

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 23-60173-CR-KMW(s) (GRAHAM)

UNITED STATES OF AMERICA

vs.

TRACY D. WADE,

Defendant.

**RESPONSE BY THE UNITED STATES TO DEFENDANT TACY WADE'S
MOTION TO MODIFY CONDITIONS OF SUPERVISED RELEASE [DE 296]**

The United States of America, by and through its undersigned counsel, hereby responds to the motion to modify conditions of supervised release filed by Defendant Tracy Wade (“Defendant”) on December 17, 2025 (DE 296) (the “Motion”).

On March 12, 2025, the Court sentenced Defendant to a 90-day term of imprisonment to be followed by a 3-year term of supervised release as to Counts 1, 2, 3, 4, 6, 7, and 10 of the Superseding Indictment for which Defendant was found guilty (DE 242). Defendant surrendered for service of his sentence on August 27, 2025. According to Bureau of Prisons website, Defendant was released from custody on November 3, 2025.

The terms of supervised release set forth in the Judgment (DE 242) provide, among other things, that Defendant shall not: 1) knowingly leave the federal judicial district in which he is authorized to reside (i.e., the Southern District of Florida) without first getting permission from the court or the probation officer; and 2) apply for, solicit or incur any further debt, including but not limited to loans, lines of credit or credit card charges, either as a principal or cosigner, as an individual or through any corporate entity, without first obtaining permission from the United States Probation Officer.

In the Motion, Defendant seeks to modify the above conditions as follows:

1. “Permission to travel outside of the current jurisdictional boundaries strictly for verified business purposes related to Wade Funeral Home operations.” In connection with this request, Defendants states that he is “fully prepared to provide comprehensive documentation for any such travel, including, but not limited to:
 - Advance written notice to my probation officer with travel dates, destinations, and purpose
 - Service contracts or family authorization forms
 - Transportation manifests and death certifications (as applicable)
 - Receipts, invoices, and business correspondence substantiating the business nature of travel
 - Contact information for all locations visited.”
2. “Removal of the condition prohibiting the opening of new lines of credit” for Wade Funeral Home. In connection with this request, Defendant states: “I propose that any new business credit applications be reported to my probation officer in advance, with full documentation provided, to ensure transparency while allowing necessary business operations to continue.”

On December 29, 2025, the undersigned Assistant United States Attorney conferred with U.S. Probation Officer Chekia Hill who is presently supervising Defendant. Officer Hill advised that Probation does not object to Defendant’s requests based upon the reasons set forth in the Motion, the fact that Defendant has satisfied all financial obligations ordered in this case, and Defendant has otherwise complied with the terms of supervision.

Based on the facts and circumstances of this case, the basis for the modifications set forth in the Motion, and Probation's position, the United States does not oppose Defendant's request to modify the conditions of his supervised release as set forth in the Motion so long as Defendant provides advance notice to U.S. Probation for each request.

Respectfully submitted,

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