

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NOS. 23-CR-60173-KMW-1
23-CR-60173-KMW-2

UNITED STATES OF AMERICA, Miami, Florida
Plaintiff, October 21, 2024
vs.
9:54 AM - 2:48 PM
CAROLYN DENISE WADE and
TRACY D. WADE,
Defendant. Pages 1 to 138

TRANSCRIPT OF TRIAL (TESTIMONY OF TRACY WADE)
HELD BEFORE THE HONORABLE DONALD L. GRAHAM
UNITED STATES DISTRICT JUDGE

FOR THE GOVERNMENT:

DAVID A. SNIDER, AUSA
ADAM LOVE, AUSA
United States Attorney's Office

ON BEHALF OF THE DEFENDANTS:

JOHNNY L MCCRAY, JR., ESQ.
Law Office of Johnny L. McCray, Jr, P.A.
and
DARYL E. WILCOX, ESQ.

ALSO PRESENT: Carolyn Wade
Hendrith V.A. Smith, paralegal

LANCE W. STEINBEISSER, FCRR, RPR, FPR-C
Official Court Reporter
United States District Court
400 North Miami Avenue
Miami, Florida 33128
305.523.5633

Proceedings recorded by mechanical stenography; transcript
produced by computer-aided transcription.

TRACY WADE - DIRECT

2

1 (Call to the Order of the Court.)

2 * * * * *

3 (Jury entered at 9:54 AM.)

4 THE COURT: We're now ready to proceed with the
5 testimony.

6 MR. MCCRAY: Thank you, Judge.

7 DIRECT EXAMINATION (CONTINUED)

8 BY MR. MCCRAY:

9 Q. Mr. Wade, how many corporations did you and your wife own
10 back around 2020, 2021?

11 A. During those years, we owned Wade Funeral Home, which is
12 located in Hallandale.

13 Q. That's one.

14 A. Wade Funeral Home South, which was located in Cutler Bay,
15 if I'm correct.

16 Q. That's two.

17 A. 1 Step A-Head, which my wife ran from home, and Just Us
18 Two Foundation, which is a nonprofit.

19 Q. What was the purpose of that nonprofit?

20 A. That nonprofit was for assisting the homeless and troubled
21 kids, troubled youth. We would donate book bags and school
22 supplies every year and feed the homeless.

23 Q. And do you still have that corporation?

24 A. Yes, sir, we do.

25 Q. Now, I'm going to move forward.

TRACY WADE - DIRECT

3

1 You indicated that you knew Mr. Rivero; is that
2 correct?

3 A. Yes, sir.

4 Q. Now, did you do business with Mr. Rivero with respect to
5 the funeral home?

6 A. Yes, sir.

7 Q. Can you please tell the members of the jury -- give them
8 some examples of things you did with Mr. Rivero's funeral
9 home.

10 A. Well, Mr. Rivero was not a funeral director, and he would
11 have constant issues with funeral directors. Where I came in,
12 I did embalming for him. I did ship-outs. I saw a couple of
13 families for him. From time to time I've utilized his
14 vehicles. He's utilized my vehicles. He's utilized my staff.
15 I've covered funerals. I've helped him with preneed -- set up
16 his preneed, things of that nature. Anything regarding the
17 funeral business.

18 Q. Okay. Did you have any interaction with his wife with
19 respect to the funeral home business?

20 A. Yes. She was the administrator of the funeral home.

21 Q. And do you remember what type specific business that you
22 did with her?

23 A. Well, I would have to be in communication with her because
24 she handled all the documents, meaning the burial transit
25 permits, monthly embalming reports, affidavits that we would

TRACY WADE - DIRECT

4

1 have to -- I think she was also a notary. So she would also
2 have to sign and I would have to sign.

3 Q. Okay. Did Mr. Rivero have any experience dealing with
4 computers?

5 A. No. He wouldn't be a part of those kind of conversations.

6 Q. Okay. Now, back in, say, 2020, when did you first meet
7 Mr. Rivero?

8 A. I can't exactly give you the year, but it was way before
9 the pandemic. I met him while -- I was covering a service for
10 another funeral home, and I believe he was there with a couple
11 of his vehicles. That's where I met him at.

12 Q. Okay. Now, did there come a time when you -- there was a
13 conversation between you and Mr. Rivero with respect to a PPP
14 loan?

15 A. Yes, it was.

16 Q. Can you tell us about that, please, and when?

17 A. If I recall correctly -- I can't recall why I was at his
18 funeral home, but I know it was for some funeral business. In
19 the parking lot, he asked me did I do a PPP. I was unaware of
20 what a PPP loan was, and he explained it to me as far as what
21 it was.

22 Q. Okay. And did he tell you why he was inquiring?

23 A. Well, he claimed him and his wife can help get the PPP
24 loan. That's what he claimed.

25 Q. Did he mention to you whether or not he and his wife had

TRACY WADE - DIRECT

5

1 applied for loans?

2 A. No. He told me he had no need for PPP loans. Him and his
3 wife was just assisting people getting PPP loans.

4 Q. Okay. Did they ever tell you that they had received a PPP
5 loan?

6 A. No, sir.

7 Q. And when he said that they were helping people get PPP
8 loans, did he indicate whether or not they had actually helped
9 the first person get a PPP loan or they were about to start
10 doing that?

11 A. No, he didn't mention any of that. He just mentioned
12 certain businesses as far as funeral homes that I knew that he
13 was assisting.

14 Q. Okay. And did you trust Mr. Eduardo Rivero back during
15 that time?

16 A. Yes, I did.

17 Q. And can you tell us why it is that you trusted him?

18 A. Well, based on all the business ventures we had done, I
19 felt he trusted me with his funeral home. I not only trusted
20 him to do the PPP loan but I thought he was -- if we were
21 doing business as far as me using my license as a funeral
22 director, if I'm trusting him with my license, which if you're
23 in violation of anything as far as your funeral home, that's
24 criminal.

25 So I figured if he was using my license to do certain

TRACY WADE - DIRECT

6

1 things that I had no reason not to trust him with anything
2 else.

3 Q. What was your understanding as to who the owner of that
4 business was?

5 A. I thought it was Eduardo Rivero.

6 Q. Did you subsequently learn otherwise?

7 A. Yes. In this court proceeding.

8 Q. Now, I believe one of the witnesses testified that he has
9 a criminal history. Did you hear that?

10 A. Yes, I did.

11 Q. Were you aware of that when you were dealing with him?

12 A. No, sir.

13 Q. When you were approached about a PPP loan, was there
14 anything discussed concerning cost or fees?

15 A. He said that you will have to pay a percentage because you
16 don't know -- no exact price was given because you don't know
17 what you're getting. You're just applying to see if you
18 qualify for this loan, and based on whatever you get, then you
19 have to pay that percentage.

20 Q. Okay. During that particular conversation, was it ever
21 mentioned as to what, if any, documents were needed?

22 A. If I'm correct -- well, it was bank statements, driver's
23 license, Social Security cards, a voided check.

24 Q. Was that during that initial conversation or was that
25 sometime later?

TRACY WADE - DIRECT

7

1 A. That was what he told me was needed initially.

2 Q. Okay. And what was your response once you all talked
3 about the PPP loan?

4 A. I really didn't have a response because he said it was a
5 simple process. He said you're just applying. If you get it,
6 you get it. If you don't, you don't. I didn't think anything
7 was suspicious about it or anything to question him about as
8 far as that went.

9 Q. Now, did Mr. Eduardo Rivero mention anything to you
10 regarding a Schedule C?

11 A. Never.

12 Q. Okay. I'm going to show you what has been marked -- okay.
13 The Schedule C that you actually filed, you filed one for what
14 years?

15 A. I've never filed a Schedule C.

16 Q. Okay. Now, you filed tax documents for 2019, 2020?

17 A. Yes, sir.

18 Q. Okay. Actually -- just one second. I'm going to show you
19 what has been marked as Government's Exhibit Number 209. Do
20 you see what's being published here, Government's Exhibit 209?

21 A. Yes, sir.

22 Q. Can you please tell us what this is?

23 A. That's my tax return for Wade Funeral Home.

24 Q. Okay. So instead of a Schedule C, is this what you filed?

25 A. Yes, sir.

TRACY WADE - DIRECT

8

1 Q. Okay. Now, have you been audited?

2 A. No, sir.

3 Q. Any communication regarding the legitimacy of 209?

4 A. No, sir.

5 Q. It also indicates, if you look on under income -- and I
6 will see if I can push that up a little bit -- income here --
7 and let's go over to 1(C). What does it say your gross
8 receipts and sales equal?

9 A. If you can move it back over, I believe 1(C) is \$332,681.

10 Q. Okay. And going to 1(A), what does that say?

11 A. It says 300,000 -- it says the same numbers.

12 Q. Okay. These were filed by you with the United States
13 Government?

14 A. Yes, sir.

15 Q. Okay. Did you have a CPA assist you with this?

16 A. Yes, sir.

17 Q. Okay. Did you ever represent to Ms. Granados that your
18 funeral home business made roughly just over a hundred
19 thousand dollars for that same year as reflected in the
20 exhibit that we just went over, which indicated that you had
21 made over 300-some thousand dollars?

22 A. No, sir.

23 Q. Did she ever tell you that she was going to put a number
24 that wasn't consistent with the 300-some odd thousand dollars
25 that we just saw?

TRACY WADE - DIRECT

9

1 A. No, sir.

2 Q. When, if anytime, did you learn that Ms. Granados had
3 included a number that was not accurate -- that was false?

4 A. Once this indictment came into place and I looked at the
5 documents.

6 Q. And what were your feelings at that time?

7 A. Deceived, hurt, betrayed.

8 Q. Now, had you ever asked Ms. Granados or Ms. Rivero to file
9 a PPP loan in the name of your funeral home, Wade Funeral
10 Home?

11 A. I didn't speak to Ms. Granados at all. I spoke to
12 Eduardo. And the understanding was the PPP loan was going to
13 be under Wade Funeral Home.

14 Q. And how was that the understanding?

15 A. Well, based on how he explained it to you, the PPP loan
16 was supposed to be for a business, not personal.

17 Q. And so you mentioned to Mr. Granados that you would be
18 applying for a business loan?

19 A. He asked. He asked did you do one for the funeral home.
20 He asked.

21 Q. And what did you say?

22 A. I said no, initially.

23 Q. Okay. And did there come a time when you said that you
24 would?

25 A. Yes. Yes, sir.

TRACY WADE - DIRECT

10

1 Q. Okay. Now, let me show you what has been marked as
2 Government's -- actually, I believe this will be defense 7 --
3 Defense Exhibit 7.

4 Can you tell us what is this?

5 A. That's me emailing Ms. Haydee Granados.

6 Q. I was trying to get it a little smaller. Okay.

7 And what did this email contain?

8 A. I would have to see it.

9 Q. This is the wrong one. I'm sorry. Excuse me.

10 I'm sorry. I should have been making reference to
11 Defense Exhibit 8.

12 Can you please tell us what this is?

13 A. This is an email coming from Wade Funeral Home going to
14 Ms. Haydee Granados.

15 Q. Okay. And did this email have any attachments to it?

16 A. Yes. Yes, sir.

17 Q. Can you please tell us what the attachments -- what this
18 reflects?

19 A. My Florida Driver's License, my Social Security card, and
20 an attachment of a voided check for Wade Funeral Home.

21 Q. And I'm going to move over to the next page. Can you
22 please tell us what this is?

23 A. That's the voided check for Wade Funeral Home.

24 Q. Okay. And this was sent at the request of whom?

25 A. Eduardo Rivero.

TRACY WADE - DIRECT

11

1 Q. Okay. And Wade Funeral Home's account, can you tell us
2 who that account was with?

3 A. At that time, it was SunTrust, which is now known as
4 Truist.

5 Q. And did you ever receive an email back saying, "Hey, I
6 didn't ask you for that. I asked you for your personal"?

7 A. No, sir, because he asked for it.

8 Q. Now, I'm going to show you -- go back to Defense
9 Exhibit 7. And can you tell us again what is this?

10 A. That's an email coming from Carolyn Wade to myself, Tracy
11 Wade.

12 Q. And can you tell us what, if anything -- did you do
13 anything with it after you received it from Carolyn?

14 A. Yes, I emailed it to Ms. Haydee Granados.

15 Q. Let's go to the back page. Can you please tell us what is
16 this?

17 A. A voided check from my wife's business 1 Step A-Head, hair
18 salon.

19 Q. And 1 Step A-Head had a bank account?

20 A. Yes, it did.

21 Q. Now, let me ask you. Why didn't Carolyn Wade send this
22 directly to Eduardo or Ms. Granados?

23 A. Probably because she was unable to do it.

24 Q. I'm sorry?

25 A. She probably was unable to do it because she was at work,

1 and initially when the process started, it was a simple
2 process as far as the sending of the documents. I did it for
3 her.

4 Q. Were you the point person between the Riveros and your
5 wife --

6 A. Yes, I was --

7 Q. -- with respect to her loan?

8 A. Yes, I was.

9 Q. And did there ever come a time when you actually would use
10 your wife's computer to file things?

11 A. Yes, I did.

12 Q. Can you give us an example?

13 A. As far as with the loan?

14 Q. Yes.

15 A. I think I probably went in and uploaded probably a bank
16 statement. I think I signed a DocuSign one time for her also.
17 So, yes, I did go in it.

18 Q. Now, does your wife really know Ms. Rivero?

19 A. No, she doesn't.

20 Q. Did she know Mr. Eduardo Rivero very well?

21 A. No, she doesn't.

22 Q. Who knows Eduardo?

23 A. I do.

24 Q. And did you know Eduardo's wife?

25 A. I knew her through the funeral home itself and through

1 casual social gatherings.

2 Q. Now, has she ever been to your funeral home before?

3 A. Multiple times.

4 Q. Now, did you at some point approach your wife --

5 A. Yes --

6 Q. -- about the opportunity to procure a PPP loan?

7 A. Yes, I did.

8 Q. And can you tell us how that came about, please?

9 A. So I can't exactly remember the time frame in which it
10 happened, but I know I had already processed my loan. When it
11 was pretty much done or if it was done -- because this has
12 been a while ago -- Eddie said to me, "Well, see. That was
13 simple. It's an easy process. And your wife has a business,
14 so let's see if she qualifies for the loan." And he says, "No
15 hurry. If she doesn't get anything, she doesn't get anything.
16 If she does, she does."

17 Q. So was it your understanding that -- let me strike that.

18 What was your understanding as the condition, if any,
19 that the Riveros would be paid?

20 A. Once she received the loan.

21 Q. So if there was no loan received, there would be no
22 payment?

23 A. Yes.

24 Q. Now, when you presented this idea to your wife, did you
25 explain to her the fee arrangement?

TRACY WADE - DIRECT

14

1 A. Yes, I explained to her it was a percentage.

2 Q. Okay. And do you remember what the percentage was?

3 A. It may have been between like 10, 15, or like 20 percent,
4 somewhere up there.

5 Q. You're not really sure?

6 A. I'm not sure of an exact. I just know it was a
7 percentage.

8 Q. And how much did you pay Eduardo?

9 A. A thousand dollars Zelle and then an additional \$4,000.

10 Q. So you paid him a total of \$5,000 for this loan?

11 A. Yes.

12 Q. Okay. How much did your wife pay the Riveros?

13 A. The same.

14 Q. A thousand dollars?

15 A. A thousand dollars Zelle and then a check for \$4,000.

16 Q. Now, the check that was paid that was -- we'll start with
17 you. That was for \$4,000, you said?

18 A. Yes, sir.

19 Q. And to whom was the check paid?

20 A. I believe it was paid to Jersey City Group.

21 Q. Were you familiar with that corporation?

22 A. Not at all.

23 Q. Why did you pay to Jersey City?

24 A. Well, I knew it was Eduardo's company and I knew he was
25 from New Jersey, but I didn't think nothing more of it because

TRACY WADE - DIRECT

15

1 I just figured it was another corporation he owned.

2 Q. And did he indicate to you how -- he indicated to you how
3 to make it out?

4 A. Yes, he did.

5 Q. Did he indicate to you what, if anything, to put in the
6 memo section?

7 A. Yes, he did.

8 Q. And what was that?

9 A. Well, based on what he said when he explained the PPP loan
10 criteria, he said it was business-related. Anything that you
11 did with the proceeds of the PPP loan had to be business
12 related. So in that memo column, he said you need to put, I
13 guess, equipment in the memo section. So everything had to be
14 related to your business.

15 Q. Okay. Now, did you -- we'll get to that as I progress.

16 Now, with respect to Mrs. Wade, you said she made two
17 payments?

18 A. Yes.

19 Q. Totaling how much?

20 A. \$5,000.

21 Q. How do you know that?

22 A. I was there when she did it.

23 Q. Okay. And to whom did she make her check to?

24 A. The same two people, Zelle -- I think to Haydee Granados's
25 account and then the \$4,000 check to Jersey City Group.

1 Q. Okay. And did they direct her how to make the --

2 A. The same.

3 Q. The memo section?

4 A. Yes.

5 Q. And do you remember what she put?

6 A. I think she may have put equipment restoration or
7 something to that effect.

8 Q. Now, did your wife have equipment in her business?

9 A. Yes, she did.

10 Q. Can you tell us about that?

11 A. Equipment such as she had, like, two salon chairs. She
12 had a -- she does cosmetology, so she had the equipment for
13 cosmetology. She has numerous curling irons, hair dryers. In
14 the area where we sit, it was also set up where a part of her
15 equipment was the furniture that was in there because
16 sometimes her clients will come over and they had other people
17 with them, so they entertained them -- a couch, a TV, things
18 of that nature.

19 Q. By the way, you said something about cosmetology. Does
20 your wife have any background in that?

21 A. Yeah. She was a licensed cosmetologist.

22 Q. Did she attend school for that?

23 A. Yes.

24 Q. Was she certified, if you will, or received some type of
25 license?

TRACY WADE - DIRECT

17

1 A. She was licensed in the state of Florida.

2 Q. And do you remember roughly what year that was?

3 A. That was before she met me.

4 Q. Okay. Now, who did you deal with primarily dealing with
5 these PPP loans?

6 A. Eduardo Rivero.

7 Q. Did you have any conversations with Ms. Granados Rivero?

8 A. I may have spoken to Ms. Haydee Rivero about maybe two or
9 three times pertaining to the PPP application.

10 Q. You saw an exhibit that was introduced by the Government
11 which shows, I believe, there may have been 28 calls
12 commencing from May 4 up until a certain date.

13 A. Yes.

14 Q. Did you speak with her 28 times about PPP loans?

15 A. No, sir, absolutely not.

16 Q. Was it uncommon for you to talk to her on the phone?

17 A. Not at all.

18 Q. When you talked to her, what, if anything, would you talk
19 to her about aside from a PPP loan?

20 A. Again, especially during those times, I know for a fact I
21 was assisting them with pretty much everything that ran in
22 their funeral home. They cannot have any documents go out of
23 there without a funeral director signing off to anything
24 pertaining to remains.

25 So it could have been from ship-outs, embalming

TRACY WADE - DIRECT

18

1 affidavits, quarterly embalming reports, burial transit
2 permits. It could have been a numerous amount of things I
3 spoke to her about.

4 Q. Now, were there ever any times when you received either a
5 phone call or an email indicating that you needed some
6 documents from Mrs. Wade?

7 A. Yes, it was.

8 Q. Did they, either Mr. Rivero or Mrs. Rivero, ever deal
9 directly with your wife?

10 A. No, sir.

11 Q. Who did they deal with?

12 A. Me.

13 Q. And if you were requested to provide documentation -- let
14 me rephrase that.

15 If Mrs. Wade was requested to provide documentation,
16 how did she learn this?

17 A. Through me.

18 Q. And how did you let her know?

19 A. I would try to text her -- not text her. I would call her
20 because she didn't have her phone. You can't have your phone
21 at work. So I will call her either through the master
22 control, or if she was in a unit, then I would call directly
23 to the unit. It all depends where she was working.

24 Q. Okay. Now, are you aware if either Ms. Rivero or
25 Mr. Rivero ever uploaded any information concerning your wife

TRACY WADE - DIRECT

19

1 with respect to this application process?

2 A. Yes.

3 Q. Tell us about that.

4 A. My understanding was when I sent the documentation for my
5 wife, it was the same as when I sent the documentation for me.
6 So if they uploaded -- whatever they uploaded for me, they
7 were supposed to do the same thing for my wife.

8 Q. Now, you all didn't apply for the loans at the exact time,
9 did you?

10 A. No, sir.

11 Q. Do you remember the difference? Was it months? Weeks?
12 Years?

13 A. I don't recall the distance.

14 Q. Okay. But it wasn't the same time?

15 A. No, sir.

16 Q. Now, tell us what you had to do to actually initiate the
17 application process for you.

18 A. I don't exactly remember what I had to do. I just know I
19 had to go in there and put preliminary information in it, and
20 I think you have to authenticate it. That's when they send
21 you the code back to activate the process. So I don't know
22 exactly what I put in. I think it's your name, your email,
23 but nothing of -- nothing -- I can't remember exactly.

24 Q. Okay. Let me just ask you. Tell us what, if any,
25 information was asked of you by Mr. or Mrs. Granados when you

1 first talked to them about this.

2 A. Nothing. They just wanted the documents that they
3 requested. That was it.

4 Q. Okay. We saw your driver's license and the check -- a
5 voided check. Did they ask you for any other information?

6 A. Oh, they wanted the passcodes because --

7 Q. Did you give them that?

8 A. Well, virtually I ended up giving it to them so -- let me
9 back it up. I was, at the time, working at the sheriff's
10 office on midnights. I was working at the funeral home and
11 covering his funeral home also. I didn't understand the
12 process of this loan, and I guess everything was -- had to be
13 done in a timely manner.

14 So he kept calling my phone, "Oh, you're not paying
15 attention to this," or "You're not doing this," or "You're not
16 doing that. Why don't you just give me your email access and
17 that way" -- because I guess part of the authentication or the
18 codes will come to your email, as they testified to. And he
19 said, "Don't worry about it. You can trust me. When it's all
20 said and done, you could just change your email access and
21 then that's that.

22 "But in order for us to process the application,
23 everything has to be done in a timely manner." He also tried
24 to ask me for my bank account --

25 Q. Before we go to that, did you give him access to your

1 email?

2 A. Yes, I did.

3 Q. Okay. Now, go ahead. Did he ask for access to anything
4 else?

5 A. So then he asked me for access to my business bank account
6 and -- and my personal and I was, like, "Yeah, I trust you but
7 don't trust you like that." I wasn't giving him that.

8 Q. So you never gave him --

9 A. No.

10 Q. -- access to either of your bank accounts?

11 A. No.

12 Q. By the way, how many bank accounts did you have?

13 A. I have a business account. My wife had a personal
14 account, which I was on. I had a personal account, which she
15 was on. And we had a savings account that we both were on --

16 Q. Okay.

17 A. -- and she also had an account for her business.

18 Q. Okay. Now, did your wife file tax returns in 2019?

19 A. Yes.

20 Q. And she had been audited based upon what she filed?

21 A. No, sir.

22 Q. Any correspondence, to your knowledge, from the United
23 States Government regarding that?

24 A. No, sir.

25 Q. Did your wife apply for a PPP loan?

TRACY WADE - DIRECT

22

1 A. Yes, sir, she did.

2 Q. And was she required to DocuSign?

3 A. Yes, she was.

4 Q. Did she DocuSign for a PPP loan?

5 A. For one of them, sir.

6 Q. Okay. And what happened when she put that loan -- when
7 that loan went through?

8 A. Which one?

9 Q. The first one.

10 A. I think the one she DocuSigned was -- it didn't go
11 through.

12 Q. Okay. And was she required to do another application?

13 A. I don't believe she was required to do another
14 application. I believe, as they testified, it just
15 automatically goes to another lender --

16 Q. Okay.

17 A. -- so she didn't have to.

18 Q. Okay. So on the second one, did she DocuSign the second
19 one?

20 A. I know I -- one of the DocuSigns for her I did.

21 Q. Okay. The first one that didn't go through, do you know
22 why it didn't go through?

23 A. Not at all.

24 Q. Okay. The second one, is that the one that you
25 DocuSigned?

TRACY WADE - DIRECT

23

1 A. If I'm -- if I'm correct, yes.

2 Q. And you DocuSigned on her behalf?

3 A. Yes, sir.

4 Q. Was she present?

5 A. No, sir.

6 Q. Did she know it?

7 A. After. I told her.

8 Q. I don't remember if I asked you regarding the voided check
9 from 1 Step A-Head. Did you send that to someone?

10 A. Yes. I sent it to Ms. Haydee Granados.

11 Q. Okay. Now, you indicate that you have a bank account --
12 the joint account with you and your wife. Which bank is that?

13 A. It was a USAA bank account.

14 Q. Now, is that a local bank?

15 A. No. USAA is based out of Texas.

16 Q. Okay. Do they have a branch here?

17 A. No, sir.

18 Q. Okay. How did you bank with them if they didn't have a
19 branch?

20 A. Everything you do with them had to be through the app or
21 online.

22 Q. Okay. And is there a portal connected with that bank
23 account?

24 A. Yes, sir, it is.

25 Q. What is a portal, first of all, if you know?

1 A. It's an app. We use an app.

2 Q. Okay.

3 A. Okay. And that app, in order to get in it, you have to
4 authenticate a code. So I have a code. She has a code. We
5 don't use the same code to go in. So once you go in and open
6 it up, everything you have with USAA is at your disposal --
7 USAA.

8 Q. Now, when you go in that portal on that app, do you --
9 what are the different reasons that you can go into that
10 account?

11 A. We had life insurance, we had car insurance, we have
12 personal accounts, we have credit cards, personal loans, all
13 accessible through that app.

14 Q. So if you look at documentation concerning that particular
15 account with USAA and it shows that you've gone and opened up
16 that portal, do you -- once you have looked into that
17 account -- to check for money?

18 A. No, sir.

19 Q. Now, I believe the Government introduced an exhibit which
20 showed that, back around the time when you applied for the
21 loan, that you had, like, \$50 in that account. Is that all
22 the money that you and your wife had, \$50?

23 A. No, sir.

24 Q. Can you tell the jury what, if any, other moneys you had
25 at that time?

TRACY WADE - DIRECT

25

1 A. I think at the time in the savings account we had over
2 \$30,000 in our savings account, and in my business account I
3 think I had almost 40,000. I'm not sure on an exact amount
4 but we had money accessible to us.

5 Q. Did you go into that bank account around the time when
6 you -- right after you had applied for the loan?

7 A. Probably did, yes.

8 Q. Okay. Were you going in anxiously waiting on this money?

9 A. No, sir.

10 (Phone rang.)

