

**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.

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GOVERNMENT'S WITNESS LIST

The United States of America, by and through its undersigned counsel, hereby files this list of proposed witnesses for trial, which is presently set to commence on October 7, 2024.

1. Althea Harris, U.S. Small Business Administration, Paycheck Protection Program
2. Aman Thakral, Oto Analytics, Inc. DBA Womply
3. Lindsey Bergh, Persona Identities, Inc.
4. Meghan Musil, Harvest Small Business Finance, LLC¹
5. Michael Friedman, SmartBiz Loans
6. Renee McClain, Internal Revenue Service
7. AT&T (witness to be designated)
8. Dion Morrow, Verizon
9. Joanna Hely, Broward Sheriff's Office
10. Alexander Rodriguez, Broward Sheriff's Office

¹ The government has proposed a stipulation to Defendants that, if agreed upon, would obviate the need for this witness.

11. Rachel Dodd, U.S. Small Business Administration, Economic Injury Disaster Loan
Program

12. Haydee Rivero, f/k/a Haydee Granados

13. Kelly DiPietrantonio, Special Agent, Federal Bureau of Investigation

The United States requests leave to add witnesses based on their availability, whether or not defendants will testify, and whether the Government will present a rebuttal case.

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