

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

IN RE: THE MARRIAGE OF

CASE NO: 501971DR004137XXDIFD

WILLIAM A. CABANA,
Petitioner/Former Husband,

FAMILY DIVISION

and

SHARON ANN MAYO f/k/a
SHARON ANN CABANA
Respondent/Former Wife.

**FORMER WIFE'S EMERGENCY MOTION FOR INJUNCTION, FOR
SANCTIONS, AND FOR OTHER RELIEF**

COMES NOW the Former Wife, SHARON ANN MAYO, by and through undersigned counsel, files her Emergency Motion for Injunction, for Sanctions, and for Other Relief, and in support thereof states as follows:

1. This matter is before the Court on Former Husband's Supplemental Petition for Modification and Former Wife's Motion for Contempt.
2. The Former Husband has established a website entitled "Abolish-Alimony.org" for the purpose of causing damage to his Former Wife and for the further purpose of generating revenues to himself.
3. On the website, the Former Husband has published many of the pleadings in the captioned cause, together with copies of documents produced by Former Wife in response to production requests, *as well as other of Former Wife's financial records* including, but not limited to:

- a. Former Wife's tax returns which reflect her social security number;
- b. Former Wife's bank statements, which reflect Former Wife's name, address and bank account numbers;
- c. Former Wife's credit card statements, which reflect Former Wife's name, address and credit card account numbers; and
- d. Former Wife's financial affidavits.

4. By way of example, and as referenced in Exhibit "A" annexed hereto, a partial printout of the website, Former Husband has scanned and published his "Motion to Deny Former Wife's Amended Motion for Contempt, Notice of Intent to Use Summaries and Compilations, Notice of Production From Non-Party, Motion to Strike Contempt Defenses, Motion to Compel Production, Interrogatories and Financial Affidavit and Motion for Change of Venue", together with Exhibits A thru P (D.E. 157), which include the items detailed above in paragraphs 3 (a) through (d).

5. By way of contrast, Former Husband has omitted to publish his answers to interrogatories (containing Former H's personal financial information) and has obliterated his social security number on any documents published on the website. See exhibits B through G annexed hereto, which are the form of the documents as downloaded from the Abolish-Alimony.org website.

6. Former Husband has repeatedly indicated his intention to defend the pending

Motion for Contempt by causing Former Wife to incur legal fees and expenses to thereby harass and intimidate Former Wife from collection of her Court awarded support. Annexed hereto as Exhibit "H" is a partial printout from Former Husband's website entitled "Abolish-Alimony.org. (See page 2).

7. Former Husband's actions are wilful, malicious, and strictly intended to cause harm to Former Wife. Former Wife verily believes that she has been or will be the victim of identity thief.

8. In his website, in addition to the foregoing, Former Husband offers for sale a "handbook" entitled "Fight Back!! How to Challenge Alimony Laws And Stop Contempt Of Court Hearings" at a price of \$39.95 (\$34.95 introductory price) per handbook. See Exhibit "H" page 4.

9. Former Wife's personal financial documents that have been published by Former Husband on the website are available at no cost to the general public and anyone who logs on to this website.

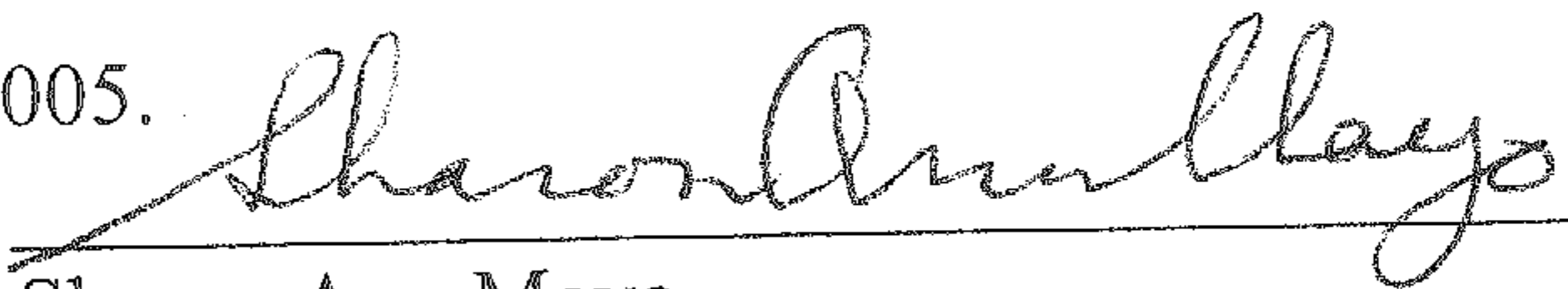
10. Former Wife has incurred attorneys fees, costs and expenses as a result of the foregoing, for which Former Husband should be held answerable.

11. The undersigned attorney hereby certifies that no efforts have been made to give notice of this motion to the Former Husband since the giving of such notice may

precipitate further harm sought to be avoided by the motion.

WHEREFORE, Former Wife prays that this Court enter an emergency temporary and permanent injunction, affirmatively requiring Former Husband to immediately close the website and remove all documents published thereon, order Former Husband to post a bond in an amount of not less than \$20,000.00 toward Former Wife's fees and expenses in investigation of Former Husband's activities and protection of herself from the results thereof; for an award of attorney's fees and costs and for such other and further relief as may be proper.

