

**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 EXHIBIT LIST

The United States of America, by and through its undersigned counsel, hereby submits this list of exhibits the Government intends to introduce at the trial of the above-captioned case, which is presently set to commence on October 7, 2024.

The United States requests leave to add exhibits as may become necessary during the trial in this matter.

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

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

UNITED STATES OF AMERICA

GOVERNMENT EXHIBIT LIST

v.

CAROLYN DENISE WADE and CASE NO. 23-60173-CR-KMW(s) (GRAHAM)
TRACY D. WADE,
 Defendants.

PRESIDING JUDGE		GOVERNMENT ATTORNEYS		DEFENDANTS' ATTORNEYS
Hon. Donald L. Graham		AUSA David A. Snider AUSA Adam Love		Johhny McCray Daryl Wilcox
GOV. EX. NO.	DATE OFFERED	DATE ADMITTED	DESCRIPTION OF EXHIBITS	
001			Stipulation Regarding Communications Transmitted By Wire in Interstate Commerce	
100			Womply Record for SBA Loan No. 6697269001 – Fund Rocket Screenshot	
101			Womply Record for SBA Loan No. 6697269001 – PPP Fast Lane Application Details	
102			Womply Record for SBA Loan No. 6697269001 – IP History Report (PDF)	
102e			Womply Record for SBA Loan No. 6697269001 – IP History Report (Excel)	
102.1			Womply Record for SBA Loan No. 6697269001 – Portal Login Information (PDF)	
102.1e			Womply Record for SBA Loan No. 6697269001 – Portal Login Information (Excel)	
102.2			Womply Record for SBA Loan No. 6697269001 – Version History Spreadsheet (PDF)	
102.2e			Womply Record for SBA Loan No. 6697269001 – Version History Spreadsheet (Excel)	
103			Womply Record for SBA Loan No. 6697269001 – KYC Details for Bank ID 2091	
104			Womply Record for SBA Loan No. 6697269001 – KYC Details for Bank ID 2097	
105			Womply Record for SBA Loan No. 6697269001 – Bank Data	

106			Womply Record for SBA Loan No. 6697269001 – Bank Documents for Bank ID 2097
107			Womply Record for SBA Loan No. 6697269001 – Funding Instructions for Bank ID 2097
108			Womply Record for SBA Loan No. 6697269001 – Supporting Tax Documents for Bank ID 2097
109			Womply Record for SBA Loan No. 6697269001 – Carolyn Wade USAA Bank Statement
110			Womply Record for SBA Loan No. 6697269001 – Carolyn Wade USAA Bank Statement
111			Womply Record for SBA Loan No. 6697269001 – Carolyn Wade USAA Bank Statement
112			Womply Record for SBA Loan No. 6697269001 – Carolyn Wade USAA Bank Statement
113			Womply Record for SBA Loan No. 6697269001 – IRS Form 1040, Schedule C
114			Womply Record for SBA Loan No. 6697269001 – Persona Identity Verification Report (Failed)
114.1			Persona Identify Verification record related to SBA Loan No. 6697269001
114.2			Persona Identify Verification record related to SBA Loan No. 6697269001
115			Womply Record for SBA Loan No. 6697269001 – Persona Identity Verification Report (Approved)
115.1			Persona Identify Verification record related to SBA Loan No. 6697269001
115.2			Persona Identify Verification record related to SBA Loan No. 6697269001
116			Womply Record for SBA Loan No. 6697269001 – SBA Form 2483-C (PPP Loan Application) Signed May 18, 2021
116.1			DocuSign Envelope History for Envelope ID “741ee07c-4ce4-4423-a6d1-d8e91f08bf27”
117			Womply Record for SBA Loan No. 6697269001 – SBA Form 2483-C (PPP Loan Application) Signed May 28, 2021
117.1			DocuSign Envelope History for Envelope ID “6bb13c16-055b-4b87-8d7e-c711d6046f00”

