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 20, 2024

GOVERNMENT'S CLOSING

Pages 1 to 38

TRANSCRIPT (EXCERPT) OF **TRIAL**

HELD BEFORE THE HONORABLE DONALD L. GRAHAM

UNITED STATES DISTRICT JUDGE

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Proceedings recorded by mechanical stenography; transcript produced by computer-aided transcription.

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(Call to the Order of the Court.)

THE COURT: Are we now ready for our closing arguments?

MR. MCCRAY: Yes, Judge.

THE COURT: I think that you have the updated version of the instructions. Other than the prior rulings, are there any other comments?

MR. MCCRAY: No, Judge, not from the defense.

MR. SNIDER: Your Honor, I just noticed that on page 11, the good-faith defense.

THE COURT: I'm sorry? Page 11?

MR. SNIDER: On page 11, Judge, I just noticed that good-faith instruction is included, and I believe the Court's ruling --

THE COURT: Oh, that should not be there, so we're going to have to alter that. Thank you for bringing that to my attention.

Any other comments?

MR. MCCRAY: No, Judge.

THE COURT: All right. So we will make that correction. You can disregard good faith.

So we're going to have to decide when to break. We'll see how it goes, but at some point in time we'll probably have to take a break before all of the arguments are concluded, and we'll see how it goes. And it also may depend

on our reaction from the jurors.

Bring the jury in, please.

(Jury enters at 9:40 AM.)

THE COURT: Good morning, ladies and gentlemen. I understand you were greeted with a lot of traffic this morning -- we're missing one? All right. Fortunately, everyone made it in okay.

So the evidence has been completed, and now we are at the closing arguments stage. Each side has a maximum of one hour to present the closing argument. The Government will go first. They have the burden of proof. Any time that the Government does not use that one hour, they may present what we call a rebuttal argument. So it would be Government and its presentation -- let's assume, hypothetically, they use 40 minutes. The defense would then have its closing argument. They have up to one hour. The Government would then have 20 minutes remaining, the time they did not use in the initial argument. So that is the process.

And as you know, afterwards, I will present to you your instructions on the law and thereafter you will be able to deliberate.

Government, are you ready to proceed?

MR. SNIDER: Yes, Your Honor.

THE COURT: You may proceed.

MR. SNIDER: Could we have the HDMI connection to

this portion for the computer? Great. Thank you.

COURTROOM DEPUTY: Sure.

MR. SNIDER: Members of the jury, Carolyn Denise Wade participated in a scheme, a scheme to get a loan from the Paycheck Protection Program that was based on lies. A scheme is a plan. It is a plan, you will hear from the Court's instructions, essentially to get money or property based on false statements -- lies. That is exactly what the scheme was in this case, and Carolyn Denise Wade, the defendant, participated in that scheme knowingly and with intent to defraud.

Over the course of this trial, you have seen overwhelming evidence, evidence that proves beyond a reasonable doubt that the defendant directly participated in the application process for her fraudulent PPP loan. She knew exactly what she was doing. She was directly involved. She intended to get a PPP loan based on lies.

Now, let's talk about those lies. At the beginning of this case, I told you that this whole case was about a $113,000 lie. Remember? And you've seen that lie over and over and over and over again. And that lie, that $113,000 lie, that was about 2019 gross income for a business that did not exist.

There was no business named Carolyn Wade. It was made up. It was pulled out of thin air. Why? To get a

fraudulent PPP loan. Even the defendant's husband, Tracy Wade, confirmed on Friday there was no business Carolyn Wade. It was one of the few things he testified to that was accurate. We'll talk about that in a minute.

Everything about the business, quote, Carolyn Wade was a lie. It had no employees. It had no payroll. It certainly didn't have any income. And Carolyn Wade knew this. She knew that this was a loan for a company that didn't exist because that lie was so obvious, so apparent, and so repeated, over and over and over again. Throughout the process, it was impossible for her to have not seen it. It was impossible for her not to have known.

I want you to remember when you look at the evidence in this case. Every time you see the business legal name Carolyn Wade, that is a lie. And every time the defendant saw it when she was applying, she knew it was a lie. Now, let's talk about some of those instances, the ones where this lie just literally jumps off the page or jumps off a computer screen.

The first time that the defendant may have seen this lie was when she logged into the Womply portal, which the evidence shows -- and we're going to go through this in great detail -- the defendant did at least nine times from her cell phone, a Samsung Note20 Ultra 5G in copper. You can look at Government's Exhibit 802. It even has the color of her phone,

the device.

Remember what Aman Thakral told you. He was the witness from Womply. He testified last Tuesday and he explained to you that every time there's a login into the Womply portal, all of the evidence that had been previously entered is visible. And Mr. Thakral should know. He wrote the program for the whole website. You heard it from the source. The person who designed the website that captured all this information was sitting in this courtroom and told you exactly how it worked.

So every login was an opportunity for the defendant to see the lie. The lie was there when the defendant uploaded three bank statements into the Womply portal because she was logged in to do that. The lie was there when the defendant linked her bank account three times through Womply's website because she was logged in to do that. The lie was there when the defendant verified her identity through Persona because she was logged in to do that.

Took six selfies of herself. Remember the testimony from the representative from Persona, Ms. Bergh? She walked through all those sessions, the failures -- not because it was the defendant who was applying, just because the barcode couldn't be read. So she had to do it over and over and over again. She's logged into Womply's portal every time she's doing that.

And then there are the documents. I'm going to focus on a few. There's the fake Schedule C. That's Government Exhibit 113.

This was uploaded into the Womply portal by Haydee Granados. There's no dispute about that. We've stipulated to that. But the point is that Haydee Granados uploads it and then the defendant's logging in afterwards. You're going to see that again in a few minutes. But look at this first line. The lie literally jumps off the page. There's no business Carolyn Wade before you even get to the fake income information. There's no principal business Carolyn Wade. And then you get down to these numbers. The lie literally jumps off the page. It's impossible not to know that.

Then there's Government Exhibit 116, the first fraudulent PPP application that was signed on May 18th from the defendant's Verizon network that she was on. The lie jumps off this page too. There's no business Carolyn Wade. There's no trade name Carolyn Wade. Business phone? Sure, that's the defendant's phone number. That's not the business phone for a business called Carolyn Wade. Carolyn Wade isn't the primary contact for a business named Carolyn Wade.

Certainly there's no $113,560 in 2019 gross income for a business called Carolyn Wade. It literally jumps off the page. And she didn't see this once. She saw it twice. This is Government 117. This is an identical application that

she just had to sign again because of that issue between the lenders and Harvest being told, "Sorry, you're too big. You can't issue any more." Had to get routed to Lendistry. That's why she had to sign it twice. It's the exact same document. It's the exact same lies jumping off the page.

And then there's the forgiveness application, which the evidence shows the defendant signed from her home. Look at the lies jumping off this page. There's no business name Carolyn Wade. There's no trade name Carolyn Wade. There's no employees. Three employees? It's painfully obvious how fake this is. And here's the defendant's signature. Sole proprietor title.

Had the SBA or its private lenders that were trying to get money to small business owners in the midst of a pandemic known about any of this false information, specifically the fake income information, her business that didn't exist, they wouldn't have funded the loan, but the SBA didn't know that because it relied on the borrower to certify that it was all true. The SBA and the lenders didn't know this was false. The defendant knew it was false.

She certified it was all true knowing that it wasn't. Look at these documents. It would have been impossible for the defendant to have missed this. I just showed you four: a fake Schedule C, two fake applications for a loan, and a fake forgiveness application.

Now let's talk about the business that the defendant did report to the IRS as having. That was called 1 Step A-Head. You don't see 1 Step A-Head anywhere in these application documents. This was not a loan for 1 Step A-Head for a business that the defendant told the IRS she had. She didn't tell BSO she had that business, by the way. You heard from Joanna Hely. If an employee of BSO has outside employment under the BSO policy, you're supposed to report it in advance. Even her husband knew that. On some years he did that for the Wade Funeral Home.

But 1 Step A-Head isn't mentioned anywhere in these applications because this was not an application -- a PPP loan application for 1 Step A-Head. And Defendant did have a Schedule C for the year 2018, 2019, and actually two for 2020 because one of the 2020s was amended. She had a Schedule C filed with the IRS for 1 Step A-Head, but that's not what she used. That wasn't included. And not only was it not included, you learned this on Friday from Mr. Wade's testimony.

The Wades never provided the real tax information -- or the tax information filed with the IRS to Haydee Granados or Eduardo Rivero. Now think about that for a second.

The person whose only role in this, according to the data, was to upload the tax information, the Wades didn't give them that information. How is Haydee Granados supposed to

know how much money 1 Step A-Head or a fake business, Carolyn Wade, is supposed to make? How is she supposed to know that if she didn't have the information? And their theory is that they had no idea? You pay somebody $5,000 to upload fake tax information and now you're surprised that it was fake when they didn't even have the real information.

This wasn't trust. This wasn't trust in the Granados or the Riveros. This was paying for somebody else to lie for you, paying someone 25 percent to create and upload fake tax information. She could have supplied the real one. That's not what she did.

Now, when you take a look at these tax returns, Government Exhibit 200, 201, 202, 203 -- that's from the years 2018 to 2020 -- you'll see what Carolyn Wade actually reported to the IRS for 1 Step A-Head. And in the 2019 -- which is the year that matters for this application because the 2019 box was checked -- she reported $6,800, not 113,560. That's a made-up number.

And the other thing to look at in those tax returns are these extraordinary expenses for a hairstyling business that's run out of a garage. That's what her husband testified. It was in the garage. It was like a chair in the garage.

Between those three years, '18, '19, '20, it cost Carolyn Wade $67,770 to run 1 Step A-Head. That's what she

reported to the IRS in expenses for those three years. And she reported only earning $10,600. That means that it cost Carolyn Wade out of her own pocket $57,000 to run 1 Step A-Head for three years? That's like 27 percent of all of her BSO wages.

And I want to make something clear here. Carolyn Wade is not on trial for anything related to her taxes. Okay? You can't consider those taxes as -- she's not on trial for taxes. That's not part of this case. I don't want you to look at that and say, well, she did something wrong here; therefore, she did something. No, you can't do that. Okay?