11 THE COURT: I used to have a rule that if lawyers had
12 a phone in the courtroom and it went off that they would have
13 to pay a fine. So I guess I'm going to have to assess myself
14 with a small fine to my favorite charity.

15 BY MR. MCCRAY:

16 Q. Now, Mr. Wade, back around 2020 and 2019, did you and your
17 wife own any real estate?

18 A. Yes, sir.

19 Q. Let's start with 2019. Can you tell the members of the
20 jury what, if any, properties you owned?

21 A. If I'm correct, the home in Coral Springs we owned in
22 2019.

23 Q. Okay. Is that where you live now?

24 A. No. This is another home we live in now in Coral Springs.

25 Q. Okay. Can you tell us what, if anything, happened

1 regarding the 2019 Coral Springs property?

2 A. We ended up selling it.

3 Q. When did you sell that property in relation to the PPP
4 loan?

5 A. Probably around 2020, somewhere up in there.

6 Q. Okay. And when you sold that property, did you acquire
7 any other property?

8 A. At the same time we had the property in Coral Springs we
9 also owned a property in Port St. Lucie where we lived prior.

10 Q. So you owned that property?

11 A. Yes, sir. Yes.

12 Q. Are you able to give the members of the jury an estimate
13 of your net worth back around 2019, 2020?

14 A. My net worth of everything?

15 Q. Yes, meaning your properties, equity --

16 A. Almost \$2 million.

17 Q. And that was around the time when you all were applying
18 for the loans?

19 A. Yes. Yes, sir.

20 Q. Now, were there other persons on that bank account -- the
21 USAA bank account with you?

22 A. My wife had -- was on the account. All of the children
23 were on the USAA bank account also. So, like, when you open
24 the portal, you can see everybody that's associated with you
25 and their accounts, everything that's there. For example, my

1 wife's son, she would monitor his account, you know, just to
2 ensure everything was okay with him and his account. That was
3 one of the reasons why we went in there -- she went in there.

4 Q. Does your wife go in that account frequently?

5 A. Absolutely, yes.

6 Q. Did you ever receive a loan with respect to the PPP
7 application?

8 A. Yes, sir.

9 Q. When you applied for the loan, can you tell the jury
10 actually what it is you did to actually apply? Was there a
11 computer involved?

12 A. Yes, sir, it was.

13 Q. Can you tell us about that?

14 A. I used my computer from my office, I used the computer
15 from my home. I used my phone apps. I used my wife's tablet.
16 I used her laptop. I used the computer.

17 Q. Did there come a time when you -- let's talk about your
18 loan first, where you had to DocuSign.

19 A. Yes, sir.

20 Q. And when went -- when you DocuSigned, what device was that
21 on?

22 A. I believe my computer from my office.

23 Q. Okay. And when you did that, tell us what you could
24 actually see on the screen.

25 A. Well, you get an email for a DocuSign. You click on the

1 link and it takes you to the portal. When it pops up, it is
2 instructing you about if you have not used that computer
3 before, then it tells you to adopt a signature. If you have
4 used that computer before, then your signature is already
5 there, and all you're doing is just initialling the
6 statements. You're not seeing any application. You're not
7 seeing any numbers. All you're doing is just initialling,
8 initialling, initialling. That's it.

9 Q. Did you see a PPP application when you went into the
10 computer to DocuSign?

11 A. No, sir.

12 Q. Did you see a Schedule C?

13 A. No, sir.

14 Q. Could you have seen it and just deliberately ignored it?

15 A. No, sir.

16 Q. What about -- I said "it." Let's talk first about the PPP
17 application.

18 Could you have seen it and just simply ignored it?

19 A. No, sir.

20 Q. What about with respect to the Schedule C?

21 A. No, sir.

22 Q. Were you ever told by Haydee Rivero or her husband that
23 they would have to put in false numbers in the PPP
24 application?

25 A. There was never a discussion of any fraudulent activity

1 being authorized or approved.

2 Q. Did they ever even mention a Schedule C to you?

3 A. No, sir.

4 Q. You spoke with them regarding your wife, you say, I
5 believe?

6 A. Yes, sir.

7 Q. With respect to your wife's application, did they ever
8 tell you that they would have to use fraudulent information in
9 the application?

10 A. No, sir.

11 Q. Did they ever tell you that they would have to use
12 fraudulent information in the Schedule C?

13 A. No, sir.

14 Q. Now, your wife's business -- you know pretty much what
15 kind of business she's doing financially. Is that a fair
16 statement?

17 A. Yes, sir.

18 Q. If you had been told by her, meaning -- husband or wife,
19 Eduardo or his wife, that they were going to put a figure of
20 say \$113,000 for 1 Step, would you have known that that was
21 false?

22 A. Absolutely.

23 Q. Did you ever see a document that reflected that 1 Step,
24 the beauty salon, had receipts of 100-plus-thousand dollars
25 for the taxable year, I believe, 2021?

TRACY WADE - DIRECT

30

1 A. Did I --

2 Q. Years, yes.

3 A. Before this proceeding?

4 Q. Yes, before this case.

5 A. Oh, no. No, sir.

6 Q. When was the first time that you saw a fraudulent

7 Schedule C?

8 A. I don't know if it was a fraudulent Schedule C, but I saw
9 the fraudulent documents the night before my wife was taken in
10 by the Broward County Sheriff's Office.

11 Q. When you learned about this, how did you feel?

12 A. I was puzzled initially, angry initially. Then I called
13 Eduardo immediately.

14 Q. Did you speak to him?

15 A. Yes, I did.

16 Q. And what was said?

17 A. I questioned that because initially when I was looking at
18 the documents online and I -- I was initially looking because
19 the document was unfamiliar to me. So I'm trying to
20 understand what it is because initially when my wife was under
21 investigation with the sheriff's office, we didn't know why,
22 and then certain other deputies started calling saying this is
23 what it has to be for.

24 So someone gave me the site, and I went and we pulled
25 it up, and I was looking for her EIN number, and I kept trying

TRACY WADE - DIRECT

31

1 to understand why her EIN number was not on the document.

2 Q. Why did you think it should have been on the document?

3 A. Because it was supposed to have been for her business

4 1 Step A-Head.

5 Q. Had you provided that to either Mr. Rivero or Mrs. Rivero?

6 A. I provided that to Eduardo Rivero with her EIN number.

7 Q. That was when you sent that email?

8 A. Yes.

9 Q. Go ahead. When you were looking -- go ahead.

10 A. So as we were looking at it and we're trying to go, then I
11 see her Social Security number on here and I say, "Wait a
12 minute. She put this loan in your personal name because you
13 your name is here." It says "Carolyn Wade" and it has her
14 Social Security number.

15 And I used some profanity and then I immediately
16 called on the phone. So when I called on the phone,
17 Eduardo -- he tried to fast-talk me. And he was, like, "No,
18 no, no, no, no, nothing's wrong, nothing's illegal." Then
19 Haydee gets on the phone and says, "Hey, I didn't do anything
20 wrong. Your wife's only in trouble because BSO is trying to
21 make a statement against all the deputies. I did everyone
22 else's PPP loan correct and no one else is having a problem."

23 So I said -- I questioned her on certain things in
24 the application and she said, "Oh, just tell them it's a
25 typo." I said, "Typo my" -- and I hung up the phone.

TRACY WADE - DIRECT

32

1 Q. Now, were you arrested around the time when your wife was
2 arrested?

3 A. No, sir.

4 Q. At the time in which your wife was arrested, were you
5 aware that your application and Schedule C had been falsified?

6 A. Yes, sir.

7 Q. You were aware the night your wife got arrested?

8 A. No, not that night, but eventually down the road, after I
9 started doing an investigation of the facts, then I looked at
10 it and I was, like, "Ah, wow. They did mine the same way."

11 Q. Okay. And eventually the Government --

12 A. Yes.

13 Q. -- caused your arrest?

14 A. Yes, sir.

15 Q. Now, with respect to Wade Funeral Home, did you have
16 employees back around the time that you applied for the PPP
17 loan?

18 A. Well, I called them based on how my CPA says they're
19 considered to be workers or laborers --

20 Q. Okay.

21 A. -- but yeah, the same thing.

22 Q. Did you pay taxes on them?

23 A. No, sir.

24 Q. Why didn't you?

25 A. Because I did 1099s.

TRACY WADE - DIRECT

33

1 Q. Okay. What's a 1099, if you remember?

2 A. The 1099s are for people -- businesses use the 1099s for
3 what -- consider them as vendors, if I'm correct, if you're
4 not withholding taxes from people that work for your business.

5 Q. Okay. So is that why you didn't list that you had -- that
6 you were -- excuse me.

7 Okay. So why did you file a 1099 as opposed to not
8 taking taxes out -- as opposed to taking taxes out? I'm
9 sorry.

10 A. It's just based on the way it was explained to me by my
11 CPA. That was the way we need to do it if we weren't going to
12 be withholding taxes.

13 Q. Okay. I beg the Court's indulgence.

14 Now, Mr. Wade, did you ever enter into some type of
15 agreement with the Riveros to defraud the Government?

16 A. No, sir.

17 Q. Did you ever authorize them to file these fraudulent
18 documents?

19 A. No, sir.

20 MR. MCCRAY: I beg the Court's indulgence.

21 THE COURT: Ladies and gentlemen, there's a brief
22 matter that I had scheduled at 11:00, so I'm going to take
23 that matter up now so that you all can get these issues
24 resolved, and this will be in conjunction with your break. So
25 we should be back and ready to proceed in about 20 minutes.

TRACY WADE - DIRECT

34

1 Thank you.

2 (Jury exited at 10:49 AM.)

3 * * * * *

4 (Jury entered at 1:34 PM.)

5 THE COURT: Be seated, ladies and gentlemen.

6 You may continue.

7 MR. MCCRAY: May I approach the witness, Judge?

8 THE COURT: Yes, sir.

9 BY MR. MCCRAY:

10 Q. I'm going to show you what's been marked as Defense
11 Exhibit 100 for identification purposes. Take a look at that
12 and see if you recognize it.

13 A. Yes, sir, I recognize it.

14 Q. Okay. What is that?

15 A. One of our bank accounts from USAA savings. This is our
16 USAA savings account.

17 Q. Okay. Does that accurately represent moneys you had in
18 the bank at the time that's reflected on the document?

19 A. Yes, sir.

20 MR. MCCRAY: Judge, I would like to move 100, Defense
21 100.

22 MR. SNIDER: No objection.

23 THE COURT: Received as marked.

24 (Defense Exhibit 100 was received in evidence.)

25 BY MR. MCCRAY:

TRACY WADE - DIRECT

35

1 Q. I'm going to show you, sir, what's been marked as
2 Defense 101. Would you please tell me what this is?

3 A. USAA savings account that we have -- or that we had.

4 Q. What is that? Well, you answered that.

5 Does that fairly and accurately represent the moneys
6 you had in the bank at the time reflected on the document?

7 A. Yes, sir.

8 Q. I want to show you what's been marked as Defendant's
9 Exhibit Number 102. Take a look at that and see if you
10 recognize it.

11 A. Yes, sir, I recognize that.

12 Q. What is that?

13 A. USAA savings account.

14 Q. Okay. Does that fairly and accurately represent the
15 amount of money that you had in the bank on the date reflected
16 on the document?

17 A. Yes, sir.

18 Q. Last, I'm going to show you what's been marked as
19 Defendant's 103. Do you recognize that document?

20 A. Yes, sir.

21 Q. What is it?

22 A. The same account, a USAA account that we have with
23 savings.

24 Q. Does that fairly and accurately represent the money you
25 had in the bank on that particular date reflected on that

TRACY WADE - DIRECT

36

1 document?

2 A. Yes, sir.

3 MR. MCCRAY: Judge, I'd like to move 101, 102, and
4 103 also.

5 THE COURT: I just lost you -- you offered 101, 102,
6 and 103?

7 MR. MCCRAY: Yes, sir. We offered. And 100 was
8 accepted.

9 THE COURT: Yes.

10 MR. MCCRAY: The others were not offered.

11 MR. SNIDER: No objection.

12 THE COURT: Received as marked.

13 (Defense Exhibits 101, 102, 103 were received in
14 evidence.)

15 MR. MCCRAY: Judge, may I publish?

16 THE COURT: Yes, sir.

17 BY MR. MCCRAY:

18 Q. Let's start with 100 -- I'll start with 101, since it's
19 on. Looking at Exhibit 101, what's the beginning balance
20 there?

21 A. \$35,404.55.

22 Q. And what is the date -- what's the beginning balance date?

23 A. I can't see it.

24 Q. Right here? Oh, I'm sorry. Okay. Can you see that?

25 A. Yes, the beginning balance is 0501.

TRACY WADE - DIRECT

37

1 Q. Okay. What's the balance on -- what's the beginning
2 balance amount?

3 A. \$35,404.55.

4 Q. Okay. So this is May 1st?

5 A. Yes.

6 Q. What year was that?

7 A. You have to slide it down for me, please.

8 Q. Oh, I'm sorry.

9 A. 2021.

10 Q. Now let's go to 100. What's the statement period
11 reflected on Exhibit 100?

12 A. It would be April 1st, 2021, to April 30, 2021.

13 Q. Okay. What is the beginning balance on Exhibit 100?

14 A. \$36,403.67.

15 Q. I'm going to show you Defense Exhibit 102. What's the
16 statement period reflected on this document?

17 A. June 1st, 2021, to June 30, 2021.

18 Q. I beg the Court's indulgence.

19 I'm now going to show you what's been admitted as
20 Defense 103. Can you please tell us the statement period for
21 103?

22 A. July 1, 2021, and it goes to July 31, 2021.

23 Q. Now, in the year 2021, actually August 2021, did you and
24 your wife sell any property?

25 A. That may have been our second property, I think, in Port

TRACY WADE - DIRECT

38

1 St. Lucie -- the one in Port St. Lucie.

2 Q. How much did you receive from the sale of the property?

3 A. Wow. I think we -- we profited well over a hundred
4 thousand from the property.

5 MR. MCCRAY: Okay, Judge -- Judge, may I please
6 approach? I'm going to show you what's been marked Defense
7 Exhibit 106.

8 THE COURT: 106 for identification?

9 MR. MCCRAY: Yes.

10 THE WITNESS: Yes.

11 BY MR. MCCRAY:

12 Q. Okay. Do you recognize that?

13 A. I want to say this is part of the closing documents or the
14 sale documents.

15 Q. Okay. For which transaction?

16 A. For the property that was sold at 599 Southeast Crosspoint
17 Drive, Port St. Lucie, Florida. 34983 is the ZIP Code.

18 Q. Does this document fairly and accurately represent the
19 proceeds of that transaction?

20 A. Yes, sir, it does.

21 MR. MCCRAY: Judge, I move 106, please.

22 THE COURT: 106 for identification is offered.

23 MR. SNIDER: There's no objection. I would just like
24 a copy.

25 THE COURT: Received as marked.

1 (Defense Exhibit 106 was received in evidence.)

2 MR. MCCRAY: May I publish, sir? Thank you.

3 BY MR. MCCRAY:

4 Q. Okay. The settlement date of the transaction was what
5 date?

6 A. 8/20/2021.

7 Q. Okay. And what date were the proceeds disbursed?

8 A. 8/20/2021.

9 Q. And when was the PPP proceeds received?

10 A. That, I'm not sure. You would have to look at a statement
11 or a document to answer that.

12 Q. Do you remember what month it was?

13 A. Actually, no, I don't. I would have to see it.

14 Q. Was it before this date? If you don't know, you don't
15 know.

16 A. I don't know. I can't accurately answer that.

17 Q. All right. So down at the bottom -- let's go to page 2
18 because page 1 is 603 -- Section 603 is cut off. So let's go
19 to the bottom. Cash to seller, on the second -- well,
20 actually, it's the same.

21 What amount of money was received by the sellers
22 here?

23 A. How much did we receive?

24 Q. Yes.

25 A. It was like \$140,000 plus.

TRACY WADE - DIRECT

40

1 Q. Okay. And that was money to you and Mrs. Wade?

2 A. Yes, sir.

3 MR. MCCRAY: May I approach please, Judge?

4 THE COURT: Yes, sir.

5 BY MR. MCCRAY:

6 Q. I'm going to show you what's been marked as Defendants'
7 Exhibit 104 for identification purposes. Can you please tell
8 us what that is?

9 A. My business bank account that I had at SunTrust.

10 Q. Okay. Does this -- you say your business bank account.
11 Is that a statement?

12 A. Yes, it is.

13 Q. Okay. Does that statement fairly and accurately represent
14 the funds that you had in the account on the date reflected on
15 the document?

16 A. Yes, sir.

17 MR. MCCRAY: Okay, Judge, I would like to admit
18 Defendants' 104.

19 THE COURT: Any objection?

20 MR. SNIDER: No, no objection.

21 THE COURT: Received as marked.

22 (Defense Exhibit 104 was received in evidence.)

23 BY MR. MCCRAY:

24 Q. Mr. Wade, let me show you what's been marked as
25 Defendants' 105 for identification purposes. Can you please

TRACY WADE - DIRECT

41

1 identify what that is?

2 A. That is also another bank statement from SunTrust.

3 Q. And does that statement accurately reflect the proceeds
4 that you had in the bank on the date of the statement?

5 A. Yes, sir.

6 MR. MCCRAY: Okay. Judge, I would like to admit 105,
7 Defense 105.

8 MR. SNIDER: No objection.

9 THE COURT: Received.

10 (Defense Exhibit 105 was received in evidence.)

11 MR. MCCRAY: I would like to publish too, Judge.

12 THE COURT: Yes, sir.

13 BY MR. MCCRAY:

14 Q. Okay. We're looking at 104, Mr. Wade. Can you please
15 tell us the date of this SunTrust document?

16 A. It would be June 1st to the -- June 1st, 2021, to June 30,
17 2021.

18 Q. And does it reflect how much money you had in that
19 account -- a beginning balance?

20 A. Yes, sir, it does.

21 Q. Can you please tell us what it says?

22 A. \$39,755.82.

23 Q. Okay. And does it indicate the average balance?

24 A. Yes, sir, it does.

25 Q. And what does it say?

TRACY WADE - DIRECT

42

1 A. \$51,345.91.

2 Q. Does it indicate the average collected balance?

3 A. Yes, sir, it does.

4 Q. And how much is that?

5 A. \$49,940.81.

6 Q. I'm now going to publish Defendants' 105. Can you please
7 tell the members of the jury the statement period for this
8 document?

9 A. May 26 -- on the top, but it's saying until May 31, 2021,
10 I guess, is the ending date of the statement.

11 Q. Okay. Will you please look where it says "balance
12 activity history"? And I'm going to move it up right here.

13 A. Yes, sir.

14 Q. What date is that?

15 A. May -- May 1st.

16 Q. Okay. And what was the balance on May 1st?

17 A. \$49,569.74.

18 Q. Okay. Let's go to May 28th. What was the balance then?

19 A. \$39,755.82.

20 Q. And this Exhibit 105, this is the bank account for whom or
21 which entity?

22 A. For Wade Funeral Home.

23 Q. I'm going to show you Government's 1000, composite,
24 page 49. Do you recognize this?

25 A. Yes, sir.

TRACY WADE - DIRECT

43

1 Q. And what is this?

2 A. It's a check that Carolyn Wade wrote out to herself.

3 Q. For how much?

4 A. \$500.

5 Q. And what does it say here?

6 A. It says "salary."

7 Q. Okay. I'm going to come back to that.

8 What about -- let's go to Government's 1000,
9 composite, page 50. What does this document show?

10 A. That's the check that Carolyn Wade wrote out to myself for
11 \$1,000 and it says "salary."

12 Q. Now, you received this from her?

13 A. The check?

14 Q. Yes, the check.

15 A. Yes, sir, I did receive the check.

16 Q. Can you tell us what the check was actually for?

17 A. Okay. So because USAA is not a local bank. It's a bank
18 that's stationed in Texas. There's no local branches. You
19 can't walk in. You can't go in and make a withdrawal. You
20 can't take money out. If you go to an ATM, it's possibly fees
21 that you incur. However, it's not uncommon for me -- families
22 that come in and they pay for funeral arrangements with cash.
23 I do not deposit all the cash in.

24 So it's nothing for me to have at a time 25- to
25 \$3,000 of what we call petty cash to do miscellaneous things.

TRACY WADE - DIRECT

44

1 So -- and this particular check right here, she wrote me the
2 check, and maybe she should have been more clearer and put
3 "Carolyn's salary," but the check wasn't to me. I gave her
4 the thousand dollars of cash and she wrote the check out to
5 me.

6 After she wrote the check out to me, then I will take
7 it and put it in my business account because it's business
8 cash that I gave her.

9 Q. When you say business account, which account?

10 A. Wade Funeral Home.

11 Q. What bank account did Wade Funeral Home use?

12 A. SunTrust at the time.

13 Q. Okay. Let's look at 50 of Government's 1000. Look at the
14 second document on that page. What does this show?

15 A. You have to push it up for me.

16 Q. I'm sorry. What does this document show?

17 A. It shows the endorsement of it being deposited in Wade
18 Funeral Home's business account.

19 Q. And why did you deposit it there?

20 A. Because I had given her cash that belonged to Wade Funeral
21 Home.

22 Q. Now, \$500 -- let's go back to page 49 of Government's
23 1000. What is this?

24 A. A check that Carolyn Wade wrote to herself, Carolyn Wade.

25 Q. And did Carolyn Wade typically write a check to herself

1 for salary?

2 A. She could, yes.

3 Q. And the PPP loan had been received at this time?

4 A. I would have to look at the date of reception. Yes. I
5 would say looking at the endorsement of the check, I would say
6 yes.

7 Q. And this says, "SunTrust, for deposit only"?

8 A. Yes.

9 Q. Which SunTrust account?

10 A. That was deposited in Carolyn Wade's 1 Step A-Head
11 SunTrust account.

12 Q. Okay. Let's go to page 52 of Government's 1000,
13 composite. What is this, the top document?

14 A. That's a check that I wrote to Wade Funeral Home.

15 Q. And for how much?

16 A. I want to say \$3,889.

17 Q. And what was the purpose?

18 A. As it says in the memo section, payroll.

19 Q. Okay. And tell us who were you paying.

20 A. Vendors, laborers, whoever worked to do multiple things at
21 that given time. I don't know offhand exactly what was done,
22 but yes.

23 Q. What kind of workers did you have at Wade Funeral Home?

24 What kind of workers did you utilize?

25 A. I utilized laborers. I utilized for funeral services to

TRACY WADE - DIRECT

46

1 help me in the prep room, to help around the funeral home --
2 secretarial, administrative work, lawn services, car
3 maintenance, car cleaning. It's a variety of things.

4 Q. When you say prep work, what do you mean with that?

5 A. I can't -- for example, if I go into the back and I have
6 to prepare remains, I would need someone to assist me with it,
7 sometimes two people.

8 Q. Okay. All right. So this check reflected payroll?

9 A. Yes.

10 Q. Okay. The same thing for page 53 of Government's 1000,
11 Carolyn Wade to Carolyn Wade, for salary?

12 A. Yes.

13 Q. The same thing for page 54, Government's 1000?

14 A. Yes, sir.

15 Q. Okay. What about Tracy Wade here where it says -- this is
16 page 55 of Government's 1000.

17 A. Yes, sir, the same as before.

18 Q. Okay. This is for salary?

19 A. Yes, sir.

20 Q. And where was this deposited?

21 A. In my SunTrust business account.

22 Q. Okay. Was this for your salary or was this for her
23 salary?

24 A. No, it was for her salary. She was paying herself.

25 Q. Okay. And just so we can be clear, explain again as it

1 relates to this check dated 6/17/21. What was the purpose of
2 this check being given in your name?

3 A. Well, basically -- she couldn't write it in her name
4 because I can't put her checks into my business account. It
5 has to be written out to me or written out to the funeral
6 home.

7 Again, I have cash that is on hand. She wanted to
8 get money out, I guess, for whatever -- supplies or whatever
9 she needed to do -- or pay storage. And I said, "Hey, take
10 the money and I'll just go ahead and write me a check and put
11 it in the account."

12 Q. Okay. Now, you mentioned storage concerning Mrs. Wade.
13 Can you talk about a storage concerning her business?

14 A. She had, like, two mini storages with her supplies in it
15 from --

16 Q. You said "too many"?

17 A. Two, like, mini storages where she had a lot of her
18 supplies and overflow of chemicals and whatever else she had
19 in there --

20 Q. Okay.

21 A. -- for the business.

22 Q. So she would rent out storage space?

23 A. Well, she had to because at some point in time we didn't
24 have our house.

25 Q. Now, let me just go back.

1 When you made application for this PPP loan
2 application for yourself, had you any inkling of an idea that
3 Haydee Granados was going to input false information?

4 A. No, sir.

5 Q. Did you learn after the application was made but before
6 any arrest in this case that any false information had been
7 included in any of the PPP documentation?

8 A. Repeat that for me one more time.

9 Q. We know you said that you learned about this for the first
10 time shortly after your wife was arrested.

11 A. Right.

12 Q. But before then, did you become aware that Ms. Haydee
13 Granados and/or her husband had inputted false, fraudulent
14 information into your document?

15 A. I had no idea any fraudulent activity had taken place.

16 Q. Now, I believe you testified that you filed a proper
17 Schedule C in 2019; is that correct?

18 A. No, I've never filed a Schedule C.

19 Q. I'm sorry, the 1120, I believe it is.

20 A. Right, right.

21 Q. Okay. And were you aware if whether or not the IRS had
22 the capacity to pick up on individuals filing dual competing
23 applications?

24 A. Yes.

25 Q. How were you aware of that?

TRACY WADE - DIRECT

49

1 A. I've -- I've known other people that file -- file, for
2 example -- as I heard prior testimony, if someone that claims
3 a child and someone else tries to file taxes and claims that
4 same child, it is caught immediately. So the IRS picks up on
5 that right then.

6 Q. You've indicated that you knew nothing about this -- what
7 Haydee had done. Would you have agreed to this if you had
8 known that she was going to input some fraudulent information?

9 A. Mr. McCray, I have 31 years of law enforcement. Spotless.
10 I created a business that's professional. I served the
11 community. I'm a fair person. I have a family that depends
12 on me. Your answer to that would be absolutely not.

13 Q. Well, in this case there were two loans; right?

14 A. Yes, sir.

15 Q. \$20,833?

16 A. Yes, sir.

17 Q. Times two?

18 A. Yes, sir.

19 Q. We're talking just over \$40,000, am I correct?

20 A. Yes, sir.

21 Q. Would you have risked your career and reputation for that
22 amount of money or any substantially greater amount of money?

