

Snider, David (USAFLS)

From: Snider, David (USAFLS)
Sent: Wednesday, May 1, 2024 9:54 PM
To: Johnny McCray; hvasmith@gmail.com
Cc: Zacca, Deric (USAFLS)
Subject: United States v. Carolyn Wade, 23-60173-CR-KMW (Graham) | Confidential Records Subject to Protective Order

Johnny and Hendrith:

Pursuant to our prior discussions and agreed upon understanding, which is memorialized herein, the government is making available to Defendant Carolyn Wade ("Defendant") the "Confidential Records" defined in and governed by the Protective Order entered in this case on May 1, 2024, at docket entry 49, subject to the following conditions:

1. The United States is making the Confidential Records available to Defendant voluntarily and as a courtesy to Defendant. The United States is offering this courtesy to Defendant based on its understanding that the Confidential Records may fall within the scope of a subpoena that Defendant has served on an entity seeking similar records.
2. By making the Confidential Records available to Defendant, the United States does not concede that the Confidential Records are within the scope of discovery mandated by the Standing Discovery Order of the Southern District of Florida, the Federal Rules of Criminal Procedure, federal statute, or relevant case law. Furthermore, by making the Confidential Records available to Defendant, the United States does not waive its right to object to any future discovery requests beyond the ambit of its legal obligations.
3. By making the Confidential Records available to Defendant, the United States does not concede that any of the Confidential Records are admissible as evidence at trial. The United States does not waive, and hereby expressly reserves, its right to object, on any ground, to the admissibility of any evidence, in any form, constituting or concerning the Confidential Records.
4. All of the Confidential Records are hereby designated as "Confidential" pursuant to the Protective Order (DE 49).
5. The United States has excluded from the Confidential Records all records previously produced to Defendant in this case.
6. The Confidential Records are made available to Defendant, through her counsel of record, via the government's USAFx platform. An invitation to use USAFx has been sent to your respective email addresses. Once you have registered to use USAFx, you may use the following link to access and download the Confidential Records:

<https://usafx.box.com/s/yj67l3njb690wq1eqsw1l9gd8ua24np>

Please contact me with any questions.

David A. Snider

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