have possession or control. What is the average monthly balance due for each of the listed accounts or cards for the past year?

8.

What amount of money did you spend on clothing for the past year?

(a) For yourself?

(b) For the children?

(c) For others?

9.

Have you taken any vacations or trips within the past year? If so, where did you go, with whom, and what were your expenses?

10.

Please give the following information with respect to your leisure time activities:

(a) Do you have hobbies or participate in recreational activities?

(b) What do you typically do in your leisure time?

(c) Do you own recreational equipment or vehicles (e.g., golf clubs, camping equipment, boats, vehicles, etc.)?

(d) Do you own or keep pets or animals? If so, please describe.

11.

Please give the following information with respect to your health and physical condition:

(a) What is the present condition of your health?

(b) Are you now under the care of a physician or psychologist? If so, for what condition(s) are you being treated?

(c) When was the last time you consulted with a physician or psychologist?

(d) Do you have an immediate need of further medical attention?

(e) What did you spend for personal medical services in the past year?

(f) What did you spend for medical services for the children, if any, in the past year?

(g) Do you have a foreseeable need for dental services?

(h) What did you spend for dental services in the past year?

12.

List all real property, giving complete legal descriptions, in which you have a right, title or interest, and state the nature of your interest.

-or-

If you own an interest in your present residence, please give the following information:

(a) What is the outstanding mortgage or debt on the residence?

(b) What is the fair market value?

(c) What is the amount of any payment which is being made to reduce the mortgage or other indebtedness thereon?

(d) Who makes the payment?

13.

Please state whether, as of the date of your receiving these interrogatories, you have any interest in an option to acquire an interest in real property. If so, please state the terms of the option(s), the optionee(s), and give a description of the property subject to each option.

14.

Please list all transfers of property, both real and personal, which you have made since _____ [date] to any individual or legal entity, describing the property transferred, the date of the transfer, to whom such property was transferred, the consideration paid by such transferee, and the consideration paid by you at the time of acquisition of the property.

15.

List each corporation in which you own stocks, bonds, debentures, franchises or operating rights, or of which you may be the payee of any note. With respect to each corporation, please give the following information:

(a) If you own stocks, state the number of shares of each class outstanding and the number of shares of each class held by you. List the total amount of dividends you have received on each of these stocks.

(b) If you own debentures, state the total number and denomination of debentures held by you. Also state the terms of the debentures, including the date of maturity and annual interest or coupons.

(c) If you hold bonds, state the total number and denomination of bonds held. Also state the terms of the bonds, including the date of maturity and annual interest or coupons.

(d) If you hold a franchise or other operating rights, please state in detail the nature of each franchise or operating right, including when and where acquired.

(e) If you have any other type of claim against any corporation, whether represented by note or otherwise, state the nature of the claim, the amount of the claim, and how evidenced with respect to each corporation concerned.

(f) State the date of acquisition by yourself with respect to any stocks, bonds, debentures, notes, other claims or evidence of indebtedness listed in response to this Interrogatory.

(g) If any of the stocks, bonds, debentures, notes or other evidence of indebtedness listed in answer to this Interrogatory are pledged as collateral, or otherwise used as security by you, state what is pledged, to whom pledged, and the amount of the debt for which it is pledged or used as collateral, as well as the date of the pledging.

16.

List, giving full descriptions, all municipal bonds owned by you as of the date of filing these interrogatories; state the date of acquisition, purchase price, maturity date, and interest rate with respect to such bonds.

(a) If you owned municipal bonds on _____ [date] or acquired such bonds thereafter which you no longer own, state the date of acquisition, purchase price, date on which your title was divested, whether by gift, sale or other transfer, and the consideration received, if any.

(b) If any of the bonds listed in answer to this Interrogatory are pledged as collateral, or otherwise used as security by you, state what is pledged, to whom pledged, and the amount of the debt for which it is pledged or used as collateral as well as the date of pledging.

17.

With respect to any business venture, whether it be a corporation, a general or limited partnership, sole proprietorship, joint venture, trust, or otherwise, in which you have a financial interest or from which you have received income, state the following:

(a) The name and principal location of the business, the financial interest which you have, the date or dates the interest was acquired and the consideration paid;

(b) The names and addresses of all other persons having a substantial interest in such business and the ratio or proportion that your interest has to the interest of all others therein;

(c) If any such business has an interest in real property, list such holdings, giving the date of acquisition and acquisition price. Describe the improvements, if any, on such real property;

(d) Attach the two most recent operating statements and annual balance sheets, or similar financial reports, with respect to each business venture;

(e) If you owned an interest on _____ [date] or acquired an interest thereafter, but did not own an interest as of the date of the filing of these Interrogatories, state the name and principal location of such business, the date of acquisition of the interest by yourself, the consideration paid, the date on which such interest terminated, whether by gift, sale or otherwise, and the consideration received with respect to each business.

