UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CRIMINAL DIVISION
CASE NO. 23-CR-60173 WILLIAMS (GRAHAM)

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CAROLYN D. WADE,

Defendant.

Miami, Florida

May 17, 2024

TESTIMONY OF
KELLY DIPIETRANTONIO

Pages 1 to 48

TRANSCRIPT (EXCERPT) OF **TRIAL**

HELD BEFORE THE HONORABLE DONALD L. GRAHAM

UNITED STATES DISTRICT JUDGE

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Official Court Reporter
United States District Court
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Proceedings recorded by mechanical stenography; transcript produced by computer-aided transcription.

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ALSO PRESENT: Carolyn Wade
Hendrith V.A. Smith, paralegal

(Call to the Order of the Court.)

THE COURT: Good morning. We are ready to proceed.

I mentioned to you yesterday if there were any issues you had for the Court to let us know by 5 o'clock yesterday. We did not receive anything by 5 o'clock.

I understand that a pleading was filed at 4 o'clock this morning -- 2 o'clock this morning. I know it's a surprise for you-all to understand that we don't wait around looking for pleadings at 2 o'clock in the morning. So I haven't reviewed the pleading, and we'll have to discuss it during our next break.

MR. MCCRAY: Judge, there was a development yesterday just before 4 o'clock PM, and we sent an email to your chambers yesterday almost right after we found this situation out.

THE COURT: What time was that?

MR. MCCRAY: It was about 4:20.

MR. WILCOX: Yes.

THE COURT: We didn't leave until 4:30.

MR. MCCRAY: What's that?

THE COURT: I said I left the bench yesterday. It was about 4:35 or so.

MR. MCCRAY: We sent it before 5 o'clock. If the Court would indulge me just for a minute.

THE COURT: Well, quickly, because I want to get the

jury in. We can talk about this later. I can't resolve it now anyway. It would be a good idea for me to read what you have submitted.

MR. MCCRAY: That's fine.

THE COURT: Bring the jury in, please.

(Jury entered at 9:32 AM.)

THE COURT: Good morning. We are ready to continue with the trial. I think I'm going to make you all my permanent jurors. You're all on time the last few days and that's very good. So you can call your employers and tell them you will see them soon. We're going to pay you a big salary.

All right. Are we ready?

MR. WILCOX: Yes, Your Honor.

THE COURT: All right. Please proceed.

I'd like to remind the witness that she is still under oath.

THE WITNESS: Yes, Judge.

MR. WILCOX: Can we turn on the ELMO and have it publish for everyone, please?

THE COURT: You'll note that the clock in the rear of the courtroom is inaccurate. We think there's a battery problem, so we won't be using that as the guide.

CROSS-EXAMINATION (CONTINUED)

BY MR. WILCOX:

Q. Good morning, Ms. DiPietrantonio.
A. Good morning.
Q. I want to direct your attention -- let me just fool with the ELMO here a little bit. Turn your attention to page 2 of the demonstrative aid, the summary of the evidence that you prepared -- is that correct?
A. Correct.
Q. Okay. And on this particular page, you have the IP address ending in 166. Okay. You show all the logins. You show several logins from that IP address number; is that correct?
A. No, these are not logins. These are transactions.
Q. Transactions. Okay. It says it right there up top. Several transactions from IP address 166. And on page 4, there is a communication from Womply asking Ms. Wade to hurry up and complete her application; correct?
A. Correct.
Q. Now, on page 5, they have login attempts; is that right?
A. Correct.
Q. To the PPP application of Ms. Wade; correct?
A. This is to the Womply portal.
Q. To the Womply portal, but this still is associated with the PPP loan application of Carolyn Wade. Am I wrong?
A. No, that's correct.
Q. Okay, okay.

And two of these logins are from an IP address ending in 125; is that right?

A. That's correct.

Q. Now, the IP address ending in 125 is not associated with Carolyn Wade; correct?

A. I don't believe so, no.

Q. Okay. Well, have you investigated to whom that IP address belongs to?

A. I have an idea of who that IP address is associated to. However, I never subpoenaed the Internet service provider for the paid subscriber for that IP address.

Q. Okay. Is there a reason why you did not subpoena the subscriber for this -- for the location of this IP address?

A. Because with other documents that I received, I was able to determine who that IP address was associated to.

Q. And who was that?

A. Haydee Granados.

Q. Okay. So the IP address ending in 125 is associated with Haydee Granados. All right.

Now, I believe there has been evidence introduced in the case where Ms. Wade paid Ms. Haydee Granados about $5,000 right around the time the PPP loan was funded; correct?