But what you can do is just look at the discrepancies. Look at the discrepancy between the -- on the fake Schedule C, she's claiming this enormous profit, and on the one she filed with the IRS, she's claiming these enormous losses. $5,000 for travel? $8,400 for utilities? She's working in the garage. Does that make sense? If it's costing you this much money to run this hairstyling business, why would you keep doing it? 24,000 miles driven in one year for a hairstyling business? They weren't living in Port St. Lucie at the time. Look at the tax returns. They were living in Coral Springs. That's what her husband testified to. She's working in Broward County at the sheriff's office, not living in Port St. Lucie.

Now, let's talk about Mr. Wade's testimony -- the

defendant's husband, Tracy Wade. He testified on Friday from that seat right there and he was clearly trying to shift the blame -- all of the blame on Haydee Granados and Eduardo Rivero. Of course he was. He was trying to protect his wife. He loves his wife. Apparently, he loves everyone. That's what he said. He even loves Mr. Zacca, which is hard to believe considering the interaction with Mr. Zacca and Mr. Wade that went on for at least two hours, but that's what he said -- "I love you, Mr. Zacca" -- something to that effect. Mr. Wade could not answer some very simple questions about his own affairs.

He couldn't tell you how much money his funeral home business made as recently as 2023. He couldn't tell you the timing of his EIDL loan. He couldn't tell you the timing of his PPP loans. He testified that he did not have a business named, quote, "Tracy Wade" but he couldn't explain why he got a PPP loan for a business called Tracy Wade.

And then Mr. Wade was asked about Carolyn Wade's PPP loan application process, and he gave you a version of events that is just not true. And how do you know that Mr. Wade's version is not true? Because the data doesn't lie.

The truth in this case is in the data, not in Mr. Wade's testimony. The data, the precise digital record of everything that happened on the Womply portal, you have it all. Womply had extraordinary records. Literally, every time

there was a key stroke, a piece of information put in, there's a record. There's a unique transaction ID. You see it's the who, the what, the where, the when. You have it all.

Let me give you a few examples. I'm going to go through the data one more time, but let me just first give you a couple of examples. For example, Mr. Wade testified his wife doesn't have access -- the defendant, Mrs. Wade, doesn't have access to her cell phone during working hours at BSO. That's not true. How do you know that's not true? You have the photographs of Mrs. Wade, the defendant, taking six selfies of herself in her BSO uniform during working hours, holding her cell phone, her Samsung Note20. You know it's a Samsung Note20 because Persona captured the model number.

Here's another example. Mr. Wade testified that, quote, "Haydee did 90 percent of everything for Carolyn Wade's loan." That's not true. That's not what the data shows. The data shows the opposite. Haydee Granados did one thing as far as actual changes in this application. She put in fake tax information. That's what the data shows. She didn't do 90 percent. She did one thing. That was her job and she got paid handsomely for it.

Mr. Wade also denied his own involvement in Carolyn Wade's application. He said, "Oh, no, that was Granados. She was doing it all," until the data was put in front of him. Now, what's that IP address for the Wade Funeral Home, that

.166 that was in front of him. At that point there was no fighting it because the data doesn't lie.

He said, well, you know, maybe it was started before May 4. No, it wasn't. Look at the data. There's no data before May 4. That's when this application was started. Finally, Mr. Wade said that he DocuSigned the second PPP loan application, the one on May 28, 2021. Remember he said that? He said, "That's the one that I signed." And he said he signed it from the Wade Funeral Home and he said it was at about 2 o'clock in the afternoon. Do you remember that? He said, "Oh, that's the one around 2 o'clock I signed." For a person who apparently couldn't remember or said he has trouble remembering what happened yesterday, he said he had a pretty clear memory of signing it around 2 o'clock in the afternoon from the Wade Funeral Home. Well, guess what? That PPP loan application was not signed at 2 o'clock in the afternoon from the Wade Funeral Home.

Number one, it was signed from the IP address from the Wades' residence -- the home they live in, not the funeral home. And number two, it wasn't signed at 2:15 in the afternoon East Coast time. You're going to look at that record. Mr. Wade may have memorized the DocuSign certificate showing 2:15. Guess what? That was Pacific time. It says it right on there, 2:15 Pacific. That's 5:15 East Coast time. He didn't sign it at 2 o'clock. He wasn't in California. He

was in Florida, East Coast, Eastern time, 5:15.

The data in this case puts Carolyn Wade, the defendant, directly involved in this PPP loan application, directly involved in this scheme. And you're going to have, as I said, all the data. So let's walk through it one more time because this is the record of what happened.

This application is started on May 4, 2021, from the Wade Funeral Home. Mr. Wade said that was him at the computer, .166. That's the IP address that AT&T assigned to the Wade Funeral Home. And there it is. Do you see operation type 0? That means it started. This is the first thing that happened.

You're going to have these spreadsheets too. It's Government Exhibit 102E, 102.1E and 102.2E. And they show different things. The information here, taken from 102E, it's kind of an overview of the transactions. But if you look at the more detail, which is 102.2E, you can see every time it goes from, like, blank to a piece of information. Mr. Wade typed in Carolyn Wade as the business, not Haydee. It's right there on the spreadsheet. This is what Mr. Wade did on May 4th. He uploaded a bank document and he linked a bank account. That's from the Wade Funeral Home. That's what the data shows.

And then there was nothing between May 4th and May 13th. He started it as -- I'm sorry -- this is as

Mr. Thakral testified. You can start it, go in and out of the application. It doesn't have to all be done at once. So nothing happens after May 4th until May 13th when an email gets sent to Carolyn Wade saying, "It may have gotten stuck. It happens to the best of us. We get busy. Can you please go in and finish?" Well, that's exactly what happens on May 13th. There's a bunch of logins.

This spreadsheet just shows every time there was a login to the Womply portal on May 13th. We don't know whose IP address ended in 34. We know that the .166 was Mr. Wade logging in. We know the .125 was Haydee Granados logging in after that. Then Mr. Wade logs back in. And then we have the defendant, Carolyn Wade. This is just May 13th. One, two three, four, five logins to the Womply portal, and then another login by Haydee Granados.

This slide, slide six, shows specifically Mr. Wade's login attempts: one at 8:23 AM and one at 9:21 AM. This slide shows Carolyn Wade, all of her logins, each one true, meaning she successfully logged in. Five times on May 13. And there's her phone, right there in front of you, the Samsung Model SM-986U, and she's using it on Verizon's network, which you can only use if you're a Verizon customer.

And there are the logins, the same type of app, Android app, the same IP address to Carolyn Wade's bank account. And you heard, in addition to this matching up with

the device that was captured during the Persona, Agent DiPietrantonio testified that this SM-986U is a Note20 Ultra 5G. That is the defendant using her phone to log into Womply five times on May 13th.

And this slide, slide eight, shows specific activity as a result of that login. It shows Haydee Granados uploading the fake tax document. That's the only thing that she did here. And then it shows, once again, the defendant logging in, uploading a bank document three times, linking her bank account three times. That 125 IP address did no other activity except upload this fake Schedule C. Logged in -- there's other logins. But as far as activity, this is all it did.

More transactions. These are the detailed transactions for Mr. Wade on May 13th. Six transactions. Look at the time, Eastern. Mr. Wade is doing these between 9:21 and 9:23 AM -- right? -- from his funeral home. And then in goes the defendant, Carolyn Wade, after him. Between 10:08 and 10:51, all these transactions in the Womply portal. Fifteen transactions. And that corresponds with her using that same IP to log into her bank account on the same day.

Then we have the defendant, Carolyn Wade, doing her Persona identity verification at work clearly in her BSO uniform. And, by the way, this too, the time here, 10:09 AM -- it says 12:09. That's UTC. This says 10:09

Eastern -- I'm sorry. It says 2:09 PM. The difference between UTC, Universal Coordinated Time, and Eastern is four hours. So this is 10:00 AM. And she is holding the Samsung Note20 in her hands in front of her face to take these three selfies. You can see on the device type SM-986U. That's the Samsung Note20 Ultra 5G. It says tablet. That's a generic term. A tablet is a device. This is her cell phone. That is what Ms. Bergh said. Ms. Bergh explained to you that it was just capturing generically. Look at the model number. That's what matters.

And here's the defendant again because the first time we know failed. Seven sessions? Right? Over and over and over. The fail, fail, fail. Because it couldn't read the barcode she was uploading from her Florida Driver's License, so she does it again. It's the same IP. It's the same device. It's the same person, the same uniform, May 13, 10:20 AM -- 10:30.

And then we come to May 18. This is the first 2483 form that's DocuSigned. This is part of Government Exhibit 116. There is the IP address ending in 224. That is an Verizon IP address. It is the same Verizon IP address that is used that day, also from an Android app, to access Mrs. Wade, the defendant's, bank account. Look at the time zone. Pacific. Minus eight. This was at 7:56 AM Pacific. That's 10:56 AM East.

So she signs this one. Mr. Wade testified he didn't do this one. He said he didn't know who did this one. You know who did this one. This is Carolyn Wade. The next day, Mrs. Wade gets an email from Womply explaining this transition between lenders. Again, tried to go to Harvest initially. Harvest was told by the SBA no more loans right now. You're too big. We want to focus on smaller community lenders. This is what is being told to Carolyn Wade. It's why she has to do it again. But in between the 18th, when she signs the first time, and the 28th, when she signs the exact same document -- the fraudulent application -- the second time, she's logging into Womply.

Here it is on May 19, 2021. She's at work. How do you know she's at work? That's the BSO IP address. The -- Mr. Rodriguez from the Broward Sheriff's Office came in here and explained to you he was the network guy and said this was BSO's IP address. It has been for a very long time.

May 20th, another login from the defendant's cell phone. The Note20 Ultra 5G. This is from her home. She's logging in from home. She's also logging into her USAA bank from home.

May 22, another login. She's now back on Verizon's network. An IP address ending in 127. That is owned by Verizon. She's using her phone, that same Samsung, May 22. This is all between the signing of the first one and the

second one. Look at how many times she's logging in.

