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 CAROLYN D. WADE'S AMENDED WITNESS AND EXHIBIT LISTS

Defendant, **CAROLYN D. WADE**, files her Witness and Exhibit List with regard to the upcoming Trial and may use some or all of the following witnesses and exhibits in the trial in this matter.

Witnesses

1. All witnesses listed on the government's witness list
2. Carolyn D. Wade, Defendant
3. Tracy Wade
4. Haydee Granados, aka Haydee Rivero
5. Edward Rivero/ Rivero Funeral Home
6. Tammy DeClerq, COO, SBA, B.S.D. Capital/Lendistry
7. Representative, Harvest Small Business Finance
8. Representative/ Records Custodial, U.S. Small Business Administration (PPP)
9. Records Custodian, Broward Sheriff Office (BSO)
10. Eric Wilson, Eric Wilson Mortuary

Exhibits

11. All exhibits listed on the government's exhibit list
12. 2019 Tax Returns (including Schedule C)-Carolyn D. Wade

13. SBA PPP Loan applications, Haydee Granados, aka Haydee Rivero
14. Email Compendium between Carolyn D. Wade, Tracy Wade and Haydee Granados
15. Cancelled Check from Carolyn D. Wade for payment to Haydee Granados for PPP Loan preparation, payable to third party upon direction
16. Cancelled Check payable to Jersey City Group for PPP Loan Application
17. Email from Tracy Wade to Haydee Granados forwarding requested bank statements
18. Email from Tracy Wade to Haydee Granados forwarding Docusign login credentials for access to account

Defendant, **CAROLYN D. WADE**, reserves the right to call additional witnesses on this list, or refrain from calling witnesses on this list, and reserves the right to introduce into evidence or utilize additional documents on this list, or refrain from utilizing or introducing into evidence documents on this list as the circumstances dictate.

CERTIFICATE OF SERVICE

I HEREBY certify that on May 1, 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 vis a transmission of Notices of Electronic Filing generated by CM/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.

Fla. Bar Number 342319

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cc: Carolyn D. Wade