

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

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

UNITED STATES OF AMERICA

vs.

CAROLYN DENISE WADE,

Defendant.

**RESPONSE BY THE UNITED STATES TO
DEFENDANT’S MOTION FOR EARLY TERMINATION OF PROBATION**

The United States of America hereby responds to the motion for early termination of probation as to Defendant Carolyn Denise Wade (“Defendant”) filed on March 18, 2026 (DE 300) (the “Motion”).¹ For the reasons set forth below, the United States does not oppose the Motion.

Procedural History

On June 27, 2024, a grand jury returned a Superseding Indictment (DE 188) charging Defendant with conspiracy to commit wire fraud (18 U.S.C. § 1349), wire fraud (18 U.S.C. § 1343), conspiracy to make false statements to the Small Business Administration (SBA) (18 U.S.C. § 371) and false statements to the SBA (15 U.S.C. § 645(a)). The charges arose from Defendant fraudulently obtaining a loan through the SBA’s Paycheck Protection Program. Defendant proceeded to trial in October 2024, and a jury returned a verdict finding her guilty on all counts with which she was charged (DE 183). On March 12, 2025, the Court sentenced Defendant to a term of 3 years’ probation and imposed criminal monetary penalties consisting of restitution in the amount of \$41,666 and a \$600 special assessment (DE 241).²

¹ The Court directed the government and the Probation Office to respond to the Motion by April 7, 2026 (DE 302).

² Defendant’s term of probation included home detention for 90 days, among other special conditions.

Applicable Statute

Title 18, United States Code, Section 3564(c) provides as follows:

The court, after considering the factors set forth in section 3553(a) to the extent that they are applicable, may, pursuant to the provisions of the Federal Rules of Criminal Procedure relating to the modification of probation, terminate a term of probation previously ordered and discharge the defendant at any time in the case of a misdemeanor or an infraction or at any time after the expiration of one year of probation in the case of a felony, if it is satisfied that such action is warranted by the conduct of the defendant and the interest of justice.

Factors Supporting Early Termination of Probation

Undersigned counsel has conferred with United States Probation Officer Caitlin Mayo, who is presently supervising Defendant. Officer Mayo advised the government that Defendant has had no instances of non-compliance during her term of probation and is presently assessed to be low risk. She further advised that Defendant has satisfied all her financial obligations in this case. Furthermore, Officer Mayo advised that she is familiar with the Motion and supports it. The government agrees with Probation's assessment.

Conclusion

The United States does not oppose early termination of probation as to Defendant Carolyn Denise Wade, pursuant to Title 18, United States Code, Section 3564(c).

Respectfully submitted,

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