And she hasn't signed the second one yet until she gets a reminder. And by the way, you're going to have all of the exhibits. I showed you one reminder. There were multiple reminders for her to sign. She thought she already signed the first time -- why do I need to sign again? -- but she keeps getting this reminder: Sign again, sign again, sign again. Another login, May 27. This one, again, from the Broward Sheriff's Office network. You've got to be an employee to log into that network.

And now we come to the second signing, May 28th, 2021, and here it is. See? This is what Mr. Wade -- he memorized this. He said it was around 2 o'clock in the afternoon. I was in the Wade Funeral Home. Yeah, that specific time. This was signed at 5:15 in the afternoon in Florida, not California. Because it was signed from the 84 IP address from the Wade's home -- not Wade Funeral Home, the home where they lived, right here, 6110 Reese Road, Unit 207, Davie, Florida, 5:15 PM. And after that, another login from home, June 5th, 2021 -- continuing to log in, continuing to participate in this scheme.

Members of the jury, when you finish going through all the data that shows unquestionably beyond a reasonable doubt that Carolyn Wade was directly involved in this, there's one more thing I want to you to do, one more thing I want you

to look at. Follow the money. Look at the money because the money trail is even more evidence of the defendant's knowing participation and intent to defraud.

This, slide 22, is the receipt of the fraudulent PPP loan, $20,833, on June 7th that was received from Harvest, who ultimately purchased the loan from Lendistry. That was the testimony that you heard from Harvest's witness, Ms. Musil. And that same day, a Zelle payment to Haydee Granados, $1,000.

The balance before that, as you heard from testimony from Agent DiPietrantonio who looked at all of the bank records -- it was like $45. All but $45 of this $1,000 payment came from the proceeds of the PPP loan to the person who uploaded the fake Schedule C. That is evidence of intent to defraud.

And that's not all they received for this loan, the Granados and the Riveros. Look at Government 305. That is the $4,000 check to Jersey City Group, which the parties have stipulated is associated with Eduardo Rivero. That's a total of $5,000. All they did was upload a fake Schedule C. Look at that check. I'll just pull it up so you can see it real quick.

Do you remember this check, equipment restoration? That's a phony memo. That's intent. That's trying to hide the purpose of this. Jersey City Group, $4,000 two days after receipt of the PPP loan proceeds.

The money trail doesn't stop at the Granados and the Riveros. That's not the only instances of sham checks that we saw here. It continues. And it continues with all the checks that Carolyn Wade wrote to herself and to her husband for, quote, salary. That is evidence of intent to defraud. Every single one of these checks. Mr. Wade wasn't a salaried employee of Carolyn Wade. He testified to that. When Mr. Zacca asked him do you do anything for this hairstyling business, he looked at Mr. Zacca like he had two heads.

Of course he didn't do anything for the hairstyling business. She's writing checks to herself and her husband over and over again for salary. And Mr. Wade stumbled to come up with some explanation for this. Oh, I was giving her cash and then she was writing me a check. Does that make any sense? Why would he give her cash and then write her a check? They had the same bank account. Their money is pooled. It doesn't make any sense.

And he couldn't explain why she had written salary. We know why she wrote salary. Look at this again and again and again and again. Over, over. Never did it before receipt of the PPP loan when you look at the bank records that we have going back to 2019. Didn't do it again once it was forgiven.

The checks, members of the jury, are evidence that Carolyn Wade knew this was a program to protect payroll -- to protect payroll of small businesses, but she didn't have

payroll from a small business, so she made it up to make it look legitimate, to make it look like she was protecting a small business that had payroll to herself. And when you add up all of these checks, it's like $13,000 in salary checks. That's twice as much money as she reported to the IRS of her business making in 2019. Remember, she reported $6,800? She's writing $13,000, twice as much in salary checks.

This was a lie about payroll. This was a lie to make payroll look legitimate under the Paycheck Protection Program. So she knew the purpose of the program. And she knew that in order to get the loan forgiven, which she wanted to do, she had to show payroll. That's exactly what she did.

Another login July 26, a reminder about forgiveness on August 7th, and then there it is. She applies for forgiveness. And when you look at Government Exhibit 118, which I showed you at the beginning of this argument, you saw she had written how much she had spent on payroll, 20,833. Another lie.

This is the last slide of the presentation. You're not going to have this one in the jury room because this is something -- this is a summary slide. But take a look at it now. Look at every instance of Carolyn Wade participating in her own fraudulent PPP loan application.

This is everything you need to know. This is her knowledge. This is her intent to defraud the Paycheck

Protection Program. This proves beyond a reasonable doubt that Carolyn Wade is guilty of wire fraud.

THE COURT: Excuse me. 40 minutes has elapsed.

MR. SNIDER: And that is exactly the verdict we are going to ask you to return, a verdict of guilty. Thank you.

* * * * *

MR. SNIDER: Data doesn't lie. There is no credibility finding in data. It is a historical record captured of electronic information transmitted, and it gives you everything you need in this case to see the Defendant acting -- knowingly acting with intent to defraud in this scheme.

This case is really about data. There's a lot of it. And it may be hard to parse through, but you can do it. You have it and you have the summaries explaining what the data is. Mr. McCray makes a point about reasonable doubt. The Government does have the sole burden in this case, and its burden is heavy. But the doubt that he is trying to raise in this data is not reasonable. It's not reasonable. The numbers are what they are. The IP addresses are what they are, the model numbers of the phone of the defendant. It is what it is.

You're going to hear a definition of reasonable doubt. It's proof so convincing that you would rely on it -- you rely and act on it without hesitation in your most

important of affairs. So look at this data. Would you rely on it? Would you look at that IP address and know that's Mr. Wade, coupled with his testimony, that he was at the Wade Funeral Home that day? Would you rely on this data? This data is the truth of this case of what really happened. It is a digital record of the defendant's own participation in this scheme.

You heard the defense's theory in this case that the Wades trusted Haydee Granados. They trusted her. They trusted Mr. Rivero. Apparently, this is what they did. I'll ask you again. How do you trust somebody to put in accurate tax information about a business when you never gave them the information in the first place? This isn't about trust. This is a scheme. This is intentional. Paying them to put in a fake tax document, that in itself was the first red flag.

The Paycheck Protection Program for Schedule C filers was based on gross income. And they didn't give the one piece of information showing what the gross income was. And it also wasn't for 1 Step A-Head. Mr. McCray argues that the defendant didn't know all the intricacies of this program, didn't know the regulations. Did she know that she didn't have a business named Carolyn Wade? Did she know that in every single one of these documents that you've seen the word 1 Step A-Head doesn't appear anywhere? It is painfully obvious that this was not a loan for any company that the

defendant had.

But that was seen over and over and over and over again. Data doesn't lie. It shows you the defendant uploading her bank statements. That's what's there. Look at the events tab on that exhibit on that spreadsheet. You also heard Mr. McCray argue that why would she do this? Why would the defendant do this if she knew that she had real tax returns filed with the IRS and the IRS could just check and see that this was all fake? It wasn't easily detectable.

You heard from the SBA witness. There were millions and millions and millions of these loans. Impossible to check them all, which is exactly why that application contains a self-certification by the borrower that all of the information is true. That was the testimony from the SBA. They rely on the borrower to be truthful. This was a trust-based system.

There was a breach of trust in this case. There wasn't a breach of trust by Haydee Granados. It was a breach of trust with the SBA and the lenders that were trying to move money out to small businesses as quickly as possible during the pandemic. That's the breach of trust. It was a trust-based system that depended entirely upon self-certification because there were so many of these loans because this was a pandemic. And as the SBA testified, small businesses are the heartbeat of the economy. That is why this program was focused on small businesses.

You heard Mr. McCray argue something to the effect that Haydee Granados was logged into the defendant's email address or email account. No. No. Go back to the data. What the data shows is that there was two ways to log into Womply. One was to supply Carolyn Wade's email address, ckidd, and the other was to supply her phone number. And if you supplied the email, then the one-time code got to her email address, the defendant's. And if you logged in using the cell phone -- her cell phone, the code got sent by SMS text to her cell phone, which means that every time there was a login, the defendant knew about it because she's getting the code.

So there was a login into her Gmail. They want you to believe that she would give her email password to the Granados? She doesn't know Haydee Granados. She's going to give her her email password? Does that make sense?

I want you to take your common sense into the jury room. Mr. McCray does too. Take your common sense. Because the common sense that you have with this data -- looking at this data with common sense shows there is no reasonable doubt in this case that the defendant knowingly and intentionally participated in this scheme to defraud.

Mr. McCray talked about the defendant's work schedule. There was no testimony about that, but there was a document, and there was no testimony because, again, just to

be clear, she has no burden. So the defendant has no burden. She doesn't have to call any witnesses at all. But he did introduce this record of her work schedule, and we're in agreement about this; yeah, the defendant was at work. You saw the picture of her in her BSO uniform taking selfies of herself to verify her identity. And the reason that she's on Verizon's network is because she's not at home. She's on a cell network. She's on her cell phone. That's not reasonable doubt. You have it right in front of you.

The data in this case shows the defendant's participation. It shows it wasn't an accident. She wasn't tricked into doing this. These were intentional acts. And if you want the context that Mr. McCray is asking for, you want the circumstances of this, follow the money. Look at those checks and look at the bank accounts. Do you see anywhere in the range of these, quote, salary checks being written other than when the defendant gets the PPP loan?

Do you want context? Look at the sham memo -- the sham memo to the Granados, to Jersey City, equipment restoration. Sure. Maybe they did tell her that, but she wrote it. It doesn't make sense. Take your common sense. Why would you write equipment restoration to the person who just uploaded a fake Schedule C into your account? Use your common sense.

That gives you the context. That gives you the

circumstances. $13,000 worth of checks. Twice as much money as 1 Step A-Head made in 2019. 1 Step A-Head not mentioned anywhere. Use your common sense. That is the circumstances. That is the context that you need. You have that. Take that context and look at the evidence through that lens.

This was a scheme. This was a plan. This was intentional. This was the defendant participating in this scheme. And what Haydee Granados did and what her husband did in this does not undo what the defendant knew and what the defendant did. It's not a defense. They were involved as well, but ultimately, this is Carolyn Wade's Paycheck Protection Program loan. This is Carolyn Wade pretending that she is protecting paychecks. She's not.