23 A. No, sir.

24 Q. Were you ever pushing Haydee or her husband to hurry up
25 and get this money for you?

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50

1 A. No, sir.

2 Q. Did you know an individual by the name of Jamil Hunter?

3 A. Never. Never heard of him until this case.

4 Q. Now, did you seek a forgiveness in connection with either
5 one or both of those PPP loans that you actually received?

6 A. I wouldn't say I seeked (phonetic) the forgiveness. I
7 think that was, like, an automatic part of the process.

8 Q. So you didn't --

9 A. It automatically comes up as a part of the process at the
10 end.

11 Q. Okay. Any of the documentation that was submitted in
12 connection with getting a forgiveness loan, were you aware of
13 any fraudulent information that had been included in that
14 document?

15 A. No, because you never see an application and you never see
16 a Schedule C.

17 MR. MCCRAY: I beg the Court's indulgence.

18 Judge, by stipulation we're admitting Defendants'
19 Exhibit 107 into evidence.

20 THE COURT: 107 for identification is received.

21 (Defense Exhibit 107 was received in evidence.)

22 THE COURT: Can you generally tell me what it is?

23 MR. MCCRAY: Yes, Judge. It's a 20191120-S tax
24 return for an S-corporation, Wade Funeral Home LLC.

25 THE COURT: All right.

1 MR. MCCRAY: Judge, can I just approach so we can
2 take a look at it first?

3 THE COURT: Sure.

4 BY MR. MCCRAY:

5 Q. I'm going to show you what has been admitted into evidence
6 as Defense 107. Do you recognize this?

7 A. Yes, sir.

8 Q. What is that?

9 A. My tax documents for Wade Funeral Home, 2019.

10 Q. Okay. I'm going to publish it and then question you.

11 Okay. I'm now publishing Defendants' Exhibit 107.

12 What's this front page of 107? Do you have it on your screen?

13 A. Yes, sir.

14 Q. What's that front page there?

15 A. That's just a cover sheet that my accountant puts on it --
16 I guess Perez accountant -- and it just tells me what's
17 enclosed after the cover sheet.

18 Q. Okay. Just for clarity purposes, Perez Accounting, is
19 that person related to this other person who was here, the
20 witness who testified a short while ago, Mr. Perez?

21 A. Not at all.

22 Q. Did you know him?

23 A. Never seen him a day in my life.

24 Q. Except for this case?

25 A. Except for this case.

TRACY WADE - DIRECT

52

1 Q. And the first time was when? Last week?

2 A. When he came the first time that he was subpoenaed.

3 Q. Okay. I'm going to turn over.

4 Now, what is this, sir?

5 A. I guess that would be a breakdown of information.

6 Initially, it says, type or print, Wade Funeral Home address,
7 the EIN number, date incorporated. It gives a breakdown of
8 the gross receipts and sales and et cetera.

9 Q. Does this indicate your gross receipts or sales?

10 A. Returns and allowances -- yes, it does.

11 Q. I'm still making reference to Defense 107.

12 How much does it say your funeral home made that
13 year?

14 A. 345,000.

15 Q. Did you ever ask, advise, agree that Haydee Granados
16 include an amount about -- between 100 and 115,000 on your
17 Schedule C filed in connection with this PPP loan?

18 A. No, sir, because I never knew what a Schedule C was.

19 Q. You don't file Schedule Cs?

20 A. I don't file Schedule Cs.

21 Q. So actually, you made more than what you later learned she
22 had included on the Schedule C?

23 A. Yes.

24 Q. And this 107 has not been questioned or challenged by the
25 Department of the Treasury or IRS; am I correct?

1 A. Not at all.

2 Q. Mr. Wade, when you applied for this loan, did you have any
3 questions about the integrity of the process?

4 A. No, sir.

5 Q. Why didn't you?

6 A. Because I trusted Eduardo Rivero based on our past
7 history, things that we've done. There was nothing that
8 alarmed me, nothing suspicious about it because everything
9 that he asked me to give him was legitimate documents.

10 MR. MCCRAY: Okay. Your Honor, I tender the witness.

11 MR. SNIDER: May we please have the HDMI connection
12 on the podium?

13 CROSS-EXAMINATION

14 BY MR. SNIDER:

15 Q. Good afternoon, Mr. Wade.

16 A. Good afternoon, Mr. Snider.

17 Q. You and I have never spoken outside of this courtroom;
18 correct?

19 A. Briefly.

20 Q. Do you remember speaking to me?

21 A. Yeah, I held the door for you. You said, "Thank you,"
22 things of that nature.

23 Q. That's true.

24 Have we ever discussed this case outside this
25 courtroom?

1 A. No, sir.

2 Q. Any discussion that I've had about this case as it
3 pertains to you has been through your attorneys; correct?

4 A. Yes, sir.

5 Q. And you and I have never formally met face-to-face --
6 correct? -- other than holding the door for me and other just
7 human interaction and pleasantries. We've never sat down
8 face-to-face; correct?

9 A. No, sir.

10 Q. So, Mr. Wade, let's go over sort of a few preliminary
11 things here.

12 You have never had a business named Tracy Wade;
13 correct?

14 A. No, sir.

15 Q. And as far as you know, there is no business doing
16 business as Tracy Wade; correct?

17 A. There should not be.

18 Q. Certainly not one that you're aware of; right?

19 A. Yes, sir.

20 Q. And there is no business named Tracy Wade that was
21 established, to your knowledge, in 2019?

22 A. No, sir.

23 Q. And you don't live at 315 West Pembroke Road in
24 Hallandale; correct?

25 A. That's not my residence, no.

1 Q. That's the residence of your funeral home?

2 A. Yes, it is.

3 Q. So that's not the residence of any business named Tracy
4 Wade; correct?

5 A. No, sir.

6 Q. Your funeral home is a Florida limited liability company;
7 is that correct?

8 A. Yes, sir.

9 Q. It is not a sole proprietorship; correct?

10 A. Okay.

11 Q. Is that right?

12 A. Yes, sir.

13 Q. And as you just went over with Mr. McCray, Wade Funeral
14 Home files business tax returns; correct?

15 A. Yes, sir.

16 Q. The income that is reported to the Internal Revenue
17 Service for Wade Funeral Home is not filed on your individual
18 tax return; correct?

19 A. No, sir.

20 Q. It is filed on an 1120-S form; right?

21 A. Yes, sir.

22 Q. Do you have a Social Security number?

23 A. Yes, I do.

24 Q. And I'll just say the last four digits. It ends in 4088;
25 correct?

1 A. Yes, it does.

2 Q. And you also have an EIN for the Wade Funeral Home;
3 correct?

4 A. Yes, I do.

5 Q. But that's a different number?

6 A. Yes, it is.

7 Q. You testified that you received a \$20,833 loan from the
8 Paycheck Protection Program; correct?

9 A. Yes, sir.

10 Q. And that went into a USAA bank account that is in your
11 name and your wife's name; correct?

12 A. Yes, sir.

13 Q. So the PPP loan for the business Tracy Wade did not go to
14 the bank account for Wade Funeral Home; correct?

15 A. Correct.

16 Q. And because there is no business named Tracy Wade, no
17 business that you're aware of named Tracy Wade made \$112,430
18 in 2019 or any other year; correct?

19 A. Repeat that question again.

20 Q. Sure.

21 Because there is no business named Tracy Wade that
22 you're aware of, you're not aware of any business named Tracy
23 Wade making \$112,430 ever?

24 A. No, sir.

25 Q. I've just connected to the HDMI and you should see on your

1 screen three exhibits that are in evidence in this case.

2 Those are Government's Exhibit 157 on the left side of your
3 screen, 158 on the right side of your screen, and 159 in the
4 center of the screen. Do you see that on the screen in front
5 of you, Mr. Wade?

6 A. Yes, I do.

7 Q. And you know what these documents are; correct?

8 A. I've learned what these documents are.

9 Q. You've learned. So let's go over what you've learned.

10 Let's start with 157, and I'm going to enlarge for
11 you the top portion here. Now, you just testified that
12 there's no business named Tracy Wade, no business has that
13 business legal name; correct?

14 A. There's no legal business named Tracy Wade.

15 Q. So where it says here "business legal name Tracy Wade,"
16 that's false; right?

17 A. That's false.

18 Q. And the top section where it says "sole proprietor," you
19 don't have a sole proprietorship named Tracy Wade; correct?

20 A. No, sir.

21 Q. So that's false; correct?

22 A. Correct.

23 Q. And the business address that we just went over, 315 West
24 Pembroke Road, that's not for a business named Tracy Wade;
25 correct?

1 A. No, sir.

2 Q. So that's false? Yes?

3 A. Yes.

4 Q. And the total amount of gross income from an IRS
5 Schedule C -- from 1040 Schedule C, line 7, showing \$112,430
6 in this document that's in front of you, Government 157,
7 that's false; right?

8 A. Absolutely.

9 Q. No dispute about that.

10 You've testified that the d/b/a Tracy Wade, that's
11 false; correct?

12 A. Yes, sir.

13 Q. And the year of establishment, that's false?

14 A. Yes, sir.

15 Q. The business TIN, that's not a business TIN, to your
16 knowledge. That's a Social Security number; correct?

17 A. Yes, yes.

18 Q. That's your social.

19 So that's your social. That's not a social for
20 business with the legal name Tracy Wade?

21 A. That's my personal Social Security number.

22 Q. Okay. And that's your phone number; correct?

23 A. Yes, it is.

24 Q. All right. And that's your email address?

25 A. My personal email.

1 Q. Your personal email address, your personal cell phone
2 ending in 1512; correct?

3 A. Yes, it is.

4 Q. So that's not for -- you said personal. That's not for
5 business; correct?

6 A. For business.

7 Q. So where it says business phone, that's false. Do you
8 agree with that?

9 A. Yes, sir.

10 Q. Now, I've just noted eight pieces of information on the
11 front page of Government's Exhibit 157 that's false. Would
12 you agree with that?

13 A. Yes, sir.

14 Q. Let's take a look at Government 158. Let me make it a
15 little bit larger. I'm going to enlarge the same section. Do
16 you see Government 158 enlarged?

17 A. Yes, sir.

18 Q. By the way, what does it say at the top there, the very
19 top?

20 A. It says, "DocuSign envelope ID."

21 Q. Correct.

22 There's a DocuSign envelope ID. And just for the
23 record, that ends in 596E; correct?

24 A. Okay.

25 Q. And what's below that?

1 A. There's a symbol.

2 Q. A symbol, okay.

3 Do you see any words to the right of the symbol in
4 the center of the application?

5 A. To the right of it it says, "Paycheck Protection Program."

6 Q. Yeah.

7 And what does it say in the line below that?

8 A. Borrower application form for Schedule C filers using
9 gross income.

10 Q. Now, would you agree that the information that is in
11 Government 158 that I've enlarged is identical to the
12 information that I just went through with you in step in 157.
13 Do you agree with that?

14 A. Yes, it is.

15 Q. So we don't need to go through it again. You would agree,
16 would you not, that the information that we just went over,
17 because it's identical, is also false in 158; correct?

18 A. Correct.

19 Q. All right. And now let's look at 159. Do you see the
20 section I've enlarged --

21 A. Yes.

22 Q. -- from Government 159?

23 And this has a DocuSign envelope ID at the top that
24 has the last four characters BBBC; is that right?

25 A. Yes, sir.

1 Q. So different envelope ID than the one we just looked at
2 from Government 158. But other than that, you would agree
3 that the information that I've enlarged here, the top portion
4 of this Paycheck Protection Program borrower application form
5 for Schedule C filers using gross income is identical to the
6 information we've just looked at in 157 and 158; right?

7 A. Yes.

8 Q. So with respect to that, it's equally false; correct?

9 A. Equally false.

10 Q. Now, you had no Schedule C that was filed with your
11 individual tax return; correct?

12 A. Correct.

13 Q. In fact, I believe you just testified when Mr. McCray was
14 asking you that question that you didn't know what a
15 Schedule C was until before this case. Is that your
16 testimony?

17 A. No. I learned about it in the prior proceeding. That's
18 what I stated.

19 Q. Okay. Fair enough.

20 That's when you first -- some other prior proceeding,
21 that's when you first learned about what a Schedule C was?

22 A. Yes, sir.

23 Q. Okay. And just so we're clear, 2018, you never filed a
24 Schedule C; correct?

25 A. For Wade Funeral Home?

1 Q. No. Just -- well --

2 A. I personally have never filed a Schedule C with my CPA
3 ever.

4 Q. Okay. So that means that for 2018, 2019, 2020, 2021,
5 Tracy Wade, the individual sitting here today, he never filed
6 a Schedule C; correct?

7 A. Correct.

8 Q. Haydee Rivero, do you know that name?

9 A. Yes, sir.

10 Q. She used to be known as Haydee Granados; correct?

11 A. Correct.

12 Q. She created a Schedule C for your PPP loan application;
13 correct?

14 A. Correct.

15 Q. And the Schedule C that Ms. Rivero created for you
16 contained information that she testified she completely made
17 up; right?

18 A. Some of it she made up.

19 Q. Some of it she made up. I guess that's fair.

20 She did put your name correct, so that part wasn't
21 false. She put your -- well, let's just look at it. Let's
22 just look at it. Publishing Government 154 in evidence. Do
23 you see that on your screen?

24 A. Yes, sir.

25 Q. This is the Schedule C that Haydee Rivero created for you;

1 right?

2 A. Yes, sir.

3 Q. And your name is correct although there is no business
4 named Tracy Wade; right?

5 A. My name is Tracy Wade, but I don't have a business named
6 Tracy Wade.

7 Q. Right.

8 So the fact that it says name of proprietor or
9 principal business or profession Tracy Wade, that's false. Do
10 you agree with that?

11 A. That's false.

12 Q. That is your Social Security number; correct?

13 A. Yes, it is.

14 Q. And the only way she had that was because you gave it to
15 her; right?

16 A. I provided it to her.

17 Q. Okay. And there's a business address there, but that's
18 not the business address for Tracy Wade. We've gone over
19 that; right?

20 A. Yes, sir.

21 Q. That's the business address for Wade Funeral Home.

22 You were shown -- I think it was maybe the last
23 exhibit by Mr. McCray -- a cover letter from Perez Accounting
24 attached to which was one of the tax returns for Wade Funeral
25 Home that Perez Accounting prepared; right?

1 A. Yes, sir.

2 Q. Perez Accounting -- am I saying it right? Is it Perez
3 Accounting?

4 A. Yes, sir.

5 Q. And your accountant there is who?

6 A. Ms. Daniela Perez.

7 Q. And she's been your longtime accountant; correct?

8 A. Yes, she has.

9 Q. Sometimes you refer to her as your CPA?

10 A. Yes.

11 Q. Do you know what CPA stands for?

12 A. Not really.

13 Q. She's a tax professional; correct?

14 A. Yeah, something of that nature. Yeah.

15 Q. She's a licensed tax professional. She has done your tax
16 returns for you individually for several years; correct?

17 A. Yes, sir.

18 Q. And she's done the tax return for Wade Funeral Home, in
19 that separate filing, since the business was formed; right?

20 A. Yes, sir.

21 Q. Which was when? Like, 2011, thereabouts?

22 A. Actually, 2010, because it was under another name, and we
23 had -- that corporation expired, and then we ended up with
24 Wade Funeral Home LLC.

25 Q. So that's like almost 14 years you've been using this

1 accountant?

2 A. Yes, sir.

3 Q. So that's someone you trust; right?

4 A. Yes, sir.

5 Q. You trust her to file your taxes and to do it correctly;
6 right?

7 A. Yes, sir.

8 Q. You didn't go to her for any questions about the PPP
9 program, the person you trust, did you?

10 A. Because clearly nothing was mentioned to me that it
11 involved taxes pertaining to my business.

12 Q. Listen to the question.

13 Did you go to Ms. Perez and ask her anything about
14 the PPP loan?

15 A. There was no need to.

16 Q. Did you go to her and say, "I need a Schedule C" -- your
17 accountant for 14 years -- and say, "Can you help me with
18 this?"

19 A. Schedule --

20 Q. The person you trust, did you go to her? Yes or no.

21 A. The Schedule C was never mentioned to me.

22 Q. It's a yes-or-no question.

23 Did you go to Ms. Perez to ask for a Schedule C?

24 A. No. There was no need to.

25 Q. And Perez Accounting is a legitimate firm; correct?

TRACY WADE - CROSS

66

1 A. Absolutely.

2 Q. Ms. Daniela Perez, she would not lie for you; right?

3 A. No.

4 Q. She would not create a fake Schedule C; correct?

5 A. No, she would not.

6 Q. And you knew that; right?

7 A. We don't do fraudulent business.

8 Q. Right.

9 Daniela Perez would not create a fake Schedule C for
10 you?

11 A. We do not operate fraudulently.

12 Q. Would Daniela Perez do a fake Schedule C for you?

13 MR. MCCRAY: Objection, Judge.

14 THE WITNESS: I wouldn't ask her --

15 THE COURT: One moment. Sustained. Ask direct
16 questions.

17 BY MR. SNIDER:

18 Q. Let's go to another topic.

19 Mr. Wade, in 2021, your cell phone service was
20 provided by Verizon Wireless; correct?

21 A. Yes, sir.

22 Q. 2021, 2022, you've been a Verizon customer for a long
23 time?

24 A. I'm not a Verizon customer right now.

25 Q. But you were in 2021?

1 A. Yes, I was.

2 Q. And your cell phone in 2021 that was provided -- service
3 for which was provided by Verizon was 786-488-1512; correct?

4 A. Correct.

5 Q. And in April, May, June, July, August of 2021, that was
6 your phone number? That never changed?

7 A. Yes, it was.

8 Q. And in April, May, June, July, August of 2021, the cell
9 phone that was assigned to that line ending in 1512 was a
10 Samsung Galaxy S21 Ultra 5G; correct?

11 A. I know it was a Samsung. I don't know all of the other
12 numbers it goes by. It was a Samsung.

13 Q. A Samsung Galaxy S21.

14 A. Okay.

15 Q. Well, you don't have to take my word for it. Let's
16 publish Government Exhibit 806.1. Do you see
17 Government 806.1?

18 A. Yes, sir, I do.

19 Q. And this is the Verizon bill that you received for the
20 billing period of April 16, 2021, and May 15, 2021; correct?

21 A. Yes, sir.

22 Q. And do you see your name on it?

23 A. Yes, sir.

24 Q. Do you see your phone number?

25 A. Yes, sir.

1 Q. And do you below that Galaxy S21 U 5G?

2 A. Okay.

3 Q. Any reason to doubt that you had a Galaxy S21 U 5G
4 assigned to phone number ending in 1512?

5 A. No, sir.

6 Q. So you accept this as true?

7 A. I accept that as true.

8 Q. Okay. Now, your cell phone service provided by Verizon
9 Wireless in 2021 in the months that I just mentioned had a
10 data plan; correct? It allowed you to use -- access the
11 Internet from your cell phone, which was then a Samsung Galaxy
12 S21; right?

13 A. Yes, sir.

14 Q. And just like most people, you use the Internet from your
15 cell phone when you're out and about; right?

16 A. Yes, sir.

17 Q. You don't need to be connected to a Wi-Fi network in order
18 to access the Internet from your cell phone because you have a
19 data plan that allows you to access the Internet on Verizon's
20 network; right?

21 A. That's not necessarily so. Sometimes, depending on where
22 you are and if you're in a place where your phone is not
23 getting good connection, you do need to use Wi-Fi.

24 Q. That's right, but listen to the question.

25 Sometimes -- I think my question was you had the

1 ability; right? You could use Verizon's network without Wi-Fi
2 to access the Internet?

3 A. Yes.

4 Q. And you did do that; right?

5 A. Yes, sir.

6 Q. Of course.

7 Now, in this case -- and you've been sitting with us,
8 of course, throughout the entire trial. Yes?

9 A. Yes, sir.

10 Q. So you've seen that in this case Verizon Wireless sent the
11 United States Government a list of certain IP addresses that
12 started with 174 that Verizon testified, through its witness,
13 it owned in 2021; correct?

14 A. Yes, sir.

15 Q. And for the record, that was Government Exhibit 805, which
16 I have just published. Do you see that?

17 A. Yes, sir.

18 Q. And so do you have any reason to doubt that those were not
19 Verizon Wireless IP addresses in 2021?

20 A. No, sir.

21 Q. You accept that as true?

22 A. Yes, sir.

23 Q. Every single one that's --

24 A. Every single one, absolutely.

25 Q. You've also seen in this case what the IP address that

1 AT&T had assigned to the Wade Funeral Home in the time period
2 that we're talking about, April and May of 2021; correct?

3 A. Yes, sir.

4 Q. And that is in evidence as Government Exhibit 601, which I
5 will publish.

6 And you don't dispute that the Wade Funeral Home IP
7 address during this period was 104.9.107.166; right? You
8 don't dispute that?

9 A. No, I do not.

10 Q. Do you accept that as true?

11 A. Yes.

12 Q. And we've also seen that AT&T provided Internet service to
13 your home; correct?

14 A. Yes, sir.

15 Q. And I'm publishing Government Exhibit 600. You have no
16 reason to doubt that the IP address that AT&T assigned to your
17 residence where you lived with Carolyn Wade during this
18 period, that IP was 107.131.161.84. Do you accept that?

19 A. Yes.

20 Q. There has been in this case a lot of records from a
21 company called Womply; right?

22 A. Yes, sir.

23 Q. And those records are now in evidence; correct?

24 A. Yes, sir.

25 Q. And those records show, Mr. Wade, that you had a lot of

1 online activity in your own PPP application on Womply's
2 portal; correct?

3 MR. MCCRAY: Judge, I'm going to object to the form
4 "a lot."

5 THE COURT: Sustained.

6 BY MR. SNIDER:

7 Q. Is it fair to say that you yourself, Mr. Wade, conducted
8 activity on Womply's portal?

9 A. I logged in to do certain transactions or certain things
10 that were required.

11 Q. Okay. And you did the same thing for your wife, Carolyn
12 Wade; correct?

13 A. Yes, sir.

14 Q. And you know that to log into Womply's portal -- let's
15 take your application, for example. You know that to log into
16 Womply's portal, you need to either supply your email address,
17 which we just looked at, or your cell phone number; correct?

18 A. Yes, sir. I did both.

19 Q. You did both?

20 A. Yes, sir.

21 Q. We'll look at the data to see what you did.

22 A. Okay.

23 Q. But a one-time code, depending on whether you use the
24 identifier of a cell phone number or an identifier as an email
25 address to log in, a one-time code gets sent to either of

1 those places, a cell phone through a text message or an email
2 address through an email; right?

3 A. Every time you do a --

4 Q. A login.

5 A. Every time, there's a code that's sent.

6 Q. Okay. And that code, you know, doesn't last forever;
7 right?

8 A. Well, I didn't know then but now I know.

9 Q. You didn't know it expired?

10 A. No.

11 Q. You never had an instance where, for example, Carolyn Wade
12 had a code that expired?

13 A. When it was explained to me because they kept rushing me
14 and kept saying, "You're not answering your phone. You're not
15 paying attention -- certain things that you need." So then I
16 found out --

17 Q. Sir, just listen to my question.

18 Is it your testimony that you didn't know that that
19 code had a limited lifespan to it?

20 A. I found out in another proceeding. Yes.

21 Q. And you've logged onto bank accounts too and other
22 websites that have a one-time code; right?

23 A. No.

24 Q. You've never done that. You've never had to put in a
25 one-time code?

1 A. Let me back up. Yeah, sometimes. I agree, yeah.

2 Q. And you know that the purpose of a one-time code is that
3 it's one time. And if it lasted forever, it wouldn't make
4 sense for it to be one time; right?

5 A. Okay.

6 Q. Okay?

7 A. Yes.

8 Q. So you know that they expire?

9 A. Well, I didn't know it was a one-time code.

10 Q. But you got those codes in connection with logging into
11 Womply's website -- you, on your cell phone, got codes; right?

12 A. Correct.

13 Q. And you shared those codes sometimes?

14 A. From the beginning. I shared the codes.

15 Q. Who did you share the codes with?

16 A. Verbally over the phone, they were given to Eduardo
17 Rivero, and he gave them to his wife, Haydee Granados, at the
18 time.

19 Q. And did you ever share one of those codes with anyone
20 else?

21 A. No.

22 Q. No.

23 A. There's no reason to.

24 Q. No reason to, right.

25 You gave that code sometimes to Haydee Granados

1 directly; right?

2 A. No. Everything pretty much was given to Eduardo. I may
3 have spoken to Ms. Granados maybe two to three times when it
4 came to this PPP application.

5 Q. Two to three times. That's your testimony. You spoke to
6 her two to three times in connection with this PPP process?

7 A. That is a fact.

8 Q. No, I'm asking you --

9 A. Yes --

10 Q. -- if that's your testimony.

11 A. -- that's my testimony.

12 Q. Okay.

13 So your PPP loan application, you started that one
14 yourself; right?

15 A. Yes, sir.

16 Q. Okay. You went to Womply's website. You put in your
17 phone number, which you had to verify, and you put in your
18 email address, which you had to verify, and that began the
19 process. You started that; right?

20 A. Yes, sir.

21 Q. In fact, we're looking now at what is slide two of the
22 Government's demonstrative that's marked as 1000. Do you see
23 that?

24 A. Yes, sir.

25 Q. And this is on May 4, 2021. These two transactions, which

1 are the first two transactions with respect to this account,
2 this application, that's you conducting that activity from the
3 Wade Funeral Home using the Internet connection that has an IP
4 address ending in 166; right?

5 A. Yes, sir.

6 Q. So that's Tracy Wade.

7 And if we go up to slide one, these are the login
8 attempts for May 4, 2021; correct?

9 A. Yes, sir.

10 Q. And those show five logins by you, Tracy Wade; right?

11 A. You said attempts initially. So is it a login or is it an
12 attempt?

13 Q. Well, do you see where it says "success"? What does it
14 say under success?

15 A. Okay.

16 Q. I'm sorry. What does it say?

17 A. It says true.

18 Q. It says true.

19 And you heard the testimony that when it says true,
20 that means the login was successful; right?

21 A. Yes, sir.

22 Q. Do you accept that as true, that fact?

23 A. Yes, sir.

24 Q. So these were successful logins by Tracy Wade on May 4,
25 2021, one, two, three, four, five. Do you accept that?

1 A. Yes, sir.

2 Q. We're now on page 8 or slide eight. These are login
3 attempts on May 5, 2021, and the last one there, which is from
4 a Verizon Wireless IP address, with the cell phone model that
5 you had at the time, a Galaxy S21 U 5G; correct?