18.

Have you paid a fee to a stockbroker or investment counselor within the past two years? If so, please state the name of each person or company and the amount paid.

19.

State whether or not you own an interest in oil or gas wells. If the answer is affirmative, state the following:

(a) The fair market value of your investment;

(b) The names of all other individuals or legal entities having an interest in the investment;

(c) The amount of income received by you from your interest in the years .[FN11]

20.

State whether or not you hold a patent or similar rights on any type of machine, process or product. If the answer is affirmative, state the following:

(a) The fair market value of your interest;

(b) The names of other individuals or legal entities having an interest in the patent rights;

(c) The amount of royalties received by you from such patent or other rights in the years _____ [date] through _____ [date].

21.

List all loans made by you to any person(s) other than corporations which have not been satisfied as of the date of filing these Interrogatories, and state the following with respect to such loans:

(a) The name of the borrower, the amount loaned, the terms of the loan, including interest rate and manner of payment, the amount due, both interest and principal;

(b) If any loans are secured by collateral, describe the collateral securing such loan.

22.

State with respect to each of the years _____
[list the years about which you need information] the following information:

(a) Each and every source of your gross income and the amount of gross income derived from each source;

(b) Your expenses attributable to each source of income listed;

(c) The net income from each source listed.

23.

Please fill out in complete detail the document attached hereto as Exhibit A, the Domestic Relations Financial Affidavit giving all information requested concerning your personal living expenses and budget.

24.

List the location of all safe-deposit boxes, safes, vaults, or other places of safekeeping valuable papers in the name of or used by yourself as of the date of filing these Interrogatories.

25.

Please prepare an itemized inventory of all items kept in the places listed in answer to the preceding Interrogatory.

26.

Please prepare an itemized inventory of all your stocks, bonds, securities, notes, receivables, deeds, jewelry, and other valuable papers and items not included in the answer to the preceding Interrogatory, and indicate the place where such items are located.

27.

List the names of all banks or savings institutions where you have a checking or savings account in your name, or in the name of another person or business, but against which you are authorized to draw checks or make withdrawals. State the amount in each account as of the date of filing these Interrogatories as well as the amount on .[FN15]

28.

List all cash (in excess of \$500.00) which was at any one time given or transferred since ,[FN16] to any relative by blood or marriage, or any other individual or legal entity. State the date of such transaction, the name and address of the recipient, the amount involved and the purpose for which such transfer was made.

29.

List all transfers, gifts, or other acts whereby custody or possession of property, real or personal, was transferred by you to any trust since _____[date]. With respect to such transfers, state the date of the transfer, the property transferred, the recipient of the transfer, the beneficiaries of the trust, and the acquisition cost of the transferred property to you.

30.

List any trust created by you, stating the date of its creation, the names of the trustees, the beneficiaries, the terms of the trust, including the date or event upon which it will terminate and the amount and source of the corpus of the trust.

31.

List any trust(s) not included in the answers to the two preceding Interrogatories of which you are a trustee. State the date of creation, names of other trustees, the beneficiaries, the terms of the trust(s), including the date or event upon which it will terminate and the amount and source of the corpus of the trust(s).

32.

List any trust(s) of which you are a beneficiary, and with respect to such trust(s), state the following:

(a) The amount and original source of the trust corpus;

(b) The annual income of the trust(s) for the past two (2) years, the amount of income distributed to the beneficiaries, and the amount received in each of the last two (2) years by each beneficiary;

(c) The date of any encroachment of trust corpus paid to or used for the benefit of yourself.

33.

List any estate, will and testament of which you have been an heir, devisee, legatee, or have in any way received property. With respect to such estate, state the following:

(a) The name of the decedent, date of death, decedent's relation to you, if any, and the executor or administrator;

(b) All property, real or personal, which was received by you, or to which you are entitled;

(c) The names of all other persons who have received property from such estate.

34.

List all estates not included in the response to the preceding Interrogatory for which you are an executor or administrator, or have held such position since _____ [date].

35.

List all policies of life insurance, including retirement or endowment policies, which name you as the principal insured. State with respect to such policies the following:

(a) The insurance carrier, date of issue, face amount of policy, plan of insurance, owner of the policy, named beneficiary(s) and whether the beneficiary designation is revocable;

(b) The annual premium and the person or business entity making payments;

(c) The cash or surrender value, if any, as of the date of the filing of these Interrogatories;

(d) If any insurance is pledged or assigned as collateral for a loan, or if there is a policy loan outstanding, state the amount of the loan, the lender, and the terms of the loan.

36.

