

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

Case No. 23-cr60173-KMW

Plaintiff,

v.

CAROLYN D. WADE and
TRACY WADE,,

Defendants.

_____ /

DEFENDANTS' PROPOSED VOIR DIRE

The Defendants, **CAROLYN D. WADE and TRACY WADE** , respectfully request this Honorable Court asks the following questions, in addition to its standard questions, during *voir dire* of the jury panel:

1. Is there anything in your background that you feel would prevent you from being a fair and impartial juror in this case?

If yes, please explain in detail:

2. Have you or any member of your family ever worked for a government contractor?

If Yes, is this: Yourself? Spouse? Child? Family? Friend?

3. Do you read publications that focus on business news or watch business shows on television or listen to them on radio or the internet?

If Yes, which business publications or news sections? Which television shows? Which business shows? Which internet business sites?

4. Have you or anyone in your immediate family ever been self-employed or owned a business?

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5. Are you/they still operating the business?

If NO, why not?

Please describe the business; Please describe the experience.

6. Before today, had you heard of PPP or EIDL loans?

If yes, what did you understand their general purpose to be?

If yes, from what sources did you learn information about EIDL or PPP loans? (i.e., television, social media, government websites, word of mouth)

7. Did you, a family member, or friend apply for an EIDL or PPP loan?

If yes, who applied for the loan?

If yes, was the application approved?

If yes, how much did you receive in loan funds?

If yes, did you apply for forgiveness?

8. Did you, a family member, or friend receive a stimulus check during the pandemic?

9. Do you have strong feelings about government financial assistance during the pandemic?

If so, please explain.

10. Have you, a family member, or friend, ever been employed by the SBA?

11. Have you, a family member, or friend ever been employed by a financial lending program.

If so, in what capacity? When and how long?

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12. Have you or a family member been the victim of fraud?
13. Do you prepare your own taxes or do you hire an accountant to do your taxes?
14. Do you have any bookkeeping/accounting experience?
15. Do you have any tax preparation experience or tax counseling experience?

CERTIFICATE OF SERVICE

I HEREBY certify that on **September 25, 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.

Respectfully submitted,

/s/ **Daryl E. Wilcox**

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CC: Clients