A. Correct.

Q. Okay. And the implication is that Ms. Wade paid Ms. Granados to prepare the PPP loan application; correct?

A. I don't believe that she assisted in preparing the application --
Q. That's not what I asked you.
A. So then my answer is no.
Q. No. Okay. You don't believe -- you don't believe that the $5,000 that were paid to Ms. Granados had anything to do with the preparation of the PPP loan application?
A. I believe it was just with the Schedule C, not the full application.
Q. Oh, the Schedule C -- the fake Schedule C.
A. The Schedule C that was submitted with the PPP application for Carolyn Wade.
Q. Let me just see if I understand.

Are you saying that the payment to Ms. Granados was associated with the inaccurate Schedule C that was filed with this PPP loan application?
A. Can you say that question again, please?
Q. Are you testifying that the $5,000 that was paid to Haydee Granados is associated with the fraudulent Schedule C that was filed with this loan application?
A. I believe so, yes.
Q. Okay. I want to go to page 8 of your demonstrative aid. In the first line -- can you see the first line?
A. I can, yes.
Q. Okay. Let me just zoom in on that a little bit. All

right. So the date of this -- this page is entitled Womply Events May 13, 2021; correct?
A. Correct.
Q. And one of the events was the uploading of a tax document; correct?
A. That's correct.
Q. And that tax document was the fraudulent Schedule C; is that correct?
A. The Schedule C that was uploaded with the application, correct.
Q. The Government is saying that that is the lie that was involved with this PPP loan application; correct?
A. That Schedule C was never filed with the IRS, correct.
Q. Okay. But the Government is saying that is the lie. I mean, I heard him say it in opening statement --
THE COURT: One moment. Ask her questions, not testify.
BY MR. WILCOX:
Q. This Schedule C is the same Schedule C that the Government in opening statement referred to as the lie that accompanied the application for the PPP loan; is that right?
A. That's correct.
Q. Okay. And that application was uploaded by the IP address ending in 125? Excuse me? I didn't hear you.
A. Did you ask a question?

Q. Yes.
A. What was the question?
Q. This Schedule C -- the fraudulent one, the lie -- was uploaded to Womply from the IP address ending in 125; correct?
A. That's correct. It was.
Q. And that IP address, you've testified, is associated with Haydee Granados; correct?
A. That's correct.
Q. Okay. That Schedule C shows that the gross income for Carolyn Wade's business was $113,000; correct?
A. Correct.
Q. Okay. Now, there was an IRS records custodian that testified that Ms. Wade had filed two Schedule Cs with the IRS; is that right?
A. No, I think she only filed one Schedule C with the IRS.
Q. Maybe we ought to -- what tax year would this Schedule C reference? Do you remember?
A. That was associated with the application?
Q. Yes.
A. 2019.
Q. 2019, okay.

But she filed a Schedule C in 2019; is that right?

A. Correct.
Q. That the IRS is in possession of; right?
A. Correct.

Q. Okay. And then there's another Schedule C for 133 that shows that her business grossed $113,000 that was submitted with this PPP loan application -- with her PPP loan application; right?

A. Correct.

Q. From an IP address that ended in 125?

A. Yes.

Q. That you have testified belongs to Haydee Granados; right?

A. Correct.

Q. Okay. Now, before this indictment was filed, you testified before the grand jury; correct?

A. Correct.

Q. And you testified as to the IP addresses that were associated with the filing of the PPP loan application; is that right? And when I say PPP loan application, I mean the application that was filed on behalf of Ms. Wade.

A. I don't remember if the IP addresses -- if I testified to the IP addresses in the grand jury.

Q. Well, let me see if I can refresh your recollection.

May I approach the witness, Your Honor?

THE COURT: Yes, sir.

MR. SNIDER: Go ahead.

THE WITNESS: Thank you.

THE COURT: Do you want to mark it for identification?

MR. WILCOX: I hadn't planned to introduce it into evidence.

THE COURT: Well, if you're going to use it, you have to mark it for identification. It's not received, but we have to keep a record of what's happening in the trial.

MR. WILCOX: I'll have to figure out what number I need to mark it as, Judge.

THE COURT: Well, you have a 1. It could be 2. We have a 1 for identification only. It could be 2.

MR. WILCOX: All right, Your Honor.

I have a 3 that's already marked, Judge. Can I mark it as 4?

THE COURT: Any mark you want. 4?

MR. WILCOX: Yes.

(Defense Exhibit 4 marked for identification.)

BY MR. WILCOX:

Q. Agent DiPietrantonio, you're reviewing what's going to be -- you have in your possession what's going to be marked as defense exhibit for identification 4.

Would you please turn to page 19?

