

AFFIDAVIT OF CARLOS BLANCO

**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA
FAMILY DIVISION**

CASE NO.: 132024DR009279A00104

IN RE: THE MARRIAGE OF

REGINA ALVAREZ BRINGAS,

Petitioner,

and

CARLOS BLANCO,

Respondent.

AFFIDAVIT OF CARLOS BLANCO

STATE OF FLORIDA

COUNTY OF MIAMI-DADE

Before me, the undersigned notary public, personally appeared **CARLOS BLANCO**, who, being duly sworn, deposes and states as follows:

I. IDENTITY AND PURPOSE

1. My name is Carlos Blanco. I am over the age of eighteen (18) years and am competent to testify to the matters stated herein. I have personal knowledge of the facts set forth in this Affidavit.

2. I am the Respondent in the above-styled dissolution of marriage proceedings, Case No. 132024DR009279A00104, pending in the Circuit Court of the Eleventh Judicial Circuit, in and for Miami-Dade County, Florida, Family Division.

3. This Affidavit is executed voluntarily and is intended to memorialize certain facts for the record in advance of my second deposition in this matter.

II. PROCEDURAL HISTORY AND DELAYS

4. The Petition for Dissolution of Marriage was filed by the Petitioner, **Regina Alvarez Bringas**, on or about **May 16, 2024**. This matter has now been pending for approximately twenty-three (23) months.

5. On or about **March 25, 2026**, the presiding judge stated on the record that she was ready to set this case for trial as early as March 2026, provided the parties were prepared to proceed.

6. On the same date, my counsel, **Jordan Abramowitz, Esq.**, represented that our CPA, Phil Shechter, was working diligently to finalize his financial analysis and would be handing over the documents to opposing counsel as soon as possible, and that this process would not require an additional five (5) months of delay.

7. Despite the Court's expressed readiness and my counsel's representation of preparedness, opposing counsel, **Dori Foster-Morales, Esq.**, did not agree to schedule a trial date before **August 2026**, resulting in a further delay of approximately five (5) months beyond the Court's earliest availability.

8. Opposing counsel has continued to serve subpoenas on my financial institutions and to schedule additional depositions notwithstanding the Court's expressed readiness to proceed to trial and notwithstanding approximately two (2) years of exhaustive discovery.

III. EXCESSIVE COSTS AND DISPROPORTIONATE LITIGATION

9. The total expenses incurred in this matter have reached approximately **\$2,400,000 (Two Million Four Hundred Thousand Dollars)**, including but not limited to legal fees, expert fees, CPA and forensic accounting fees, and related costs.

10. Legal fees alone have exceeded approximately **\$1,400,000 (One Million Four Hundred Thousand Dollars)**.

11. CPA and accounting fees have exceeded approximately **\$200,000 (Two Hundred Thousand Dollars)**.

12. At the time of filing on May 16, 2024, my net worth — calculated as total assets less total liabilities — was **less than \$6,000,000 (Six Million Dollars)**. There is no marital estate in this matter, as the parties maintained a **total separation of assets** regime. The total litigation costs of \$2,400,000 therefore represent more than **forty percent (40%)** of my net worth at the time of filing, which is clearly excessive and disproportionate under any reasonable standard.

IV. ATTEMPTS TO REDUCE COSTS AND MEDIATION CONDUCT

13. During the first mediation session in this matter, the mediator communicated to me that the Petitioner's side was demanding **\$5,000,000 (Five Million Dollars) in cash**. Given that my net worth at the time of filing was less than \$6,000,000, this demand was monetarily impossible to satisfy and demonstrated that there was no genuine basis for reaching a settlement. I was further told, specifically, that if I did not agree to a settlement, Petitioner's counsel intended to **contact all of my investors and subpoena all of my banking relationships**. I understood this as an explicit threat to disrupt my business operations and investor relationships as leverage to coerce a settlement. This threat, combined with the impossible settlement demand, once again reinforces the pattern of tortious interference with my business described elsewhere in this Affidavit.

14. **Raymond Rafool, Esq.**, my prior attorney in this matter, sent an email to opposing counsel requesting that the parties "cut the bleeding" and cease incurring unnecessary costs in this matter.

15. Opposing counsel Dori Foster-Morales did not respond to this request and has continued to pursue aggressive litigation tactics, including the issuance of additional subpoenas and scheduling of further depositions, which I believe to be unnecessary given the current state of discovery.

16. It is my belief that the threat communicated during the first mediation (paragraph 13), followed by the subsequent issuance of subpoenas to my financial institutions, represents a pattern of conduct designed to disrupt my business relationships and coerce a settlement, rather than to obtain information legitimately necessary for the resolution of this matter.

V. PETITIONER'S FINANCIAL REPRESENTATIONS AND FAILURE TO SEEK EMPLOYMENT

17. During the course of these proceedings, the Petitioner, **Regina Alvarez Bringas**, requested an increase in temporary alimony to approximately **\$15,000 per month**, representing to the Court that she does not have sufficient funds to meet her expenses.

18. Despite this claimed financial hardship, to the best of my knowledge and belief, the Petitioner has **not sought or obtained employment of any kind** during the approximately **two (2) years** that this dissolution proceeding has been pending. The Petitioner is an able-bodied individual who is capable of gainful employment, yet she has made no apparent effort to become self-supporting or to mitigate her claimed financial need. This failure to seek employment is directly relevant to any determination of alimony under **Florida Statute §61.08**, which requires the Court to consider, among other factors, the requesting party's earning capacity, educational level, vocational skills, and the time necessary to acquire sufficient education or training to find appropriate employment.

19. This representation raises a material concern regarding opposing counsel's ability to recover her legal fees from her own client and calls into question the financial basis for continued aggressive and costly litigation in this matter.