List all current loans to yourself from any bank or lending institution. With respect to each loan state the following:

(a) The date of the loan, the name of the lender, the terms of the loan and the purpose of the loan.

37.

State whether or not you have prepared a financial statement showing your assets and/or liabilities. With respect to each financial statement, list the following:

(a) The date of the financial statement;

(b) To whom given;

(c) Where the original or a copy is now located.

38.

State whether or not you filed income tax returns with the State and Federal governments for the years [FN19]. If the answer is yes, please state the following (or attach a complete copy of the returns):

(a) Place of filing;

(b) Your gross income;

(c) Amount of deductions claimed by you;

(d) Your total taxable income;

(e) Tax paid or refund given.

39.

Please describe in detail what, if any, grounds you have for divorce against the ☐ Plaintiff or ☐ Defendant or what, if any, complaints you now have against the ☐ Plaintiff or ☐ Defendant as a spouse [or as a parent].

40.

Please state the name and address of each person who has assisted in the preparation of the answers to these Interrogatories, the capacity in which he assisted and the assistance given.

Respectfully submitted,

☐ Plaintiff or ☐ Defendant *pro se*

_____,)
)
 Plaintiff,)
)
 v.) Civil Action No. _____
)
 _____,)
)
 Defendant.)

I hereby certify that I have this day served the foregoing _____ [full title of pleading or other document being served] upon the following counsel for [party] [or party if no counsel of record] by delivering [or causing to be delivered] by hand a copy of same as follows:

Telephone Number _____

Exhibit A—Domestic Relations Financial Affidavit of ☐ Plaintiff or ☐ Defendant

In the Superior Court of _____ County, Georgia

_____	)	
, Plaintiff	)	
	)	
vs.	)	Civil Action No. _____
	)	
_____	)	
, Defendant	)	
	)	

DOMESTIC RELATIONS FINANCIAL AFFIDAVIT

1. AFFIANT'S NAME: _____ Age _____

Spouse's Name: _____ Age _____

Date of Marriage: _____ Date of Separation _____

Names and birth dates of children for whom support is to be determined in this action:

Name	Date of Birth	Resides with
------	---------------	--------------

_____	_____	_____
_____	_____	_____
_____	_____	_____

Names and birth dates of affiant's other children:

Name	Date of Birth	<u>Resides with</u>
------	---------------	---------------------

_____	_____	_____
_____	_____	_____
_____	_____	_____

2. SUMMARY OF AFFIANT'S INCOME AND NEEDS

(a) Gross monthly income (from item 3A) \$ _____

(b) Net monthly income (from item 3C) _____

(c) Average monthly expenses (item 5A)	\$ _____
Monthly payments to creditors	+ _____
Total monthly expenses and payments to creditors (item 5C)	_____

(subsections (d) & (e) deleted)

3. A. AFFIANT'S GROSS MONTHLY INCOME (complete this section or attach Child Support Schedule A)

(All income must be entered based on monthly average regardless of date of receipt.)

Salary or Wages \$ _____
ATTACH COPIES OF 2 MOST RECENT WAGE STATEMENTS

Commissions, Fees, Tips \$ _____

Income from self-employment, partnership, close corporations,
and independent contracts (gross receipts minus ordinary
and necessary expenses required to produce income)
ATTACH SHEET ITEMIZING YOUR CALCULATIONS \$ _____

Rental Income (gross receipts minus ordinary and
necessary expenses required to produce income)
ATTACH SHEET ITEMIZING YOUR CALCULATIONS \$ _____

Bonuses \$ _____

Overtime Payments \$ _____

Severance Pay \$ _____

Recurring Income from Pensions or Retirement Plans \$ _____

Interest and Dividends \$ _____

Trust Income \$ _____

Income from Annuities \$ _____

Capital Gains \$ _____

Social Security Disability or Retirement Benefits \$ _____

Workers' Compensation Benefits \$ _____

Unemployment Benefits \$ _____

Judgments from Personal Injury or Other Civil Cases \$ _____

Gifts (cash or other gifts that can be converted to cash) \$ _____

Prizes/Lottery Winnings \$ _____

Alimony and maintenance from persons not in this case \$ _____

Assets which are used for support of family \$ _____

Fringe Benefits (if significantly reduce living expenses) \$ _____

Any other income (do NOT include means-tested Public assistance, such as TANF or food stamps) \$ _____

GROSS MONTHLY INCOME \$ _____

(prior section B deleted)

B. Affiant's Net Monthly Income from employment
(deducting only state and federal taxes and FICA) \$ _____

Affiant's pay period (i.e., weekly, monthly, etc.) _____

Number of exemptions claimed _____

4. ASSETS

(If you claim or agree that all or part of an asset is non-marital, indicate the non-marital portion under the appropriate spouse's column and state the amount and the basis: pre-marital, gift, inheritance, source of funds, etc.).

