

The Litigator's Financial-Records Checklist

What to request before depositions, mediation, or expert disclosure

A forensic analysis is only as strong as the records under it — and a summary a party prepared is a starting point, not evidence. Banks and lenders can take **weeks** to produce older records, so build these requests early and check that the file is complete before you commit to a deposition or mediation date.

1 Bank & brokerage statements

- ☐ Monthly statements for **every account** each party holds or controls, from before the relevant start date through the present
- ☐ Joint and individually held accounts, including any closed during the period
- ☐ Native statements from the institution — not screenshots, exports, or summaries
- ☐ Check images and wire confirmations for large or disputed transfers

2 Real property

- ☐ Closing disclosure or settlement statement (CD / HUD-1) for the original purchase
- ☐ **Every refinance** closing statement — cash-out refinances change the analysis and are the single most-forgotten document
- ☐ The deed(s) and any co-ownership or contribution agreement, recorded or not
- ☐ Lender year-end statements showing principal, interest, taxes, and insurance
- ☐ Property tax bills and homeowners insurance records

3 Business & entity records *where a business is in play*

- ☐ Federal and state business tax returns for the relevant years
- ☐ Financial statements and the general ledger — request a **native export**, not a PDF
- ☐ Bank statements for every business account
- ☐ Owner distributions, loans to and from owners, and payroll records
- ☐ Buy-sell or operating agreements and any prior valuations

4 Individual tax records

- ☐ Personal federal and state returns for the relevant years, with all schedules, W-2s, and 1099s
- ☐ Amended returns and any correspondence with taxing authorities

5 Originating documents

to trace separate / non-marital funds

- ☐ Estate accountings or probate distributions
- ☐ Gift letters and documentation of the gift's source
- ☐ Statements dated **before** the marriage or the disputed event, to fix a starting balance

6 Loans & credit

- ☐ Mortgage, HELOC, auto, and personal loan statements and payoff records
- ☐ Credit card statements, where spending or lifestyle is at issue

Format & completeness — where cases are won or lost

- Request records in **native format from the institution**, not a summary a party assembled.
- Ask for the **full date range in one request** — partial pulls cost weeks and invite a second round.
- For every transfer that matters, request **both sides**: the account it left and the account it landed in.
- Confirm there are **no gaps**. Missing months are exactly where the disputed dollars hide.

Not sure which records your matter actually needs?

A 20-minute scoping call narrows this list to the **accounts and years that move your case.**

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