This is a scheme. And Carolyn Denise Wade is guilty of participating in this scheme knowingly and with the intent to defraud. Carolyn Wade is guilty of wire fraud, and that is the verdict we are asking you to return based on the evidence in this case and your common sense looking at all of that evidence. The data doesn't lie. 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

$

$1,000 [2] - 22:8, 22:11
$10,600 [1] - 12:2
$113,000 [2] - 5:20, 5:21
$113,560 [1] - 8:22
$13,000 [3] - 24:4, 24:7, 29:25
$20,833 [1] - 22:5
$4,000 [2] - 22:17, 22:24
$45 [2] - 22:11
$5,000 [3] - 11:4, 12:16, 22:19
$57,000 [1] - 12:3
$6,800 [2] - 11:17, 24:6
$67,770 [1] - 11:25
$8,400 [1] - 12:16

'

'18 [1] - 11:24
'19 [1] - 11:24
'20 [1] - 11:24

/

/s/Lance [1] - 31:5

0

0 [1] - 16:11

1

1 [15] - 1:8, 10:2, 10:3, 10:4, 10:11, 10:13, 10:16, 11:1, 11:15, 11:25, 12:3, 26:19, 26:24, 30:1
102.1E [1] - 16:14
102.2E [2] - 16:14, 16:17
102E [2] - 16:14, 16:15
10:00 [1] - 19:3
10:08 [1] - 18:18
10:09 [2] - 18:24, 18:25
10:20 [1] - 19:16
10:30 [1] - 19:17
10:51 [1] - 18:19
10:56 [1] - 19:25
11 [3] - 3:10, 3:11, 3:12
113 [1] - 8:3
113,560 [1] - 11:17
116 [2] - 8:14, 19:20
117 [1] - 8:25
118 [1] - 24:15
125 [2] - 17:11, 18:10
127 [1] - 20:23
12:09 [1] - 18:25
13 [2] - 17:19, 19:16
13th [7] - 16:25, 17:3, 17:7, 17:9, 17:13, 18:4, 18:15
166 [3] - 15:1, 16:9, 17:10
18 [1] - 19:18
18th [4] - 2:17, 8:15, 20:9, 31:5
19 [1] - 20:13

2

2 [6] - 15:10, 15:11, 15:14, 15:16, 15:25, 21:13
20 [2] - 1:5, 4:17
20,833 [1] - 24:17
200 [1] - 11:13
201 [1] - 11:13
2018 [2] - 10:14, 11:14
2019 [8] - 5:22, 8:22, 10:14, 11:15, 11:16, 23:22, 24:6, 30:1
202 [1] - 11:13
2020 [2] - 10:14, 11:14
2020s [1] - 10:15
2021 [5] - 15:7, 16:7, 20:13, 21:12, 21:20
2023 [1] - 13:13
2024 [2] - 1:5, 31:5
203 [1] - 11:13
207 [1] - 21:18
20th [1] - 20:18
22 [3] - 20:22, 20:24, 22:4
224 [1] - 19:20
23-CR-60173 [1] - 1:2
24,000 [1] - 12:19
2483 [1] - 19:18
25 [1] - 11:9
26 [1] - 24:13
27 [2] - 12:4, 21:8
28 [1] - 15:7
28th [2] - 20:10, 21:11
2:09 [1] - 19:1
2:15 [3] - 15:20, 15:23, 15:24

3

305 [1] - 22:16
305.523.5633 [1] - 1:21
31 [1] - 1:8
33060 [1] - 2:14
33128 [1] - 1:20
33317 [1] - 2:17
33394 [2] - 2:5, 2:9
34 [1] - 17:10

4

4 [3] - 15:4, 15:5, 16:7
40 [2] - 4:15, 25:3
400 [2] - 1:20, 2:13
4th [3] - 16:21, 16:24, 17:3

5

500 [2] - 2:4, 2:8
5201 [1] - 2:17
5:15 [4] - 15:24, 16:1, 21:15, 21:19
5G [4] - 6:24, 18:3, 19:6, 20:19
5th [1] - 21:20

6

6110 [1] - 21:18

7

7 [2] - 2:4, 2:8
7:56 [1] - 19:24
7th [2] - 22:5, 24:14

8

8 [1] - 18:5
802 [1] - 6:25
84 [1] - 21:16
8:23 [1] - 17:17

9

90 [2] - 14:15, 14:20
954-303-1457 [1] - 2:18
954-660-5696 [1] - 2:5
954-660-5789 [1] - 2:9
954-781-3662 [1] - 2:14
9:21 [2] - 17:17, 18:17
9:23 [1] - 18:17
9:40 [1] - 4:3

A

A-Head [13] - 10:3, 10:4, 10:11, 10:13, 10:16, 11:1, 11:15, 11:25, 12:4, 26:19, 26:24, 30:1
able [1] - 4:20
above-entitled [1] - 31:3
access [3] - 14:7, 14:8, 19:22
accident [1] - 29:10
according [1] - 10:23
account [9] - 7:15, 16:22, 17:25, 18:10, 18:21, 19:23, 23:16, 28:3, 29:22
accounts [1] - 29:14
accurate [2] - 6:4, 26:11
act [1] - 25:25
acting [2] - 25:11
activity [3] - 18:5, 18:11, 18:12
acts [1] - 29:11
actual [1] - 14:18
add [1] - 24:3
addition [1] - 17:25
address [17] - 14:25, 15:18, 16:9, 17:10, 17:24, 18:10, 19:20, 19:21, 20:14, 20:17, 20:23, 21:17, 26:2, 28:3, 28:5, 28:8
addresses [1] - 25:20
advance [1] - 10:9
affairs [2] - 13:11, 26:1
afternoon [6] - 15:10, 15:14, 15:16, 15:21, 21:14, 21:15
afterwards [2] - 4:19, 8:7
Agent [2] - 18:1, 22:10
agreement [1] - 29:3
Ahead [1] - 10:3
aided [1] - 1:23
air [1] - 5:25
ALSO [1] - 2:20
alter [1] - 3:16
AM [9] - 4:3, 17:17, 18:17, 18:24, 19:3, 19:16, 19:24, 19:25
Aman [1] - 7:2
amended [1] - 10:15
AMERICA [1] - 1:4
Android [2] - 17:24, 19:22
answer [1] - 13:10
app [3] - 17:23, 17:24, 19:22
apparent [1] - 6:9
appear [1] - 26:24
APPEARANCES [1] - 2:1
application [21] - 5:15, 8:15, 8:25, 9:6, 9:25, 10:4, 10:12, 10:13, 11:16, 13:19, 14:18, 14:23, 15:5, 15:7, 15:16, 16:3, 16:7, 17:2, 20:11, 24:23, 27:12
applications [2] - 9:24, 10:12
applies [1] - 24:14
applying [2] - 6:16, 7:22
argue [2] - 27:6, 28:1
argues [1] - 26:19
argument [5] - 4:10, 4:13, 4:15, 4:18, 24:16
arguments [3] - 3:3, 3:24, 4:9
assigned [1] - 16:9
associated [1] - 22:18
assume [1] - 4:14
AT&T [1] - 16:9
Atlantic [1] - 2:13
attempts [1] - 17:17
attention [1] - 3:17
Attorney's [2] - 2:4, 2:8
August [1] - 24:14
AUSA [2] - 2:3, 2:7
Avenue [1] - 1:20

B

balance [1] - 22:9
bank [15] - 7:13, 7:15, 16:21, 17:24, 18:9, 18:21, 19:23, 20:20, 22:10, 23:16, 23:21, 27:4, 29:14
barcode [2] - 7:22, 19:14
based [7] - 5:5, 5:7, 5:17, 26:17, 27:15, 27:21, 30:16
Beach [1] - 2:14
BEFORE [1] - 1:12
beginning [2] - 5:18, 24:16
BEHALF [1] - 2:11
bergh [1] - 19:8
Bergh [2] - 7:20, 19:8
best [1] - 17:5
between [10] - 9:1, 11:24, 12:13, 16:24, 18:16, 18:18, 19:1, 20:5, 20:9, 20:25
beyond [3] - 5:13, 21:23, 25:1
big [2] - 9:2, 20:7
blame [2] - 13:3
blank [1] - 16:18
borrower [3] - 9:18, 27:13, 27:15
Boulevard [3] - 2:4, 2:8, 2:13
box [1] - 11:16
breach [4] - 27:16, 27:17, 27:20
break [2] - 3:22, 3:24
bring [1] - 4:2
bringing [1] - 3:16
Broward [5] - 2:4, 2:8, 12:23, 20:15, 21:8
BSO [9] - 10:6, 10:7, 10:8, 12:5, 14:8, 14:11, 18:23, 20:14, 29:4
BSO's [1] - 20:17
bunch [1] - 17:7
burden [5] - 4:11, 25:17, 25:18, 28:25
business [34] - 5:22, 5:24, 6:2, 6:5, 6:14, 8:9, 8:11, 8:17, 8:18, 8:19, 8:20, 8:21, 8:23, 9:8, 9:14, 9:16, 10:1, 10:5, 10:6, 11:1, 11:20, 12:18, 12:20, 13:13, 13:16, 13:17, 16:19, 23:9, 23:11, 24:1, 24:3, 24:6, 26:12, 26:22
businesses [4] - 23:25, 27:19, 27:24, 27:25
busy [1] - 17:5