118			SBA Record for SBA Loan No. 6697269001 – SBA Form 3508S (PPP Loan Forgiveness Application) Signed August 7, 2021
118.1			DocuSign Envelope History for Envelope ID “6c82f48c-0ac0-4991-929d-0e0fcba643c2”
119			Harvest Record for SBA Loan No. 6697269001 – Notice of PPP Forgiveness Payment
120			Womply Record for SBA Loan No. 6697269001 – List of Emails sent to ckidd1226@gmail.com
120.1			Womply Record for SBA Loan No. 6261949003 – List of Emails sent to tracyw764@gmail.com
121			Womply Record for SBA Loan No. 6697269001 – Email ID 1122 sent to ckidd1226@gmail.com
122			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1214 sent to ckidd1226@gmail.com and tracyw764@gmail.com
123			Womply Record for SBA Loan No. 6697269001 – Email ID 1216 sent to ckidd1226@gmail.com
124			Womply Record for SBA Loan No. 6697269001 – Email ID 1217 sent to ckidd1226@gmail.com
125			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1222 sent to ckidd1226@gmail.com and tracyw764@gmail.com
126			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1227 sent to ckidd1226@gmail.com and tracyw764@gmail.com
127			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1229 sent to ckidd1226@gmail.com and tracyw764@gmail.com
128			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1246 sent to ckidd1226@gmail.com and tracyw764@gmail.com
129			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1248 sent to ckidd1226@gmail.com and tracyw764@gmail.com
130			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1251 sent to ckidd1226@gmail.com and tracyw764@gmail.com
131			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1256 sent to ckidd1226@gmail.com and tracyw764@gmail.com
132			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1260 sent to ckidd1226@gmail.com and tracyw764@gmail.com

133			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1263 sent to ckidd1226@gmail.com and tracyw764@gmail.com
134			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1268 sent to ckidd1226@gmail.com and tracyw764@gmail.com
135			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1273 sent to ckidd1226@gmail.com and tracyw764@gmail.com
136			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1319 sent to ckidd1226@gmail.com and tracyw764@gmail.com
137			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1493 sent to ckidd1226@gmail.com and tracyw764@gmail.com
138			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1500 sent to ckidd1226@gmail.com and tracyw764@gmail.com
139			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1503 sent to ckidd1226@gmail.com and tracyw764@gmail.com
140			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1509 sent to ckidd1226@gmail.com and tracyw764@gmail.com
141			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1514 sent to ckidd1226@gmail.com and tracyw764@gmail.com
142			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1517 sent to ckidd1226@gmail.com and tracyw764@gmail.com
143			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1519 sent to ckidd1226@gmail.com and tracyw764@gmail.com
144			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1533 sent to ckidd1226@gmail.com and tracyw764@gmail.com
145			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1539 sent to ckidd1226@gmail.com and tracyw764@gmail.com
146			Womply Record for SBA Loan Nos. 6697269001 and 6261949003 – Email ID 1546 sent to ckidd1226@gmail.com and tracyw764@gmail.com
147			Womply Record for SBA Loan No. 6261949003 – Email ID 1051 sent to tracyw764@gmail.com
148			Womply Record for SBA Loan No. 6261949003 – Email ID 1387 sent to tracyw764@gmail.com

149			Womply Record for SBA Loan No. 6261949003 – Fund Rocket Screenshot
150			Womply Record for SBA Loan No. 6261949003 – PPP Fast Lane Application Details
151			Womply Record for SBA Loan No. 6261949003 – KYC Details for Deal ID 63336
152			Womply Record for SBA Loan No. 6261949003 – Bank Documents for Deal ID 63336
152.1			Womply Record for SBA Loan No. 6261949003 – Account Statement for SunTrust Account
152.2			Womply Record for SBA Loan No. 6261949003 – Account Statement for USAA Classic Checking
152.3			Womply Record for SBA Loan No. 6261949003 – Account Statement for USAA Classic Checking
152.4			Womply Record for SBA Loan No. 6261949003 – Account Statement for USAA Classic Checking
153			Womply Record for SBA Loan No. 6261949003 – Supporting Tax Documents
154			Womply Record for SBA Loan No. 6261949003 – IRS Form 1040, Schedule C for “Tracy Wade”
155			Womply Record for SBA Loan No. 6261949003 – Funding Instructions
156			Persona Identify Verification record related to SBA Loan No. 6261949003 – Inquiry Report
156.1			Persona Identify Verification record related to SBA Loan No. 6261949003 – Sessions Tab
156.2			Persona Identify Verification record related to SBA Loan No. 6261949003 – Verifications Tab
157			Womply Record for SBA Loan No. 6261949003– SBA Form 2483-C (PPP Loan Application) for “Tracy Wade” dated May 12, 2021
157.1			DocuSign Certificate of Completion for Envelope ID “89A18283E64947B790AE064EAA69D98B”
157.2			DocuSign Envelope History for Envelope ID “89A18283E64947B790AE064EAA69D98B”
158			Womply Record for SBA Loan No. 6261949003– SBA Form 2483-C (PPP Loan Application) for “Tracy Wade” dated May 18, 2021
158.1			DocuSign Envelope History for Envelope ID “e7657691-b54f-462f-b819-b7561aae596e”
159			Womply Record for SBA Loan No. 6261949003– SBA Form 2483-C (PPP Loan Application) and Note for “Tracy Wade” dated May 27, 2021
159.1			DocuSign Envelope History for Envelope ID “5dfe0ae0-f761-4c3f-9751-251749bdbbbc”