6 A. Correct.

7 Q. So that is you, Mr. Wade, logging in on May 5th, 2021, to
8 your PPP loan application; correct?

9 A. Yes, sir.

10 Q. On slide nine, this is now May 6, 2021. This is you,
11 Mr. Wade, logging in, one, two, three, four times using your
12 cell phone, the Galaxy S 21 U 5G while on Verizon's network.
13 Yes?

14 A. Yes, sir.

15 Q. We're now on slide 31. These show login attempts on
16 May 19, 2021; correct?

17 A. Correct.

18 Q. And there's two logins on this page. Yes?

19 A. Yes.

20 Q. Okay. And that's you, Mr. Wade, logging into Womply's
21 portal for your application twice on May 19, 2021; correct?

22 A. Correct.

23 Q. And that's you using -- it's a cell phone you were using.

24 We're now looking at slide 33, which shows two login
25 attempts on May 20, 2021; correct?

1 A. Correct.

2 Q. And that's you, Mr. Wade, logging in both those times on
3 May 20, 2021, to your PPP loan application on Womply's
4 website; correct?

5 A. Absolutely.

6 Q. Now we're on slide 37. This shows one login on May 25,
7 2021. Yes?

8 A. Yes.

9 Q. And that is you, Mr. Wade, logging in to your PPP loan
10 application on May 25, 2021, using your Samsung Galaxy phone;
11 correct?

12 A. Correct.

13 Q. Now we're looking at slide 38. This is a login attempt on
14 May 26, 2021. And that's you, Mr. Wade, in the second row of
15 this data, logging in to your PPP loan application on Womply's
16 website; correct?

17 A. Correct.

18 Q. And I didn't go over this on all the slides, but do you
19 see where it says "identifier" on the far left?

20 A. Okay.

21 Q. That's your phone number; right?

22 A. Correct.

23 Q. So these codes to log in are being sent to your phone?

24 A. Correct.

25 Q. Correct.

1 A. Although I think sometimes they sent simultaneous codes to
2 the email and the cell phone, so I'm not exactly sure on that.

3 Q. Well, there's no email there; right? It's just a phone
4 number?

5 A. But you have my Verizon up right now.

6 Q. I'm sorry?

7 A. You only have the Verizon up, so I don't know.

8 Q. Well, actually, I'll represent to you -- do you see where
9 it says source, Government Exhibit 163E?

10 A. Right.

11 Q. So that's taken from that big spreadsheet that Womply
12 produced to us. If you want to see it, I'll be happy to show
13 it to you.

14 A. No. What I'm saying is you're saying the one-time code
15 was sent to my cell phone. I said to you -- because that's
16 what this represents. I said to you, "I think they were
17 simultaneously sending the codes to your cell phone and your
18 email." I think they did do that. What you're showing me is
19 a cell phone, and nothing that you're showing shows where they
20 sent the code out -- the passcode.

21 Q. Well, let's just take a look at the data because you
22 accept the data; right, Mr. Wade?

23 I'm showing you Government 163E, which is an Excel
24 file. Do you see that?

25 A. Okay.

1 Q. So this is Excel. This isn't a Verizon record; correct?

2 A. Okay.

3 Q. Do you see Column A where it says "identifier"?

4 A. Yes, sir.

5 Q. Do you see your cell phone number in every single one of
6 those rows?

7 A. That's not what I -- that's not the statement --

8 Q. Well, I'm asking that question. Do you see your cell
9 phone there?

10 A. No, sir.

11 Q. You don't see your cell phone number?

12 A. Well, I see my cell phone --

13 Q. That's my question. Do you see your cell phone number?

14 A. Yes, sir.

15 Q. The line?

16 A. Yes, sir.

17 Q. Right.

18 You don't see your email address there, do you?

19 A. No, sir.

20 Q. Do you remember the testimony that the identifier captures
21 either the place where the code was sent -- either a cell
22 phone number or an email address. Do you remember that?

23 A. I don't remember that, but if you say that -- go ahead.

24 Q. All right. Let's go back to Government 1000. We were on
25 slide 38, which you said was you logging in; correct?

TRACY WADE - CROSS

80

1 A. Yes, sir.

2 Q. Now we'll go to slide 62, which is a login attempt on
3 July 26, 2021, and you, Mr. Wade, logged in then at 5:56 PM
4 Eastern; correct?

5 A. Yes, sir.

6 Q. So I can go back, if you want to count them, but -- or you
7 can -- if you want to count them, you're free to, but I
8 counted 17 successful logins by you, Tracy Wade, into your PPP
9 loan application on Womply's website between May 4, 2021, and
10 July 26, 2021.

11 MR. MCCRAY: Objection, Judge. There's no question.

12 BY MR. SNIDER:

13 Q. Is that right?

14 THE COURT: What is the question?

15 BY MR. SNIDER:

16 Q. Does that seem right to you, 17 logins?

17 A. Was I logging in? What was I doing in these logins?

18 Q. That's not my question.

19 Did you log in 17 times between May 4, 2021, and
20 July 26, 2021?

21 A. Where do you show me logging in at?

22 Q. I'm sorry?

23 A. Yeah, it shows me logging in.

24 Q. 17 times?

25 A. Yes.

1 Q. And Haydee Rivero was the person who uploaded your
2 Schedule C; correct?

3 A. That's what she testified to.

4 Q. Well, do you not know that?

5 A. The answer is yes.

6 Q. Yes, she did do that. She uploaded your Schedule C.

7 And many of these logins that we just looked at were
8 after Ms. Rivero uploaded the Schedule C into your
9 application; correct?

10 A. Correct. I'm not sure to testify to that, unless you want
11 to go through every line and tell me what she did she did and
12 what I did I did.

13 Q. I show her uploading it -- and we can take a look at it --
14 she did it actually a few times -- but May 6, 2021 -- there
15 was more than one -- between 2:32 and -- well, it's tough
16 because of the conversions, but I've converted it.

17 So between May 5 at 10:32 PM to May 6 at 10:30 AM is
18 when she, according to the data, uploaded a Schedule C for
19 you.

20 MR. MCCRAY: Objection, Judge. That's not a
21 question.

22 THE COURT: Well --

23 MR. MCCRAY: Form.

24 THE COURT: -- is this a summary witness -- I mean, a
25 summary exhibit that you're referencing?

1 MR. SNIDER: It's in the summary exhibit. I'm
2 asking --

3 THE COURT: All right. So you're going to have to
4 ask the question as if it's directed to the actual exhibit.
5 BY MR. SNIDER:

6 Q. We're looking at the events tab from Government
7 Exhibit 163E. Do you see that? Do you see that, sir?

8 A. Yes, sir.

9 Q. And we can see here that if you look at the time stamp,
10 which is in UTC -- right? -- and then the event type where it
11 says "event file upload," these are file uploads that are
12 going up at that date and time; correct?

13 A. Okay.

14 Q. Is that what the data shows?

15 A. That's what it says on the screen.

16 Q. Okay. And these uploads are files that are named Tracy
17 Wade.pdf; correct?

18 A. Yes, it is.

19 Q. And you don't have an iPhone; right?

20 A. Now I do.

21 Q. Let's just stick with the time period here.

22 A. Okay.

23 Q. We are in May of 2021. Did you have an iPhone then?

24 A. No, sir.

25 Q. And this is an iPhone that's uploading these. So you

1 accept that that is Ms. Granados, now Ms. Rivero, uploading
2 your Schedule C into your application on or about May 6, 2021?

3 A. I can't confirm that because it just says "file upload."
4 So I don't know if she's uploading that Schedule C or some
5 other application documents with this. I don't know what
6 she's uploading.

7 Q. But let's get back to my earlier question.

8 You logged in, based on what we just looked at,
9 multiple times after this date. Yes?

10 A. Okay. Yes.

11 Q. So 17 logins, many of which were after the Schedule C was
12 uploaded; correct?

13 A. Correct.

14 Q. And it's your testimony --

15 A. Well, I don't know -- I don't know if that's correct.
16 You're telling me. I don't know.

17 Q. Well, that's what the data shows. Do you have any reason
18 to doubt the data?

19 A. I see two -- when looking on here, it says two -- after
20 her, it's only two logins.

21 Q. Well, we're not looking at the logins. These are just the
22 events. You have to go to look at this screen.

23 A. Oh, okay.

24 Q. So between the events, the uploads here and the logins,
25 you agree that you logged in after Ms. Rivero had uploaded

1 your Schedule C. Yes?

2 A. Yes, sir.

3 Q. And it's your testimony to this jury that in those 17
4 times that you logged in, some of which were after she
5 uploaded the Schedule C, you had no idea there was false
6 information in your PPP loan application?

7 A. That is absolutely what I'm testifying to.

8 Q. You didn't see a business name named Tracy Wade?

9 A. No, sir.

10 Q. You didn't see a date of establishment of 2011? You
11 didn't see a d/b/a? You didn't see any of the false
12 information? 17 logins.

13 A. No, sir. No, sir.

14 Q. Now, you said, I think a couple minutes ago, that you
15 weren't sure what you were doing when you logged in. You may
16 have just logged in. You may have done something else;
17 correct?

18 A. Yes, sir.

19 Q. And, in fact, you did do more on some occasions than just
20 log in; right?

21 A. Yes, sir.

22 Q. You uploaded documents like a bank statement; right?

23 A. Yes, sir.

24 Q. You linked your bank account, meaning putting in the
25 routing number and account number for your personal joint

1 account with Ms. Wade; right?

2 A. That was given to the Riveros initially and then they got
3 the business bank account. So they had all the documents from
4 the beginning.

5 Q. Just listen to the question, sir.

6 A. No, I hear you.

7 Q. Did you link your bank account on Womply's website?

8 A. Yes.

9 Q. Yeah.

10 And what you put in -- when you linked it it was the
11 account to which the money was sent?

12 A. For --

13 Q. For your PPP loan.

14 A. I'm not sure if I did that or not.

15 Q. You're not sure. Okay.

16 A. If I did I did. I'm not sure.

17 Q. These are two uploaded events on May 4, 2021, and that's
18 you conducting this activity from the Wade Funeral Home;
19 correct?

20 A. Yes, it is.

21 Q. And this event type is file upload. Yes?

22 A. Yes, it is.

23 Q. And those file names, red ribbon.pdf and black.pdf, those
24 are the files you uploaded; right?

25 A. Okay.

1 Q. Well, do you have any reason to doubt this data?

2 A. No, sir.

3 Q. And slide six, these are additional events to your PPP
4 application on May 5, 2021, and the ones that are highlighted
5 are you conducting those events; correct?

6 A. Correct.

7 Q. That is file upload, and the first line that is
8 highlighted. Yes?

9 A. Okay.

10 Q. And the file that you uploaded is a Four Star checking
11 7309.pdf. Do you see that?

12 A. Okay.

13 Q. Well, do you see it?

14 A. Yes, sir.

15 Q. And that's what the data shows?

16 A. That's what the data shows.

17 Q. And you've testified now that you have no reason to doubt
18 this data; correct?

19 A. That's what it says.

20 Q. Okay. And below that, a bank account was linked. Yes?

21 A. Yes.

22 Q. Okay. And that's you conducting that transaction. Yes?

23 A. Yes.

24 Q. So those are the events that occurred -- when I say an
25 event, it is either an upload or a link; correct?

1 A. Yes.

2 Q. And we've just looked at four that you did. Yes?

3 A. Yes, sir.

4 Q. And it's your testimony that during those four events, you
5 had no idea about any of the false information in this PPP
6 loan application; correct? That's your testimony?

7 A. Do you want to ask that question again?

8 Q. Sure.

9 We talked about the logins first. Now we're talking
10 about the events -- these four events that you did. It's your
11 testimony that during these four events you didn't see any
12 information that you knew to be false?

13 A. No, sir. I uploaded accurate -- accurate bank documents.
14 Nothing was altered.

15 Q. I'm not saying that. I'm just saying about what you
16 saw --

17 A. No, I didn't see anything.

18 Q. Let's take a look now, then, at the changes that you made
19 to your application because you did type in some information
20 yourself; correct?

21 A. I typed in some, yes.

22 Q. Okay. These are two transactions that you conducted. The
23 zero indicates, as you know from the testimony of Mr. Thakral,
24 that you started this; right? Mr. Wade, these are two
25 transactions that you conducted. Yes?

1 A. Okay.

2 Q. Well, you're saying okay. That's what the data shows.

3 Yes?

4 A. Yes.

5 Q. Okay. And one of those transactions where there's a zero
6 is you starting this application; correct?

7 A. Yes.

8 Q. And what is highlighted here on slide seven are five
9 transactions that you, Mr. Wade, conducted in your PPP loan
10 application. Yes?

11 A. Yes.

12 Q. You're using Verizon Wireless to do that. Yes? I'm
13 sorry. I didn't hear the answer.

14 A. Yes.

15 Q. And one of those transactions is a change to -- it's hard
16 to see. I'm going to make it a little bit easier. I'm
17 looking at the transaction where it says "funding source.ACH
18 version." Do you see that?

19 A. Okay.

20 Q. Do you see that on your screen?

21 A. Yes, I see it.

22 Q. Okay. And that was the part of the application where the
23 change was made, the funding source; correct?

24 A. Okay.

25 Q. That's what the data shows?

1 A. Yes.

2 Q. Okay. And we're looking now at a Womply document that's
3 in evidence, Government Exhibit 155. Do you see that?

4 A. Yes, sir.

5 Q. What does it say at the top?

6 A. Funding instructions.

7 Q. Okay. And these are the instructions, the account number
8 and the routing number that you put in so Womply would know
9 where to send the money. Yes?

10 A. Okay. If those are my account numbers, yes.

11 Q. You don't know if those are your account numbers?

12 A. I don't know them by memory, but if you say that's the
13 account number, yes.

14 Q. What does this account number end in?

15 A. 7309.

16 Q. Okay. And what does this account number end in?

17 A. 7309.

18 Q. The same number, yes?

19 A. Yes, it is.

20 Q. So that's the checking account to which -- that you put in
21 so you could -- so Womply would know where to send the money.
22 Yes?

23 A. Yes.

24 Q. That wasn't something that Ms. Rivero did. You put in
25 where to send the money and you didn't put in Wade Funeral

1 Home, did you -- the account for Wade Funeral Home?

2 A. Well, evidently that was inaccurately put in if I put it
3 in.

4 Q. I'm sorry?

5 A. Evidently that was inaccurately put in if it was put in.

6 Q. What do you mean? You just said you put it in. Put in
7 this --

8 A. Because I would not have been putting in my business
9 account information -- my personal information into a business
10 loan.

11 Q. So what are you saying? You put in the wrong number?

12 A. Well, my computer probably -- maybe it self-populated it.

13 Q. Oh, it self-populated. Oh, that's what happened.

14 A. I don't know.

15 Q. Explain that. What's that process like?

16 A. Sir, I can't give you the explanation. It's there. I
17 agree with you --

18 Q. Are you just guessing now?

19 A. No, I'm not guessing.

20 THE COURT: One moment. One at a time, please.

21 THE WITNESS: I'm not guessing.

22 BY MR. SNIDER:

23 Q. You put in for a receipt of the money, where it should go,
24 your checking account at USAA Savings Bank ending in 7309,
25 which is a joint account that you held with Carolyn Wade.

1 Yes?

2 A. That's what the record shows.

3 Q. We're back now looking at the demonstrative slide. We're
4 on page 11, and we're looking at transactions which were done
5 on May 6, 2021. Do you see that?

6 A. Yes, sir.

7 Q. There's six transactions that are highlighted. Yes?

8 A. Yes, sir.

9 Q. And those are transactions that you, Mr. Wade, conducted
10 in your own PPP loan application on Womply's website. Yes?

11 A. What transactions?

12 Q. Are those transactions that occurred by you on Womply's
13 website? I'll show you what they are in a moment but --

14 A. Yes, sir.

15 Q. But is that what you're seeing?

16 A. Yes, sir.

17 THE COURT: Let me stop you there, Counsel. We're
18 going to have our afternoon break at this time. We are in
19 recess.

20 (Jury exited at 2:59 PM.)

21 THE COURT: We are in recess.

22 (Recess at 3:00 PM to 3:21 PM.)

23 THE COURT: Please continue.

24 BY MR. SNIDER:

25 Q. Mr. Wade, before the break, we were looking at the

1 modifications to the Tracy Wade PPP loan application that you
2 yourself had conducted on the Womply website; correct?

3 A. Yes, sir.

4 Q. All right. And we looked at slides 2, 7, and 11; correct?

5 A. Yes, sir.

6 Q. And on those slides, there show 13 different transactions
7 that you yourself had conducted on the Womply website in your
8 own PPP loan application; correct?

9 A. Yes, sir.

10 Q. One of those transactions, Mr. Wade, was you putting in as
11 the business name Tracy Wade; correct?

12 A. I'm not aware of that, sir.

13 Q. You're not aware of you starting the application and being
14 asked what the business legal name was and putting in Tracy
15 Wade?

16 A. No, I'm not aware, sir.

17 Q. But you never put in Wade Funeral Home, did you?

18 A. I don't recall what I put in, but I would never put a
19 business named Tracy Wade.

20 Q. You would never do that?

21 A. There's no business named Tracy Wade.

22 Q. Of course there's not, but the data shows that you did
23 that; right?

24 A. Yes, sir.

25 Q. The data shows, and the data isn't wrong; right?

1 A. Well, I don't know what action was being taken when I was
2 in the portal.

3 Q. I'm sorry?

4 A. I don't know which action was being taken that you're
5 referring to.

6 Q. I'm referring to the entry "Tracy Wade" into Womply's
7 portal where it said, "What is the business name?"

8 A. I don't recall. I know I put my initial information in,
9 the email address, and my phone number, whatever it took to
10 get the code.

11 Q. Okay. But there was a step that said, "What is the
12 business name?" And the answer that was put in was "Tracy
13 Wade." Yes?

14 A. I don't remember that.

15 Q. You don't remember that?

16 A. No.

17 Q. But if the IP address shows that that information, Tracy
18 Wade, went into the application from the 166 IP address, it
19 was coming from Wade Funeral Home; correct?

20 A. Yes, that's the Wade Funeral Home IP.

21 Q. And you're the only one at Wade Funeral Home who was
22 accessing this PPP loan application for yourself; correct?

23 A. Yes.

24 Q. So you would agree, then, if the IP address shows 166 for
25 that piece of information, Tracy Wade as a business name, that

1 was you putting that in?

2 A. I probably put my name in in reference to being associated
3 with the business.

4 Q. Associated with the business Tracy Wade?

5 A. I put the preliminary information in to get the passcode.
6 So I don't recall what the preliminary information is.

7 Q. During the break, Mr. Wade, I went ahead and opened up
8 Government 164, which is one of the exhibits that is in
9 evidence, and I just highlighted some of the IP addresses that
10 were used to put in information. And the first IP address for
11 the first line of information put into this is the 166. Yes?

12 A. Yes, sir.

13 Q. And the second one is the 166?

14 A. Yes, sir.

15 Q. And the information is being transmitted to Womply from
16 that address -- that is you, sir -- was you putting it in
17 Womply's portal. Yes?

18 A. The entry information, yes.

19 Q. I'm sorry?

20 A. The entry information, yes, sir.

21 Q. The entry information?

22 A. Whatever it took to start the application.

23 Q. Right.

24 Including the business name Tracy Wade?

25 A. I would never have referred to it as Tracy Wade because

1 there's no business --

2 Q. But that's what the data shows. Yes?

3 A. Yes. It's highlighted.

4 Q. I highlighted it, just so you're clear, because the IP
5 address we're scrolling over in column W is the IP address for
6 the Wade Funeral Home. And I've highlighted the other
7 transactions, which are also from IP addresses that you said
8 were Verizon and you were a Verizon customer -- we've gone
9 over those because those are in slides 2, 7, and 11. You've
10 already testified that that was you, so we don't need to go
11 over that again.

12 There was another component of the application
13 process that you did yourself, and that was to take pictures
14 of yourself to verify your identity; right?

15 A. Yes, sir.

16 Q. I'm publishing for you Government Exhibit 156, page 8.

17 And the other component of that verification was to
18 upload a picture of your driver's license. Yes?

19 A. Yes, sir.

20 Q. And that's you, sir, holding your driver's license, the
21 front and back -- your Florida Driver's License?

22 A. Yes, sir.

23 Q. And you uploaded those pictures?

24 A. Yes, sir.

25 Q. Not Haydee Rivero; correct?

1 A. Correct.

2 Q. And not Mr. Rivero -- correct? --

3 A. Correct.

4 Q. -- who you testified doesn't even know how to use a
5 computer; right?

6 A. I didn't testify to that.

7 Q. You didn't testify to that?

8 A. No, sir.

9 Q. You didn't testify that he, to your knowledge, is not good
10 with computers? You didn't say that about, I don't know, an
11 hour ago?

12 A. I said that Ms. Rivero handled all the administrative
13 duties, and he didn't pretty much --

14 THE COURT: I'm sorry. Can you speak a little --

15 BY MR. SNIDER:

16 Q. Speak into the microphone.

17 A. He said that his wife, Haydee, handled all of their
18 administrative duties at the funeral home. The documentations
19 that went through the computer -- I don't recall exactly how I
20 said it -- but he didn't pretty much handle anything with the
21 computer.

22 Q. To your knowledge, is Mr. Rivero computer savvy? Can he
23 use computers well? You know or you don't know?

24 A. I really don't know if he's computer --

25 Q. You don't know, okay. Let's go back to 156, which is on

1 your screen.

2 So that was you uploading pictures of your driver's
3 license. And if we go to page 6, that's you taking three
4 photographs of yourself; correct?

5 A. Yes, sir.

6 Q. And you used your cell phone that you had at the time, the
7 Samsung Galaxy S21, to do so; correct?

8 A. Yes, sir.

9 Q. And you had to take these pictures more than once because
10 it didn't work the first time; correct?

11 A. Yes, sir.

12 Q. So now we're on page 7 of Government 156. That's you
13 taking the second set of photographs of yourself to verify
14 your identity for your PPP loan application; correct?

15 A. Yes, sir.

16 Q. That's not something that Ms. Rivero did for you; correct?

17 A. No, sir.

18 Q. You didn't go to her house to have pictures of yourself
19 taken?

20 A. No, sir.

21 Q. Here you are in your funeral home taking pictures of
22 yourself for your own PPP loan application; correct? I'll
23 make it bigger if you need to see.

24 Are you at work there, sir?

25 A. I don't think that's the funeral home.

1 Q. You don't?

2 A. No.

3 Q. Where do you think that is?

4 A. I'm not sure.

5 Q. What are you wearing?

6 A. I'm wearing scrubs.

7 Q. Where do you wear scrubs?

8 A. At the funeral home, but I don't have a camera in the
9 ceiling like that.

10 Q. Okay. You're wearing your work scrubs but you're not
11 quite sure where you are?

12 A. Correct.

13 Q. Is that what you're saying?

14 A. Yes.

15 Q. You took these pictures of yourself using your cell phone?

16 A. Yes, sir.

17 Q. So we've looked at, just now, 17 instances of Tracy Wade
18 logging into his own PPP loan application; correct?

19 A. Yes, sir.

20 Q. We've looked at Tracy Wade uploading four documents into
21 his PPP loan application; correct?

22 A. Yes, sir.

23 Q. We've looked at 13 instances of Tracy Wade making changes
24 to his own PPP loan application; correct?

25 A. Yes, sir.

1 Q. We've looked at Tracy Wade taking six selfies of himself
2 for his own PPP loan application; correct?

3 A. Yes, sir.

4 Q. And we've looked at Tracy Wade uploading two copies -- or
5 two pictures, front and back of his driver's license, to
6 verify his identity; correct?

7 A. Yes, sir.

8 Q. And it is your sworn testimony to this jury that in those
9 17 logins, four uploads, 13 modifications, six selfies, and
10 two uploads of a driver's license, you had no idea -- in your
11 words, not an inkling there was any false information in your
12 PPP loan application?

13 A. Absolutely not.

14 Q. Even though the data shows that you were the one that
15 wrote Tracy Wade as the business legal name?

16 A. Okay. It says -- I didn't see that.

17 Q. You didn't see it. So you typed it without seeing it, is
18 that what you're saying?

19 A. What you showed me was that I started the application.
20 You didn't show me what I actually typed in when I started.

21 Q. Well, the name "Tracy Wade" didn't just appear out of
22 nowhere -- right? -- as far as the business legal name?

23 A. No, it didn't appear out of nowhere.

24 Q. In fact, that record I just showed you showed that it was
25 entered from an IP address ending in 166, which we're all now

1 clear was the IP address for the Wade Funeral Home?

2 A. I'm unclear of showing it -- saying Tracy Wade being
3 entered. That's what I'm telling you. I'm not sure if Tracy
4 Wade was entered.

5 Q. But we looked at the first line of data. Yes?

6 A. Yes, we did.

7 Q. And in that first line, which was associated with the 166
8 IP address, the name "Tracy Wade" as the business legal name
9 appeared. Yes?

10 A. Yes, if that's what it says.

11 Q. Well, that's what it showed. Did you not see it?

12 A. Actually, no.

13 Q. Now, this Persona component of this and the uploads that
14 occurred and the starting of the application, all of which you
15 just testified you did, that was even before anything was
16 signed; right?

17 A. Yes.

18 Q. Okay. Because once that part was done, there was a
19 signing component in order get a PPP loan; right?

20 A. Yes, sir.

21 Q. And that was done by DocuSign?

22 A. Yes, sir.

23 Q. And you, sir, DocuSigned not one, not two, but three SBA
24 Form 2483 Paycheck Protection Program applications. Yes?

25 A. I don't know if that was considered an application, but

1 yes, I signed the DocuSign.

2 Q. Well, do you remember the document, when we looked at it
3 and I asked you a few minutes ago to read from the top and it
4 said PPP application? Do you remember that, the borrower
5 application?

6 A. Yes.

7 Q. We're going to look at it, but that's the one you signed
8 three times?

9 A. That's not what's shown on DocuSign.

10 Q. That's not what's shown on DocuSign?

11 A. No, sir.

12 Q. Right. We'll go through it. We'll go through it.

13 There was three of them. Yes?

14 A. Whatever the number for DocuSign, yes.

15 Q. I'm sorry. I don't want to keep going back and forth. I
16 actually can't hear you. If you don't mind -- I'm not trying
17 to be difficult -- just pull it a little closer. I'm having
18 trouble hearing you.

19 A. So whatever the number of pages that were associated with
20 the DocuSign, yes.

21 Q. You signed three different PPP applications. Yes?

22 A. Yes.

23 Q. And they all had the same information in them. That's the
24 first thing we went over when I began my examination. Yes?

25 A. Yes.

1 Q. Okay. And here's the first one, Government Exhibit 157,
2 has a DocuSign envelope ID ending in D98B, which means it was
3 DocuSigned; correct? Is that a "yes," sir? If you're saying
4 it, I can't hear you.