A. Okay.

Q. Just looked at it -- just look at page 19, toward the bottom. And look at page 19 towards the top as well.

Okay. Did you make references to IP addresses in your testimony before the grand jury?

A. I did, yes.
Q. You did, okay.
And you made reference to IP address 107 -- sorry. An IP address ending in 84; correct?
A. Correct.
Q. And there is no reference in your grand jury testimony to the IP address ending in 125; correct?
A. Correct.
Q. Okay. Thank you.
MR. WILCOX: Your Honor, may I confer just a minute with counsel?
BY MR. WILCOX:
Q. Now, I believe yesterday we talked a little bit about the DocuSign process, for lack of a better word. Now, I believe that we were able to establish that just because the initials CW appeared on a document that was DocuSigned does not necessarily mean that CW is the person that DocuSigned -- that actually executed the DocuSign; correct?
A. That's correct.
Q. Okay. So when we see these DocuSigned documents with the initials CW, it doesn't necessarily mean that Carolyn Wade is the person that executed the DocuSign document; is that correct?
A. That's correct.
Q. And if one person has the DocuSign login information of

another person, then that first person can DocuSign on behalf of that other person; correct?

A. No, that's not correct.

Q. So if I had the DocuSign login information of an individual and I had their login credentials, I could not DocuSign on behalf of that individual?

A. No.

Q. Why not?

A. Because when DocuSigns are sent to somebody, they're sent to their email address on file. So even if you have their DocuSign account, you have to have the email in order to be able to sign the document in question.

Q. I apologize.

If I had the DocuSign account and their email address, then I could do it; correct?

A. Correct.

Q. I want to turn to the summary of your demonstrative aid. This page 36 is titled Summary of Activity for Wade's PPP Loan Application -- well, before I -- okay. I'll continue. Okay.

Now, you have -- in line 2 -- the second line here -- do you see where my finger is pointing?

A. The third line?

Q. Yes, the third line. That's right. Okay. I'm going to go back to the first line, but right now I just want to focus on the third line. You show that there were five logins from

Verizon IP addresses 184, 224, 171 -- I'm sorry. Excuse me. I need to start over -- IP addresses ending in 184, 224, 127, 200 while Ms. Wade was a Verizon customer; correct?

A. Correct.

Q. There's no reference in this summary as to how many events or logins came from the IP address ending in 125; is that correct?

A. That's correct.

Q. And going to the number of transactions, I just want to make sure. We have a number of Womply transactions from IP address ending in 184, IP address ending in 224, IP address ending in 127, and IP address ending in 200.

You don't have any reference to Womply events coming from IP address ending in 125, which is Haydee Granados's IP address; right?

A. Not in that line, that's correct.

Q. Okay. Now, I'm going to go back and ask you a question about DocuSign.

When you DocuSign a document or when you execute a DocuSign on a document or -- I don't know if I'm phrasing that correctly, but I think you understand what I'm saying -- it prompts you; right?

A. For where to sign?

Q. Yes.

A. Correct.

Q. Okay. It prompts you for where to sign. And when it prompts you for where to sign, the entire document is not visible; correct?
A. No, I don't believe that's correct.
Q. You don't?
A. No. I think you see exactly what you're signing.
Q. I know you see exactly what you're signing, but I'm saying the prompt, okay -- there's words after the prompt, okay, and there's a prompt showing you where to sign; right?
A. Correct.
Q. And then there's a paragraph or something next to the place where you're supposed to sign; right?
A. It's what you're attesting to with that signature or initial, yes.
Q. Okay. But it doesn't show the entirety of the document?
A. You do have the option to see the entire document.
Q. You have the option. But when you're signing, the entirety of the document is not visible?
A. No, I believe it is.
Q. You believe it is. You're not sure, though?
A. I'm not a hundred percent sure. I am a hundred percent sure --
Q. That's enough.
A. -- that DocuSign sends you the entire application upon signing.

Q. Maybe you don't understand the point I'm trying to make. Let me see if I can be a little clearer. Okay.

When the DocuSign program prompts you to put your initials next to whatever wording is next to it, the entire document is not visible at that instant?

A. No, I believe that it is.

Q. You believe that it is, okay.

Now, as part of the investigation, you issued a subpoena to Womply -- one moment, Your Honor. I'm going to have to mark it.

MR. SNIDER: Are you seeking to enter this into evidence?

MR. WILCOX: No.

MR. SNIDER: I think there's nothing -- there's no foundation to refresh her recollection.

MR. WILCOX: May I approach the witness, Your Honor?

THE COURT: Yes, sir.

MR. SNIDER: You can show it to her.

MR. WILCOX: Okay.

(Defense Exhibit 5 marked for identification.)