160			SBA Record for SBA Loan No. 6261949003 – SBA Form 3508S (PPP Loan Forgiveness Application) for “Tracy Wade” dated August 7, 2021
160.1			DocuSign Certificate of Completion for Envelope ID “747527CFFCDD4EB28B85C1225696CA49”
160.2			DocuSign Envelope History for Envelope ID “747527CFFCDD4EB28B85C1225696CA49”
161			SBA Record for SBA Loan No. 6261949003 – Notice of PPP Forgiveness Payment
162			Womply Record for SBA Loan No. 6261949003 – IP History Report (PDF)
162e			Womply Record for SBA Loan No. 6261949003 – IP History Report (Excel)
163			Womply Record for SBA Loan No. 6261949003 – Portal Login Information (PDF)
163e			Womply Record for SBA Loan No. 6261949003 – Portal Login Information (Excel)
164			Womply Record for SBA Loan No. 6261949003 – Version History Spreadsheet (PDF)
164e			Womply Record for SBA Loan No. 6261949003 – Version History Spreadsheet (Excel)
165			SmartBiz Record for PPP Application No. 6781674 for Wade Funeral Home – Application Summary
166			SmartBiz Record for PPP Application No. 6781674 for Wade Funeral Home – Application Details
167			SmartBiz Record for PPP Application No. 6781674 for Wade Funeral Home – “Payroll Cost From: 01/01/20 To: 12/31/20”
168			SmartBiz Record for PPP Application No. 6781674 for Wade Funeral Home – “Payroll Cost From: 02/01/20 To: 02/29/20”
169			SmartBiz Record for PPP Application No. 6781674 for Wade Funeral Home – IRS Form 941 for 2020 Q1
170			SmartBiz Record for PPP Application No. 6781674 for Wade Funeral Home – “Wade Funeral Home LLC Payroll Summary”
171			SmartBiz Record for PPP Application No. 6781674 for Wade Funeral Home – Decline Information
200			IRS Form 1040 U.S Individual Income Tax Return for Carolyn Wade for Tax Year 2018
201			IRS Form 1040 U.S Individual Income Tax Return for Carolyn Wade for Tax Year 2019
202			IRS Form 1040 U.S Individual Income Tax Return for Carolyn Wade for Tax Year 2020

203			IRS Form 1040-X Amended U.S Individual Income Tax Return for Carolyn Wade for Tax Year 2020
204			IRS Form 1040 U.S Individual Income Tax Return for Tracy Wade for Tax Year 2018
205			IRS Form 1120-S U.S Income Tax Return for Wade Funeral Home LLC for Tax Year 2018
206			IRS Form 1040 U.S Individual Income Tax Return for Tracy Wade for Tax Year 2019
207			IRS Form 1120-S U.S Income Tax Return for Wade Funeral Home LLC for Tax Year 2019
208			IRS Form 1040 U.S Individual Income Tax Return for Tracy Wade for Tax Year 2020
209			IRS Form 1120-S U.S Income Tax Return for Wade Funeral Home LLC for Tax Year 2020
210			IRS Form 1120-S U.S Income Tax Return for Wade Funeral Home LLC for Tax Year 2021
211			IRS Certification of Lack of Record for Form 941 for Wade Funeral Home March 31, 2018 through December 31, 2021
212			IRS Certification of Lack of Record for Forms 1065 and 940 for Wade Funeral Home December 31, 2018 through December 31, 2021
300			USAA Federal Savings Bank Member Authentication History for Member Number ending 6578
301			USAA Federal Savings Bank Signature Card for Account Number ending 3926
302			USAA Federal Savings Bank Account Statements for Account Number ending 3926
303			USAA Federal Savings Bank Account Statements for Account Number ending 3926
303.1			USAA Federal Savings Bank Account Statement for Account Number ending 3926 – 05/27/2021 to 06/28/2021
304			USAA Federal Savings Bank Account Check Images from Account Number ending 3926
305			USAA Federal Savings Bank Account Check Image from Account Number ending 3926
306			USAA Federal Savings Bank Account Statements for Account Number ending 7309
306.1			USAA Federal Savings Bank Account Statement for Account Number ending 7309 – 05/07/2021 to 06/07/2021
307			USAA Federal Savings Bank Account Check Images from Account Number ending 7309

