

**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.

/

**UNITED STATES' NOTICE OF INTENT TO SEEK
ADMISSION OF SELF-AUTHENTICATING RECORDS**

The United States of America, by and through its undersigned counsel, hereby files this notice, pursuant to Rules 902(11) and 902(13) of the Federal Rules of Evidence, of the United States' intent to introduce into evidence at trial the following records as self-authenticating certified domestic records of a regularly conducted activity and/or certified records generated by an electronic process or system:

No.	Entity	Description of Records
1.	B.S.D. Capital Inc. DBA Lendistry	Paycheck Protection Program loan records.
2.	Harvest Small Business	Paycheck Protection Program loan records.
3.	Oto Analytics, Inc. DBA Womply	Paycheck Protection Program loan records.
4.	U.S. Small Business Administration	Paycheck Protection Program loan records. Economic Injury Disaster Loan records.
5.	Internal Revenue Service	Federal tax records, including tax returns.
6.	USAA Federal Savings Bank	Bank records.
7.	Florida Department of Revenue	Florida revenue and tax records.
8.	AT&T	Internet service provider records.
9.	Verizon	Cell phone account records.
10.	Google	Account subscriber records.
11.	Broward Sheriff's Office (BSO)	BSO policy and human resource records.
12.	DocuSign	Electronic signature records.
13.	Leader Bank	Paycheck Protection Program loan records.
14.	Persona	Identity verification records.
15.	SmartBiz	Paycheck Protection Program loan records.

Copies of these records were provided to Defendants' counsel of record in discovery prior to this filing.¹ The United States reserves its right to supplement this Notice to Defendants as necessary.

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

By: /s/ David A. Snider
David A. Snider
Assistant United States Attorney
Court ID No. A5502260
500 E. Broward Blvd
Fort Lauderdale, FL 33394
Tel: (954) 660-5696
Fax: (954) 356-7336
Email: david.snider@usdoj.gov

¹ The government is awaiting receipt of the certified copies of the IRS records produced in discovery on July 25, 2024 pertaining to Defendant Tracy Wade (Bates numbers 23-60173-CR_006249 through 23-60173-CR_006361).