C

California [2] - 15:25, 21:16
captured [4] - 7:8, 14:13, 18:1, 25:9
capturing [1] - 19:9
CAROLYN [1] - 1:7
Carolyn [48] - 2:20, 5:3, 5:9, 5:24, 6:2, 6:5, 6:7, 6:15, 8:10, 8:11, 8:17, 8:18, 8:20, 8:21, 8:23, 9:9, 11:1, 11:14, 11:25, 12:3, 12:6, 13:18, 14:15, 14:22, 16:2, 16:19, 17:4, 17:13, 17:18, 17:24, 18:18, 18:22, 20:3, 20:8, 21:24, 23:4, 23:7, 23:24, 24:22, 25:2, 26:22, 28:5, 30:10, 30:11, 30:13, 30:15
case [16] - 5:9, 5:19, 6:14, 12:9, 13:22, 16:2, 25:10, 25:13, 25:17, 26:5, 26:8, 27:16, 28:20, 29:9, 30:17
CASE [1] - 1:2
cash [2] - 23:13, 23:15
cell [10] - 6:23, 14:8, 14:12, 19:7, 20:18, 28:8, 28:9, 28:10, 29:7
certainly [2] - 6:7, 8:22
certificate [1] - 15:22
CERTIFICATE [1] - 31:1
certification [2] - 27:13, 27:22
certified [1] - 9:21
certify [2] - 9:18, 31:2
chair [1] - 11:22
changes [1] - 14:18
check [7] - 22:17, 22:20, 22:22, 23:14, 23:15, 27:8, 27:11
checked [1] - 11:17
checks [11] - 23:2, 23:3, 23:6, 23:11, 23:23, 24:4, 24:7, 29:14, 29:15, 29:25
circumstances [3] - 29:13, 29:25, 30:2
City [3] - 22:17, 22:24, 29:18
ckidd [1] - 28:5
claiming [2] - 12:14, 12:15
clear [3] - 12:6, 15:14, 28:25
clearly [2] - 13:2, 18:23
CLOSING [1] - 1:6
closing [4] - 3:2, 4:9, 4:10, 4:15
Coast [3] - 15:21, 15:24, 16:1
code [3] - 28:7, 28:9, 28:11
color [1] - 6:25
comments [2] - 3:7, 3:18
common [8] - 28:16, 28:17, 28:18, 28:19, 29:20, 29:23, 30:2, 30:17
community [1] - 20:7
company [2] - 6:8, 26:25
completed [1] - 4:8
computer [4] - 1:23, 5:1, 6:18, 16:9
computer-aided [1] - 1:23
concluded [1] - 3:25
confirmed [1] - 6:2
connection [1] - 4:25
consider [1] - 12:8
considering [1] - 13:7
contact [1] - 8:21
contains [1] - 27:12
context [5] - 29:12, 29:17, 29:24, 30:3, 30:4
continues [2] - 23:3
continuing [2] - 21:20
convincing [1] - 25:24
Coordinated [1] - 19:2
copper [1] - 6:24
Coral [1] - 12:22
correct [1] - 31:2
correction [1] - 3:21
corresponds [1] - 18:20
cost [2] - 11:24, 12:2
costing [1] - 12:17
County [1] - 12:23
couple [1] - 14:6
coupled [1] - 26:3
course [3] - 5:12, 13:4, 23:10
COURT [9] - 1:1, 3:2, 3:5, 3:11, 3:15, 3:20, 4:4, 4:24, 25:3
Court [5] - 1:19, 1:19, 3:1, 31:6, 31:7
Court's [2] - 3:13, 5:6
COURTROOM [1] - 5:2
courtroom [1] - 7:9
create [1] - 11:9
credibility [1] - 25:8
CRIMINAL [1] - 1:2
customer [1] - 17:22

D

DARYL [1] - 2:16
darylewilcox06@gmail.com [1] - 2:18
data [31] - 10:24, 13:21, 13:22, 13:23, 14:5, 14:16, 14:17, 14:19, 14:24, 15:2, 15:4, 16:2, 16:5, 16:23, 21:23, 25:7, 25:8, 25:13, 25:15, 25:19, 26:1, 26:4, 26:5, 27:3, 28:3, 28:4, 28:18, 28:19, 29:9, 30:18
DATE [1] - 31:5
DAVID [1] - 2:3
david.snider@usdoj.gov [1] - 2:6
Davie [1] - 21:19
days [1] - 22:24
decide [1] - 3:22
Defendant [3] - 1:8, 10:13, 25:10
DEFENDANT [1] - 2:11
defendant [36] - 5:9, 5:14, 6:15, 6:20, 6:23, 7:11, 7:12, 7:14, 7:17, 7:22, 9:7, 9:20, 9:23, 10:1, 10:5, 14:7, 14:10, 16:3, 17:13, 18:3, 18:8, 18:18, 18:22, 19:11, 26:20, 27:1, 27:3, 27:7, 28:11, 28:20, 28:25, 29:3, 29:16, 30:6, 30:8, 30:9
defendant's [14] - 6:1, 8:7, 8:16, 8:19, 9:11, 13:1, 19:23, 20:18, 22:2, 26:6, 28:2, 28:8, 28:22, 29:9
defendants [1] - 25:21
defense [4] - 3:8, 3:10, 4:15, 30:9
defense's [1] - 26:8
definition [1] - 25:23
defraud [8] - 5:11, 22:3, 22:14, 23:5, 24:25, 25:11, 28:21, 30:15
deliberate [1] - 4:21
denied [1] - 14:22
Denise [3] - 5:3, 5:9, 30:13
depended [1] - 27:21
DEPUTY [1] - 5:2
DERIC [1] - 2:7
deric.zacca@usdoj.gov [1] - 2:10
designed [1] - 7:8
detail [1] - 6:23
detailed [2] - 16:17, 18:14
detectable [1] - 27:9
device [5] - 7:1, 18:1, 19:5, 19:7, 19:15
difference [1] - 19:1
different [1] - 16:15
digital [2] - 13:23, 26:6
DiPietrantonio [2] - 18:2, 22:10
directly [5] - 5:14, 5:16, 16:3, 16:4, 21:24
discrepancies [1] - 12:13
discrepancy [1] - 12:13
dispute [1] - 8:5
disregard [1] - 3:21
DISTRICT [3] - 1:1,

1:1, 1:13
District [3] - 1:19, 31:7, 31:7
DIVISION [1] - 1:2
document [7] - 9:5, 16:21, 18:7, 18:9, 20:10, 26:15, 28:24
documents [4] - 8:1, 9:22, 10:4, 26:23
DocuSign [1] - 15:22
DocuSigned [2] - 15:6, 19:19
DONALD [1] - 1:12
done [1] - 17:2
doubt [8] - 5:14, 21:24, 25:1, 25:16, 25:18, 25:24, 28:19, 29:8
down [1] - 8:12
driven [1] - 12:19
Driver's [1] - 19:14
during [4] - 14:8, 14:11, 18:1, 27:19

E

earning [1] - 12:2
easily [1] - 27:9
East [7] - 2:4, 2:8, 2:13, 15:21, 15:24, 16:1, 19:25
Eastern [4] - 16:1, 18:16, 18:25, 19:2
economy [1] - 27:24
Eduardo [3] - 10:22, 13:3, 22:18
effect [2] - 13:10, 28:1
EIDL [1] - 13:14
eight [1] - 19:24
elapsed [1] - 25:3
electronic [1] - 25:9
email [9] - 17:3, 20:4, 28:2, 28:3, 28:5, 28:7, 28:13, 28:15
employee [3] - 10:7, 21:9, 23:7
employees [3] - 6:6, 9:10
employment [1] - 10:8
ended [1] - 17:10
ending [2] - 19:20, 20:23
enormous [2] - 12:14, 12:15
entered [1] - 7:6
enters [1] - 4:3
entirely [1] - 27:21
entitled [1] - 31:3
equipment [3] - 22:22, 29:18, 29:21
ESQ [2] - 2:12, 2:16
essentially [1] - 5:7
events [2] - 13:19, 27:5
evidence [14] - 4:8, 5:13, 6:13, 6:22, 7:5, 9:7, 22:2, 22:13, 23:5, 23:23, 30:4, 30:16, 30:18
exact [3] - 9:4, 9:5, 20:10
exactly [7] - 5:8, 5:16, 7:10, 17:6, 24:12, 25:4, 27:12
example [2] - 14:6, 14:14
examples [2] - 14:4, 14:6
except [1] - 18:11
EXCERPT [1] - 1:11
excuse [1] - 25:3
Exhibit [7] - 6:25, 8:3, 8:14, 11:13, 16:14, 19:20, 24:15
exhibit [1] - 27:5
exhibits [1] - 21:4
exist [3] - 5:23, 6:8, 9:17
expenses [2] - 11:20, 12:1
explain [2] - 13:16, 23:18
explained [3] - 7:4, 19:8, 20:16
explaining [2] - 20:4, 25:15
explanation [1] - 23:13
extraordinary [2] - 11:20, 13:25

F

face [1] - 19:4
fail [3] - 19:13
failed [1] - 19:12
failures [1] - 7:21
faith [3] - 3:10, 3:13, 3:21
fake [20] - 8:2, 8:10, 9:10, 9:16, 9:24, 11:1, 11:4, 11:5, 11:9, 12:14, 14:18, 18:7, 18:11, 22:13, 22:19, 26:15, 27:9, 29:22
false [4] - 5:8, 9:15, 9:20
far [2] - 14:17, 18:12
FCRR [2] - 1:18, 31:6
few [4] - 6:3, 8:2, 8:8, 14:4
fifteen [1] - 18:20
fighting [1] - 15:2
filed [4] - 10:16, 10:21, 12:15, 27:8
filers [1] - 26:16
finally [1] - 15:6
finish [2] - 17:6, 21:22
first [13] - 4:11, 6:20, 8:8, 8:14, 14:5, 16:11, 19:11, 19:18, 20:9, 20:25, 21:6, 26:13, 26:15
five [3] - 17:14, 17:19, 18:4
flag [1] - 26:15
Floor [2] - 2:4, 2:8
FLORIDA [1] - 1:1
Florida [12] - 1:4, 1:20, 2:5, 2:9, 2:14, 2:17, 16:1, 19:14, 21:16, 21:19, 31:7, 31:8
focus [2] - 8:1, 20:7
focused [1] - 27:25
follow [2] - 22:1, 29:13
FOR [1] - 2:2
foregoing [1] - 31:2
forgiven [2] - 23:22, 24:11
forgiveness [4] - 9:6, 9:25, 24:13, 24:15
form [1] - 19:19
Fort [2] - 2:5, 2:9
fortunately [1] - 4:6
four [3] - 9:23, 17:14, 19:2
FPR [2] - 1:18, 31:6
FPR-C [2] - 1:18, 31:6
fraud [2] - 25:2, 30:15
fraudulent [6] - 5:15, 6:1, 8:15, 20:11, 22:4, 24:23
Friday [3] - 6:2, 10:18, 13:1
front [5] - 14:24, 15:1, 17:20, 19:4, 29:8
funded [1] - 9:17
funeral [3] - 13:12, 15:19, 18:17
Funeral [11] - 10:10, 14:25, 15:9, 15:15, 15:17, 16:8, 16:10, 16:22, 21:14, 21:17, 26:4