400			Records from Florida Department of Revenue regarding Wade Funereal Home South LLC, Just Us 2 Foundation Inc, and Carolyn Wade
401			Records from Florida Department of Revenue regarding Tracy Wade and Wade Funeral Home LLC
500			Broward Sheriff's Office Employee Action History for Carolyn Wade
501			Broward Sheriff's Office contact information for Carolyn Wade
502			Sheriff's Policy Manual Section 3.16 titled "Off-Duty and Extra Duty Employment," effective September 6, 2018
503			Broward Sheriff's Office Off-Duty Employment Form
504			Broward Sheriff's Office network interface showing IP address 70.151.137.130
505			Broward Sheriff's Office Employee Action History for Tracy Wade
506			Broward Sheriff's Office Off-Duty Employment Forms regarding Wade Funeral Home
600			AT&T Subscriber / IP Usage record for U-Verse account number ending 5638
601			AT&T Subscriber / IP Usage record for U-Verse account number ending 7558
700			Google subscriber information for Google Account ID ending 6506 (PDF file – page 1)
700e			Google subscriber information for Google Account ID ending 6506 (Google Chrome file)
701			Google subscriber information for Google Account ID ending 9890
800			Verizon cell phone records for cell phone number ending 6800.
801			Verizon subscriber record for account number ending 6310-1 (PDF)
801e			Verizon subscriber record for account number ending 6310-1 (Excel)
802			Verizon device record for account number ending 6310-1 (PDF)
802e			Verizon device record for account number ending 6310-1 (Excel)
803			Verizon phone number record for account number ending 6310-1 (PDF)
803e			Verizon phone number record for account number ending 6310-1 (Excel)

804			Verizon payment history record for account number ending 6310-1 (PDF)
804e			Verizon payment history record for account number ending 6310-1 (Excel)
805			Letter dated September 11, 2024 from Verizon regarding IP addresses.
806			Verizon cell phone records for cell phone number ending 1512.
806.1			Selected pages from Government Exhibit 806 (Verizon cell phone records for cell phone number ending 1512)
807			Verizon subscriber record for account number ending 6310-1 (PDF)
807e			Verizon subscriber record for account number ending 6310-1 (Excel)
808			Verizon device record for account number ending 6310-1 (PDF)
808e			Verizon device record for account number ending 6310-1 (Excel)
900			SBA Record for EIDL Application No. 3303453793 for Wade Funeral Home – Rapid Intake Form
901			SBA Record for EIDL Application No. 3303453793 for Wade Funeral Home – Rapid Finance Application Details
902			SBA Record for EIDL Application No. 3303453793 for Wade Funeral Home – Tracy Wade Florida Driver’s License
903			SBA Record for EIDL Application No. 3303453793 for Wade Funeral Home – Loan Authorization and Agreement for SBA Loan Number 6483358209
903.1			SBA Record for EIDL Application No. 3303453793 for Wade Funeral Home – DocuSign Certificate of Completion for Envelope ID “30E7EFDEFF7C4F9CBB976F45E7449754”
904			SBA Record for EIDL Application No. 3303453793 for Wade Funeral Home – Email dated May 5, 2021 from SBA to tracyw764@gmail.com
905			SBA Record for EIDL Application No. 3303453793 for Wade Funeral Home – Loan Comment and Chron List for SBA Loan Number 6483358209
906			SBA Record for EIDL Application No. 3000109849 for Wade Funeral Home – Rapid Intake Form
907			SBA Record for EIDL Application No. 3000109849 for Wade Funeral Home – Rapid Finance Application Details

1000.1			Demonstrative Summary
2000			Plea Agreement between the United States and Haydee Rivero, f/k/a “Haydee Granados”
2001			Factual Proffer in support of guilty plea as to Haydee Rivero, f/k/a “Haydee Granados”
2002			Email dated May 6, 2021, from Odalys Conception to Haydee Granados with subject “wade funeral home” and attachment thereto