Description	Value	Separate Asset of the Husband	Separate Asset of the Wife	<u>Basis of the Claim</u>
Cash	\$ _____	_____	_____	_____
Stocks, bonds	\$ _____	_____	_____	_____
CD's/Money Market Accounts	\$ _____	_____	_____	_____
Bank Accounts (list each account):				
_____	\$ _____	_____	_____	_____
_____	\$ _____	_____	_____	_____
_____	\$ _____	_____	_____	_____
<u>Retirement Pensions, 401K, IRA, or Profit Sharing</u>	\$ _____	_____	_____	_____
Money owed you:	\$ _____	_____	_____	_____

Tax Refund

owed you: \$ _____

Real Estate:

home: \$ _____

debt owed: \$ _____

other: \$ _____

debt owed: \$ _____

Automobiles/Vehicles:

Vehicle 1: \$ _____

debt owed: \$ _____

Vehicle 2: \$ _____

debt owed: \$ _____

Life Insurance

(net cash value): \$ _____

Furniture/furnishings: \$ _____

Jewelry: \$ _____

Collectibles: \$ _____

Other Assets: \$ _____

_____ \$ _____

_____ \$ _____

_____ \$ _____

Total Assets: \$ _____

5. A. AVERAGE MONTHLY EXPENSES

HOUSEHOLD

Mortgage or rent payments \$ _____ Cable TV \$ _____

Property taxes \$ _____ Misc. household and
grocery items \$ _____

Homeowner/Renter Insurance \$ _____ Meals outside the home \$ _____

Electricity	\$ _____	Other	\$ _____
Water	\$ _____	AUTOMOBILE	
Garbage and Sewer	\$ _____	Gasoline and oil	\$ _____
Telephone:		Repairs	\$ _____
<u>residential line:</u>	\$ _____	Auto tags and license	\$ _____
<u>cellular telephone:</u>	\$ _____	Insurance	\$ _____
Gas	\$ _____	<u>OTHER VEHICLES</u>	
		<u>(boats, trailers, RVs, etc.)</u>	
		<u>Gasoline and oil</u>	\$ _____
Repairs and maintenance:	\$ _____	<u>Repairs</u>	\$ _____
Lawn Care	\$ _____	<u>Tags and license</u>	\$ _____
Pest Control	\$ _____	<u>Insurance</u>	\$ _____

CHILDREN'S EXPENSES

Child care <u>(total monthly cost)</u>	\$ _____
School tuition	\$ _____
<u>Tutoring</u>	\$ _____
<u>Private lessons (e.g., music, dance)</u>	\$ _____
School supplies/expenses	\$ _____
Lunch Money	\$ _____
<u>Other Educational Expenses (list)</u>	
_____	\$ _____
_____	\$ _____
Allowance	\$ _____
Clothing	\$ _____
Diapers	\$ _____
Medical, dental, prescription	

AFFIANT'S OTHER EXPENSES

Dry cleaning/laundry	\$ _____
Clothing	\$ _____
Medical, dental, <u>prescription</u> <u>(out of pocket/uncovered expenses)</u>	\$ _____
Affiant's gifts (special holidays)	\$ _____
Entertainment	\$ _____
<u>Recreational Expenses (e.g., fitness)</u>	\$ _____
Vacations	\$ _____
<u>Travel Expenses for Visitation</u>	\$ _____
Publications	\$ _____
Dues, clubs	\$ _____
Religious and charities	\$ _____
<u>Pet expenses</u>	\$ _____
Alimony paid to former spouse	\$ _____

(out of pocket/uncovered expenses) \$ _____

Grooming, hygiene \$ _____ Child support paid for other \$ _____
children

Gifts from children to others \$ _____ Date of initial order: _____

Entertainment \$ _____ Other (attach sheet) \$ _____

Activities (including extra-curricular, school, religious, cultural, etc.) \$ _____

Summer Camps \$ _____

OTHER INSURANCE

Health \$ _____
Child(ren)'s portion: \$ _____

Dental \$ _____
Child(ren)'s portion: \$ _____

Vision \$ _____
Child(ren)'s portion: \$ _____

Life \$ _____
Relationship of Beneficiary: _____

Disability \$ _____

Other(specify): \$ _____

TOTAL ABOVE EXPENSES \$ _____

B. PAYMENTS TO CREDITORS

(please check one)

To Whom:	Balance Due	Monthly Payment	Joint	Plaintiff	Defendant

--	--	--	--	--	--

TOTAL MONTHLY PAYMENTS TO CREDITORS: \$ _____

C. TOTAL MONTHLY EXPENSES: \$ _____

This _____ day of _____, 20_____.

Affiant

Notary Public