BY MR. WILCOX:

Q. I'm showing you what's been marked as Defense Exhibit 5 for identification. Do you recognize that?

A. I do, yes.

Q. What is it?

A. This is the subpoena I served --

MR. SNIDER: Objection.

THE COURT: Bring the document sidebar, please.

(The following proceedings were held sidebar:)

THE COURT: May I see the exhibit?

MR. WILCOX: I thought you had it.

MR. SNIDER: You gave it to the witness.

MR. WILCOX: Oh, I'm sorry.

THE COURT: All right.

MR. SNIDER: My objection is she's reading a document that is not in evidence --

THE COURT: Well, she hasn't read it yet.

MR. SNIDER: She was about to; that's why I objected.

THE COURT: I'm sorry?

MR. SNIDER: I think the question was for her to read it, which is why I objected.

THE COURT: Did you ask her to read it?

MR. WILCOX: No, I asked her did she recognize it.

THE COURT: She said yes. Okay. And then there's an objection.

MR. ZACCA: I think the next --

THE COURT: Listen, only one at a time.

MR. SNIDER: Sorry. My objection is -- I am objecting before she reads it in evidence. It's not in evidence and if -- I'm not -- I wouldn't object to it being

entered --

THE COURT: One moment. Did she serve this subpoena?

MR. WILCOX: She wrote it.

THE COURT: Did she serve this subpoena?

MR. WILCOX: Her name is on it.

THE COURT: Did she serve it on Oto Analytics?

MR. WILCOX: It was served on Oto Analytics. I don't know who served it.

THE COURT: You don't know if she served it on -- and you said her name is on it. When you say her name --

MR. WILCOX: She signed it.

MR. SNIDER: Directed it. I signed it.

THE COURT: All right. I'm confused. There's a subpoena with the Clerk of Court and Mr. Snider's name on it. Okay? So that's not her.

Now, what is it that you want to ask this witness? Apparently, this subpoena, at least from the face of it, has nothing to do with her, but I don't know.

MR. WILCOX: I'm sorry. I may be mistaken. On the bottom of it, Judge.

THE COURT: All right, sir. You have to show it to me. I haven't seen it.

So on the bottom it has, "Please provide the materials, if possible," and it has the agent's name at the bottom of it.

MR. WILCOX: Yes.

THE COURT: All right. So you want to ask her if she -- what, if she --

MR. WILCOX: Received the items that are listed in the subpoena.

THE COURT: In the subpoena. All right. And then from there you will do what? Let's say she says -- I mean, you probably know the answer; right? Did she get these items?

MR. WILCOX: Yes.

THE COURT: Okay. So she's going to say, "I retrieved these items," and I don't know. You may say, "Do you have the statements" -- I don't know what you're going to say, but what's the objection?

MR. SNIDER: I wanted to preemptively object to her reading documents that are not in evidence. If he wants to ask her if she received the records, that's fine.

THE COURT: We haven't had that question yet.

MR. SNIDER: Okay. To me, I thought that's where it was going and I don't want to have a second sidebar, so perhaps we can address the limit of this scope.

THE COURT: Ask her, "Did you serve the subpoena? Are you aware of the subpoena? Did you receive some documents? What were the documents? Where are the documents?"

MR. SNIDER: That's fine.

THE COURT: All right? Let's --

MR. MCCRAY: I do have the letter that I sent to you at 4:22 yesterday. It's very short.

THE COURT: When you say sent to me --

MR. MCCRAY: Well, sent to --

THE COURT: Okay. Here's -- I don't know why lawyers are getting into this habit now, but we don't take emails because nobody's there to receive emails. In other words, I don't get emails. You have to file a motion with the clerk and then we can take some action. And that created a little problem with the issue we discussed at the status hearing. You were going to have some subpoenas and I said, "Do both parties agree?" And I said, "Yes, I will."

And then there was an email sent. And then my clerk was out and the email came in and it sat there for six days and I didn't know about it. I found out later because there was an email -- if it's a motion filed. Then it goes through our docketing and then I see it, but the email is like a casual little thing. So just so you know.

MR. MCCRAY: Okay.

THE COURT: Because if I had known your pleading came in on that day, as you told me it was, I would have signed it that day.

MR. MCCRAY: Yeah.

THE COURT: But my JA was out for five days and it

sat there and I wasn't happy about it, but that's not your problem. But anyway... okay. I didn't get this. I'll make inquiry because it was sent at 4:22. So that's an issue I'll have to take up with my staff.

MR. MCCRAY: Do you want to keep that, Judge?

THE COURT: Yes.

(The following proceedings were held in open court:)

THE COURT: The objection is overruled.

MR. WILCOX: One moment.

May I approach the witness, Your Honor?

THE COURT: Yes, sir.

