

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

Case No:23-CR-60173 Williams (Graham)

v.

CAROLYN D. WADE,

Defendant.

_____ /

DEFENDANT WADE'S PROPOSED JURY INSTRUCTION

The Defendant, **CAROLYN D. WADE**, through counsel, respectfully requests that the Court give the following instructions to the jury panel prior to their deliberations:

**Defendant's Proposed Jury Instruction regarding
Summaries and Summary Witnesses**

There has been testimony from summary witnesses at this trial and the Court permitted this testimony in order to make the other evidence more meaningful and to aid you in considering the evidence. Such testimony is no better than the books, records and other documents upon which the summary witness based his/her summary and is not independent evidence. Therefore, you are to give no greater consideration to a summary witness than you would give to the evidence upon which that testimony is based.

It is for you to decide whether the charts or summary testimony offered by a summary witness correctly presented the information contained in the documents on which they were based, and what, if any, weight to give such evidence.

USA v. Carolyn D. Wade
Proposed Jury Instruction
Case NO. 23-cr-60173 Williams/Graham

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 12, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of the Notices of Electronic Filing generated by CMF-ECF or in some other authorized manner for those Counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

Respectfully submitted,

/s/ Johnny L. McCray, Jr., Esq._____

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