G

garage [4] - 11:21, 11:22, 11:23, 12:17
generic [1] - 19:6
generically [1] - 19:9
gentlemen [1] - 4:4
Gmail [1] - 28:12
good-faith [2] - 3:10, 3:13
GOVERNMENT [1] - 2:2
Government [14] - 4:10, 4:12, 4:13, 4:16, 4:22, 8:2, 8:14, 8:25, 11:13, 16:14, 19:19, 22:16, 24:15, 25:17
Government's [1] - 6:25
GOVERNMENT'S [1] - 1:6
GRAHAM [2] - 1:2, 1:12
Granados [21] - 8:5, 8:6, 10:21, 10:25, 11:7, 13:3, 14:17, 14:23, 17:11, 17:15, 18:6, 22:8, 22:16, 23:1, 26:9, 27:17, 28:2, 28:14, 29:18, 30:7
great [2] - 5:1, 6:22
greeted [1] - 4:5
gross [4] - 5:22, 8:22, 26:17, 26:18
Group [2] - 22:17, 22:24
guess [2] - 15:15, 15:23
guilty [4] - 25:2, 25:5, 30:13, 30:15
guy [1] - 20:16

H

hairstyling [5] - 11:20, 12:18, 12:20, 23:8, 23:10
hands [1] - 19:4
handsomely [1] - 14:21
hard [2] - 13:6, 25:14
Harvest [4] - 9:2, 20:5, 20:6, 22:5
Harvest's [1] - 22:7
Haydee [17] - 8:4, 8:6, 10:21, 10:25, 13:3, 14:15, 14:17, 16:19, 17:11, 17:15, 18:6, 22:8, 26:9, 27:17, 28:2, 28:14, 30:7
HDMI [1] - 4:25
Head [13] - 10:3, 10:4, 10:11, 10:13, 10:16, 11:1, 11:15, 11:25, 12:4, 26:19, 26:24, 30:1
heads [1] - 23:9
hear [2] - 5:6, 25:23
heard [9] - 7:7, 10:6, 17:25, 22:7, 22:9, 26:8, 27:6, 27:10, 28:1
heartbeat [1] - 27:24
heavy [1] - 25:18
HELD [1] - 1:12
Hely [1] - 10:7
Hendrith [1] - 2:20
herself [6] - 7:19, 14:11, 23:4, 23:11, 24:3, 29:5
hesitation [1] - 25:25
hide [1] - 22:23
historical [1] - 25:8
holding [2] - 14:12, 19:3
home [12] - 9:7, 13:12, 15:19, 15:20, 18:17, 20:19, 20:20, 20:21, 21:17, 21:18, 21:20, 29:6
Home [11] - 10:10, 14:25, 15:9, 15:15, 15:17, 16:8, 16:10, 16:22, 21:14, 21:17, 26:4
Honor [2] - 3:9, 4:23
HONORABLE [1] - 1:12
hour [3] - 4:10, 4:12, 4:16
hours [4] - 13:8, 14:8, 14:11, 19:2
husband [8] - 6:1, 10:9, 11:21, 12:22, 13:1, 23:4, 23:11, 30:7
hypothetically [1] - 4:14

I

ID [1] - 14:2
idea [1] - 11:4
identical [1] - 8:25
identity [3] - 7:17, 18:23, 29:5
important [1] - 26:1
impossible [5] - 6:11, 8:13, 9:22, 27:11
included [3] - 3:13, 10:17, 10:18
income [7] - 5:22, 6:7, 8:10, 8:22, 9:16, 26:17, 26:18
information [21] - 7:9, 8:11, 9:15, 9:16, 10:20, 10:21, 10:24, 10:25, 11:3, 11:5, 11:6, 11:10, 14:1, 14:19, 16:15, 16:18, 25:9, 26:12, 26:13, 26:18, 27:13
initial [1] - 4:17
instance [1] - 24:22
instances [2] - 6:17, 23:2
instruction [1] - 3:13
instructions [3] - 3:6, 4:20, 5:7
intended [1] - 5:17
intent [8] - 5:10, 22:3, 22:13, 22:23, 23:5, 24:25, 25:11, 30:14
intentional [3] - 26:14, 29:11, 30:6
intentionally [1] - 28:20
interaction [1] - 13:7
intricacies [1] - 26:20
introduce [1] - 29:2
involved [5] - 5:16, 16:3, 16:4, 21:24, 30:9
involvement [1] - 14:22
IP [17] - 14:25, 15:18, 16:9, 17:10, 17:24, 18:10, 18:21, 19:15, 19:20, 19:21, 20:14, 20:17, 20:23, 21:16, 25:20, 26:2
IRS [10] - 10:2, 10:5, 10:16, 10:21, 11:15, 12:1, 12:15, 24:5, 27:8
issue [2] - 9:1, 9:3
itself [1] - 26:15

J

Jersey [3] - 22:17, 22:24, 29:18
Joanna [1] - 10:7
job [1] - 14:20
JOHNNY [1] - 2:12
Johnny [1] - 2:13
JR [1] - 2:12
Jr [1] - 2:13
JUDGE [1] - 1:13
Judge [4] - 3:4, 3:8, 3:12, 3:19
July [2] - 24:13, 31:5
jumping [2] - 9:5, 9:8
jumps [6] - 6:18, 8:9, 8:12, 8:17, 8:23
June [2] - 21:20, 22:5
jurors [1] - 4:1
jury [6] - 4:2, 5:3, 21:22, 23:23, 24:20, 28:16
Jury [1] - 4:3

K

keep [1] - 12:19
keeps [1] - 21:6
key [1] - 14:1
kind [1] - 16:16
knowing [2] - 9:21, 22:2
knowingly [4] - 5:10, 25:11, 28:20, 30:14
knowledge [1] - 24:25
known [2] - 6:12, 9:15

L

ladies [1] - 4:4
Lance [1] - 31:5
LANCE [1] - 1:18
last [2] - 7:3, 24:19
Lauderdale [2] - 2:5, 2:9
law [1] - 4:20
Law [1] - 2:13
learned [1] - 10:18
least [2] - 6:23, 13:8
legal [1] - 6:14
legitimate [2] - 24:2, 24:9
lenders [6] - 9:2, 9:13, 9:19, 20:5, 20:7, 27:18
Lendistry [2] - 9:3, 22:6
lens [1] - 30:4
License [1] - 19:14
lie [26] - 5:20, 5:21, 5:22, 6:6, 6:9, 6:15, 6:16, 6:17, 6:21, 7:12, 7:14, 7:16, 8:9, 8:12, 8:16, 11:8, 13:21, 15:2, 24:8, 24:18, 25:7, 27:3, 30:18
lies [6] - 5:5, 5:8, 5:17, 5:18, 9:5, 9:8
line [1] - 8:8
linked [2] - 7:15, 16:21
linking [1] - 18:9
literally [5] - 6:18, 8:9, 8:12, 8:23, 13:25
live [1] - 15:19
lived [1] - 21:18
living [3] - 12:20, 12:21, 12:23
loan [27] - 5:4, 5:15, 5:17, 6:1, 6:8, 9:17, 9:24, 10:4, 10:12, 13:14, 13:17, 13:19, 14:16, 15:6, 15:15, 16:3, 22:5, 22:6, 22:12, 22:15, 22:25, 23:21, 24:11, 24:23, 26:25, 29:16, 30:11
loans [4] - 13:15, 20:6, 27:11, 27:22
log [5] - 18:3, 18:21, 21:9, 21:20, 28:4
logged [9] - 6:21, 7:14, 7:16, 7:18, 7:24, 17:19, 18:11, 28:2, 28:8
logging [8] - 8:7, 17:11, 18:8, 20:11, 20:20, 21:1
login [13] - 7:4, 7:11, 17:9, 17:15, 17:17, 18:6, 20:18, 20:22, 21:8, 21:19, 24:13, 28:10, 28:12
logins [5] - 17:7, 17:14, 17:18, 17:23, 18:12
logs [1] - 17:12
look [37] - 6:13, 6:24, 8:8, 9:7, 9:22, 11:12, 11:19, 12:10, 12:12, 12:13, 12:21, 15:4, 15:21, 16:16, 18:16, 19:9, 19:23, 21:1, 22:1, 22:16, 22:19, 23:19, 23:21, 24:2, 24:9, 24:15, 24:21, 24:22, 26:1, 26:2, 27:4, 29:13, 29:14, 29:17, 30:4
looked [2] - 22:10, 23:9
looking [2] - 28:18, 30:17
losses [1] - 12:16
love [1] - 13:9
loves [3] - 13:5, 13:6
Lucie [2] - 12:20, 12:24

M

made-up [1] - 11:18
matching [1] - 17:25
matter [1] - 31:3
matters [2] - 11:16, 19:10
maximum [1] - 4:9
MCCRAY [4] - 2:12, 3:4, 3:8, 3:19
McCray [8] - 2:13, 25:16, 26:19, 27:6, 28:1, 28:17, 28:22, 29:12
mccrayjlaw@gmail.com [1] - 2:15
meaning [1] - 17:19
means [3] - 12:2, 16:11, 28:10
mechanical [1] - 1:23
members [3] - 5:3, 21:22, 23:23
memo [3] - 22:23, 29:17, 29:18
memorized [2] - 15:22, 21:13
memory [1] - 15:14
mentioned [2] - 10:11, 30:1
Miami [4] - 1:4, 1:20, 1:20, 31:8
midst [1] - 9:14
miles [1] - 12:19
millions [3] - 27:10, 27:11
minus [1] - 19:24
minute [1] - 6:4
minutes [4] - 4:15, 4:17, 8:8, 25:3
missed [1] - 9:23
missing [1] - 4:6
Model [1] - 17:21
model [3] - 14:13, 19:9, 25:21
money [14] - 5:7, 9:14, 11:1, 12:18, 13:12, 22:1, 22:2, 23:1, 23:16, 24:5, 27:19, 29:13, 29:25
morning [2] - 4:4, 4:6
most [1] - 25:25
move [1] - 27:18
MR [10] - 3:4, 3:8, 3:9, 3:12, 3:19, 4:23, 4:25, 5:3, 25:4, 25:7
multiple [1] - 21:4
Musil [1] - 22:7

