

U.S. v. Carolyn D. Wade and Tracy D. Wade  
Case# 23-cr-60173 Williams/ Graham  
Defendants' Witness & Exhibit List

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

**UNITED STATES OF AMERICA,**

**Case No:23-CR-60173 (Graham)**

**v.**

**CAROLYN DENISE WADE, and**

**TRACY D. WADE**

**Defendants.**

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**DEFENDANTS CAROLYN AND TRACY WADES' WITNESS AND EXHIBIT LISTS**

Defendants, **CAROLYN DENISE WADE** and **TRACY D. WADE**, files their Witness and Exhibit List with regard to the upcoming Trial and may use some or all of the following witnesses and exhibits in the trial in this matter.

**Witnesses**

1. All witnesses listed on the government's witness list
2. Carolyn Denise Wade, Defendant
3. Tracy D. Wade, Defendant
4. Haydee Granados, aka Haydee Rivero
5. Edward Rivero/ Rivero Funeral Home; Rivero & Rivero
6. Tammy DeClerq, COO, SBA, B.S.D. Capital/Lendistry
7. Representative, Custodian of Records, Harvest Small Business Finance
8. Representative/ Records Custodian, U.S. Small Business Administration (SBA) (PPP) Section
9. Records Custodian, Broward Sheriff Office (BSO)
10. Eric Wilson, Eric Wilson Mortuary
11. Representative/ Custodian of Records, Oto Analytics, Inc. dba Womply
12. Jamil Hunter
13. Daniela Perez, Perez Accounting Services

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14. Odalys Concepcion, Rivero's Accountant at Kay Tax and Business Solutions
15. Valencia Wilson, Eric Wilson Mortuary
16. Kelly Dipietrantonio, Special Agent, FBI Case Agent
17. Bryan Piper, FBI
18. Ailec Vale
19. Angela De La Cruz
20. Barbara Abreu
21. Carlos Fandino
22. Clemente Perez
23. Edison Rogers
24. Jorge Rivero
25. Jose Rivero
26. Julio Urena
27. Katelin Acevedo
28. Michael Jiminez
29. Mohamed Faitrouni
30. Nichole Almanzar
31. Nilda Rivera
32. Onimer Lazaro Garcia Chagotte
33. Steve Allison
34. Victor Rivero Walter Wright
35. Yaosca Granados
36. Dr. Anthony Reed
37. Dr. Rickey Mitchell
38. Prof. John H. Hill, III
39. Christian M. Noriega

#### Exhibits

40. All exhibits listed on the government's exhibit list, as may be amended
41. 2019 Tax Returns (including Schedule C)-Carolyn D. Wade
42. 2019 Tax Returns (including Schedule C)-Tracy D. Wade
43. 2019 -2020 Various Tax Returns (including Schedule Cs) and PPP applications prepared by Haydee Granados for other applicants
44. Haydee Granados PPP Loan Application (including Schedule C)
45. Haydee Granados FBI Investigation Interview on or about 06/14/2024 File # 194C-MM-3602833-302; entry date 07/24/2024 and the FD-302 transcript thereof
46. SBA PPP Loan applications, Haydee Granados, aka Haydee Rivero

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47. Compendium of email correspondence with attachments between Carolyn D. Wade, Tracy D. Wade and Haydee Granados in connection with Carolyn Wade's One Step A-Head PPP Loan Application
48. Compendium of email correspondence with attachments between Tracy D. Wade and Haydee Granados in connection with Tracy Wade's Wade Funeral Home PPP Loan Application
49. Cancelled Check from Tracy Wade on behalf of Wade Funeral Home for payment to Haydee Granados for PPP Loan preparation, payable to third party as directed.
50. Cancelled Check from Carolyn D. Wade on behalf of One Step A-Head for payment to Haydee Granados for PPP Loan preparation, payable to third party upon direction
51. Cancelled Check payable to Jersey City Group for PPP Loan preparation
52. Cancelled check payable to Jersey City Group from Tracy Wade/ Wade Funeral Home for purchase of embalming table from Rivero Funeral Home
53. Email from Tracy Wade to Haydee Granados forwarding requested bank statements
54. Email from Tracy Wade to Haydee Granados forwarding DocuSign login credentials for Haydee's access to Tracy Wade's DocuSign account
55. Email from Tracy Wade to Haydee Granados forwarding DocuSign login credentials for Haydee's access to Carolyn Wade's DocuSign account
56. Womply document depicting IP address .125 which uploaded the Schedule C submitted in support of Carolyn Wade's PPP Application
57. Womply document depicting IP address .125 which uploaded the Schedule C submitted in support of Tracy Wade's PPP Loan Application
58. Womply documents related to PPP Loan Application for \$700,000 loan applied for in the name of Tracy Wade or Wade Funeral Home
59. Womply documents and audit files related to Carolyn D. Wade's PPP Loan Applications #1 and #2 files
60. Womply documents and audit files related to Carolyn D. Wade's PPP Loan Application depicting IP address .125 (Haydee Granados) uploading the fraudulent Schedule C Tax Document submitted in support of Carolyn Wade's loan
61. Womply documents and audit files related to Tracy D. Wade's PPP Loan Applications #1 and #2 files
62. United States/ David Snider Trail Subpoena with Attachment dated March 7, 2024 to Oto Analytics, Inc. dba Womply
63. Broward County Sheriff's Office (BSO) Employee Work Schedule Records for Carolyn D. Wade

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64. Broward County Sherrif's Office (BSO) Employment Policy on Employee Coming and Going
65. Stipulation with United States as to Broward Sherrif's Office (BSO) IP addresses .130, .504 and .224
66. Carolyn D. Wade's filed 2019 Tax Return documents
67. Tracy D. Wade's filed 2019 Tax Return documents
68. Checkbook for Carolyn Wade with Port St. Lucie Address in 2019
69. 2011 Incorporation documents for One Step A-Head
70. Formation and status documents for Wade Funeral Home, LLC
71. TIN 592-090-026 Documents for One Step A-Head
72. Tower records for ATT related to IP addresses relevant to the case

Defendants, **CAROLYN D. WADE** and **TRACY D. WADE**, reserve the right to call additional witnesses on this list, or refrain from calling witnesses on this list, and reserves the right to introduce into evidence or utilize additional documents on this list, or refrain from utilizing or introducing into evidence documents on this list as the circumstances dictate.

### **CERTIFICATE OF SERVICE**

I HEREBY certify that on September 17, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

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**Attorneys for the Defendants, Carolyn D.  
Wade and Tracy D. Wade**

cc: Carolyn D. Wade  
Tracy D. Wade