# **Hidden/Dissipated Assets**

All of these vehicles/assets were owned by Plaintiff at time of separation but omitted on his CIS

2011 Lotus Evora

2015 Dodge Challenger

2008 Jeep Wrangler

\$64,000

\$44,000

\$22,000

Also, see Factory Five Racing, Inc. 8/18/2015 receipt for \$10,184.50 deposit for Cobra Replica Kit

# Total Estimated Value \$140,184.50



Above picture taken at marital home on 5/10/2015

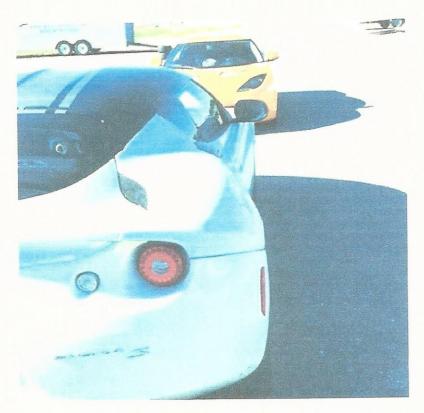
Subsequent pictures of these cars taken at Plaintiff's new house after 8/22/2015 separation





2011 Lotus Evora
Picture taken at Plaintiff's house on 9/22/2015 after 8/22/2015 separation







Today at the track



2011 Lotus Evora
Picture taken "at the track" on 11/16/2015 after 8/22/2015 separation and 10/26/2015 CIS





Lil Draco (@josh.regnaert

)

I miss the chally 😩

① 12:00am 12/29/2015 ♀ 1 ♥ 33

2015 Dodge Challenger and 2008 Jeep Wrangler Picture taken at Plaintiff's house after 8/22/2015 separation



9:32 PM pictaram.com







Cobra Replica Kit Car
See deposit information on Factory Five Racing, Inc. receipt printed on 8/18/2015 before 8/22/2015 separation

Plaintiff's 2015 Ram Truck, also pictured on 9/5/2015, was omitted on 10/26/2015 CIS
Defendant paid the auto insurance on this vehicle from September 2015 until January 2016
Picture taken at Factory Five Racing, Inc. on 9/5/2015

Car is worth more when built

## FACTORY FIVE RACING, INC

9 Tow Road

Wareham, MA 02571

Phone: (508) 291-3443 Fax: (508) 291-3883

Bill To:

TODD REGNAERT 2816 VINE ROAD Vineland, NJ 08360

## Sales Order# 099565

Account ID 00760143	Contact REGNAE	RT, TODD
Customer PO 00760143	Telephone (609) 805-5964	Facsimilie

Ship To:

TODD REGNAERT 2816 VINE ROAD Vineland, NJ 08360

Order Date 07/15/2014		ments	CKUP 9/5/15 VD	Special Instructions		Terms 10 E	DAYS PRIOR
Ship Via PICK L		Date Required 09/05/2015	FOB Wareham	From Quote	<del>2</del> #	Salesperson VINNY I	DEGEORGE
Ordered	Shipp	ed Open	Item# Description	UOM	Date Required	Price	Total
1	0	1	PAYMENT \$1,000.00 CC#8	EACH 3004 10/09/2014 JS	09/05/2015	\$0.0000	\$0.0
1	0	1	PAYMENT PAYMENT \$1,184.50 CC 1	EACH 2/02/2014 - JK	09/05/2015	\$0.0000	\$0.0
1	0	1	12189 POWDER COATING ROA	EACH DSTER CHASSIS	09/05/2015	\$399.0000	\$399.0
1	0	1	12070 BODY CUT-OUTS	EACH	09/05/2015	\$149.0000	\$149.0
1	0	1	12453 BATTERY CUT-OFF SWIT	EA	09/05/2015	\$29.0000	\$29.0
1	0	1	11195 PAIR OF EXTERNAL BAT	PAIR TERY POSTS	09/05/2015	\$36.0000	\$36.0
1	0	1	14758 BOX 12 K 3-LINK DELUX	EACH E REAR SUSPENSION	1 09/05/2015	\$0.0000	\$0.0
1	0	1	PAYMENT PAYMENT \$1,000.00 CC	EACH 5/8/2015 - DG	H 09/05/2015	\$0.0000	\$0.0
1	0	1	13083 302-351 ENGINE/TRANS	MOUNTS	09/05/2015	\$0.0000	\$0.0
1	0	1	14776 28 SPLINE 10.625" DRIV	EACH ESHAFT	H 09/05/2015	\$0.0000	\$0.0