N

name [2] - 6:14, 9:8
named [4] - 5:24, 8:21, 13:16, 26:22
need [4] - 21:6, 24:24, 25:10, 30:3
network [8] - 8:16, 17:22, 20:16, 20:23, 21:9, 21:10, 29:6, 29:7
never [3] - 10:20, 23:20, 26:12
next [1] - 20:3
nine [1] - 6:23
NO [1] - 1:2
North [1] - 1:20
Note20 [7] - 6:24, 14:12, 14:13, 18:2, 19:3, 19:6, 20:19
notes [1] - 31:3
nothing [2] - 16:24, 17:3
noticed [2] - 3:9, 3:12
number [7] - 8:19, 11:18, 14:13, 15:18, 15:20, 19:9, 28:6
numbers [3] - 8:12, 25:20, 25:21

O

o'clock [6] - 15:10, 15:11, 15:14, 15:16, 15:25, 21:13
obvious [3] - 6:9, 9:10, 26:25
OF [5] - 1:1, 1:4, 1:11, 2:11, 31:1

office [1] - 12:23
Office [5] - 2:4, 2:8, 2:13, 20:15, 21:9
Official [2] - 1:19, 31:6
ON [1] - 2:11
once [4] - 8:24, 17:2, 18:8, 23:22
one [38] - 4:6, 4:9, 4:12, 4:16, 6:3, 10:15, 11:10, 12:15, 12:19, 14:5, 14:17, 14:20, 15:7, 15:8, 15:11, 15:18, 16:5, 17:13, 17:17, 17:18, 20:1, 20:2, 20:3, 20:25, 21:1, 21:2, 21:4, 21:8, 21:25, 23:6, 24:20, 26:17, 26:23, 28:5, 28:7
one-time [1] - 28:7
ones [1] - 6:17
operation [1] - 16:10
opportunity [1] - 7:11
opposite [1] - 14:17
order [1] - 24:11
Order [1] - 3:1
outside [1] - 10:7
overview [1] - 16:16
overwhelming [1] - 5:13
own [5] - 12:3, 13:11, 14:22, 24:23, 26:6
owned [1] - 20:23
owners [1] - 9:14

P

P.A [1] - 2:13
Pacific [4] - 15:23, 15:24, 19:24
page [10] - 3:10, 3:11, 3:12, 6:18, 8:9, 8:13, 8:17, 8:24, 9:5, 9:8
Pages [1] - 1:8
paid [1] - 14:21
painfully [2] - 9:10, 26:24
pandemic [3] - 9:15, 27:20, 27:23
paralegal [1] - 2:20
parse [1] - 25:14
part [2] - 12:9, 19:19
participate [1] - 21:21
participated [4] - 5:4, 5:10, 5:14, 28:21
participating [3] - 24:22, 30:6, 30:14
participation [3] - 22:3, 26:6, 29:10
parties [1] - 22:17
password [2] - 28:13, 28:15
pay [1] - 11:4
Paycheck [5] - 5:5, 24:9, 24:25, 26:16, 30:10
paychecks [1] - 30:12
paying [3] - 11:8, 11:9, 26:14
payment [2] - 22:8, 22:12
payroll [9] - 6:6, 23:24, 23:25, 24:1, 24:3, 24:8, 24:9, 24:12, 24:17
percent [4] - 11:9, 12:4, 14:15, 14:20
person [6] - 7:8, 10:23, 15:12, 19:16, 22:12, 29:21
Persona [5] - 7:17, 7:20, 14:13, 18:1, 18:23
phone [18] - 6:24, 6:25, 8:18, 8:19, 8:20, 14:8, 14:12, 17:20, 18:3, 19:7, 20:19, 20:24, 25:21, 28:6, 28:9, 28:10, 29:7
phony [1] - 22:23
photographs [1] - 14:10
picture [1] - 29:4
piece [3] - 14:1, 16:18, 26:17
place [1] - 26:13
Plaintiff [1] - 1:5
plan [3] - 5:6, 30:5
Plantation [1] - 2:17
PM [2] - 19:1, 21:19
pocket [1] - 12:3
point [4] - 3:23, 8:6, 15:1, 25:16
policy [1] - 10:8
Pompano [1] - 2:14
pooled [1] - 23:16
Port [2] - 12:20, 12:24
portal [9] - 6:21, 7:5, 7:13, 7:24, 8:4, 13:24, 17:9, 17:14, 18:19
portion [1] - 5:1
possible [1] - 27:19
PPP [17] - 5:15, 5:17, 6:1, 8:15, 10:12, 13:15, 13:17, 13:18, 15:6, 15:15, 16:3, 22:4, 22:12, 22:25, 23:21, 24:23, 29:16
precise [1] - 13:23
prepared [1] - 31:3
present [3] - 4:10, 4:12, 4:19
PRESENT [1] - 2:20
presentation [2] - 4:14, 24:19
pretending [1] - 30:11
pretty [1] - 15:13
previously [1] - 7:5
primary [1] - 8:21
principal [1] - 8:11
private [1] - 9:13
proceed [2] - 4:22, 4:24
Proceedings [1] - 1:23
proceedings [1] - 31:3
proceeds [2] - 22:12, 22:25
process [4] - 4:18, 5:15, 6:10, 13:19
produced [1] - 1:23
profit [1] - 12:14
program [5] - 7:7, 23:24, 24:10, 26:20, 27:25
Program [5] - 5:5, 24:9, 25:1, 26:16, 30:11
proof [2] - 4:11, 25:24
property [1] - 5:7
proprietor [1] - 9:12
protect [3] - 13:4, 23:24, 23:25
protecting [2] - 24:2, 30:12
Protection [5] - 5:5, 24:9, 25:1, 26:16, 30:11
proves [2] - 5:13, 25:1
provided [1] - 10:20
pull [1] - 22:20
pulled [1] - 5:25
purchased [1] - 22:6
purpose [2] - 22:24, 24:10
put [5] - 14:1, 14:18, 14:24, 26:11, 26:14
puts [1] - 16:2

Q

questions [1] - 13:10
quick [1] - 22:21
quickly [1] - 27:19
quote [5] - 6:5, 13:16, 14:15, 23:5, 29:15

R

raise [1] - 25:18
range [1] - 29:15
reaction [1] - 4:1
read [2] - 7:23, 19:13
ready [2] - 3:2, 4:22
real [5] - 10:20, 11:6, 11:10, 22:20, 27:7
really [2] - 25:13, 26:5
reason [1] - 29:5
reasonable [9] - 5:14, 21:23, 25:1, 25:16, 25:19, 25:23, 28:19, 29:7
rebuttal [1] - 4:13
receipt [3] - 22:4, 22:25, 23:20
received [2] - 22:5, 22:15
recently [1] - 13:13
record [8] - 13:23, 14:2, 15:22, 16:6, 25:8, 26:6, 29:2, 31:3
recorded [1] - 1:23
records [3] - 13:25, 22:11, 23:21
red [1] - 26:15
Reese [1] - 21:18
regulations [1] - 26:21
related [1] - 12:7
relied [1] - 9:18
rely [5] - 25:24, 25:25, 26:1, 26:4, 27:14
remaining [1] - 4:17
remember [9] - 5:20, 6:13, 7:2, 7:19, 15:7, 15:10, 15:12, 22:22, 24:6
remembering [1] - 15:13
reminder [4] - 21:3, 21:4, 21:7, 24:13
reminders [1] - 21:5
repeated [1] - 6:9
report [2] - 10:2, 10:8
reported [6] - 11:14, 11:17, 12:1, 12:2, 24:5, 24:6
REPORTER [1] - 31:1
Reporter [2] - 1:19, 31:6
representative [1] - 7:20
residence [1] - 15:19
restoration [3] - 22:22, 29:19, 29:21
result [1] - 18:6
return [2] - 25:5, 30:16
returns [4] - 11:12, 11:19, 12:21, 27:8
Rivero [4] - 10:22, 13:4, 22:18, 26:10
Riveros [3] - 11:8, 22:16, 23:2
Road [1] - 21:18
Rodriguez [1] - 20:15
role [1] - 10:23
room [2] - 24:20, 28:17
routed [1] - 9:3
RPR [2] - 1:18, 31:6
ruling [1] - 3:14
rulings [1] - 3:6
run [4] - 11:21, 11:25, 12:3, 12:18

S

salaried [1] - 23:6
salary [7] - 23:5, 23:12, 23:18, 23:19, 24:4, 24:7, 29:15
Samsung [7] - 6:24, 14:12, 14:13, 17:21, 19:3, 19:5, 20:24
saw [5] - 6:15, 8:24, 23:3, 24:16, 29:4
SBA [8] - 9:13, 9:17, 9:19, 20:6, 27:10, 27:14, 27:18, 27:23
schedule [2] - 28:23, 29:2
Schedule [10] - 8:2, 9:24, 10:14, 10:15, 12:14, 18:11, 22:13, 22:19,