5 A. You're asking me is this --

6 Q. Which means it was DocuSigned.

7 A. The application itself, yes.

8 Q. Okay. Thank you.

9 And moving to page 2 of Government 157, we begin to
10 see some initials that are on here through the DocuSign
11 signing process. Yes?

12 A. Yes.

13 Q. And those initials are TW; correct?

14 A. Yes, sir.

15 Q. Those are your initials and you put these here. Yes?

16 A. That's TW. Yes.

17 Q. And you put them here?

18 A. Yes.

19 Q. So that's two initials.

20 And now we're going to move to page 3, and there's
21 nine initials on this page. Yes?

22 A. Yes.

23 Q. And they're "TW" in each instance?

24 A. Yes.

25 Q. And you put them there?

1 A. Yes, sir.

2 Q. Okay. And certainly when you put them there, you could
3 see what you were initialling; correct?

4 A. The writing that's on the side of what I'm initialling,
5 yes.

6 Q. Yes.

7 DocuSign doesn't have you initial something in the
8 dark or --

9 THE COURT: Sir, just ask your question and let's
10 move along, please.

11 BY MR. SNIDER:

12 Q. So DocuSign doesn't have you initial something that you
13 can't see; correct?

14 A. What I -- what the initials are by is what I was
15 initialling.

16 Q. Okay. So this one, the last one, where it says, "I
17 further certify that the information provided in this
18 application and the information provided in all supporting
19 documents and forms is true and accurate in all material
20 respects."

21 You saw that when you put your initials on it. Yes?

22 A. Yes.

23 Q. And on this last page 4 of Government 157, there's one
24 more initial; correct?

25 A. Yes, it is.

1 Q. And there's a signature there; correct?

2 A. Yes, sir.

3 Q. And that is you putting that signature on there either
4 initialling or selecting your signature; correct?

5 A. Yes, sir.

6 Q. I am pulling up 157.1 because the certificate for this one
7 is on a separate exhibit. This is the certificate of
8 completion memorializing the signing event that you just
9 testified you completed; correct?

10 A. Yes, it does.

11 Q. And there it is with respect to the signing events. This
12 was sent to your email address in order for you to begin the
13 signing process; correct?

14 A. Yes, it does.

15 Q. And it shows that you signed it using what we know from
16 Government Exhibit 805 is a Verizon Wireless IP address;
17 correct?

18 A. Yes, sir.

19 Q. And it shows the times that it was sent, resent, viewed,
20 and ultimately signed by you; correct?

21 A. Yes, sir.

22 Q. Let's pull up Government 158. This is the second Paycheck
23 Protection Program borrower application form for Schedule C
24 filers, which has another DocuSign envelope ID. Yes?

25 A. Yes.

1 Q. This one ends in 596E. Yes?

2 A. Yes.

3 Q. And moving on to page 2. There's two initials there, TW,
4 and you put those there; correct?

5 A. Yes.

6 Q. And now on page 3, nine initials there. You put those
7 there; correct?

8 A. Yes, sir.

9 Q. Including the last one, where it says that you certify
10 that all the information is true, including all supporting
11 documents; correct?

12 A. Yes, sir.

13 Q. And on page 4, another initial and, again, your same
14 DocuSign signature; correct?

15 A. Yes, sir.

16 Q. You signed this one. And if we go to page 9, we see the
17 certificate of completion for that signing event that you just
18 testified was yours; correct?

19 A. Correct.

20 Q. This went to your email address, signed by you. You used
21 a Verizon Wireless IP address to conduct this online activity,
22 and it has the time when it was sent, viewed, and signed by
23 you. Yes?

24 A. Yes, sir.

25 Q. And one last one. Government Exhibit 159 is yet another

1 Paycheck Protection Program borrower application form that
2 you, sir, Tracy Wade, signed and initialled via DocuSign;
3 correct?

4 A. Correct.

5 Q. And this one, for the record, has a DocuSign envelope ID
6 ending in BBBC.

7 And if we go to page 2, two sets of initials on
8 page 2?

9 A. Yes, sir.

10 Q. Those are yours and you put them there?

11 A. Yes, sir.

12 Q. And on page 3, nine sets of initials that are all yours
13 and that you put there; correct?

14 A. Yes, sir.

15 Q. Including the last one where you certified that all the
16 information was true and correct in all material respects,
17 including in the supporting documents?

18 A. Yes, sir.

19 Q. And on page 4, another initial and signature by you, Tracy
20 Wade; correct?

21 A. Yes, sir.

22 Q. And the certificate of completion for this one is on
23 page 20, which shows that you were the signer, that you signed
24 on Verizon Wireless's network, the documents were sent to your
25 email address, and it has the times it was sent, viewed, and

1 signed; correct?

2 A. Yes, sir.

3 Q. Okay. This one has two signatures. Do you see that?

4 A. Yes, sir.

5 Q. Because this Government 159 exhibit actually had the note
6 for your PPP application; correct?

7 A. I don't know.

8 Q. You don't know? Sure. Let me help you out.

9 We're on page 9 of Government 159. Do you see that?

10 A. Yes.

11 Q. Do you see where it says "note" at the top?

12 A. Yes.

13 Q. So this is the note for the loan, the Paycheck Protection
14 Program loan that you received, the promissory note. Yes?

15 A. Yes, sir.

16 Q. Which required an additional signature as opposed to the
17 other -- first two applications, which did not have a note
18 attached to them because they needed to go to another lender;
19 right?

20 A. Yes, sir.

21 Q. Okay. So three PPP applications, each signed three times,
22 one of which had a note also signed, and it is your testimony
23 that you had no idea, not an inkling that there was any false
24 information in any of those three PPP loan applications?

25 A. No, sir. As I look at the note -- I just paid attention

1 to it. It says "SBA loan." For me to see my name, "Tracy
2 Wade," associated with anything with reference to Wade Funeral
3 Home would not alarm me because I am Wade Funeral Home. So
4 just because I seen the 20,833 -- that was the loan and my
5 name associated with the loan because as a guarantee, I have
6 to --

7 Q. So you read the note --

8 A. No, I just --

9 Q. -- is that what you're saying?

10 A. I just read it just now.

11 Q. Oh, you read it just now.

12 So when you signed it, you didn't read it?

13 A. No, sir.

14 Q. Okay.

15 A. It was --

16 Q. Is that what you do? You sign promissory notes obligating
17 yourself to pay money without reading them?

18 MR. MCCRAY: Objection. Form and argument.

19 THE COURT: One at a time, Mr. Snider. So when he's
20 answering, you have to wait and ask the next question.

21 MR. SNIDER: Sorry. I apologize. I'll slow down.

22 There's no need to rush this.

23 BY MR. SNIDER:

24 Q. Is that what you do, sir? When you're obligating yourself
25 to pay money for a loan, you don't read documents?

1 A. When it came to this loan, based on how it was done and
2 the circumstances surrounding this loan, I saw nothing
3 alarming, nothing fraudulent. The documentation that I saw
4 when it said it was 20,833, I was under the assumption that's
5 what I was going to get for the PPP application and that was
6 it.

7 Q. Right.

8 A. Seeing my name on this application did not alarm me. I
9 just glanced at it, signed it, and that was that.

10 Q. Right.

11 So it didn't alarm you that the front page of this
12 application -- and three of them -- said that the business
13 legal name was Tracy Wade and that the total amount of income
14 for that business was \$112,430 coming from a Schedule C, which
15 you testified you didn't even know what it was? That didn't
16 alarm you?

17 MR. MCCRAY: Objection. Asked and answered.

18 Objection. Asked and answered.

19 THE COURT: The last time, sir, Mr. Snider.

20 BY MR. SNIDER:

21 Q. You didn't -- this is the first page.

22 A. Again, when you DocuSign, this document never shows up.

23 Q. Okay. So you just ignored the first page. Is that what
24 you're saying?

25 A. It never showed up.

1 Q. Three times?

2 A. Each DocuSign, it never showed up. It never shows.

3 Q. Is it your testimony that DocuSign, when they sent you
4 this application to sign, didn't include the first page? Is
5 that what you're telling this jury?

6 A. What I'm saying to you, Mr. Snider, when you click on the
7 link for DocuSign, it sends you straight to where you need to
8 adapt your signature and begin to sign.

9 Q. So you just ignored the first page is what you're saying?

10 A. There was no first page.

11 MR. MCCRAY: Objection. Asked and answered, Judge.

12 THE COURT: Sustained.

13 BY MR. SNIDER:

14 Q. And how about the 36 initials that you put on, total?

15 A. I initialled it.

16 Q. 36 times?

17 A. I initialled it.

18 Q. 36 times; correct?

19 A. Yes, I initialled it.

20 Q. And in the 36 initials that you put on, you didn't happen
21 to see that the business legal name was not Wade Funeral Home?

22 A. There was nothing for me to see that said that the
23 business was not listed under Wade Funeral Home -- nothing
24 that I saw.

25 Q. And in the 36 times that you put your initials --

1 A. If you want.

2 Q. -- you never saw --

3 A. If you want to pull it back up and show me, then.

4 Q. When you finished signing the PPP loan application in
5 Government 157, that was emailed to you, wasn't it?

6 A. I'm not sure of what loan we're talking about. All of
7 them were emailed.

8 Q. Well, how many loans did you get?

9 A. Two.

10 Q. Two loans?

11 A. Yes, sir.

12 Q. How much was each one?

13 A. 20,833.

14 Q. So you actually got two different PPP loans?

15 A. Yes, sir.

16 Q. But with respect to the one that we're talking about here,
17 these three PPP applications in Government 157, 158, 159,
18 which we've looked at now several times, that was all for this
19 first one you got?

20 A. If you say so.

21 Q. Well, 157, do you see that one?

22 A. Yes, sir.

23 Q. Okay. And you've already testified that you signed this
24 one and initialed it. If you look at Government
25 Exhibit 157.2, this is the history of all of the events that

1 occurred with DocuSign with respect to this PPP loan
2 application; correct?

3 A. Yes, sir.

4 Q. And it says here, on May 18, 2021, a printable copy was
5 delivered. I'm looking -- sorry. "Tracy Wade, May 18, 2021.
6 The user Tracy Wade received a copy of the envelope archive."

7 So you got the entire package you had signed emailed
8 to you on May 18?

9 A. Okay. I may have. I may have not --

10 Q. Well, that's what the data shows.

11 A. It shows it was sent to me.

12 Q. Correct.

13 A. Okay.

14 Q. You never opened it?

15 A. I never opened it, never printed it.

16 Q. Okay. And when it was sent again on May 19, didn't open
17 that one either?

18 A. No, sir.

19 Q. So in addition to signing all those times and initialling
20 and going through the whole process three times, two copies
21 actually get sent to you and it's your testimony you never
22 opened them?

23 A. I do that quite often.

24 Q. Oh. For loans?

25 A. Yes, I have.

1 Q. So you just don't -- you don't read your papers, is that
2 what you're saying, as a businessman who owns Wade Funeral
3 Home and has for 14 years?

4 A. Well, for example, if I sit down -- I just did a lease --
5 if I sit down and we do a lease contract for a vehicle and
6 I've done it with someone that I've done business with over
7 the years and then I sit down with the loan officer, I don't
8 have to go back and read every line and check everything
9 that -- we made an agreement. I've done business with you.
10 I've trusted you with my business. No, I do not.

11 Q. But that's not what happened here. You hadn't gotten a
12 PPP loan before. You hadn't done business with the SBA that's
13 related to the PPP program; correct?

14 A. But I had done --

15 Q. So we're talking about two different things.

16 THE COURT: One moment. One moment. One at a time,
17 please, gentlemen.

18 BY MR. SNIDER:

19 Q. What you just described with respect to your business and
20 Wade Funeral Home and doing business with others, that's not
21 at all what we're talking about as it pertains to the PPP
22 loan, is it?

23 A. Somewhat.

24 Q. Somewhat.

25 A. Yes.

1 Q. Now, the forgiveness application, that was a separate
2 process; correct?

3 A. Yes, sir.

4 Q. You testified on direct examination that it was automatic,
5 I believe; right?

6 A. Yes, sir.

7 Q. But it required you, nonetheless, to review and sign and
8 initial a separate application; correct?

9 A. Yes, sir.

10 Q. And you did that?

11 A. Yes, sir.

12 Q. And that application, unlike the ones we just looked at in
13 157, 158, 159, that was only one page?

14 A. I don't know that.

15 Q. You don't know that? Well, let's take a look at it. It's
16 Government Exhibit 160.

17 When I say one page, I should be -- let me be a
18 little clearer. The page that had your two initials and
19 signature was the first page of the document; correct?

20 A. Correct.

21 Q. We're looking now at Government Exhibit 160 and this is,
22 sir, your forgiveness application for your Paycheck Protection
23 Program loan; correct?

24 A. Correct.

25 Q. Okay. And you initialed this one twice. Yes?

1 A. I don't believe I did the PPP forgiveness aspect of it.

2 Q. You don't believe you did it?

3 A. No, because I forwarded it to Haydee Granados. I
4 forwarded the DocuSign to her.

5 Q. You know that Haydee Granados doesn't have Verizon
6 Wireless; right?

7 A. It came to me and I forwarded it to her through my email.

8 Q. You heard her testify here; correct?

9 A. Yes.

10 Q. She said she's never had Verizon; correct?

11 A. No.

12 Q. No, you didn't hear her say that?

13 A. No, she doesn't have Verizon. We did.

14 Q. Right.

15 And AT&T. You actually -- is that your memory, sir?
16 Your memory is that Haydee Granados signed this for you?

17 A. If you look at the signature at the bottom, it says Trace.
18 I know for a fact I forwarded the forgiveness over to her
19 because I was advised when you get notification for the
20 forgiveness to please send it over to me so that therefore I
21 can look it over and make sure that everything was accurately
22 done.

23 Q. Well, let's take a look at -- before we get into the
24 signing, let's take a look at the top here. Business legal
25 name Tracy Wade. You've testified before that that's false;

1 correct? There's no business named Tracy Wade; right?

2 A. Okay.

3 Q. Tracy Wade is not a doing business as name; correct?

4 A. No, sir.

5 Q. Right.

6 And the address here is the same one that was on the
7 three PPP loan applications, and that's for your funeral home,
8 not for the business name Tracy Wade?

9 A. That's correct.

10 Q. So you agree with me that this is at least three pieces of
11 false information right at the top of this form?

12 A. Yes, sir.

13 Q. And this section here, this just has the loan amount that
14 was disbursed and the date of the disbursement; correct?

15 A. Yes, sir.

16 Q. You got the loan. There's no dispute about that; right?
17 Right?

18 A. Yes, sir.

19 Q. There's a section here about employees at the time of the
20 loan application. It says ten. That's not what the original
21 application said, though; right?

22 A. I didn't do the original application. I didn't input the
23 employees. I didn't do the original application. And I
24 didn't input the employees here.

25 Q. You didn't do that either?

1 A. No, sir.

2 Q. And you don't have ten employees, do you?

3 A. At times I have more than ten. It all depends.

4 Q. It all depends --

5 A. It fluctuates.

6 Q. What?

7 A. It fluctuates.

8 Q. And when I say employees, sir, I'm not referring to
9 independent contractors that were vendors that do business and
10 then you pay as 1099s because that's not an employee; right?

11 A. Well, then if you want to say that, then no, there were no
12 employees but myself.

13 Q. So everyone else that works for Wade Funeral Home does so
14 on an independent contractor basis, not as W-2 employees at
15 Wade Funeral Home; right?

16 A. Yes, sir.

17 Q. So just so we're clear, this information is not correct,
18 the ten here?

19 A. It's not correct.

20 Q. And the amount spent on payroll costs, 20,833, that's also
21 false; correct?

22 A. The amount spent on payroll?

23 Q. Correct.

24 A. I wouldn't say that's false.

25 Q. It is false?

1 A. I wouldn't say that's false. When you say payroll, are we
2 referring to my 1099 workers or laborers, or what are we
3 referring to? Because that's what I referred it to.

4 Q. Well, we looked at those checks. You didn't spend \$20,000
5 in those checks to your employees?

6 A. I put those checks in Wade Funeral Home's bank account.

7 Q. Yeah. It wasn't \$20,000, though.

8 A. Because it was the total amount minus what we paid Haydee
9 Granados and her husband, Eduardo.

10 Q. We'll get to that in a second. We'll get to that later.

11 So the initials here, "borrower has complied with all
12 requirements in the Paycheck Protection Program rules" -- do
13 you see that initialled? Do you see that initialled?

14 A. Yes, sir.

15 Q. With TW?

16 A. Yes, sir.

17 Q. And then the information provided in this application is
18 true and correct in all material respects. That's also
19 initialed by TW?

20 A. Yes, sir.

21 Q. Through DocuSign?

22 A. I'm not sure if I DocuSigned that.

23 Q. You're not sure?

24 A. Yeah.

25 Q. Do you see the IP address there that was used to DocuSign

1 it?

2 A. Yes, sir.

3 Q. Why don't you just go ahead and read that number.

4 A. It ends in 84.

5 Q. Okay. And 107.131.161.84; correct?

6 A. Yes, sir.

7 Q. All right. Well, do you see the IP address
8 107.131.161.84? For the record, we're looking at slide 67 of
9 the Government's demonstrative marked as 1000.

10 Do you see the IP address 107.131.161.84?

11 A. Yes, sir.

12 Q. That's the IP address that's assigned -- was assigned to
13 your home.

14 A. Okay.

15 Q. You signed this at home, sir.

16 THE COURT: Is there a question?

17 BY MR. SNIDER:

18 Q. Did you sign this at home?

19 A. As I remember clearly, when the DocuSign came to me, I was
20 instructed to forward it to Ms. Granados. We're talking about
21 something that's four years old from now. I don't exactly
22 remember the chain of events. Initially, it was forwarded to
23 Ms. Granados.

24 Q. Well, before we go down the chain of events, let's start
25 at the last event, which is signing this by DocuSign with an

1 IP address that ends in 84. That IP address, sir, was
2 assigned to your home when this was executed; correct?

3 A. That's what it says.

4 Q. And do you have any reason to dispute the accuracy of
5 AT&T's record of the IP address that they provided to your
6 home?

7 A. No, sir.

8 Q. So this is you, sir, signing by DocuSign at home; correct?

9 A. Just showing that it was done at the IP address at home --
10 at my house.

11 Q. So someone else -- what are you saying, sir? Did someone
12 else at your home sign this for you?

13 A. It says the IP address here is associated with AT&T, and
14 we had AT&T at that given time.

15 Q. Yes.

16 And that's the IP address that was used to sign this;
17 correct?

18 A. That's what it states.

19 Q. And are you saying to this jury that you didn't sign it?

20 A. I just told you from my recollection of how this IP -- how
21 the DocuSign went from when it came in. I don't recall
22 signing it because --

23 Q. But you agree that was it signed using your home Internet
24 connection. Do you agree with that?

25 A. That's what it says.

1 THE COURT: All right, sir. I am going to stop you
2 there.

3 Can I have counsel come sidebar just so we can
4 discuss scheduling?

5 (The following proceedings were held sidebar:)

6 THE COURT: How much longer do you anticipate your
7 cross?

8 MR. SNIDER: Definitely an hour. If not, perhaps a
9 little longer.

10 THE COURT: Wait. You told me two hours two hours
11 ago.

12 MR. SNIDER: But we had a break too.

13 THE COURT: I'm not talking about the 15-minute
14 break.

15 MR. SNIDER: What time did we start?

16 MR. LOVE: I don't know.

17 MR. SNIDER: I said that I needed at least two hours.

18 THE COURT: No.

19 MR. SNIDER: Yes, I did. Judge, you asked me --

20 THE COURT: I said how much longer do you think it's
21 going to take. I don't recall you saying I need at least two
22 hours. The response was two hours. What I'm trying to
23 suggest is you need to move along. You're asking several
24 questions two and three times.

25 MR. SNIDER: I will speed it up.

1 THE COURT: You just have to ask it once and then go
2 to your next point.

3 MR. SNIDER: I think if he's not answering the
4 question, I need to ask it again, but I will try my best --

5 THE COURT: He does answer and you phrase it a
6 different way as to give it more emphasis. You can do that
7 during your closing argument.

8 MR. SNIDER: All right.

9 THE COURT: All right?

10 MR. SNIDER: We're done with his -- we're going to go
11 to a new topic now. Are we done for the day?

12 THE COURT: Yes. It's 4 o'clock. It's after 4:00.

13 MR. SNIDER: Your Honor, when the Court asked me how
14 much two days ago --

15 THE COURT: How much longer do you think your cross
16 is going to take?

17 MR. SNIDER: I need an hour.

18 THE COURT: And how long do you think your redirect
19 will be?

20 MR. MCCRAY: Probably 20 minutes, at best.

21 THE COURT: All right. We're going to have our
22 charge conference this evening.

23 MR. SNIDER: Okay.

24 THE COURT: And -- all right.

25 Defense, is this your last witness?

1 MR. MCCRAY: Yes, Judge.

2 (The following proceedings were held in open court:)

3 THE COURT: Ladies and gentlemen, we are going to
4 start tomorrow morning at 9:30. I expect that we will have
5 the evidence completed by 10:40.

6 We're going to have our charge conference this
7 evening after you depart. So we'll have that resolved. And
8 I'll try to get as much of our argument as I can today so that
9 we should only spend about five minutes tomorrow for motions.
10 I will entertain your motions in advance, so to speak, as best
11 we can. We want to get the case to you by lunchtime.

12 Now, what time is lunchtime going to be? I'm not
13 sure. We're going to do the best we can to get this matter to
14 you as early as we can tomorrow. Thank you for your patience
15 and cooperation. Have a great afternoon and evening.

16 (Jury exited at 4:04 PM.)

17 * * * * *

18 CERTIFICATE OF REPORTER

19 I certify that the foregoing is a correct
20 transcription of the record of proceedings in the
21 above-entitled matter prepared from my stenotype notes.

22 DATE: 16th of January, 2025 /s/Lance W. Steinbeisser
23 Lance W. Steinbeisser,
24 FCRR, RPR, FPR-C
25 Official Court Reporter
United States District Court
Southern District of Florida
Miami, Florida

\$	43:8, 44:13, 44:23, 45:12, 46:10, 46:13, 46:16, 74:22, 79:24, 119:9	103:23, 111:5, 111:17, 111:21, 114:13	50:23	33128 [1] - 1:23
\$1,000 [1] - 43:11	101 [6] - 35:2, 36:3, 36:5, 36:13, 36:18, 36:19	157.1 [1] - 104:6	2020 [7] - 2:10, 4:6, 7:16, 25:16, 26:5, 26:13, 62:4	345,000 [1] - 52:14
\$112,430 [4] - 56:17, 56:23, 58:5, 109:14	102 [5] - 35:9, 36:3, 36:5, 36:13, 37:15	157.2 [1] - 111:25	2021 [53] - 2:10, 29:25, 37:9, 37:12, 37:17, 37:22, 37:23, 41:16, 41:17, 42:9, 62:4, 66:19, 66:22, 66:25, 67:2, 67:5, 67:8, 67:20, 68:9, 69:13, 69:19, 70:2, 74:25, 75:8, 75:25, 76:3, 76:7, 76:10, 76:16, 76:21, 76:25, 77:3, 77:7, 77:10, 77:14, 80:3, 80:9, 80:10, 80:19, 80:20, 81:14, 82:23, 83:2, 85:17, 86:4, 91:5, 112:4, 112:5	34983 [1] - 38:17
\$113,000 [1] - 29:20	103 [6] - 35:19, 36:4, 36:6, 36:13, 37:20, 37:21	158 [10] - 57:3, 59:14, 59:16, 60:11, 60:17, 61:2, 61:6, 104:22, 111:17, 114:13	2022 [1] - 66:22	36 [5] - 110:14, 110:16, 110:18, 110:20, 110:25
\$140,000 [1] - 39:25	104 [4] - 40:7, 40:18, 40:22, 41:14	159 [8] - 57:3, 60:19, 60:22, 105:25, 107:5, 107:9, 111:17, 114:13	2024 [1] - 1:5	37 [1] - 77:6
\$20,000 [2] - 118:4, 118:7	104.9.107.166 [1] - 70:7	16 [1] - 67:20	2025 [1] - 123:22	38 [2] - 77:13, 79:25
\$20,833 [2] - 49:15, 56:7	1040 [1] - 58:5	160 [2] - 114:16, 114:21	209 [3] - 7:19, 7:20, 8:3	3:00 [1] - 91:22
\$3,000 [1] - 43:25	105 [6] - 40:25, 41:6, 41:7, 41:10, 42:6, 42:20	163E [3] - 78:9, 78:23, 82:7	21 [2] - 1:5, 76:12	3:21 [1] - 91:22
\$3,889 [1] - 45:16	106 [5] - 38:7, 38:8, 38:21, 38:22, 39:1	164 [1] - 94:8	23-CR-60173-KMW-1 [1] - 1:2	4
\$30,000 [1] - 25:2	107 [8] - 50:19, 50:20, 50:21, 51:6, 51:11, 51:12, 52:11, 52:24	166 [7] - 75:4, 93:18, 93:24, 94:11, 94:13, 99:25, 100:7	23-CR-60173-KMW-2 [1] - 1:3	4 [11] - 17:12, 74:25, 75:8, 75:24, 80:9, 80:19, 85:17, 103:23, 105:13, 106:19, 122:12
\$332,681 [1] - 8:9	107.131.161.84 [4] - 70:18, 119:5, 119:8, 119:10	16th [1] - 123:22	2483 [1] - 100:24	40,000 [1] - 25:3
\$35,404.55 [2] - 36:21, 37:3	1099 [3] - 33:1, 33:7, 118:2	17 [9] - 80:8, 80:16, 80:19, 80:24, 83:11, 84:3, 84:12, 98:17, 99:9	25 [3] - 43:24, 77:6, 77:10	400 [1] - 1:22
\$36,403.67 [1] - 37:14	1099s [4] - 32:25, 33:2, 117:10	174 [1] - 69:12	26 [5] - 42:9, 77:14, 80:3, 80:10, 80:20	4088 [1] - 55:24
\$39,755.82 [2] - 41:22, 42:19	1030 [1] - 81:17	18 [3] - 112:4, 112:5, 112:8	28 [2] - 17:11, 17:14	49 [2] - 42:24, 44:22
\$4,000 [4] - 14:9, 14:15, 14:17, 15:25	1032 [1] - 81:17	19 [3] - 76:16, 76:21, 112:16	28th [1] - 42:18	4:00 [1] - 122:12
\$40,000 [1] - 49:19	1040 [1] - 123:5	1:34 [1] - 34:4	2:32 [1] - 81:15	4:04 [1] - 123:16
\$49,569.74 [1] - 42:17	1049 [1] - 34:2	1st [7] - 37:4, 37:12, 37:17, 41:16, 42:15, 42:16	2:48 [1] - 1:6	5
\$49,940.81 [1] - 42:5	11 [3] - 91:4, 92:4, 95:9	2	2:59 [1] - 91:20	5 [3] - 76:3, 81:17, 86:4
\$5,000 [2] - 14:10, 15:20	1120 [1] - 48:19	2 [8] - 26:16, 39:17, 92:4, 95:9, 102:9, 105:3, 106:7, 106:8	3	50 [2] - 43:9, 44:13
\$50 [2] - 24:21, 24:22	1120-S [1] - 55:20	20 [6] - 14:3, 33:25, 76:25, 77:3, 106:23, 122:20	3 [3] - 102:20, 105:6, 106:12	52 [1] - 45:12
\$500 [2] - 43:4, 44:22	115,000 [1] - 52:16	20,833 [4] - 108:4, 109:4, 111:13, 117:20	30 [3] - 37:12, 37:17, 41:16	53 [1] - 46:10
\$51,345.91 [1] - 42:1	11:00 [1] - 33:22	2010 [1] - 64:22	300,000 [1] - 8:11	54 [1] - 46:13
/	123 [1] - 1:9	2011 [2] - 64:21, 84:10	300-some [2] - 8:21, 8:24	55 [1] - 46:16
/s/Lance [1] - 123:22	13 [3] - 92:6, 98:23, 99:9	2018 [2] - 61:23, 62:4	305.523.5633 [1] - 1:23	596E [2] - 59:23, 105:1
0	14 [3] - 64:25, 65:17, 113:3	2019 [12] - 7:16, 21:18, 25:16, 25:19, 25:22, 26:1, 26:13, 48:17, 51:9, 54:21, 56:18, 62:4	31 [4] - 37:22, 42:9, 49:9, 76:15	599 [1] - 38:16
0501 [1] - 36:25	15 [2] - 14:3, 67:20	20191120-S [1] -	315 [2] - 54:23, 57:23	5:56 [1] - 80:3
1	15-minute [1] - 121:13		33 [1] - 76:24	5G [5] - 67:10, 68:1, 68:3, 76:5, 76:12
1 [11] - 1:9, 2:17, 11:17, 11:19, 23:9, 29:20, 29:23, 31:4, 37:22, 39:18, 45:10	1512 [3] - 59:2, 67:9, 68:4			5th [1] - 76:7
1(A) [1] - 8:10	154 [1] - 62:22			6
1(C) [1] - 8:9	155 [1] - 89:3			6 [6] - 76:10, 81:14, 81:17, 83:2, 91:5, 97:3
1(C) [1] - 8:7	156 [3] - 95:16, 96:25, 97:12			6/17/21 [1] - 47:1
10 [1] - 14:3	157 [13] - 57:2, 57:10, 58:6, 59:11, 60:12, 61:6, 102:1, 102:9,			600 [1] - 70:15
100 [10] - 34:11, 34:20, 34:21, 34:24, 36:7, 36:18, 37:10, 37:11, 37:13, 52:16				601 [1] - 70:4
100-plus-thousand [1] - 29:24				603 [2] - 39:18
1000 [11] - 42:23,				62 [1] - 80:2
				67 [1] - 119:8
				7
				7 [7] - 10:2, 10:3,