## FACTORY FIVE RACING, INC

9 Tow Road

Wareham, MA 02571

Phone: (508) 291-3443 Fax: (508) 291-3883

Sales Order#

099565

Account ID 00760143	Contact REGNAE	RT, TODD
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Bill To:

TODD REGNAERT 2816 VINE ROAD Vineland, NJ 08360

Order Date 07/15/2014	Commen		CKUP 9/5/15 VD	Special Instructi	ions		Terms 10 E	AYS PRIOR
Ship Via PICK L		Required 9/05/2015	FOB Wareham	Fron	n Quote#		Salesperson VINNY E	DEGEORGE
Ordered	Shipped	Open	Item# Description		UOM	Date Required	Price	Total
1	0	1	PAYMENT PAYMENT \$1,000 CC 6/5/1		EACH	09/05/2015	\$0.0000	\$0.0
1	0	1	50018 289 COMPLETE KIT		EACH	09/05/2015	\$21,990.0000	\$21,990.0
1	0	1	13861 '87-'95 STRAIGHT TUBES,	STAINLESS	EACH	09/05/2015	\$0.0000	\$0.0
1	0	1	15478 BOX 9 D LOWBACK VINT.	AGE RACE SEATS	EACH	09/05/2015	\$0.0000	\$0.0
1	0	1	13242 PIN-DRIVE FRONT SUSPE	NSION	EACH	09/05/2015	\$0.0000	\$0.0
1	0	1	14758 BOX 12 K 3-LINK DELUXE	REAR SUSPENSI	EACH	09/05/2015	\$0.0000	\$0.0
1	0	1	15748 FFR 289 ELECTRIC GAUG	E SET W/KIT	EACH	09/05/2015	\$0.0000	\$0.0
1	0	1	15549 ROADSTER WIPER KIT		EACH	09/05/2015	\$499.0000	\$499.0
1	0	1	14816 ROADSTER HEATER/DEFI	ROSTER	EACH	09/05/2015	\$349.0000	\$349.0
1	0	1	12079 COMPETITION SIDE MIRR	OR	EA	09/05/2015	\$35.0000	\$35.0

### FACTORY FIVE RACING, INC

9 Tow Road

Wareham, MA 02571

Phone: (508) 291-3443 Fax: (508) 291-3883

Sales Order#

099565

Account ID 00760143	Contact   REGNAE	RT, TODD
Customer PO 00760143	Telephone (609) 805-5964	Facsimilie

Bill To:

TODD REGNAERT 2816 VINE ROAD Vineland, NJ 08360 Ship To:

TODD REGNAERT 2816 VINE ROAD Vineland, NJ 08360

ATTENTION! - This is an Order Confirmation. Please Check the Line Items for Accuracy

				Mark Consider	-
Special	Order		Drnn	Shin	1
Sheriai	Oluci	$\perp$	DIOP	A b	1

Order Date 07/15/201	Comme 4		CKUP 9/5/15 VD	Special Inst	tructions		-	erms 10 DAYS PRIOR
Ship Via	Da	te Required 09/05/2015	FOB Wareham	and the same of th	From Quote#		Salesperson	NY DEGEORGE
Ordered	Shipped	Open	Item# Description		MOU	Date Required	Price	Total
1	0	1	15774 289 USRRC STYLE (NO E	BUMP) TRUNK	EACH	09/05/2015	\$0.0000	\$0.00
1	0	1	DISCOUNT 50/50 SPECIAL SPECIAL	. SPRING 2015 -	EACH JK	09/05/2015	-\$748.000	0 -\$748.00
1	0	1	PAYMENT PAYMENT \$6,000.00 CK1	1094 6/13/2015 J	EACH	09/05/2015	\$0.0000	\$0.00