VI. KNOWLEDGE OF THE ACTUAL FINANCIAL POSITION

20. At my deposition, opposing counsel **Dori Foster-Morales** stated on the record that she is aware I am heavily leveraged.

21. Over the course of this litigation, I have produced to the Petitioner and her counsel **five (5) full years of federal and state income tax returns**, together with **all bank account statements** for every financial institution at which I maintain accounts. Opposing counsel has further issued subpoenas to my financial institutions and has had the benefit of reviewing the responses thereto. Despite having received and reviewed the totality of my financial records — a level of disclosure that leaves no material aspect of my finances unexamined — **opposing counsel has not been able to demonstrate or substantiate that I am worth the amount they claim**. The exhaustive production of financial records has confirmed, rather than contradicted, the financial position I have represented throughout these proceedings.

22. My CPA, **Phil Shechter**, has communicated to Petitioner's CPA that the financial figures Petitioner's team believes to be accurate are, in his professional opinion, **significantly different from reality**, and that given my actual financial position at the date of filing, the Petitioner's equitable distribution claims may yield little to no recovery.

23. My counsel, Jordan Abramowitz, Esq., made a similar representation at the hearing held on or about **March 25, 2026**.

24. Given that these facts are known to all parties — including opposing counsel's own on-the-record acknowledgment of my leveraged financial position, the Petitioner's own signed acknowledgment that she is not entitled to equitable distribution, and **the inability of opposing counsel to substantiate their valuation claims despite receiving the complete universe of my financial records** — it is difficult to understand the economic rationale for continuing to pursue high-dollar litigation positions in this case. The cumulative cost of this litigation has already consumed a grossly disproportionate share of my net worth, and any reasonable cost-benefit analysis would, in my belief, counsel against the continued course of action being pursued.

VII. SUPPORTIVE RELATIONSHIP AND ASSET DISSIPATION

25. I have retained a licensed private investigator whose reports document that Petitioner's partner, **Alejandro Delfino**, purchased a residence valued at approximately **\$3,700,000 (Three Million Seven Hundred Thousand Dollars)**.

26. The private investigator's reports document that the Petitioner and Mr. Delfino went together to purchase the home and that the home is being prepared for them to reside in together.

27. This evidence is directly relevant to a **supportive relationship** determination under **Florida Statute §61.14(1)(b)**, which may serve as a basis for modification or termination of alimony obligations.

28. Additionally, I am aware of approximately **\$350,000 in asset dissipation** through overspending during the pendency of these proceedings and approximately **\$44,000 in fraudulent charges** on an American Express credit card account.

29. The private investigator's reports further document that **Alejandro Delfino** has been residing at my condominium apartment at **Grand Bay**, rent-free, during the pendency of these proceedings.

30. The Petitioner has acknowledged before the Court, and has signed a document to that effect, that she is **not entitled to equitable distribution** in this matter. The parties maintained a **total separation of assets** regime. Despite this signed acknowledgment, it appears that opposing counsel is attempting to characterize this total separation of assets as equivalent to a marital estate subject to division, potentially relying on a compensatory concept under Mexican law. This theory is being advanced notwithstanding the Petitioner's own acknowledgment before this Court that she has no equitable distribution entitlement under Florida law.

VIII. PETITIONER'S PERJURY AND TORTIOUS INTERFERENCE

31. At her first deposition in this matter, the Petitioner testified under oath that **Alejandro Delfino did not reside at my condominium apartment at Grand Bay**.

This testimony is directly contradicted by the licensed private investigator's reports referenced in paragraphs 25, 26, and 29 above, which document Mr. Delfino's residence at the Grand Bay apartment.

32. During the pendency of these proceedings, I sent a **cease and desist** letter to Petitioner's counsel regarding conduct by the Petitioner and her family members that constitutes **tortious interference** with my business relationships. This tortious interference has caused me business losses in excess of **\$28,000,000 (Twenty-Eight Million Dollars)**, consisting of approximately **\$8,000,000 in lost equity investment** and approximately **\$20,000,000 in a lost Letter of Intent (LOI)** for a business transaction that was disrupted as a direct result of their conduct.

IX. RESERVATION OF RIGHTS

33. I reserve all rights to seek reimbursement of attorney's fees and costs pursuant to **Florida Statute §61.16** and sanctions pursuant to **Florida Statute §57.105** based on the conduct described herein.

34. I further reserve all rights to pursue separate civil claims for tortious interference with business relationships and any other applicable causes of action arising from the conduct described in paragraph 32, as well as claims for damages arising from the asset dissipation and fraudulent charges described in paragraph 28. I further reserve all rights to seek reimbursement for the **unjust enrichment** of the Petitioner and Alejandro Delfino, who have resided at my condominium apartment located at **445 Grand Bay Drive**, rent-free, for approximately two (2) years during the pendency of these proceedings. This property carries an opportunity cost of approximately **\$18,000 per month** in lost rental income, in addition to **\$4,000 per month in HOA fees**, plus the mortgage, insurance, and property taxes, all of which I have been solely responsible for paying while the Petitioner and her partner have enjoyed exclusive use and occupancy without compensation.

35. I intend to present these facts under oath at my second deposition in this matter and at trial.

VERIFICATION

I, Carlos Blanco, hereby declare under penalty of perjury pursuant to **Florida Statute §92.525** that the foregoing statements are true and correct to the best of my knowledge and belief.

CARLOS BLANCO

Date: _____

NOTARIZATION

STATE OF FLORIDA
COUNTY OF MIAMI-DADE

Sworn to and subscribed before me this _____ day of _____, 2026,
by **CARLOS BLANCO**, who is personally known to me / who produced
_____ as identification.

NOTARY PUBLIC, State of Florida

Name (printed): _____

Commission No.: _____

My Commission Expires: _____