UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

UNITED STATES OF AMERICA

vs.

CAROLYN DENISE WADE and
TRACY D. WADE,

Defendants.
_____/

AO386-C
GOVERNMENT EXHIBIT
CASE NO. 23-60173-CR
EXHIBIT NO. 001

TRIAL STIPULATION REGARDING
COMMUNICATIONS TRANSMITTED BY WIRE IN INTERSTATE COMMERCE

The United States of America and Defendants Carolyn Denise Wade and Tracy D. Wade ("Defendants"), through their respective undersigned counsel, hereby stipulate and agree to the following facts:

As alleged in Count 2 of the Superseding Indictment, the disbursement of SBA loan number 6261949003 (hereinafter, "PPP Loan 1") from Harvest Small Business Finance, LLC, identified in the Superseding Indictment as Lender 1 (hereinafter, "Lender 1"), in the approximate amount of $20,833, by Automated Clearing House (ACH) transfer to USAA Federal Savings Bank ("USAA Bank") account number ending in 7309, was a communication transmitted by wire in interstate commerce on or about June 3, 2021. Among other things, the funds for PPP Loan 1 originated from Lender 1's bank, which was a bank located in the State of California, and the funds were transmitted electronically via ACH transfer to a classic checking account ending in 7309 at USAA Bank, which was a bank located in the State of Texas.

As alleged in Count 3 of the Superseding Indictment, the disbursement of SBA loan number 6697269001 (hereinafter, "PPP Loan 2") from Lender 1 in the approximate amount of

$20,833, by ACH transfer to USAA Bank account number ending in 3926, was a communication transmitted by wire in interstate commerce on or about June 7, 2021. Among other things, the funds for PPP Loan 2 originated from Lender 1's bank, which was a bank located in the State of California, and the funds were transmitted electronically via ACH transfer to a classic checking account ending in 3926 at USAA Bank, which was a bank located in the State of Texas.

The United States and Defendants further stipulate and agree that the United States would prove the above-stated facts beyond a reasonable doubt with evidence admissible at trial under the Federal Rules of Evidence, including, but not limited to, testimony and records from Lender 1, and that these facts are deemed proven beyond a reasonable doubt.

DATED: September 23, 2024

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

By: DAVID SNIDER Digitally signed by DAVID SNIDER Date: 2024.09.23 09:27:32 -04'00'

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