Comments

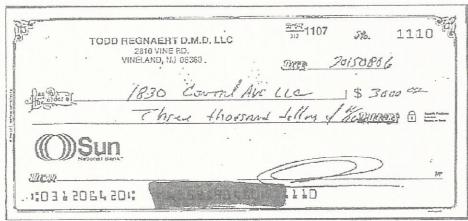
LINE ITEMS WITH A ZERO DOLLAR VALUE ARE A NO COST REVISION TO THE PAID KIT OR OPTION.

NOTE ON MISSING ITEMS: PLEASE COMMUNICATE ANY ITEMS MISSING FROM THE SHIPMENT IMMEDIATELY UPON DELIVERY BY CALLING 508-291-3443. ANY PARTS NOTED AS MISSING BEYOND 45 DAYS AFTER THE DELIVERY DATE MUST BE PURCHASED AT THE CURRENT RETAIL PRICE.

\$22,738.00
\$0.00
\$0.00
\$22,738.00
\$10,184.50
\$12,553.50

The key case that defines what is dissipation is <u>Kothari v. Kothari</u>, 255 N.J. Super 500 (App. Div. 1992). Here, the Appellate Division defined dissipation as "where a spouse uses marital property for his or her own benefit and for a purpose unrelated to the marriage at a time when the marital relationship was in serious jeopardy."

The check, dated 08/06/2015, is Todd's deposit for his rental home where he is, presently, residing. Below, are just some of the vehicles that Todd owned during our 8 1/2 year marriage. He claimed financial hardship, immediately, after we wed. I, then, worked for him for free much of the time from April 2007 to Dec 2008 and paid over \$80,000 worth of his He paid none of mine. I only bills. purchased necessities for myself and our child while Todd spent, continuously, on his hobbies and cars. Whenever he didn't get what he wanted,



08/11/2015 1110 \$3,000.00

he'd threaten suicide or go into an angry rage. Todd taught this same behavior to his older son. He, then, filed bankruptcy in Dec 2008, moved into my premarital home in March 2009 and continued his selfish spending while making me pay the majority of living expenses until Feb 2013. When Todd started paying the majority of living expenses, he grew angrier and verbally abusive. We separated 2 ½ years later on 08/22/2015. Todd then hid assets, misrepresented his income and lied about funding the remodeling of my premarital home among many other things, in our divorce trial, on 10/16/2016.