26:16, 29:22
scheme [15] - 5:4, 5:5, 5:8, 5:10, 16:4, 21:21, 25:12, 26:7, 26:14, 28:21, 30:5, 30:7, 30:13, 30:14
screen [1] - 6:19
seat [1] - 13:2
second [6] - 10:22, 15:6, 20:11, 21:1, 21:2, 21:11
see [17] - 3:23, 3:25, 6:14, 7:12, 8:8, 8:24, 10:3, 11:14, 14:2, 16:10, 16:17, 19:5, 21:12, 22:20, 25:10, 27:9, 29:14
self [2] - 27:13, 27:22
self-certification [2] - 27:13, 27:22
selfies [4] - 7:19, 14:11, 19:4, 29:4
sense [13] - 12:17, 23:15, 23:17, 28:15, 28:16, 28:17, 28:18, 28:19, 29:20, 29:23, 30:2, 30:17
sent [2] - 17:4, 28:9
sessions [2] - 7:21, 19:12
seven [1] - 19:12
sham [3] - 23:2, 29:17, 29:18
sheriff's [1] - 12:23
Sheriff's [2] - 20:15, 21:9
shift [1] - 13:2
show [2] - 16:14, 24:12
showed [3] - 9:23, 21:4, 24:16
showing [2] - 15:23, 26:18
shows [18] - 6:22, 9:7, 14:16, 14:17, 14:19, 16:23, 17:8, 17:16, 17:18, 18:5, 18:6, 18:8, 21:23, 27:3, 28:4, 28:19, 29:9, 29:10
side [1] - 4:9
sign [8] - 9:1, 9:4, 15:25, 21:5, 21:6, 21:7
signature [1] - 9:11
signed [12] - 8:15, 9:7, 15:8, 15:9, 15:11, 15:16, 15:18, 15:20, 21:2, 21:5, 21:15, 21:16
signing [3] - 15:14, 20:25, 21:11
signs [3] - 20:1, 20:9, 20:10
simple [1] - 13:10
single [2] - 23:6, 26:23
sitting [1] - 7:9
six [4] - 7:19, 14:10, 17:16, 18:15
slide [8] - 17:16, 17:18, 18:5, 22:4, 24:19, 24:21
SM-986U [3] - 17:21, 18:2, 19:5
small [7] - 9:14, 23:25, 24:1, 24:3, 27:19, 27:23, 27:25
smaller [1] - 20:7
Smith [1] - 2:20
SMS [1] - 28:9
SNIDER [8] - 2:3, 3:9, 3:12, 4:23, 4:25, 5:3, 25:4, 25:7
sole [2] - 9:11, 25:17
someone [1] - 11:9
Sorry [1] - 9:2
sorry [3] - 3:11, 16:25, 19:1
source [1] - 7:8
Southern [1] - 31:7
SOUTHERN [1] - 1:1
Southwest [1] - 2:17
specific [2] - 18:5, 21:15
specifically [2] - 9:16, 17:16
spent [1] - 24:17
spreadsheet [3] - 16:20, 17:8, 27:5
spreadsheets [1] - 16:13
Springs [1] - 12:22
St [2] - 12:20, 12:24
stage [1] - 4:9
start [1] - 17:1
started [5] - 15:3, 15:5, 16:7, 16:11, 16:25
statements [3] - 5:8, 7:13, 27:4
STATES [3] - 1:1, 1:4, 1:13
States [4] - 1:19, 2:4, 2:8, 31:7
Steinbeisser [2] - 31:5, 31:5
STEINBEISSER [1] - 1:18
stenography [1] - 1:23
stenotype [1] - 31:3
Step [14] - 10:2, 10:3, 10:4, 10:11, 10:13, 10:16, 11:1, 11:15, 11:25, 12:3, 26:19, 26:24, 30:1
stipulated [2] - 8:5, 22:18
stop [1] - 23:1
Street [1] - 2:17
stroke [1] - 14:1
stuck [1] - 17:4
stumbled [1] - 23:12
successfully [1] - 17:19
summaries [1] - 25:15
summary [1] - 24:21
supplied [2] - 11:10, 28:7
supply [2] - 28:5, 28:6
supposed [4] - 10:8, 10:25, 11:2
surprised [1] - 11:5
system [2] - 27:15, 27:21

T

tab [1] - 27:5
tablet [2] - 19:6, 19:7
tax [13] - 10:20, 10:21, 10:24, 11:5, 11:9, 11:12, 11:19, 12:21, 14:18, 18:7, 26:12, 26:15, 27:7
taxes [3] - 12:7, 12:8, 12:9
term [1] - 19:6
testified [13] - 6:3, 7:3, 11:22, 12:22, 13:1, 13:15, 14:6, 14:14, 17:1, 18:2, 20:1, 23:7, 27:23
testimony [10] - 7:19, 10:19, 12:25, 13:23, 22:7, 22:9, 26:3, 27:14, 28:23, 28:24
text [1] - 28:9
Thakral [3] - 7:2, 7:6, 17:1
THE [11] - 1:12, 2:2, 2:11, 3:2, 3:5, 3:11, 3:15, 3:20, 4:4, 4:24, 25:3
theory [2] - 11:3, 26:8
thereafter [1] - 4:20
therefore [1] - 12:11
thin [1] - 5:25
three [10] - 7:13, 7:15, 9:10, 11:24, 12:1, 12:4, 17:14, 18:9, 18:10, 19:4
throughout [1] - 6:10
timing [2] - 13:14
title [1] - 9:12
took [1] - 7:19
total [1] - 22:18
Tracy [4] - 6:1, 13:1, 13:16, 13:17
trade name [2] - 8:18, 9:9
traffic [1] - 4:5
trail [2] - 22:2, 23:1
transaction [1] - 14:2
transactions [6] - 16:16, 18:14, 18:15, 18:19, 18:20
TRANSCRIPT [1] - 1:11
transcript [1] - 1:23
transcription [2] - 1:23, 31:3
transition [1] - 20:4
transmitted [1] - 25:9
travel [1] - 12:16
trial [3] - 5:12, 12:7, 12:8
TRIAL [1] - 1:11
tricked [1] - 29:11
tried [1] - 20:5
trouble [1] - 15:12
true [9] - 9:19, 9:21, 13:20, 13:21, 14:9, 14:16, 17:18, 27:14
trust [10] - 11:7, 26:11, 26:13, 27:15, 27:16, 27:17, 27:18, 27:20, 27:21
trust-based [2] - 27:15, 27:21
trusted [3] - 26:9, 26:10
truth [2] - 13:22, 26:5
truthful [1] - 27:15
trying [6] - 9:13, 13:2, 13:4, 22:23, 25:18, 27:18
Tuesday [1] - 7:3
twice [5] - 8:24, 9:4, 24:5, 24:7, 29:25
two [8] - 9:24, 10:14, 13:8, 15:20, 17:13, 22:24, 23:9, 28:4
type [3] - 16:11, 17:23, 19:5
typed [1] - 16:19

U

ultimately [2] - 22:6, 30:10
Ultra [4] - 6:24, 18:2, 19:6, 20:19
under [2] - 10:8, 24:9
undo [1] - 30:8
uniform [4] - 14:11, 18:24, 19:16, 29:4
unique [1] - 14:2
Unit [1] - 21:18
UNITED [3] - 1:1, 1:4, 1:13
United [4] - 1:19, 2:4, 2:8, 31:7
Universal [1] - 19:2
unquestionably [1] - 21:23
up [8] - 4:16, 5:25, 11:18, 17:25, 22:20, 23:13, 24:1, 24:4
updated [1] - 3:5
upload [5] - 10:24, 11:4, 11:9, 18:11, 22:19
uploaded [5] - 7:12, 8:4, 16:21, 22:13, 29:22
uploading [4] - 18:6, 18:9, 19:14, 27:4
uploads [1] - 8:6
USAA [1] - 20:20
UTC [2] - 18:25, 19:1
utilities [1] - 12:16

V

V.A [1] - 2:20
verdict [3] - 25:4, 25:5, 30:16
verification [1] - 18:23
verified [1] - 7:17
verify [1] - 29:5
Verizon [5] - 8:16, 17:22, 19:21, 20:24
Verizon's [3] - 17:21, 20:22, 29:6
version [3] - 3:5, 13:19, 13:21
visible [1] - 7:6
vs [1] - 1:6

W

Wade [81] - 2:20, 5:3, 5:9, 5:24, 6:2, 6:5, 6:7, 6:15, 8:10, 8:11, 8:17, 8:18, 8:20, 8:21, 8:23, 9:9, 10:10, 11:2, 11:14, 11:25, 12:3, 12:7, 13:1, 13:8, 13:10, 13:16, 13:17, 13:18, 14:6, 14:7, 14:10, 14:14, 14:22, 14:25, 15:6, 15:9, 15:15, 15:17, 15:22, 16:2, 16:8, 16:10, 16:18, 16:19, 16:20, 16:22, 17:4, 17:10, 17:12, 17:13, 17:18, 18:15, 18:16, 18:18, 18:22, 19:22, 20:1, 20:3, 20:4, 20:8, 21:12, 21:14, 21:17, 21:24, 23:4, 23:6, 23:7, 23:12, 23:24, 24:22, 25:2, 26:3, 26:22, 30:11, 30:13, 30:15
WADE [1] - 1:7
Wade's [13] - 10:18, 12:25, 13:18, 13:20, 13:23, 14:15, 14:23, 15:19, 17:16, 17:24, 21:17, 28:5, 30:10
Wades [3] - 10:20, 10:24, 26:9
wages [1] - 12:5
walk [1] - 16:5
walked [1] - 7:20
ways [1] - 28:4
website [3] - 7:7, 7:8, 7:15
whole [2] - 5:19, 7:7
wife [3] - 13:4, 13:5, 14:7
WILCOX [1] - 2:16
WILLIAMS [1] - 1:2
wire [2] - 25:2, 30:15
witness [3] - 7:3, 22:7, 27:10
witnesses [1] - 29:1
Womply [14] - 6:21, 7:3, 7:5, 7:13, 8:4, 13:24, 13:25, 17:9, 17:14, 18:3, 18:19, 20:4, 20:12, 28:5
Womply's [2] - 7:15, 7:24
word [1] - 26:23
worth [1] - 29:25
write [2] - 23:15, 29:21
writing [3] - 23:11, 23:14, 24:7
written [3] - 23:18, 24:17, 29:15
wrote [4] - 7:6, 23:4, 23:19, 29:20

Y

year [3] - 10:14, 11:16, 12:19
years [5] - 10:9, 11:13, 11:24, 12:1, 12:4
yesterday [1] - 15:13

Z

Zacca [5] - 13:6, 13:7, 13:9, 23:8, 23:9
ZACCA [1] - 2:7
Zelle [1] - 22:8
zone [1] - 19:23