BY MR. WILCOX:

Q. Now I kind of lost my train of thought here.

You have in your possession a document that's marked for identification as Defense Exhibit 5; correct?

A. That's correct.

Q. Do you recognize that document?

A. I do.

Q. What is it?

A. This is the subpoena that I served to Womply.

Q. You served it?

A. Yes.

Q. And the second page of it, it requests that Womply provides you with certain items; is that correct? Records; right?

A. That's correct.
Q. Did you receive those records?
A. I did.
Q. And you asked Womply to provide all records in the custody or control of Oto Analytics, doing business as Womply; correct?
A. Correct.
Q. Related to paycheck --
MR. SNIDER: This is the objection I raised at sidebar.
THE COURT: I'm sorry?
MR. SNIDER: This is the objection that I raised at sidebar, reading from a document not in evidence.
THE COURT: Well, he's asking her a question. It just so happens to be on a form, but he's asking her a question, so she may respond to the question.
Overruled.
BY MR. WILCOX:
Q. You asked Womply to provide all records related to Paycheck Protection Program loan number 6697269001 and, in parentheses, business legal name Carolyn Wade; correct?
A. That's correct.
Q. Including the entire content of any electronic or physical file related to PPP loan number 6697269001, which includes but is not limited to the following records. And then you list

ten different items; correct?
A. Correct.
Q. Audit files, bank statements, all signed documents, PPP application and accompanying documents, approved Persona verification documents, denied Persona verification documents, tax documents to include upload Schedule Cs, Internet protocol report for the user related to PPP loan number 6697269001, other applications with the same IP addresses as PPP loan number 6697269001, and all applications between Womply and the applicant/borrower to include communications from customer IO database, the drift, D-R-I-F-T, platform and all sales force communications; right?
A. Correct.
Q. So number eight is Internet protocol report for the IP related to PPP loan number 6692699001 [sic]. Now, did Womply provide you files or documents or records pursuant to this subpoena?
A. They did.
Q. Do you remember approximately how many files?
A. I don't remember how many files on this, no.
Q. Were any of those files associated with Haydee Granados?
A. Are you talking about number nine, not number eight?
Q. I'm talking about the documents that were provided pursuant to this subpoena. Did any of them involve Haydee Granados?

A. Yes, they did.
Q. How many?
A. How many documents? I would have to --
Q. How many files?
A. I don't remember.
Q. Hmm?
A. I don't remember.
Q. But there were files?
A. Yes, there were.
Q. There were files associated with Haydee Granados that weren't connected to Carolyn Wade. Am I correct?
A. They were connected via similar IP addresses.
Q. No. What I'm asking you is the files that you received --
MR. SNIDER: Your Honor, at this point, I'm going to renew my objection -- I'm sorry. I'm going to renew my objection to the extent that the witness is providing testimony about documents that are not in evidence.
THE COURT: Well, but he's asking her if she retrieved certain documents; correct?
MR. WILCOX: Yes.
THE COURT: All right. So she can answer that question.
MR. SNIDER: Okay.
THE COURT: So overruled.
///

BY MR. WILCOX:
Q. Did you receive documents or files relating to Haydee Granados that were not related to Carolyn Wade?
A. They had similar IPs listed on them.
Q. Did that mean --
A. They're related in the fact that they have similar IPs -- or not similar, the same IP.
Q. Let me ask it another way.
Were there any documents that were related to Carolyn Wade -- sorry. Excuse me. Let me step back.
Were there any documents or files that were related to Haydee Granados that had nothing to do with Carolyn Wade?
A. I received the PPP loan applications for Haydee Granados. In the documents --
Q. Ma'am -- I'm sorry. That's kind of like a yes-or-no question.
A. Well, the subpoena asks for information specifically related to Carolyn Wade's loan.
Q. Just allow me to ask the question again, please. Please.
Did you receive files relating to Haydee Granados that had nothing to do with Carolyn Wade?
A. Your Honor, this is not a yes-or-no question.
The subpoena specifically states with the same IP addresses --
MR. WILCOX: Objection, Your Honor. It's

nonresponsive.

THE COURT: Can you respond to his question? You can explain your answer. But did you receive files relating to Haydee Granados that had nothing to do with Carolyn Wade? I think that's the question.

THE WITNESS: Then I think the answer is no because I received those files because she had a similar -- the same IP address as Carolyn Wade's.

BY MR. WILCOX:

Q. So every file that you received relating to Haydee Granados -- okay.

The files that you received relating to Haydee Granados, did they relate to Carolyn Wade's PPP application -- all the files that you received concerning -- hmm?

A. Outside of the fact that they had the same IP listed in both applications, I received applications for both individuals.