2002 FORD F-350	(FL-NJ)	PREMARITAL	PAID IN FULL	1FTSX31S72EA88699	Misrepresented in Chapter 13
SPEC RACER FORD	(FL)	PREMARITAL	PAID IN FULL		Sold before filing Chapter 13
1970 PLYMOUTH CUDA	(FL)	PREMARITAL	PAID IN FULL	BP23G0B176933	Sold before filing Chapter 13
1965 BACKDRAFT COBRA	(FL)	PREMARITAL	PAID IN FULL	AA9BMAAHV61CN1056	Sold before filing Chapter 13
1966 FORD MUSTANG	(FL-NJ)	PREMARITAL	PAID IN FULL		Hid in Chapter 13
2005 OUTBACK RV TRAILER	(FL-NJ)	PREMARITAL	PAID IN FULL	4YDT25R295G912324	Misrepresented in Chapter 13
2005 LOTUS ELISE	(FL)	PREMARITAL	BALANCE DUE	SCCPC111X5HL34949	Repossessed in Chapter 13
2007 FORD MUSTANG	(FL)	MARITAL 2007	BALANCE DUE	1ZVHT82H875290509	Repossessed in Chapter 13
1969 FORD MUSTANG	(FL)	MARITAL 2007	PAID IN FULL		Sold before filing Chapter 13
FORMULA RACECAR	(FL)	MARITAL 2007	PAID IN FULL		Sold before filing Chapter 13
1978 FIAT SPYDER	(FL)	MARITAL 2008	PAID IN FULL	JM1NA3517M1221651	Misrepresented in Chapter 13
1966 PLYMOUTH BELVEDERE	(FL-NJ)	MARITAL 2008	PAID IN FULL	RH27E67239805	Misrepresented in Chapter 13
1991 MAZDA	(FL-NJ)	MARITAL 2008	PAID IN FULL	JM1NA3517M1221651	Purchased 3 days after filing Chapter 13
1997 MAZDA	(NJ)	MARITAL 2009	PAID IN FULL	JM1NA3539V0724364	Purchased during Chapter 13
(BLUE) LOTUS RACECAR	(NJ)	MARITAL 2009	PAID IN FULL		Purchased during Chapter 13
1996 FORD SALEEN MUSTANG	(NJ)	MARITAL 2010	PAID IN FULL	1FALP42X8TF189594	Purchased during Chapter 13
2001 PORSCHE 911 CARRERA	(NJ)	MARITAL 2012	PAID IN FULL	WP0AA29931S621611	Purchased during Chapter 13
2006 MAZDA MX-5 MIATA	(NJ)	MARITAL 2012	UNKNOWN	JM1NC25FX60118040	Purchased during Chapter 13
2007 FORD SALEEN MUSTANG	(NJ)	MARITAL 2013	PAID IN FULL	1ZYFT85H075264862	Purchased during Chapter 13
2008 JEEP WRANGLER	(NJ)	MARITAL 2013	PAID IN FULL	1J4GA59128L545447	Sold after separation on 8/29/15
2013 SUBARU BRZ	(NJ)	MARITAL 2013	PAID IN FULL	JF1ZCAC12D1607399	Sold /Hid before separation
(BLACK) LOTUS 7 RACECAR	(NJ)	MARITAL 2014	PAID IN FULL		Sold /Hid before separation
1995 EXCALIBUR COBRA	(NJ)	MARITAL 2014	PAID IN FULL	1XACA2310SM123084	Sold /Hid before separation
2011 LOTUS EVORA	(NJ)	MARITAL 2014	UNKNOWN	SCCLMDTUIBHA10288	Sold /Hid after separation
2015 DODGE CHALLENGER	(NJ)	MARITAL 2015	UNKNOWN	2C3CD2AT1FH711861	Sold /Hid after separation
FACTORY FIVE COBRA (DEPOS	IT) (NJ)	MARITAL 2015	PAID IN FULL		Misrepresented in separation
2015 RAM TRUCK	(NJ)	SEPARATED 2015	UNKNOWN	3C6RR7LTXFG629627	Purchased after separation on 08/30/15
PLYMOUTH PROWLER	(NJ)	SEPARATED 2016	UNKNOWN		Purchased after separation
1986 FORD MUSTANG	(NJ)	SEPARATED 2016	UNKNOWN		Purchased after separation

Todd's older son drove 5 different cars during our separation. Todd claimed to support him 100%. Both, now, drive brand new vehicles.