11:9, 58:5, 92:4, 95:9, 97:12 7309 [3] - 89:15, 89:17, 90:24 7309.pdf [1] - 86:11 786-488-1512 [1] - 67:3	23:12, 23:13, 23:23, 24:10, 24:15, 24:17, 24:21, 25:1, 25:2, 25:5, 26:20, 26:21, 26:22, 26:23, 27:1, 27:2, 27:4, 34:16, 35:3, 35:13, 35:22, 40:9, 40:10, 40:14, 41:19, 42:20, 44:7, 44:9, 44:11, 44:18, 45:9, 45:11, 46:21, 47:4, 47:11, 56:10, 56:14, 75:1, 84:24, 84:25, 85:1, 85:3, 85:7, 85:11, 86:20, 89:7, 89:10, 89:11, 89:13, 89:14, 89:16, 89:20, 90:1, 90:9, 90:24, 90:25, 118:6	93:18, 93:24, 94:10, 94:16, 95:5, 99:25, 100:1, 100:8, 104:12, 104:16, 105:20, 105:21, 106:25, 116:6, 118:25, 119:7, 119:10, 119:12, 120:1, 120:5, 120:9, 120:13, 120:16 addresses [4] - 69:11, 69:19, 94:9, 95:7 administrative [3] - 46:2, 96:12, 96:18 administrator [1] - 3:20 admit [2] - 40:17, 41:6 admitted [2] - 37:19, 51:5 admitting [1] - 50:18 adopt [1] - 28:3 advance [1] - 123:10 advise [1] - 52:15 advised [1] - 115:19 affidavits [2] - 3:25, 18:1 afternoon [4] - 53:15, 53:16, 91:18, 123:15 ago [7] - 13:12, 51:20, 84:14, 96:11, 101:3, 121:11, 122:14 agree [15] - 52:15, 59:8, 59:12, 60:10, 60:13, 60:15, 61:2, 63:10, 73:1, 83:25, 90:17, 93:24, 116:10, 120:23, 120:24 agreed [1] - 49:7 agreement [2] - 33:15, 113:9 ahead [7] - 21:3, 31:9, 47:10, 79:23, 94:7, 119:3 aided [1] - 1:25 alarm [4] - 108:3, 109:8, 109:11, 109:16 alarmed [1] - 53:8 alarming [1] - 109:3 allowances [1] - 52:10 allowed [1] - 68:10 allows [1] - 68:19 almost [3] - 25:3,	26:16, 64:25 ALSO [1] - 1:19 altered [1] - 87:14 AM [4] - 1:6, 2:3, 34:2, 81:17 AMERICA [1] - 1:4 amount [14] - 18:2, 25:3, 35:15, 37:2, 39:21, 49:22, 52:16, 58:4, 109:13, 116:13, 117:20, 117:22, 118:8 angry [1] - 30:12 answer [7] - 39:11, 39:16, 49:12, 81:5, 88:13, 93:12, 122:5 answered [4] - 35:4, 109:17, 109:18, 110:11 answering [3] - 72:14, 108:20, 122:3 anticipate [1] - 121:6 anxiously [1] - 25:8 anytime [1] - 9:2 apologize [1] - 108:21 app [6] - 23:20, 24:1, 24:3, 24:8, 24:13 appear [2] - 99:21, 99:23 appeared [1] - 100:9 application [84] - 17:9, 19:1, 19:17, 20:22, 22:12, 22:14, 27:7, 28:6, 28:9, 28:17, 28:24, 29:7, 29:9, 31:24, 32:5, 48:1, 48:2, 48:5, 50:15, 60:4, 60:8, 61:4, 62:12, 71:1, 71:15, 74:4, 74:13, 75:2, 76:8, 76:21, 77:3, 77:10, 77:15, 80:9, 81:9, 83:2, 83:5, 84:6, 86:4, 87:6, 87:19, 88:6, 88:10, 88:22, 91:10, 92:1, 92:8, 92:13, 93:18, 93:22, 94:22, 95:12, 97:14, 97:22, 98:18, 98:21, 98:24, 99:2, 99:12, 99:19, 100:14, 100:25, 101:4, 101:5, 102:7, 103:18, 104:23, 106:1,	107:6, 109:5, 109:8, 109:12, 110:4, 111:4, 112:2, 114:1, 114:8, 114:12, 114:22, 116:20, 116:21, 116:22, 116:23, 118:17 applications [8] - 48:23, 100:24, 101:21, 107:17, 107:21, 107:24, 111:17, 116:7 applied [6] - 5:1, 24:20, 25:6, 27:9, 32:16, 53:2 apply [3] - 19:8, 21:25, 27:10 applying [4] - 6:17, 7:5, 9:18, 26:17 approach [5] - 13:4, 34:7, 38:6, 40:3, 51:1 approached [1] - 6:13 approved [1] - 29:1 apps [1] - 27:15 April [6] - 37:12, 67:5, 67:8, 67:20, 70:2 archive [1] - 112:6 area [1] - 16:14 argument [3] - 108:18, 122:7, 123:8 arrangement [1] - 13:25 arrangements [1] - 43:22 arrest [2] - 32:13, 48:6 arrested [5] - 32:1, 32:2, 32:4, 32:7, 48:10 aside [1] - 17:19 aspect [1] - 115:1 assess [1] - 25:13 assigned [7] - 67:9, 68:4, 70:1, 70:16, 119:12, 120:2 assist [2] - 8:15, 46:6 assisting [4] - 2:20, 5:3, 5:13, 17:21 associated [8] - 26:24, 94:2, 94:4, 100:7, 101:19, 108:2, 108:5, 120:13 assumption [1] - 109:4	
8					
8 [3] - 10:11, 76:2, 95:16 8/20/2021 [2] - 39:6, 39:8 805 [2] - 69:15, 104:16 806.1 [2] - 67:16, 67:17 84 [2] - 119:4, 120:1					
9					
9 [2] - 105:16, 107:9 9:30 [1] - 123:4 9:54 [2] - 1:6, 2:3	accountant [6] - 51:15, 51:16, 64:5, 64:7, 65:1, 65:17 Accounting [6] - 51:18, 63:23, 63:25, 64:2, 64:3, 65:25 accounts [6] - 21:10, 21:12, 24:12, 26:25, 34:15, 72:21 accuracy [1] - 120:4 accurate [4] - 9:3, 87:13, 103:19 accurately [9] - 34:17, 35:5, 35:14, 35:24, 38:18, 39:16, 40:13, 41:3, 115:21 acquire [1] - 26:6 action [2] - 93:1, 93:4 activate [1] - 19:21 activity [8] - 28:25, 42:12, 48:15, 71:1, 71:8, 75:2, 85:18, 105:21 actual [1] - 82:4 ADAM [1] - 1:14 adapt [1] - 110:8 addition [1] - 112:19 additional [3] - 14:9, 86:3, 107:16 address [45] - 52:6, 57:23, 58:24, 59:1, 63:17, 63:18, 63:21, 69:25, 70:7, 70:16, 71:16, 71:25, 72:2, 74:18, 75:4, 76:4, 79:18, 79:22, 93:9, 93:17,				
A					
A-Head [6] - 2:17, 11:17, 11:19, 23:9, 31:4, 45:10 ability [1] - 69:1 able [1] - 26:12 above-entitled [1] - 123:20 absolutely [10] - 17:15, 27:5, 29:22, 49:12, 58:8, 66:1, 69:24, 77:5, 84:7, 99:13 accept [9] - 68:6, 68:7, 69:21, 70:10, 70:18, 75:22, 75:25, 78:22, 83:1 accepted [1] - 36:8 access [10] - 20:16, 20:20, 20:25, 21:3, 21:5, 21:10, 68:10, 68:18, 68:19, 69:2 accessible [2] - 24:13, 25:4 accessing [1] - 93:22 according [1] - 81:18 account [72] - 11:1, 11:2, 11:19, 15:25, 20:24, 21:5, 21:13, 21:14, 21:15, 21:17, 23:11,					

AT&T [6] - 70:1, 70:12, 70:16, 115:15, 120:13, 120:14 AT&T's [1] - 120:5 ATM [1] - 43:20 attached [2] - 63:24, 107:18 attachment [1] - 10:20 attachments [2] - 10:15, 10:17 attempt [3] - 75:12, 77:13, 80:2 attempts [5] - 75:8, 75:11, 76:3, 76:15, 76:25 attend [1] - 16:22 attention [3] - 20:15, 72:15, 107:25 Attorney's [1] - 1:14 attorneys [1] - 54:3 audited [2] - 8:1, 21:20 August [3] - 37:23, 67:5, 67:8 AUSA [2] - 1:13, 1:14 authenticate [2] - 19:20, 24:4 authentication [1] - 20:17 authorize [1] - 33:17 authorized [1] - 29:1 automatic [2] - 50:7, 114:4 automatically [2] - 22:15, 50:9 Avenue [1] - 1:22 average [2] - 41:23, 42:2 aware [15] - 6:11, 18:24, 32:5, 32:7, 48:12, 48:21, 48:25, 50:12, 54:18, 56:17, 56:22, 92:12, 92:13, 92:16	11:19, 12:15, 20:24, 21:5, 21:10, 21:12, 23:11, 23:12, 23:13, 23:14, 23:18, 23:22, 25:5, 26:20, 26:21, 26:23, 34:15, 34:18, 35:6, 35:15, 35:25, 40:9, 40:10, 41:2, 41:4, 42:20, 43:17, 44:11, 56:10, 56:14, 72:21, 84:22, 84:24, 85:3, 85:7, 86:20, 87:13, 118:6 Bank [1] - 90:24 based [11] - 5:18, 6:18, 9:15, 15:9, 21:20, 23:15, 32:18, 33:10, 53:6, 83:8, 109:1 basis [1] - 117:14 Bay [1] - 2:14 BBBC [2] - 60:24, 106:6 beauty [1] - 29:24 become [1] - 48:12 BEFORE [1] - 1:11 beg [4] - 33:13, 33:20, 37:18, 50:17 began [2] - 74:18, 101:24 begin [3] - 102:9, 104:12, 110:8 beginning [8] - 36:19, 36:22, 36:25, 37:1, 37:13, 41:19, 73:14, 85:4 BEHALF [1] - 1:15 behalf [1] - 23:2 belonged [1] - 44:20 below [4] - 59:25, 60:7, 68:1, 86:20 best [4] - 122:4, 122:20, 123:10, 123:13 betrayed [1] - 9:7 between [9] - 4:13, 12:4, 14:3, 52:16, 80:9, 80:19, 81:15, 81:17, 83:24 big [1] - 78:11 bigger [1] - 97:23 bill [1] - 67:19 billing [1] - 67:20 bit [3] - 8:6, 59:15, 88:16 black.pdf [1] - 85:23 book [1] - 2:21	borrower [6] - 60:8, 61:4, 101:4, 104:23, 106:1, 118:11 bottom [3] - 39:17, 39:19, 115:17 branch [2] - 23:16, 23:19 branches [1] - 43:18 break [6] - 33:24, 91:18, 91:25, 94:7, 121:12, 121:14 breakdown [2] - 52:5, 52:7 brief [1] - 33:21 briefly [1] - 53:19 Broward [1] - 30:10 BSO [1] - 31:20 burial [2] - 3:24, 18:1 business [102] - 3:4, 3:17, 3:19, 3:21, 4:18, 5:18, 5:21, 6:4, 8:18, 9:16, 9:18, 11:17, 13:13, 15:10, 15:11, 15:14, 16:8, 21:5, 21:13, 21:17, 25:2, 29:14, 29:15, 31:3, 33:4, 40:9, 40:10, 44:7, 44:9, 44:18, 46:21, 47:4, 47:13, 47:21, 49:10, 54:12, 54:15, 54:16, 54:20, 55:3, 55:14, 56:13, 56:16, 56:17, 56:21, 56:22, 57:12, 57:13, 57:14, 57:15, 57:23, 57:24, 58:15, 58:20, 59:5, 59:6, 59:7, 63:3, 63:5, 63:9, 63:17, 63:18, 63:21, 64:19, 65:11, 66:7, 84:8, 85:3, 90:8, 90:9, 92:11, 92:14, 92:19, 92:21, 93:7, 93:12, 93:25, 94:3, 94:4, 94:24, 95:1, 99:15, 99:22, 100:8, 109:12, 109:14, 110:21, 110:23, 113:6, 113:9, 113:10, 113:12, 113:19, 113:20, 115:24, 116:1, 116:3, 116:8, 117:9 business-related [1]	- 15:10 businesses [2] - 5:12, 33:2 businessman [1] - 113:2 BY [26] - 2:8, 25:15, 34:9, 34:25, 36:17, 38:11, 39:3, 40:5, 40:23, 41:13, 51:4, 53:14, 66:17, 71:6, 80:12, 80:15, 82:5, 90:22, 91:24, 96:15, 103:11, 108:23, 109:20, 110:13, 113:18, 119:17	78:2, 78:15, 78:17, 78:19, 79:5, 79:8, 79:11, 79:12, 79:13, 79:21, 97:6, 98:15 center [2] - 57:4, 60:4 certain [9] - 5:12, 5:25, 17:12, 30:22, 31:23, 69:11, 71:9, 72:15 certainly [2] - 54:18, 103:2 certificate [4] - 104:6, 104:7, 105:17, 106:22 CERTIFICATE [1] - 123:18 certified [2] - 16:24, 106:15 certify [3] - 103:17, 105:9, 123:19 cetera [1] - 52:8 chain [2] - 119:22, 119:24 chairs [1] - 16:11 challenged [1] - 52:24 change [3] - 20:20, 88:15, 88:23 changed [1] - 67:6 changes [2] - 87:18, 98:23 characters [1] - 60:24 charge [2] - 122:22, 123:6 charity [1] - 25:14 check [33] - 6:23, 10:20, 10:23, 11:17, 14:15, 14:16, 14:19, 15:23, 15:25, 20:4, 20:5, 23:8, 24:17, 43:2, 43:10, 43:13, 43:14, 43:15, 43:16, 44:1, 44:2, 44:3, 44:4, 44:6, 44:24, 44:25, 45:5, 45:14, 46:8, 47:1, 47:2, 47:10, 113:8 checking [3] - 86:10, 89:20, 90:24 checks [4] - 47:4, 118:4, 118:5, 118:6 chemicals [1] - 47:18 child [2] - 49:3, 49:4 children [1] - 26:22 circumstances [1] - 109:2 City [3] - 14:20,
C				
camera [1] - 98:8 cannot [1] - 17:22 capacity [1] - 48:22 captures [1] - 79:20 car [3] - 24:11, 46:2, 46:3 card [1] - 10:19 cards [2] - 6:23, 24:12 career [1] - 49:21 CAROLYN [1] - 1:7 Carolyn [17] - 1:19, 11:10, 11:13, 11:21, 31:13, 43:2, 43:10, 44:24, 44:25, 45:10, 46:11, 70:17, 71:11, 72:11, 90:25 Carolyn's [1] - 44:3 case [15] - 30:4, 48:6, 49:13, 50:3, 51:24, 51:25, 53:24, 54:2, 57:1, 61:15, 69:7, 69:10, 69:25, 70:20, 123:11 CASE [1] - 1:2 cash [8] - 39:19, 43:22, 43:23, 43:25, 44:4, 44:8, 44:20, 47:7 casual [1] - 13:1 caught [1] - 49:4 caused [1] - 32:13 ceiling [1] - 98:9 cell [27] - 59:1, 66:19, 67:2, 67:8, 68:8, 68:11, 68:15, 68:18, 71:17, 71:24, 72:1, 73:11, 76:4, 76:12, 76:23,				

14:23, 15:25 claimed [2] - 4:23, 4:24 claims [2] - 49:2, 49:3 clarity [1] - 51:18 cleaning [1] - 46:3 clear [5] - 46:25, 61:23, 95:4, 100:1, 117:17 clearer [2] - 44:2, 114:18 clearly [2] - 65:10, 119:19 click [2] - 27:25, 110:6 clients [1] - 16:16 closer [1] - 101:17 closing [2] - 38:13, 122:7 code [20] - 19:21, 24:4, 24:5, 71:23, 71:25, 72:5, 72:6, 72:12, 72:19, 72:22, 72:25, 73:2, 73:9, 73:25, 78:14, 78:20, 79:21, 93:10 Code [1] - 38:17 codes [10] - 20:18, 73:10, 73:11, 73:13, 73:14, 73:15, 73:19, 77:23, 78:1, 78:17 collected [1] - 42:2 Column [1] - 79:3 column [2] - 15:12, 95:5 coming [4] - 10:13, 11:10, 93:19, 109:14 commencing [1] - 17:12 communication [2] - 3:23, 8:3 community [1] - 49:11 company [3] - 14:24, 55:6, 70:21 competing [1] - 48:22 completed [2] - 104:9, 123:5 completely [1] - 62:16 completion [3] - 104:8, 105:17, 106:22 complied [1] - 118:11 component [4] - 95:12, 95:17,	100:13, 100:19 composite [3] - 42:23, 43:9, 45:13 computer [16] - 1:25, 12:10, 27:11, 27:14, 27:16, 27:22, 28:2, 28:4, 28:10, 90:12, 96:5, 96:19, 96:21, 96:22, 96:24 computer-aided [1] - 1:25 computers [3] - 4:4, 96:10, 96:23 concerning [5] - 6:14, 18:25, 24:14, 47:12, 47:13 condition [1] - 13:18 conduct [1] - 105:21 conducted [7] - 71:7, 87:22, 87:25, 88:9, 91:9, 92:2, 92:7 conducting [4] - 75:2, 85:18, 86:5, 86:22 conference [2] - 122:22, 123:6 confirm [1] - 83:3 conjunction [1] - 33:24 connected [3] - 23:22, 56:25, 68:17 connection [9] - 50:4, 50:12, 52:17, 53:11, 68:23, 73:10, 74:6, 75:3, 120:24 consider [1] - 33:3 considered [2] - 32:19, 100:25 consistent [1] - 8:24 constant [1] - 3:11 contain [1] - 10:7 contained [1] - 62:16 continue [2] - 34:6, 91:23 CONTINUED [1] - 2:7 contract [1] - 113:5 contractor [1] - 117:14 contractors [1] - 117:9 control [1] - 18:22 conversation [3] - 4:13, 6:20, 6:24 conversations [2] - 4:5, 17:7 conversions [1] - 81:16 converted [1] - 81:16	cooperation [1] - 123:15 copies [2] - 99:4, 112:20 copy [3] - 38:24, 112:4, 112:6 Coral [4] - 25:21, 25:24, 26:1, 26:8 corporation [5] - 2:23, 14:21, 15:1, 50:24, 64:23 corporations [1] - 2:9 correct [187] - 2:15, 3:2, 6:22, 23:1, 25:21, 31:22, 33:3, 48:17, 49:19, 52:25, 53:18, 54:3, 54:6, 54:8, 54:13, 54:16, 54:24, 55:4, 55:7, 55:9, 55:14, 55:18, 55:25, 56:3, 56:8, 56:11, 56:14, 56:15, 56:18, 57:7, 57:13, 57:19, 57:21, 57:22, 57:25, 58:11, 58:16, 58:22, 59:2, 59:5, 59:21, 59:23, 60:17, 60:18, 61:8, 61:11, 61:12, 61:24, 62:6, 62:7, 62:10, 62:11, 62:13, 62:14, 62:20, 63:3, 63:12, 64:7, 64:13, 64:16, 65:25, 66:4, 66:20, 67:3, 67:4, 67:10, 67:20, 68:10, 69:13, 70:2, 70:13, 70:23, 71:2, 71:12, 71:17, 73:12, 75:8, 76:5, 76:6, 76:8, 76:16, 76:17, 76:21, 76:22, 76:25, 77:1, 77:4, 77:11, 77:12, 77:16, 77:17, 77:22, 77:24, 77:25, 79:1, 79:25, 80:4, 81:2, 81:9, 81:10, 82:12, 82:17, 83:12, 83:13, 83:15, 84:17, 85:19, 86:5, 86:6, 86:18, 86:25, 87:6, 87:20, 88:6, 88:23, 92:2, 92:4, 92:8, 92:11, 93:19, 93:22, 95:25, 96:1,	96:2, 96:3, 97:4, 97:7, 97:10, 97:14, 97:16, 97:22, 98:12, 98:18, 98:21, 98:24, 99:2, 99:6, 102:3, 102:13, 103:3, 103:13, 103:24, 104:1, 104:4, 104:9, 104:13, 104:17, 104:20, 105:4, 105:7, 105:11, 105:14, 105:18, 105:19, 106:3, 106:4, 106:13, 106:16, 106:20, 107:1, 107:6, 110:18, 112:2, 112:12, 113:13, 114:2, 114:8, 114:19, 114:20, 114:23, 114:24, 115:8, 115:10, 116:1, 116:3, 116:9, 116:14, 117:17, 117:19, 117:21, 117:23, 118:18, 119:5, 120:2, 120:8, 120:17, 123:19 correctly [2] - 4:17, 65:5 correspondence [1] - 21:22 cosmetologist [1] - 16:21 cosmetology [3] - 16:12, 16:13, 16:19 cost [1] - 6:14 costs [1] - 117:20 couch [1] - 16:17 counsel [1] - 121:3 Counsel [1] - 91:17 count [2] - 80:6, 80:7 counted [1] - 80:8 County [1] - 30:10 couple [3] - 3:12, 4:10, 84:14 course [3] - 69:6, 69:8, 92:22 COURT [55] - 1:1, 2:4, 25:11, 33:21, 34:5, 34:8, 34:23, 36:5, 36:9, 36:12, 36:16, 38:8, 38:22, 38:25, 40:4, 40:19, 40:21, 41:9, 41:12, 50:20, 50:22, 50:25, 51:3, 66:15,	71:5, 80:14, 81:22, 81:24, 82:3, 90:20, 91:17, 91:21, 91:23, 96:14, 103:9, 108:19, 109:19, 110:12, 113:16, 119:16, 121:1, 121:6, 121:10, 121:13, 121:18, 121:20, 122:1, 122:5, 122:9, 122:12, 122:15, 122:18, 122:21, 122:24, 123:3 Court [6] - 1:21, 1:22, 2:1, 122:13, 123:23, 123:24 court [2] - 6:7, 123:2 Court's [4] - 33:13, 33:20, 37:18, 50:17 courtroom [3] - 25:12, 53:17, 53:25 cover [3] - 51:15, 51:17, 63:23 covered [1] - 3:15 covering [2] - 4:9, 20:11 CPA [6] - 8:15, 32:18, 33:11, 62:2, 64:9, 64:11 create [2] - 66:4, 66:9 created [4] - 49:10, 62:12, 62:15, 62:25 credit [1] - 24:12 criminal [2] - 5:24, 6:9 criteria [1] - 15:10 cross [2] - 121:7, 122:15 CROSS [1] - 53:13 CROSS-EXAMINATION [1] - 53:13 Crosspoint [1] - 38:16 Cs [2] - 52:19, 52:20 curling [1] - 16:13 customer [3] - 66:22, 66:24, 95:8 cut [1] - 39:18 Cutler [1] - 2:14
D				
d/b/a [2] - 58:10, 84:11 D98B [1] - 102:2 Daniela [4] - 64:6,				