Q. What IP address are you saying --

A. The one ending in 125.

Q. Okay. And we've established that that IP address belonged to Haydee Granados, okay.

Were there files relating to Haydee Granados --

MR. MCCRAY: Judge, did she answer? I don't think she answered.

MR. WILCOX: May I just confer with my co-counsel?

BY MR. WILCOX:

Q. You received files that had the same IP address ending in 125; is that right?

A. Correct.

Q. And we know that in some instances an IP address ending in 125 was part of Ms. Wade's PPP application process; is that right?

A. That's correct.

Q. Now, were there other files that you received ending in 125 that were unrelated to Ms. Wade's PPP application?

A. Yes.

Q. Yes. Thank you.

How many?

A. How many files exactly? I don't remember.

Q. How many applications?

A. Approximate --

Q. Excuse me. Let me finish the question. Okay.

How many PPP applications ending in 125 did you receive pursuant to this subpoena?

A. I'm sorry. I don't understand the question.

Q. How many PPP applications associated with the IP address ending in 125 did you receive pursuant to this subpoena?

A. Approximately 20.

Q. 20, okay.

And some were saying Haydee Granados were involved in

20 separate PPP loan applications?
A. Is there a question?
Q. Yes.
A. What was the question?
Q. So pursuant to this subpoena, you received 20 PPP applications that were associated with the IP address ending in 125, which we have established is associated with Haydee Granados; correct?
A. Approximately 20, that's correct.
Q. Okay. And Ms. Wade certainly wasn't involved in all 20 of those files, was she?
A. Not to my knowledge.
Q. So is it fair for me to conclude that Haydee Granados filed 20 PPP loan applications?
A. I think it's fair to say that she assisted with those applications. I don't know if she submitted them.
Q. All right. So she was involved with 20 PPP loan applications; correct?
A. Yes.
MR. WILCOX: One moment, Your Honor. Can I just confer with counsel? One moment, Your Honor.
I apologize, Your Honor. We have misplaced a document. I don't seem to have it.
THE COURT: Which document? The subpoena or --
MR. WILCOX: It's in evidence. Exhibit 102.1 is what

we're trying to find. You did not give it to me.

MR. MCCRAY: We didn't leave it up there, did we?

MR. WILCOX: Your Honor, may I approach the bench?

THE COURT: Yes, sir.

MR. WILCOX: One moment, Your Honor.

BY MR. WILCOX:

Q. As part of your investigation, you requested IRS documents or documents from the IRS which included her W-2 Form; is that correct?

A. Yes, it is.

Q. And if I'm not mistaken, she earned about $90,000 per year as a BSO deputy?

A. I think it was approximately 80 to 90,000, yes.

Q. Excuse me?

A. I think it was approximately 80 to 90,000, yes.

Q. 80 to 90,000?

A. Yes.

Q. Okay. I won't quibble about that.

And the loan amount in this case is $20,833, and she paid Ms. Granados $5,000; correct?

A. That's correct.

MR. WILCOX: Your Honor, I think I'm just about done. I just want to confer with counsel.

Your Honor, I don't have any other questions.

THE COURT: All right. Redirect?

MR. SNIDER: Yes, Your Honor. Thank you.

REDIRECT EXAMINATION

BY MR. SNIDER:

Q. Agent DiPietrantonio, during cross-examination you were asked some questions about an IP address ending in 125; correct?

A. That's correct.

Q. Okay --

MR. WILCOX: Objection to the leading, Your Honor.

THE COURT: Overruled.

BY MR. SNIDER:

Q. Let's talk about that IP address for a little bit. You were shown a copy of your grand jury transcript in this case; correct?

A. That's correct.

Q. How many times did you testify in front of the grand jury with respect to this case against Carolyn Wade?

A. Just once.

Q. And what was the purpose of that testimony?

A. To receive an indictment.

Q. Did you testify about all the facts that you knew at the time?

A. No, I did not.

Q. What facts did you provide to the grand jury through your testimony?

A. Only enough facts to receive the indictment.
Q. To establish something?
A. To establish probable cause to receive the indictment.
Q. Do you remember in the grand jury being asked about a particular IP address?
A. Yes.
Q. Was that the one ending in 84?
A. Yes, it was.
Q. And do you remember being asked about the context of that IP address as it related to the indictment?
A. Yes.
Q. And what was that?
A. That it was the IP address that was used to sign the DocuSign.
Q. When you were in front of the grand jury testifying, at that time -- and by the way, when was that, if you recall?
A. I believe that was October.
Q. Sometime last fall?
A. Yes.
Q. When you were testifying in front of the grand jury last fall, were you aware then that an IP address ending in 125 was involved in an application for a PPP loan for Carolyn Wade?
A. No, I was not.
Q. Did you know then who the IP address ending in 125 was attributable to or associated with?