# Some of Todd's vehicles



029



DSC00101



DSC00634



DSC01025





DSC01301



DSC01464



DSC01742



DSC02204



DSC02371



006 (2)



015



IMG\_20140706\_102133-2 (2) Scan0011





Picture0510152158951



2016-01-06 004



centaur 7 001



machhome



cobrahome



shelby6



Todd's race car - Copy



prpv



vandiemen1



belvedere3



toddjosh



66mustang



044



fiat cell phone pic





Fiat 124 013



100\_0196



046



064



DSC00081



0806111738a

#### SOME OF TODD CAR PAYMENTS

**911 CARRERA PORSCHE** 11/13/12 29,195.00

**COBRA COMP** 09/18/12 6,000 JOINT

#### SALEEN MUSTANG

01/23/13 23,418.00

1,000 DEPOSIT CHARGED TO MY DISCOVER CREDIT CARD

COBRA EXCALIBUR					
04/17/14	AMERICAN GLOBAL EN (DELIVERY)	1,495.50			
06/26/14	US LIABILITY INS CO (AGREED VALUE)	30,000.			

	JEEP WRANGLER (MODIF	
OWNED	BY TODD AT TIME OF SEPAI	RATION ON 08/22/15
06/17/14	TIRE RACK	1,902.64
06/19/14	NTB	364.86
06/20/14	QUADRETEC ESSENTIA	79.97
06/24/14	NTB	709.61
07/29/14	QUADRETEC ESSENTIA	109.99
07/29/14	QUADRETEC ESSENTIA	144.99 X 5 = 724.95
07/30/14	QUADRETEC ESSENTIA	111.99
07/30/14	QUADRETEC ESSENTIA	144.99
08/08/14	QUADRETEC ESSENTIA	984.98
08/14/14	NTB	2,436.78

#### LOTUS EVORA (GM/GO FINANCIAL) ACCT #200000271801

TODD OWNED THIS VEHICLE PRIOR TO SEPARATION AND HE MADE PAYMENTS ON IT UNTIL 02/22/16 BUT IT WAS NOT DISCLOSED ON HIS 10/26/15 CASE INFORMATION STATEMENT

07/28/14	1,000.00 DEBIT
09/02/14	500.00 DEBIT
09/26/14	500.00 DEBIT
09/29/14	475.00 AUTO TRAN DEBIT
10/07/14	1,400.00 AUTO TRAN CASH
11/24/14	500.00 DEBIT
12/31/14	600.00 DEBIT
01/26/15	600.00 DEBIT
02/09/15	900.00
03/09/15	900.00
04/06/15	154.50 DEBIT
04/06/15	754.50 DEBIT
05/06/15	904.50 DEBIT
05/28/15	900.00
06/26/15	900.00
07/28/15	900.00
09/10/15	900.00
OCTOBER	HIDDEN STATEMENT
11/20/15	900.00
02/02/16	900.00
02/22/16	900.00
02/22/16	900.00

#### SUBARU BRZ

2013 NO RECORD OF PURCHASE OR SALE BUT HAVE PHOTOS

AND INSURANCE DOCUMENTS

LOTUS RACEO	CAR/EVORA
11/24/14	1,000
12/31/14	1,000

	MIATA MX-5		
08/	29/12 - 09/30/13		
\$1	L2,042.88 JOINT		

# TODD R RECNAERT SANDRA MARIE REGNAERT 8055964 1227 125 2016 VINSED. VINELAND, NJ BEXAG 9225 PART Of 1015 Thenk has thousand of harhold fifthed rows 1 25 Thenk has thousand of harhold fifthed rows 1 25 NO NOT 1018 BOOK NOT 1018 BOOK NOT 1018 BOOK NO 07 Jacob 1:03 1: 205 3 4 01; 11

1/23/2013 Check# 125 Amount \$22,418.00 Saleen

#### FACTORY FIVE RACING, INC. COBRA KIT

TODD CLAIMED THAT HE PAID FOR THIS WITH PROCEEDS FROM HIS JEEP SOLD ON 08/29/15

07/28/14	1,000.00 DEBIT	
10/14/14	1,000.00 DEBIT	
12/05/14	1,184.50 DEBIT	
06/08/15	1,000.00 DEBIT	
06/16/15	6,000.00	

#### DODGE CHALLENGER (ALLY ACCT #020922652540) OWNED AT SEPARATION ON 08/22/15

02/11/15	200.00 LANCASTER DODGE IN PA
02/24/15	1,570.00 LEXI J FL (MODIFICATIONS)
03/09/15	700.00
04/14/15	1,821.39 LEXI J FL (MODIFICATIONS)
04/14/15	600.00
05/08/15	600.00
06/02/15	600.00
06/08/15	600.00
07/09/15	500.00
08/04/15	600.00