66:2, 66:9, 66:12 dark [1] - 103:8 DARYL [1] - 1:18 data [23] - 68:10, 68:19, 71:21, 77:15, 78:21, 78:22, 81:18, 82:14, 83:17, 83:18, 86:1, 86:15, 86:16, 86:18, 88:2, 88:25, 92:22, 92:25, 95:2, 99:14, 100:5, 112:10 date [20] - 17:12, 35:15, 35:25, 36:22, 39:4, 39:5, 39:7, 39:14, 40:14, 41:4, 41:15, 42:10, 42:14, 45:4, 52:7, 82:12, 83:9, 84:10, 116:14 DATE [1] - 123:22 dated [1] - 47:1 DAVID [1] - 1:13 days [1] - 122:14 deal [3] - 17:4, 18:8, 18:11 dealing [3] - 4:3, 6:11, 17:4 deceived [1] - 9:7 Defendant [1] - 1:9 Defendant's [2] - 35:8, 35:19 DEFENDANTS [1] - 1:15 Defendants' [6] - 40:6, 40:18, 40:25, 42:6, 50:18, 51:11 defense [2] - 10:2, 122:25 Defense [18] - 10:3, 10:11, 11:8, 34:10, 34:20, 34:24, 35:2, 36:13, 37:15, 37:20, 38:6, 39:1, 40:22, 41:7, 41:10, 50:21, 51:6, 52:11 definitely [1] - 121:8 defraud [1] - 33:15 deliberately [1] - 28:14 delivered [1] - 112:5 demonstrative [3] - 74:22, 91:3, 119:9 DENISE [1] - 1:7 depart [1] - 123:7 Department [1] - 52:25 deposit [3] - 43:23, 44:19, 45:7	deposited [3] - 44:17, 45:10, 46:20 deputies [2] - 30:22, 31:21 described [1] - 113:19 device [1] - 27:20 difference [1] - 19:11 different [8] - 24:9, 56:5, 61:1, 92:6, 101:21, 111:14, 113:15, 122:6 difficult [1] - 101:17 digits [1] - 55:24 direct [3] - 16:1, 66:15, 114:4 DIRECT [1] - 2:7 directed [1] - 82:4 directly [4] - 11:22, 18:9, 18:22, 74:1 director [3] - 3:10, 5:22, 17:23 directors [1] - 3:11 disbursed [2] - 39:7, 116:14 disbursement [1] - 116:14 discuss [1] - 121:4 discussed [2] - 6:14, 53:24 discussion [2] - 28:25, 54:2 disposal [1] - 24:6 dispute [5] - 58:9, 70:6, 70:8, 116:16, 120:4 distance [1] - 19:13 District [3] - 1:22, 123:24, 123:24 DISTRICT [3] - 1:1, 1:1, 1:11 document [26] - 29:23, 30:19, 31:1, 31:2, 34:18, 35:6, 35:16, 35:19, 36:1, 37:16, 38:18, 39:11, 40:15, 41:15, 42:8, 43:9, 44:14, 44:16, 45:13, 48:14, 50:14, 58:6, 89:2, 101:2, 109:22, 114:19 documentation [8] - 18:13, 18:15, 19:4, 19:5, 24:14, 48:7, 50:11, 109:3 documentations [1] - 96:18 documents [27] -	3:24, 6:21, 7:16, 9:5, 12:2, 17:22, 18:6, 20:2, 30:9, 30:18, 33:18, 38:13, 38:14, 51:9, 53:9, 57:7, 57:8, 83:5, 84:22, 85:3, 87:13, 98:20, 103:19, 105:11, 106:17, 106:24, 108:25 DocuSign [36] - 12:16, 22:2, 22:4, 22:18, 27:18, 27:25, 28:10, 59:20, 59:22, 60:23, 100:21, 101:1, 101:9, 101:10, 101:14, 101:20, 102:2, 102:10, 103:7, 103:12, 104:24, 105:14, 106:2, 106:5, 109:22, 110:2, 110:3, 110:7, 112:1, 115:4, 118:21, 118:25, 119:19, 119:25, 120:8, 120:21 DocuSigned [8] - 22:10, 22:25, 23:2, 27:20, 100:23, 102:3, 102:6, 118:22 DocuSigns [1] - 22:20 dollars [8] - 8:19, 8:21, 8:24, 14:9, 14:14, 14:15, 29:24, 44:4 DONALD [1] - 1:11 donate [1] - 2:21 done [26] - 5:18, 13:11, 20:13, 20:20, 20:23, 45:21, 49:7, 53:7, 64:15, 64:18, 72:24, 84:16, 91:4, 100:18, 100:21, 109:1, 113:6, 113:9, 113:12, 113:14, 115:22, 120:9, 122:10, 122:11 door [2] - 53:21, 54:6 doubt [6] - 68:3, 69:18, 70:16, 83:18, 86:1, 86:17 down [9] - 32:8, 37:7,	39:17, 54:7, 108:21, 113:4, 113:5, 113:7, 119:24 Drive [1] - 38:17 driver's [7] - 6:22, 20:4, 95:18, 95:20, 97:2, 99:5, 99:10 Driver's [2] - 10:19, 95:21 dryers [1] - 16:13 dual [1] - 48:22 during [11] - 2:11, 5:14, 6:20, 6:24, 17:20, 70:7, 70:17, 87:4, 87:11, 94:7, 122:7 duties [2] - 96:13, 96:18	emailed [4] - 11:14, 111:5, 111:7, 112:7 emailing [1] - 10:5 embalming [4] - 3:12, 3:25, 17:25, 18:1 emphasis [1] - 122:6 employee [1] - 117:10 employees [9] - 32:16, 116:19, 116:23, 116:24, 117:2, 117:8, 117:12, 117:14, 118:5 enclosed [1] - 51:17 end [3] - 50:10, 89:14, 89:16 ended [3] - 20:8, 26:2, 64:23 ending [9] - 42:10, 59:2, 67:9, 68:4, 75:4, 90:24, 99:25, 102:2, 106:6 endorsement [2] - 44:17, 45:5 ends [5] - 55:24, 59:23, 105:1, 119:4, 120:1 enforcement [1] - 49:9 enlarge [2] - 57:10, 59:15 enlarged [4] - 59:16, 60:11, 60:20, 61:3 ensure [1] - 27:2 enter [1] - 33:14 entered [5] - 2:3, 34:4, 99:25, 100:3, 100:4 entertain [1] - 123:10 entertained [1] - 16:17 entire [2] - 69:8, 112:7 entitled [1] - 123:20 entity [1] - 42:21 entry [4] - 93:6, 94:18, 94:20, 94:21 envelope [8] - 59:20, 59:22, 60:23, 61:1, 102:2, 104:24, 106:5, 112:6 equal [1] - 8:8 equally [2] - 61:8, 61:9 equipment [6] - 15:13, 16:6, 16:8, 16:11, 16:12, 16:15 equity [1] - 26:15
E				
early [1] - 123:14 easier [1] - 88:16 Eastern [1] - 80:4 easy [1] - 13:13 Eddie [1] - 13:12 Eduardo [18] - 5:14, 6:5, 7:9, 9:12, 10:25, 11:22, 12:20, 12:22, 14:8, 17:6, 29:19, 30:13, 31:6, 31:17, 53:6, 73:16, 74:2, 118:9 Eduardo's [2] - 12:24, 14:24 effect [1] - 16:7 eight [2] - 59:10, 76:2 EIN [5] - 30:25, 31:1, 31:6, 52:7, 56:2 either [15] - 18:4, 18:8, 18:21, 18:24, 21:10, 31:5, 50:4, 71:16, 71:25, 79:21, 86:25, 104:3, 112:17, 116:25 email [31] - 10:7, 10:13, 10:15, 11:5, 11:10, 18:5, 19:22, 20:16, 20:18, 20:20, 21:1, 27:25, 31:7, 58:24, 58:25, 59:1, 71:16, 71:24, 72:1, 72:2, 74:18, 78:2, 78:3, 78:18, 79:18, 79:22, 93:9, 104:12, 105:20, 106:25, 115:7				

especially ^[1] - 17:20 ESQ ^[2] - 1:16, 1:18 established ^[1] - 54:21 establishment ^[2] - 58:13, 84:10 estate ^[1] - 25:17 estimate ^[1] - 26:12 et ^[1] - 52:8 evening ^[3] - 122:22, 123:7, 123:15 event ^[7] - 82:10, 82:11, 85:21, 86:25, 104:8, 105:17, 119:25 events ^[15] - 82:6, 83:22, 83:24, 85:17, 86:3, 86:5, 86:24, 87:4, 87:10, 87:11, 104:11, 111:25, 119:22, 119:24 eventually ^[2] - 32:8, 32:11 evidence ^[15] - 34:24, 36:14, 39:1, 40:22, 41:10, 50:19, 50:21, 51:5, 57:1, 62:22, 70:4, 70:23, 89:3, 94:9, 123:5 evidently ^[2] - 90:2, 90:5 exact ^[4] - 6:16, 14:6, 19:8, 25:3 exactly ^[9] - 4:8, 13:9, 19:18, 19:22, 19:23, 45:21, 78:2, 96:19, 119:21 EXAMINATION ^[2] - 2:7, 53:13 examination ^[2] - 101:24, 114:4 example ^[7] - 12:12, 26:25, 46:5, 49:2, 71:15, 72:11, 113:4 examples ^[1] - 3:8 Excel ^[2] - 78:23, 79:1 except ^[2] - 51:24, 51:25 excuse ^[2] - 10:9, 33:6 executed ^[1] - 120:2 Exhibit ^[37] - 7:19, 7:20, 10:3, 10:11, 11:9, 34:11, 34:24, 35:9, 36:19, 37:11, 37:13, 37:15, 38:7, 39:1, 40:7, 40:22, 41:10, 42:20,	50:19, 50:21, 51:11, 57:2, 59:11, 67:16, 69:15, 70:4, 70:15, 78:9, 82:7, 89:3, 95:16, 102:1, 104:16, 105:25, 111:25, 114:16, 114:21 exhibit ^[9] - 8:20, 17:10, 24:19, 63:23, 81:25, 82:1, 82:4, 104:7, 107:5 Exhibits ^[1] - 36:13 exhibits ^[2] - 57:1, 94:8 exited ^[3] - 34:2, 91:20, 123:16 expect ^[1] - 123:4 experience ^[1] - 4:3 expire ^[1] - 73:8 expired ^[3] - 64:23, 72:9, 72:12 explain ^[3] - 13:25, 46:25, 90:15 explained ^[6] - 4:20, 9:15, 14:1, 15:9, 33:10, 72:13 explanation ^[1] - 90:16	117:21, 117:24, 117:25, 118:1 falsified ^[1] - 32:5 familiar ^[1] - 14:21 families ^[2] - 3:13, 43:21 family ^[1] - 49:11 far ^[10] - 4:20, 5:12, 5:21, 5:23, 7:8, 12:2, 12:13, 54:15, 77:19, 99:22 fast ^[1] - 31:17 fast-talk ^[1] - 31:17 favorite ^[1] - 25:14 FCRR ^[2] - 1:21, 123:23 fee ^[1] - 13:25 feed ^[1] - 2:22 feelings ^[1] - 9:6 fees ^[2] - 6:14, 43:20 felt ^[1] - 5:19 few ^[3] - 54:10, 81:14, 101:3 Fi ^[3] - 68:17, 68:23, 69:1 figure ^[1] - 29:19 figured ^[2] - 5:25, 15:1 file ^[19] - 9:8, 12:10, 21:18, 33:7, 33:17, 49:1, 49:3, 52:19, 52:20, 65:5, 78:24, 82:11, 83:3, 85:21, 85:23, 86:7, 86:10 filed ^[16] - 7:13, 7:15, 7:16, 7:24, 8:12, 21:20, 48:16, 48:18, 52:17, 55:17, 55:20, 61:10, 61:23, 62:2, 62:5 filers ^[3] - 60:8, 61:5, 104:24 files ^[3] - 55:14, 82:16, 85:24 filing ^[2] - 48:22, 64:19 financially ^[1] - 29:15 fine ^[2] - 25:13, 25:14 finished ^[1] - 111:4 firm ^[1] - 65:25 first ^[33] - 4:6, 5:9, 20:1, 22:9, 22:21, 23:25, 27:18, 28:16, 30:6, 48:9, 51:2, 52:1, 52:2, 61:20, 61:21, 75:1, 86:7, 87:9, 94:10, 94:11, 97:10, 100:5, 100:7,	101:24, 102:1, 107:17, 109:21, 109:23, 110:4, 110:9, 110:10, 111:19, 114:19 five ^[4] - 75:10, 75:25, 88:8, 123:9 FLORIDA ^[1] - 1:1 Florida ^[9] - 1:4, 1:23, 10:19, 17:1, 38:17, 55:6, 95:21, 123:24, 123:25 fluctuates ^[2] - 117:5, 117:7 following ^[2] - 121:5, 123:2 FOR ^[1] - 1:12 foregoing ^[1] - 123:19 forever ^[2] - 72:6, 73:3 forgiveness ^[8] - 50:4, 50:6, 50:12, 114:1, 114:22, 115:1, 115:18, 115:20 Form ^[1] - 100:24 form ^[9] - 55:20, 60:8, 61:4, 71:3, 81:23, 104:23, 106:1, 108:18, 116:11 formally ^[1] - 54:5 formed ^[1] - 64:19 forms ^[1] - 103:19 forth ^[1] - 101:15 forward ^[2] - 2:25, 119:20 forwarded ^[5] - 115:3, 115:4, 115:7, 115:18, 119:22 Foundation ^[1] - 2:18 Four ^[1] - 86:10 four ^[11] - 55:24, 60:24, 75:25, 76:11, 87:2, 87:4, 87:10, 87:11, 98:20, 99:9, 119:21 FPR ^[2] - 1:21, 123:23 FPR-C ^[2] - 1:21, 123:23 frame ^[1] - 13:9 fraudulent ^[13] - 28:25, 29:8, 29:12, 30:6, 30:8, 30:9, 33:17, 48:13, 48:15, 49:8, 50:13, 66:7, 109:3	fraudulently ^[1] - 66:11 free ^[1] - 80:7 frequently ^[1] - 27:4 front ^[8] - 51:12, 51:14, 57:4, 58:6, 59:11, 95:21, 99:5, 109:11 funding ^[3] - 88:17, 88:23, 89:6 funds ^[1] - 40:14 Funeral ^[50] - 2:11, 2:14, 7:23, 9:9, 9:13, 10:13, 10:20, 10:23, 11:1, 32:15, 42:22, 44:10, 44:11, 44:18, 44:20, 45:14, 45:23, 50:24, 51:9, 52:6, 55:13, 55:17, 56:2, 56:14, 61:25, 63:21, 63:24, 64:18, 64:24, 70:1, 70:6, 75:3, 85:18, 89:25, 90:1, 92:17, 93:19, 93:20, 93:21, 95:6, 100:1, 108:2, 108:3, 110:21, 110:23, 113:2, 113:20, 117:13, 117:15, 118:6 funeral ^[35] - 3:5, 3:8, 3:10, 3:11, 3:17, 3:19, 3:20, 4:10, 4:18, 5:12, 5:19, 5:21, 5:23, 8:18, 9:9, 9:19, 12:25, 13:2, 17:22, 17:23, 20:10, 20:11, 43:22, 45:25, 46:1, 47:5, 52:12, 55:1, 55:6, 96:18, 97:21, 97:25, 98:8, 116:7 funerals ^[1] - 3:15 furniture ^[1] - 16:15
G				
Galaxy ^[9] - 67:10, 67:13, 68:1, 68:3, 68:11, 76:5, 76:12, 77:10, 97:7 gatherings ^[1] - 13:1 generally ^[1] - 50:22 gentlemen ^[4] - 33:21, 34:5, 113:17, 123:3 given ^[8] - 6:16, 44:20, 45:21, 47:2,				

73:16, 74:2, 85:2, 120:14 glanced [1] - 109:9 GOVERNMENT [1] - 1:12 Government [40] - 8:13, 17:10, 21:23, 24:19, 32:11, 33:15, 58:6, 59:14, 59:16, 60:11, 60:22, 61:2, 62:22, 67:16, 67:17, 69:11, 69:15, 70:4, 70:15, 78:9, 78:23, 79:24, 82:6, 89:3, 94:8, 95:16, 97:12, 102:1, 102:9, 103:23, 104:16, 104:22, 105:25, 107:5, 107:9, 111:5, 111:17, 111:24, 114:16, 114:21 Government's [15] - 7:19, 7:20, 10:2, 42:23, 43:8, 44:13, 44:22, 45:12, 46:10, 46:13, 46:16, 57:2, 59:11, 74:22, 119:9 GRAHAM [1] - 1:11 Granados [26] - 8:17, 9:2, 9:8, 9:11, 9:17, 10:5, 10:14, 11:14, 11:22, 17:7, 19:25, 23:10, 48:3, 48:13, 52:15, 62:10, 73:17, 73:25, 74:3, 83:1, 115:3, 115:5, 115:16, 118:9, 119:20, 119:23 Granados's [1] - 15:24 great [1] - 123:15 greater [1] - 49:22 gross [6] - 8:7, 52:8, 52:9, 58:4, 60:9, 61:5 Group [2] - 14:20, 15:25 guarantee [1] - 108:5 guess [9] - 15:13, 20:12, 20:17, 25:13, 42:10, 47:8, 51:16, 52:5, 62:19 guessing [3] - 90:18, 90:19, 90:21	H hair [2] - 11:17, 16:13 Hallandale [2] - 2:12, 54:24 hand [1] - 47:7 handle [1] - 96:20 handled [3] - 3:24, 96:12, 96:17 happy [1] - 78:12 hard [1] - 88:15 Haydee [25] - 10:5, 10:14, 11:14, 15:24, 17:8, 23:10, 28:22, 31:19, 48:3, 48:12, 49:7, 49:24, 52:15, 62:8, 62:10, 62:25, 73:17, 73:25, 81:1, 95:25, 96:17, 115:3, 115:5, 115:16, 118:8 HDMI [2] - 53:11, 56:25 Head [6] - 2:17, 11:17, 11:19, 23:9, 31:4, 45:10 hear [6] - 6:9, 85:6, 88:13, 101:16, 102:4, 115:12 heard [4] - 49:2, 50:3, 75:19, 115:8 hearing [1] - 101:18 HELD [1] - 1:11 held [4] - 53:21, 90:25, 121:5, 123:2 help [5] - 4:23, 46:1, 65:17, 107:8 helped [2] - 3:15, 5:8 helping [1] - 5:7 Hendrith [1] - 1:19 herself [4] - 43:2, 44:24, 44:25, 46:24 highlighted [8] - 86:4, 86:8, 88:8, 91:7, 94:9, 95:3, 95:4, 95:6 himself [1] - 99:1 history [4] - 6:9, 42:12, 53:7, 111:25 holding [2] - 54:6, 95:20 Home [47] - 2:11, 2:14, 7:23, 9:10, 9:13, 10:13, 10:20, 10:23, 32:15, 42:22, 44:10, 44:11, 44:21, 45:14, 45:23,	50:24, 51:9, 52:6, 55:14, 55:17, 56:2, 56:14, 61:25, 63:21, 63:25, 64:18, 64:24, 70:1, 70:6, 75:3, 85:18, 90:1, 92:17, 93:19, 93:20, 93:21, 95:6, 100:1, 108:3, 110:21, 110:23, 113:3, 113:20, 117:13, 117:15 home [40] - 2:17, 3:5, 3:9, 3:19, 3:20, 4:10, 4:18, 5:19, 5:23, 8:18, 9:9, 9:19, 12:25, 13:2, 17:22, 20:10, 20:11, 25:21, 25:24, 27:15, 46:1, 47:6, 52:12, 55:1, 55:6, 70:13, 96:18, 97:21, 97:25, 98:8, 116:7, 119:13, 119:15, 119:18, 120:2, 120:6, 120:8, 120:9, 120:12, 120:23 Home's [3] - 11:1, 44:18, 118:6 homeless [2] - 2:20, 2:22 homes [1] - 5:12 Honor [2] - 53:10, 122:13 HONORABLE [1] - 1:11 hour [3] - 96:11, 121:8, 122:17 hours [5] - 121:10, 121:17, 121:22 house [3] - 47:24, 97:18, 120:10 human [1] - 54:7 hundred [2] - 8:18, 38:3 hung [1] - 31:25 Hunter [1] - 50:2 hurry [2] - 13:15, 49:24 hurt [1] - 9:7 husband [5] - 28:22, 29:18, 48:13, 49:24, 118:9	104:24, 106:5 idea [7] - 13:24, 48:2, 48:15, 84:5, 87:5, 99:10, 107:23 identical [3] - 60:11, 60:17, 61:5 identification [6] - 34:11, 38:8, 38:22, 40:7, 40:25, 50:20 identifier [5] - 71:24, 77:19, 79:3, 79:20 identify [1] - 41:1 identity [3] - 95:14, 97:14, 99:6 ignored [4] - 28:14, 28:18, 109:23, 110:9 illegal [1] - 31:18 immediately [3] - 30:13, 31:15, 49:4 inaccurately [2] - 90:2, 90:5 include [2] - 52:16, 110:4 included [4] - 9:3, 48:7, 50:13, 52:22 including [5] - 94:24, 105:9, 105:10, 106:15, 106:17 income [7] - 8:5, 8:6, 55:16, 58:4, 60:9, 61:5, 109:13 incorporated [1] - 52:7 incur [1] - 43:21 independent [2] - 117:9, 117:14 indicate [7] - 5:8, 15:2, 15:5, 23:11, 41:23, 42:2, 52:9 indicated [4] - 3:1, 8:20, 15:2, 49:6 indicates [2] - 8:5, 87:23 indicating [1] - 18:5 indictment [1] - 9:4 individual [4] - 50:2, 55:17, 61:11, 62:5 individually [1] - 64:16 individuals [1] - 48:22 indulgence [4] - 33:13, 33:20, 37:18, 50:17 information [47] - 18:25, 19:19, 19:25, 20:5, 29:8, 29:12, 48:3, 48:6, 48:14, 49:8, 50:13,	52:5, 59:10, 60:10, 60:12, 60:16, 61:3, 61:6, 62:16, 84:6, 84:12, 87:5, 87:12, 87:19, 90:9, 93:8, 93:17, 93:25, 94:5, 94:6, 94:10, 94:11, 94:15, 94:18, 94:20, 94:21, 99:11, 101:23, 103:17, 103:18, 105:10, 106:16, 107:24, 116:11, 117:17, 118:17 initial [8] - 6:24, 93:8, 103:7, 103:12, 103:24, 105:13, 106:19, 114:8 initialed [3] - 111:24, 114:25, 118:19 initialled [6] - 106:2, 110:15, 110:17, 110:19, 118:13 initialling [9] - 28:5, 28:7, 28:8, 103:3, 103:4, 103:15, 104:4, 112:19 initials [16] - 102:10, 102:13, 102:15, 102:19, 102:21, 103:14, 103:21, 105:3, 105:6, 106:7, 106:12, 110:14, 110:20, 110:25, 114:18, 118:11 initiate [1] - 19:16 inkling [3] - 48:2, 99:11, 107:23 input [4] - 48:3, 49:8, 116:22, 116:24 inputted [1] - 48:13 inquiring [1] - 4:22 instance [2] - 72:11, 102:23 instances [2] - 98:17, 98:23 instead [1] - 7:24 instructed [1] - 119:20 instructing [1] - 28:2 instructions [2] - 89:6, 89:7 insurance [2] - 24:11 integrity [1] - 53:3 interaction [2] - 3:18, 54:7 Internal [1] - 55:16 Internet [8] - 68:11, 68:14, 68:18,
Lance W. Steinbeisser, Official Court Reporter				