Dated this 18th day of August, 2005.



Sharon Ann Mayo

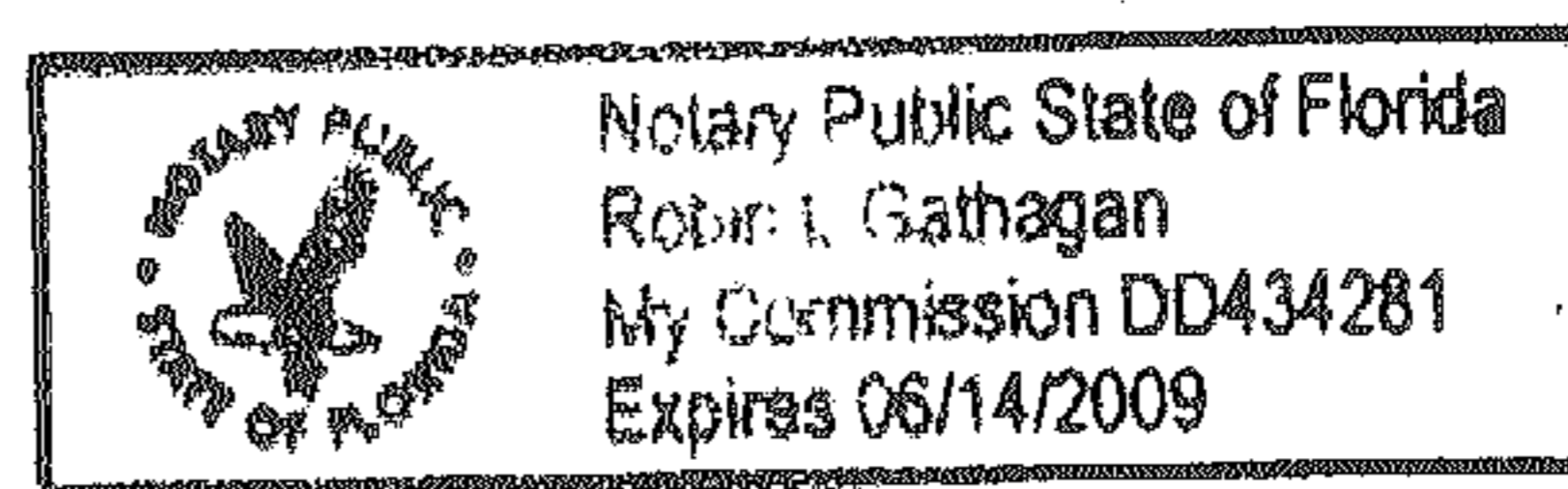
STATE OF FLORIDA)
COUNTY OF PALM BEACH)

BEFORE ME, the undersigned authority, personally appeared Sharon Ann Mayo, who, by me being first duly sworn, deposes and states under oath that she has reviewed the foregoing Emergency Motion for Injunction, for Sanctions, and for Other Relief, and that the facts alleged therein are true and correct.



NOTARY PUBLIC - STATE OF FLORIDA

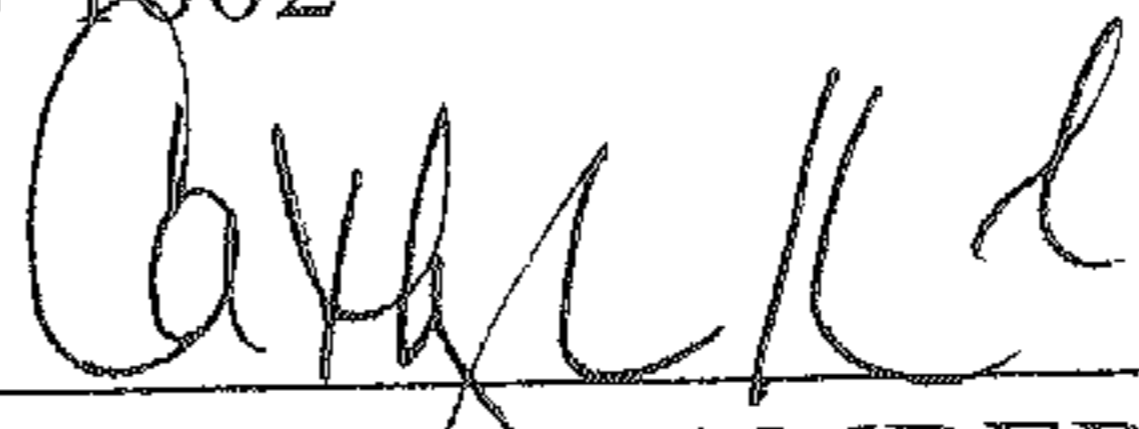
[Print, type, or stamp commissioned name of notary]



Personally known
 Produced identification
Type of identification produced _____

I HEREBY CERTIFY that a true copy of the foregoing was furnished by mail to Mr.
William A. Cabana, 1050 Capri Isles Blvd., #F105, Venice, FL 34292, this 18 day of
August, 2005.

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By: 
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