#### RAM TRUCK (ALLY ACCT #62892140598) OR 611921470598

THIS VEHICLE WAS NOT DISCLOSED IN TODD'S CIS ON 10/26/15 BUT HE CLAIMED IT AS HIS ONLY VEHICLE, IN OUR DIVORCE TRIAL. IT WAS ACTUALLY PURCHASED ON 08/30/15, AFTER WE SEPARATED, BUT TODD MADE ME PAY THE INSURANCE ON IT FOR 5 MONTHS BEFORE REMOVING IT FROM MY POLICY.

09/18/15		600.00
OCTOBER	HIDDEN STATEMENT	
10/28/15		600.00
DECEMBER	HIDDEN STATEMENT	
01/11/16		574.19
02/02/16		12.00
02/11/16		600.00
03/03/16		600.00
APRIL	HIDDEN STATEMENT	
05/18/16		600.00
06/06/16		585.21

- None in my possession. 9.
- See the Plaintiff's Case Information Statement and tax returns. 10.
- Any documents in this regard are in the former marital residence under the 11. control of the Defendant.
  - See Insurance Policies attached as EXHIBIT "B". 12.

Any documents in this regard are in the former marital residence under the 13. Jaker Lotice La 1088'S Produce control of the Defendant.

- 14. None.
- 15. None.
- 16. N/A.
- 17. None.
- See credit card statements attached to the Plaintiff's Answers to 18. Interrogatories.
  - See tax returns attached to the Plaintiff's Answers to Interrogatories. 19.
- See Registration for 2015 Ram 1500 Crew Cab Pick and Kelly Blue Book 20 value as of July 21, 2016 attached as EXHIBIT "C". The Plaintiff also purchased a 2001 Chrysler Prowler after the filing of the Complaint for Divorce.
  - 21. None.
- See Settlement Statement from personal injury lawsuit and handwritten explanation as to the use of the funds attached as EXHIBIT "D".
  - 23. See Inventory attached as EXHIBIT "E"
  - See Kelly Blue Book value attached as EXHIBIT "F". 24.
  - 25. None.

Pictured, is our son in another car that Todd sold prior to moving out. I believe it is called a Vintage Renault Sports Racer. You can see Todd's yellow 2011 Lotus Evora in the upper left hand corner of picture. Also, Todd did not own the 2015 Ram Pickup at the time of our separation. See State of New Jersey Insurance Identification Card. He purchased it later on 08/30/2015, after we separated, but made me pay the insurance on it until January/February 2016. The 2015 Ram Pickup was the only vehicle that Todd claimed in his Notice to Produce and our Divorce Trial.



Later Length

# STATE OF NEW JERSEY INSURANCE IDENTIFICATION CARD



POLICY INFORMATION

Policy Number AOU-238-

Policy Effective Date - 02/22/2015

Policy Expiration Date 02/22/2016

Name of Insured TODD R REGNAERT SANDRA REGNAERT 2816 VINE RD VINELAND NJ 08360-9225



VEHICLE INFORMATION
Year 2015

Make RAM

Model PICKUP

Vehicle Identification Number 3C6RR7LTXFG629627



CONTACT US

To report a claim
1-800-2CLAIMS
(1-800-225-2467)
Customer service
1-800-225-8285

Card Effective Date 08/30/2015
Card Expiration Date 02/22/2016

Company Name: 090 LIBERTY MUTUAL MID-ATLANTIC INSURANCE COMPANY
NAIC Number: 14486 - PMKT 587 04 10

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