A. No, I did not.
Q. Had you ever even seen that IP address ending in 125 before?
A. No, I did not.
Q. When did you learn about the identity -- let me rephrase that.
When did you become aware of this 125 IP address?
A. In a trial preparation call we had with somebody who was contracted by Womply.
Q. Did they identify the IP address or did they -- well, let me go back for a second.
You were involved in drafting a subpoena to Womply?
A. That's correct.
Q. That was a trial subpoena, not a grand jury subpoena?
A. Correct.
Q. And there was a request in there to provide any records that had a similar IP that was used in Carolyn Wade's application; is that right?
MR. WILCOX: Objection to the leading, Your Honor.
BY MR. SNIDER:
Q. I can rephrase.
Why did you include in the trial subpoena request to include any -- let me rephrase.
Do you know what IP crossover is, if I use that term?
A. Yes.

Q. What is that?
A. It's when an IP -- the same IP is used on more than one, in this case, application.
Q. Okay. Did you ask Womply for any crossover IP?
A. Yes.
Q. Why did you do that?
A. Because on that trial preparation call, we were made aware that there were other applications that made similar -- not similar -- had the same IP addresses that were used in Carolyn Wade's PPP application.
Q. Did you learn the actual identity of the 125 then or did you learn it only when you got the records?
A. Only when I got the records.
Q. Okay. So you didn't learn on that call that there was --
MR. WILCOX: Objection to the leading, Your Honor.
THE COURT: I'm sorry. I didn't hear.
MR. WILCOX: Objection to the leading.
THE COURT: Sustained.
BY MR. SNIDER:
Q. Did you learn on that call --
THE COURT: What did she learn on that call?
BY MR. SNIDER:
Q. What did you learn on that call about this 125? Was that identified?
A. It was not identified. I just learned that that IP

address was also used in the submission of other PPP applications.

Q. Okay. When you got the records back from Womply, did it include records of IP addresses that were involved in Carolyn Wade's PPP loan application?

A. It did, yes.

Q. And was one of those IP addresses ending in 125?

A. Yes, it was.

Q. And let's take a look at your -- did you do an analysis when you got the Womply records of what that IP address ending in 125 did in relation to Carolyn Wade's application?

A. Yes.

Q. And was that based on the information and data that had been supplied by Womply?

A. Yes.

Q. I'm going to publish for you the demonstrative that we were using during your direct examination two days ago, and I'm going to go to slide eight. It's marked for identification as Government 1000.

What is in slide eight?

A. These are Womply events on May 13, 2021, related to Carolyn Wade's PPP loan application.

Q. And was there an event that occurred from an IP address ending in 125?

A. Yes, there was.

Q. What was that event?
A. It was the uploading of the Schedule C.
MR. WILCOX: Your Honor, I'm going to object. This is exceeding the scope of my cross-examination. It's --
THE COURT: Beyond the scope of the cross is the --
MR. WILCOX: Yeah, beyond the scope of the cross.
THE COURT: Overruled.
BY MR. SNIDER:
Q. In looking at the Womply records, did this IP address ending in 125, as far as activity or events in Carolyn Wade's application, do anything else other than upload this Schedule C?
A. No, it did not.
Q. Did you see logins into Carolyn Wade's account from the IP address ending in 125?
A. No, it did not let me.
Q. I'm sorry. I don't mean event. I just mean actual logins. Let's take a look at login attempts on slide five. A lot of terms I'm throwing around here, so I don't want to confuse you.
Do you see on slide five login attempts from a 125 address?
A. Yes.
Q. Okay. But if there was an event from a 125 meaning something was actually done --

MR. WILCOX: Objection, Your Honor. It calls for speculation.

THE COURT: Ask the question and if she's knowledgeable, she may respond.

BY MR. SNIDER:

Q. Do you know whether it is possible to log in and not do anything to an application on Womply's website?

A. It is possible, yes.

Q. And if something is done, is it tracked in the events spreadsheet?

A. Yes, it is.

Q. So there were additional logins from the 125; correct?

A. Correct.

Q. But there was no other activity?

A. Correct.

Q. You were shown slide 36 during your cross-examination. Do you remember that?

A. Yes.

Q. And on the third line here, it reflects that there were five logins from those IP addresses belonging to Verizon?

A. Correct.

Q. Why did you select those five to put into your summary?

A. Because those IP addresses were included in Carolyn Wade's application while Carolyn Wade was a Verizon customer.

Q. And did you see logins into the Womply portal from those

IP addresses?
A. Yes, I did.
Q. Did you see activity in the Womply portal from those IP addresses?
A. Yes, I did.
Q. Did you see activity in the Womply portal -- logins and/or activity in the Womply portal after -- later in time from the logins ending in 125?
A. Yes, I did.
Q. You've testified that you saw this 125 IP address in other PPP loan applications that were for borrowers that were not Carolyn Wade; correct?
A. That's correct.
Q. And that information came from Womply?
A. Correct.
Q. But based on that alone, do you know what activity, if any, was being done in those applications from the 125 IP address?
A. No, I don't.
Q. And you've testified that, to your knowledge, this 125 IP address is associated with who?
A. Haydee Granados.
Q. And the bank records in this case that are in evidence, how much money did Haydee Granados receive from Carolyn Wade on the day that Carolyn Wade received her PPP loan

application?
A. $1,000.
Q. How that was made?
A. Via Zelle.
Q. Did you see any other money going from Carolyn Wade's account to any other entity or person associated with Haydee Granados?
A. Yes.
Q. What was that?
A. A $4,000 check to the Jersey City Group a few days after she received the proceeds of her PPP loan application.
Q. I've published Government Exhibit 305 in evidence. Is this the check you just referred to?
A. Yes.
Q. What is in the memo?
A. Equipment restoration.
Q. Do you know what that is?
A. No, I do not.
Q. I'm going to pull your demonstrative back up. I'm publishing page 13.
Tell us again what is on page 13.
A. This is the DocuSign for Carolyn Wade's PPP application that was funded.
Q. And the IP address that was used for this DocuSign?
A. 174.228.6.224.

Q. Is there an attribution between that IP address and Carolyn Wade?
A. Yes. That's a Verizon-owned IP address while Carolyn Wade was a Verizon customer.
Q. What other --
MR. WILCOX: Objection, Your Honor. That calls for speculation.
THE COURT: Have her testify from law enforcement knowledge.
MR. SNIDER: I'm asking her what were the records that are in evidence.
BY MR. SNIDER:
Q. Based on the records in evidence, what is the attribution between the 224 IP address and Carolyn Wade?
A. It's a Verizon IP address while Carolyn Wade was a Verizon customer.
Q. What other attribution is shown on slide 13 between the IP address ending in 224 and Carolyn Wade?
A. The same day Carolyn Wade's PPP application is signed with the IP address ending in 224, there's also a login to Carolyn Wade's USAA bank account also from the IP address ending in 224.
Q. And how many DocuSigns for PPP applications were signed in this case?
A. Two.

Q. This is the first?
A. Yes.
Q. Let's go to page 20. What are we looking at on page 20?
A. This is the second DocuSign that was signed for Carolyn Wade's PPP application.
Q. And that IP ends in what?
A. 84.
Q. And what is the attribution based on the evidence in this case between Carolyn Wade and the IP address ending in 84?
A. Carolyn Wade was the billing party and the name of the service information for this IP address, her AT&T.
Q. Where was the service provided to?
A. To Carolyn Wade's residence.
Q. What other attribution is shown on slide 20?
A. On the days before and after this DocuSign was signed, an IP address ending in 84 also logged into Carolyn Wade's USAA bank account.
Q. And what type of device did that, based on the evidence in this case that's in evidence?
A. It was an Android app.
Q. What kind of phone did Carolyn Wade have based on the evidence in this case during this time frame?
A. A Note20 Ultra 5G, 128 gigabytes, copper in color.
Q. What kind of operating system does that run, if you know?
A. Android.

Q. You were asked some questions about how the DocuSign process works on cross-examination. Do you remember that?
A. Yes.
Q. To your knowledge, can you sign a document by DocuSign by logging into a website?
A. No, you cannot.
Q. How is it that one would begin the process of DocuSigning a document?
A. One has to receive the document in their email from a company via DocuSign. They then open the link in that email address, sign the document, and they're then provided with a copy of everything that they signed to the same email address on file.
Q. So you need that original email, is that your testimony?
A. Correct.

MR. SNIDER: I have no further questions.

THE COURT: You may step down.

MR. WILCOX: Your Honor, just for purposes of the record, the defense may want to recall Agent DiPietrantonio.

THE COURT: She's not -- she is excused subject to recall.

MR. WILCOX: Thank you.

* * * * *

CERTIFICATE OF REPORTER

I certify that the foregoing is a correct transcription of the record of proceedings in the above-entitled matter prepared from my stenotype notes.

DATE: 18th of July, 2024

/s/Lance W. Steinbeisser
Lance W. Steinbeisser,
FCRR, RPR, FPR-C
Official Court Reporter
United States District Court
Southern District of Florida
Miami, Florida

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