68:19, 69:2, 70:12, 75:3, 120:23 introduced [2] - 17:10, 24:19 investigation [2] - 30:21, 32:9 involved [2] - 27:11, 65:11 IP [33] - 69:11, 69:19, 69:25, 70:6, 70:16, 70:18, 75:3, 76:4, 93:17, 93:18, 93:20, 93:24, 94:9, 94:10, 95:4, 95:5, 95:7, 99:25, 100:1, 100:8, 104:16, 105:21, 118:25, 119:7, 119:10, 119:12, 120:1, 120:5, 120:9, 120:13, 120:16, 120:20 iPhone [3] - 82:19, 82:23, 82:25 irons [1] - 16:13 IRS [4] - 48:21, 49:4, 52:25, 58:4 issues [2] - 3:11, 33:23 itself [2] - 12:25, 102:7	41:16, 67:5, 67:8 Jury [5] - 2:3, 34:2, 34:4, 91:20, 123:16 jury [10] - 3:7, 24:24, 25:20, 26:12, 27:9, 42:7, 84:3, 99:8, 110:5, 120:19	99:15, 99:22, 100:8, 109:13, 110:21, 115:24 legitimacy [1] - 8:3 legitimate [2] - 53:9, 65:25 lender [2] - 22:15, 107:18 letter [1] - 63:23 liability [1] - 55:6 license [11] - 5:21, 5:22, 5:25, 6:23, 16:25, 20:4, 95:18, 95:20, 97:3, 99:5, 99:10 License [2] - 10:19, 95:21 licensed [3] - 16:21, 17:1, 64:15 lie [1] - 66:2 life [2] - 24:11, 51:23 lifespan [1] - 72:19 limited [2] - 55:6, 72:19 line [10] - 58:5, 60:7, 67:9, 79:15, 81:11, 86:7, 94:11, 100:5, 100:7, 113:8 link [4] - 28:1, 85:7, 86:25, 110:7 linked [3] - 84:24, 85:10, 86:20 list [2] - 33:5, 69:11 listed [1] - 110:23 listen [4] - 65:12, 68:24, 72:17, 85:5 live [3] - 25:23, 25:24, 54:23 lived [2] - 26:9, 70:17 LLC [2] - 50:24, 64:24 loan [90] - 4:14, 4:20, 4:24, 5:5, 5:9, 5:20, 6:13, 6:18, 7:3, 9:9, 9:12, 9:15, 9:18, 12:7, 12:13, 13:6, 13:10, 13:14, 13:20, 13:21, 14:10, 15:9, 15:11, 17:19, 20:12, 21:25, 22:4, 22:6, 22:7, 24:21, 25:6, 26:4, 27:6, 27:9, 27:18, 31:12, 31:22, 32:17, 45:3, 48:1, 50:12, 52:17, 53:2, 56:7, 56:13, 62:12, 65:14, 74:13, 76:8, 77:3, 77:9, 77:15, 80:9,	84:6, 85:13, 87:6, 88:9, 90:10, 91:10, 92:1, 92:8, 93:22, 97:14, 97:22, 98:18, 98:21, 98:24, 99:2, 99:12, 100:19, 107:13, 107:14, 107:24, 108:1, 108:4, 108:5, 108:25, 109:1, 109:2, 111:4, 111:6, 112:1, 113:7, 113:12, 113:22, 114:23, 116:7, 116:13, 116:16, 116:20 loans [15] - 5:1, 5:2, 5:3, 5:8, 17:5, 17:14, 19:8, 24:12, 26:18, 49:13, 50:5, 111:8, 111:10, 111:14, 112:24 local [3] - 23:14, 43:17, 43:18 located [2] - 2:12, 2:14 log [6] - 71:14, 71:15, 71:25, 77:23, 80:19, 84:20 logged [8] - 71:9, 72:21, 80:3, 83:8, 83:25, 84:4, 84:15, 84:16 logging [12] - 73:10, 76:7, 76:11, 76:20, 77:2, 77:9, 77:15, 79:25, 80:17, 80:21, 80:23, 98:18 login [10] - 72:4, 75:7, 75:11, 75:20, 76:2, 76:15, 76:24, 77:6, 77:13, 80:2 logins [14] - 75:10, 75:24, 76:18, 80:8, 80:16, 80:17, 81:7, 83:11, 83:20, 83:21, 83:24, 84:12, 87:9, 99:9 longtime [1] - 64:7 look [28] - 8:5, 24:14, 34:11, 35:9, 39:10, 42:11, 44:13, 45:4, 51:2, 59:14, 60:19, 62:21, 62:22, 71:21, 78:21, 81:13, 82:9, 83:22, 87:18, 101:7, 107:25, 111:24, 114:15, 115:17,	115:21, 115:23, 115:24 looked [20] - 9:4, 24:16, 32:9, 61:1, 61:6, 71:17, 81:7, 83:8, 87:2, 92:4, 98:17, 98:20, 98:23, 99:1, 99:4, 100:5, 101:2, 111:18, 114:12, 118:4 looking [22] - 30:17, 30:18, 30:25, 31:9, 31:10, 36:19, 41:14, 45:5, 74:21, 76:24, 77:13, 82:6, 83:19, 83:21, 88:17, 89:2, 91:3, 91:4, 91:25, 112:5, 114:21, 119:8 lost [1] - 36:5 LOVE [2] - 1:14, 121:16 Lucie [4] - 26:9, 38:1, 38:17 lunchtime [2] - 123:11, 123:12
J	K	L	M	
Jamil [1] - 50:2 January [1] - 123:22 Jersey [4] - 14:20, 14:23, 14:25, 15:25 JOHNNY [1] - 1:16 Johnny [1] - 1:17 joint [3] - 23:12, 84:25, 90:25 JR [1] - 1:16 Jr [1] - 1:17 judge [8] - 34:20, 36:3, 36:15, 38:21, 50:18, 51:1, 71:3, 121:19 JUDGE [1] - 1:11 Judge [14] - 2:6, 34:7, 38:5, 40:3, 40:17, 41:6, 41:11, 50:23, 66:13, 80:11, 81:20, 110:11, 123:1 July [7] - 37:22, 67:5, 67:8, 80:3, 80:10, 80:20 June [7] - 37:17,	keep [1] - 101:15 kept [4] - 20:14, 30:25, 72:13, 72:14 kids [1] - 2:21 kind [4] - 4:5, 29:15, 45:23, 45:24 knowledge [5] - 21:22, 54:21, 58:16, 96:9, 96:22 known [5] - 11:3, 29:20, 49:1, 49:8, 62:10 knows [1] - 12:22	laborers [4] - 32:19, 45:20, 45:25, 118:2 ladies [3] - 33:21, 34:5, 123:3 Lance [1] - 123:22 LANCE [1] - 1:21 laptop [1] - 27:16 larger [1] - 59:15 last [15] - 35:18, 52:1, 55:24, 60:24, 63:22, 72:6, 76:3, 103:16, 103:23, 105:9, 105:25, 106:15, 109:19, 119:25, 122:25 lasted [1] - 73:3 law [1] - 49:9 Law [1] - 1:17 lawn [1] - 46:2 lawyers [1] - 25:11 learn [4] - 6:6, 9:2, 18:16, 48:5 learned [8] - 30:11, 48:9, 52:21, 57:8, 57:9, 61:17, 61:21 lease [2] - 113:4, 113:5 least [3] - 116:10, 121:17, 121:21 left [2] - 57:2, 77:19 legal [11] - 57:13, 57:14, 57:15, 58:20, 92:14,	115:21, 115:23, 115:24 maintenance [1] - 46:3 manner [2] - 20:13, 20:23 marked [16] - 7:12, 7:19, 10:1, 34:10, 34:23, 35:1, 35:8, 35:18, 36:12, 38:6, 38:25, 40:6, 40:21, 40:24, 74:22, 119:9 master [1] - 18:21 material [3] - 103:19, 106:16, 118:18 matter [4] - 33:22, 33:23, 123:13, 123:20 MCCRAY [42] - 1:16, 2:6, 2:8, 25:15, 33:20, 34:7, 34:9, 34:20, 34:25, 36:3, 36:7, 36:10, 36:15, 36:17, 38:5, 38:9, 38:11, 38:21, 39:2, 39:3, 40:3, 40:5, 40:17, 40:23, 41:6, 41:11, 41:13, 50:17, 50:23, 51:1, 51:4, 53:10, 66:13, 71:3, 80:11, 81:20, 81:23, 108:18,	

109:17, 110:11, 122:20, 123:1 McCray [5] - 1:17, 49:9, 55:13, 61:13, 63:23 mean [3] - 46:4, 81:24, 90:6 meaning [4] - 3:24, 26:15, 29:18, 84:24 means [4] - 62:4, 75:20, 102:2, 102:6 mechanical [1] - 1:24 meet [1] - 4:6 members [4] - 3:7, 25:19, 26:12, 42:7 memo [5] - 15:6, 15:12, 15:13, 16:3, 45:18 memorializing [1] - 104:8 memory [3] - 89:12, 115:15, 115:16 mention [4] - 4:25, 5:11, 7:9, 29:2 mentioned [7] - 5:11, 6:21, 9:17, 47:12, 65:10, 65:21, 68:9 message [1] - 72:1 met [4] - 4:9, 4:11, 17:3, 54:5 Miami [4] - 1:4, 1:22, 1:23, 123:25 microphone [1] - 96:16 midnights [1] - 20:10 million [1] - 26:16 mind [1] - 101:16 mine [1] - 32:10 mini [2] - 47:14, 47:17 minus [1] - 118:8 minute [1] - 31:12 minutes [5] - 33:25, 84:14, 101:3, 122:20, 123:9 miscellaneous [1] - 43:25 model [1] - 76:4 modifications [2] - 92:1, 99:9 moment [5] - 66:15, 90:20, 91:13, 113:16 money [22] - 24:17, 24:22, 25:4, 25:8, 35:15, 35:24, 39:21, 40:1, 41:18, 43:20, 47:8, 47:10, 49:22, 49:25, 85:11, 89:9, 89:21,	89:25, 90:23, 108:17, 108:25 moneys [3] - 24:24, 34:17, 35:5 monitor [1] - 27:1 month [1] - 39:12 monthly [1] - 3:25 months [2] - 19:11, 68:9 morning [1] - 123:4 most [1] - 68:14 motions [2] - 123:9, 123:10 move [10] - 2:25, 8:9, 10:21, 34:20, 36:3, 38:21, 42:12, 102:20, 103:10, 121:23 moving [2] - 102:9, 105:3 MR [77] - 2:6, 2:8, 25:15, 33:20, 34:7, 34:9, 34:20, 34:22, 34:25, 36:3, 36:7, 36:10, 36:11, 36:15, 36:17, 38:5, 38:9, 38:11, 38:21, 38:23, 39:2, 39:3, 40:3, 40:5, 40:17, 40:20, 40:23, 41:6, 41:8, 41:11, 41:13, 50:17, 50:23, 51:1, 51:4, 53:10, 53:11, 53:14, 66:13, 66:17, 71:3, 71:6, 80:11, 80:12, 80:15, 81:20, 81:23, 82:1, 82:5, 90:22, 91:24, 96:15, 103:11, 108:18, 108:21, 108:23, 109:17, 109:20, 110:11, 110:13, 113:18, 119:17, 121:8, 121:12, 121:15, 121:16, 121:17, 121:19, 121:25, 122:3, 122:8, 122:10, 122:13, 122:17, 122:20, 122:23, 123:1 multiple [3] - 13:3, 45:20, 83:9	50:2, 56:11, 57:13, 57:15, 58:20, 62:8, 62:20, 63:3, 63:5, 63:8, 64:22, 67:22, 84:8, 92:11, 92:14, 93:7, 93:12, 93:25, 94:2, 94:24, 99:15, 99:21, 99:22, 100:8, 108:1, 108:5, 109:8, 109:13, 110:21, 115:25, 116:3, 116:8 named [18] - 54:12, 54:20, 55:3, 56:16, 56:17, 56:21, 56:22, 57:12, 57:14, 57:19, 57:24, 63:4, 63:5, 82:16, 84:8, 92:19, 92:21, 116:1 names [1] - 85:23 nature [4] - 3:16, 16:18, 53:22, 64:14 necessarily [1] - 68:21 need [20] - 5:2, 15:12, 33:11, 46:6, 60:15, 65:15, 65:16, 65:24, 68:17, 68:23, 71:16, 72:15, 95:10, 97:23, 108:22, 110:7, 121:21, 121:23, 122:4, 122:17 needed [6] - 6:21, 7:1, 18:5, 47:9, 107:18, 121:17 net [2] - 26:13, 26:14 network [5] - 68:17, 68:20, 69:1, 76:12, 106:24 never [37] - 7:11, 7:15, 21:8, 28:25, 48:18, 50:3, 50:15, 51:23, 52:18, 53:17, 54:5, 54:7, 54:12, 61:23, 62:2, 62:5, 65:21, 67:6, 72:11, 72:24, 92:17, 92:18, 92:20, 94:25, 109:22, 109:25, 110:2, 111:2, 112:14, 112:15, 112:21, 115:10 new [1] - 122:11 New [1] - 14:25 next [3] - 10:21,	108:20, 122:2 night [3] - 30:9, 32:7, 32:8 nine [4] - 76:10, 102:21, 105:6, 106:12 nonetheless [1] - 114:7 nonprofit [3] - 2:18, 2:19, 2:20 North [1] - 1:22 NOS [1] - 1:2 notary [1] - 4:1 note [8] - 107:5, 107:11, 107:13, 107:14, 107:17, 107:22, 107:25, 108:7 noted [1] - 59:10 notes [2] - 108:16, 123:20 nothing [15] - 14:25, 19:23, 20:2, 43:24, 49:6, 53:7, 53:8, 65:10, 78:19, 87:14, 109:2, 109:3, 110:22, 110:23 nothing's [2] - 31:18 notification [1] - 115:19 nowhere [2] - 99:22, 99:23 Number [2] - 7:19, 35:9 number [39] - 8:23, 9:3, 30:25, 31:1, 31:6, 31:11, 31:14, 52:7, 55:22, 56:5, 58:16, 58:21, 58:22, 63:12, 67:6, 67:24, 68:4, 71:17, 71:24, 74:17, 77:21, 78:4, 79:5, 79:11, 79:13, 79:22, 84:25, 89:7, 89:8, 89:13, 89:14, 89:16, 89:18, 90:11, 93:9, 101:14, 101:19, 119:3 numbers [6] - 8:11, 28:7, 28:23, 67:12, 89:10, 89:11 numerous [2] - 16:13, 18:2	O o'clock [1] - 122:12 object [1] - 71:3 objection [13] - 34:22, 36:11, 38:23, 40:19, 40:20, 41:8, 66:13, 80:11, 81:20, 108:18, 109:17, 109:18, 110:11 obligating [2] - 108:16, 108:24 occasions [1] - 84:19 occurred [4] - 86:24, 91:12, 100:14, 112:1 October [1] - 1:5 odd [1] - 8:24 OF [6] - 1:1, 1:4, 1:10, 1:15, 123:18 offered [4] - 36:5, 36:7, 36:10, 38:22 offhand [1] - 45:21 Office [3] - 1:14, 1:17, 30:10 office [4] - 20:10, 27:14, 27:22, 30:21 officer [1] - 113:7 Official [2] - 1:21, 123:23 often [1] - 112:23 old [1] - 119:21 ON [1] - 1:15 once [8] - 7:2, 9:4, 13:20, 24:5, 24:16, 97:9, 100:18, 122:1 one [87] - 2:13, 6:8, 7:13, 7:18, 9:19, 10:9, 12:16, 22:5, 22:8, 22:9, 22:10, 22:18, 22:19, 22:20, 22:21, 22:24, 27:3, 31:22, 34:15, 38:1, 48:8, 50:5, 54:18, 61:1, 63:24, 66:15, 69:23, 69:24, 71:23, 71:25, 72:22, 72:25, 73:2, 73:3, 73:4, 73:9, 73:19, 74:13, 75:7, 75:25, 76:3, 76:11, 77:6, 78:14, 79:5, 81:15, 88:5, 88:15, 90:20, 92:10, 93:21, 94:8, 94:13, 99:14, 100:23, 101:7, 102:1,
--	---	---	---	---

103:16, 103:23, 104:6, 105:1, 105:9, 105:16, 105:25, 106:5, 106:15, 106:22, 107:3, 107:22, 108:19, 111:12, 111:16, 111:19, 111:21, 111:24, 112:17, 113:16, 114:13, 114:17, 114:25, 116:6 one-time [7] - 71:23, 71:25, 72:22, 72:25, 73:2, 73:9, 78:14 ones [2] - 86:4, 114:12 online [4] - 23:21, 30:18, 71:1, 105:21 open [4] - 24:5, 26:23, 112:16, 123:2 opened [5] - 24:15, 94:7, 112:14, 112:15, 112:22 operate [1] - 66:11 opportunity [1] - 13:6 opposed [3] - 33:7, 33:8, 107:16 Order [1] - 2:1 order [5] - 20:22, 24:3, 68:17, 100:19, 104:12 original [3] - 116:20, 116:22, 116:23 otherwise [1] - 6:6 outs [2] - 3:12, 17:25 outside [2] - 53:17, 53:24 overflow [1] - 47:18 own [9] - 2:9, 25:17, 71:1, 91:10, 92:8, 97:22, 98:18, 98:24, 99:2 owned [7] - 2:11, 15:1, 25:20, 25:21, 26:9, 26:10, 69:13 owner [1] - 6:3 owns [1] - 113:2	44:14, 44:22, 45:12, 46:10, 46:13, 46:16, 51:12, 51:14, 59:11, 76:2, 76:18, 91:4, 95:16, 97:3, 97:12, 102:9, 102:20, 102:21, 103:23, 105:3, 105:6, 105:13, 105:16, 106:7, 106:8, 106:12, 106:19, 106:23, 107:9, 109:11, 109:21, 109:23, 110:4, 110:9, 110:10, 114:13, 114:17, 114:18, 114:19 pages [1] - 101:19 Pages [1] - 1:9 paid [7] - 13:19, 14:10, 14:16, 14:19, 14:20, 107:25, 118:8 pandemic [1] - 4:9 papers [1] - 113:1 paralegal [1] - 1:19 parking [1] - 4:19 part [9] - 4:5, 16:14, 20:17, 38:13, 50:7, 50:9, 62:20, 88:22, 100:18 particular [4] - 6:20, 24:14, 35:25, 44:1 passcode [2] - 78:20, 94:5 passcodes [1] - 20:6 past [1] - 53:6 patience [1] - 123:14 pay [12] - 6:15, 6:19, 14:8, 14:12, 14:23, 25:13, 32:22, 43:22, 47:9, 108:17, 108:25, 117:10 Paycheck [9] - 56:8, 60:5, 61:4, 100:24, 104:22, 106:1, 107:13, 114:22, 118:12 paying [4] - 20:14, 45:19, 46:24, 72:15 payment [1] - 13:22 payments [1] - 15:17 payroll [5] - 45:18, 46:8, 117:20, 117:22, 118:1 Pembroke [2] - 54:23, 57:24	people [9] - 5:3, 5:7, 15:24, 16:16, 33:2, 33:4, 46:7, 49:1, 68:14 percent [1] - 14:3 percentage [5] - 6:15, 6:19, 14:1, 14:2, 14:7 Perez [14] - 51:16, 51:18, 51:20, 63:23, 63:25, 64:2, 64:6, 65:13, 65:23, 65:25, 66:2, 66:9, 66:12 perhaps [1] - 121:8 period [9] - 37:10, 37:16, 37:20, 42:7, 67:20, 70:1, 70:7, 70:18, 82:21 permits [2] - 3:25, 18:2 person [8] - 5:9, 12:4, 49:11, 51:19, 65:9, 65:20, 81:1 Persona [1] - 100:13 personal [15] - 9:16, 11:6, 21:6, 21:13, 21:14, 24:12, 31:12, 58:21, 58:25, 59:1, 59:4, 84:25, 90:9 personally [1] - 62:2 persons [1] - 26:20 pertaining [3] - 17:9, 17:24, 65:11 pertains [2] - 54:3, 113:21 petty [1] - 43:25 phone [52] - 17:16, 18:5, 18:20, 20:14, 25:12, 27:15, 31:16, 31:19, 31:25, 58:22, 59:1, 59:7, 66:19, 67:2, 67:6, 67:9, 67:24, 68:4, 68:8, 68:11, 68:15, 68:18, 68:22, 71:17, 71:24, 72:1, 72:14, 73:11, 73:16, 74:17, 76:4, 76:12, 76:23, 77:10, 77:21, 77:23, 78:2, 78:3, 78:15, 78:17, 78:19, 79:5, 79:9, 79:11, 79:12, 79:13, 79:22, 93:9, 97:6, 98:15 Phone [1] - 25:10 phonetic [1] - 50:6	photographs [2] - 97:4, 97:13 phrase [1] - 122:5 pick [1] - 48:22 picks [1] - 49:4 picture [1] - 95:18 pictures [8] - 95:13, 95:23, 97:2, 97:9, 97:18, 97:21, 98:15, 99:5 piece [1] - 93:25 pieces [2] - 59:10, 116:10 place [4] - 9:4, 48:15, 68:22, 79:21 places [1] - 72:1 Plaintiff [1] - 1:5 plan [2] - 68:10, 68:19 pleasantries [1] - 54:7 plus [1] - 39:25 PM [8] - 1:6, 34:4, 80:3, 81:17, 91:20, 91:22, 123:16 podium [1] - 53:12 point [4] - 12:4, 13:4, 47:23, 122:2 pops [1] - 28:1 populated [2] - 90:12, 90:13 Port [4] - 26:9, 37:25, 38:1, 38:17 portal [14] - 23:22, 23:25, 24:8, 24:16, 26:24, 28:1, 71:2, 71:8, 71:14, 71:16, 76:21, 93:2, 93:7, 94:17 portion [2] - 57:11, 61:3 possibly [1] - 43:20 PPP [82] - 4:13, 4:19, 4:20, 4:23, 5:2, 5:3, 5:4, 5:7, 5:9, 5:20, 6:13, 7:3, 9:9, 9:12, 9:15, 13:6, 15:9, 15:11, 17:5, 17:9, 17:14, 17:19, 21:25, 22:4, 26:3, 27:6, 28:9, 28:16, 28:23, 31:22, 32:16, 39:9, 45:3, 48:1, 48:7, 50:5, 52:17, 56:13, 62:12, 65:8, 65:14, 71:1, 74:4, 74:6, 74:13, 76:8, 77:3, 77:9, 77:15, 80:8, 84:6, 85:13, 86:3,	87:5, 88:9, 91:10, 92:1, 92:8, 93:22, 97:14, 97:22, 98:18, 98:21, 98:24, 99:2, 99:12, 100:19, 101:4, 101:21, 107:6, 107:21, 107:24, 109:5, 111:4, 111:14, 111:17, 112:1, 113:12, 113:13, 113:21, 115:1, 116:7 preliminary [4] - 19:19, 54:10, 94:5, 94:6 preneed [2] - 3:15, 3:16 prep [2] - 46:1, 46:4 prepare [1] - 46:6 prepared [2] - 63:25, 123:20 PRESENT [1] - 1:19 present [1] - 23:4 presented [1] - 13:24 pretty [6] - 13:11, 17:21, 29:14, 74:2, 96:13, 96:20 price [1] - 6:16 primarily [1] - 17:4 principal [1] - 63:9 print [1] - 52:6 printable [1] - 112:4 printed [1] - 112:15 problem [1] - 31:22 proceed [2] - 2:4, 33:25 proceeding [5] - 6:7, 30:3, 61:17, 61:20, 72:20 proceedings [3] - 121:5, 123:2, 123:20 Proceedings [1] - 1:24 proceeds [5] - 15:11, 38:19, 39:7, 39:9, 41:3 process [20] - 7:5, 12:1, 12:2, 13:13, 19:1, 19:17, 19:21, 20:12, 20:22, 50:7, 50:9, 53:3, 74:6, 74:19, 90:15, 95:13, 102:11, 104:13, 112:20, 114:2 processed [1] - 13:10 procure [1] - 13:6
P				
P.A [1] - 1:17 package [1] - 112:7 page [45] - 10:21, 11:15, 39:17, 39:18, 42:24, 43:9,				

produced [2] - 1:25, 78:12 profanity [1] - 31:15 profession [1] - 63:9 professional [3] - 49:10, 64:13, 64:15 profited [1] - 38:3 program [2] - 65:9, 113:13 Program [9] - 56:8, 60:5, 61:4, 100:24, 104:23, 106:1, 107:14, 114:23, 118:12 progress [1] - 15:15 promissory [2] - 107:14, 108:16 proper [1] - 48:16 properties [2] - 25:20, 26:15 property [12] - 26:1, 26:3, 26:6, 26:7, 26:8, 26:9, 26:10, 37:24, 37:25, 38:2, 38:4, 38:16 proprietor [2] - 57:18, 63:8 proprietorship [2] - 55:9, 57:19 Protection [9] - 56:8, 60:5, 61:4, 100:24, 104:23, 106:1, 107:13, 114:22, 118:12 provide [2] - 18:13, 18:15 provided [12] - 31:5, 31:6, 63:16, 66:20, 67:2, 67:3, 68:8, 70:12, 103:17, 103:18, 118:17, 120:5 publish [7] - 36:15, 39:2, 41:11, 42:6, 51:10, 67:16, 70:5 published [2] - 7:20, 69:16 publishing [4] - 51:11, 62:22, 70:15, 95:16 pull [3] - 101:17, 104:22, 111:3 pulled [1] - 30:24 pulling [1] - 104:6 purpose [4] - 2:19, 45:17, 47:1, 73:2 purposes [4] - 34:11, 40:7, 40:25, 51:18 push [2] - 8:6, 44:15 pushing [1] - 49:24	put [55] - 8:23, 15:5, 15:12, 16:5, 16:6, 19:19, 19:22, 22:6, 28:23, 29:19, 31:12, 44:2, 44:7, 47:4, 47:10, 62:20, 62:21, 72:24, 74:16, 74:17, 85:10, 89:8, 89:20, 89:24, 89:25, 90:2, 90:5, 90:6, 90:11, 90:23, 92:17, 92:18, 93:8, 93:12, 94:2, 94:5, 94:10, 94:11, 102:15, 102:17, 102:25, 103:2, 103:21, 105:4, 105:6, 106:10, 106:13, 110:14, 110:20, 110:25, 118:6 puts [1] - 51:15 putting [7] - 84:24, 90:8, 92:10, 92:14, 94:1, 94:16, 104:3 puzzled [1] - 30:12	27:3 receipt [1] - 90:23 receipts [4] - 8:8, 29:24, 52:8, 52:9 receive [5] - 11:5, 27:6, 38:2, 39:23, 43:15 received [27] - 5:4, 11:13, 13:20, 13:21, 16:24, 18:4, 34:23, 34:24, 36:12, 36:13, 38:25, 39:1, 39:9, 39:21, 40:21, 40:22, 41:9, 41:10, 43:12, 45:3, 50:5, 50:20, 50:21, 56:7, 67:19, 107:14, 112:6 reception [1] - 45:4 recess [2] - 91:19, 91:21 Recess [1] - 91:22 recognize [8] - 34:12, 34:13, 35:10, 35:11, 35:19, 38:12, 42:24, 51:6 recollection [1] - 120:20 record [9] - 59:23, 69:15, 79:1, 91:2, 99:24, 106:5, 119:8, 120:5, 123:20 recorded [1] - 1:24 records [3] - 70:20, 70:23, 70:25 red [1] - 85:23 redirect [1] - 122:18 refer [1] - 64:9 reference [4] - 10:10, 52:11, 94:2, 108:2 referencing [1] - 81:25 referred [2] - 94:25, 118:3 referring [5] - 93:5, 93:6, 117:8, 118:2, 118:3 reflect [2] - 41:3, 41:18 reflected [10] - 8:19, 29:23, 34:18, 35:6, 35:15, 35:25, 37:11, 37:16, 40:14, 46:8 reflects [1] - 10:18 regarding [7] - 3:16, 7:10, 8:3, 21:23, 23:8, 26:1, 29:4	related [5] - 15:10, 15:12, 15:14, 51:19, 113:13 relates [1] - 47:1 relation [1] - 26:3 remains [2] - 17:24, 46:6 remember [21] - 3:21, 13:9, 14:2, 16:5, 17:2, 19:11, 19:18, 19:23, 23:8, 33:1, 39:12, 53:20, 79:20, 79:22, 79:23, 93:14, 93:15, 101:2, 101:4, 119:19, 119:22 rent [1] - 47:22 repeat [2] - 48:8, 56:19 rephrase [1] - 18:14 reported [1] - 55:16 Reporter [2] - 1:21, 123:23 REPORTER [1] - 123:18 reports [2] - 3:25, 18:1 represent [8] - 8:17, 34:17, 35:5, 35:14, 35:24, 38:18, 40:13, 78:8 represents [1] - 78:16 reputation [1] - 49:21 request [1] - 10:24 requested [3] - 18:13, 18:15, 20:3 required [6] - 22:2, 22:12, 22:13, 71:10, 107:16, 114:7 requirements [1] - 118:12 resent [1] - 104:19 residence [4] - 54:25, 55:1, 55:3, 70:17 resolved [2] - 33:24, 123:7 respect [16] - 3:4, 3:19, 4:13, 12:7, 15:16, 19:1, 27:6, 28:20, 29:7, 32:15, 61:8, 75:1, 104:11, 111:16, 112:1, 113:19 respects [3] - 103:20, 106:16, 118:18 response [3] - 7:2, 7:4, 121:22	restoration [1] - 16:6 return [5] - 7:23, 50:24, 55:18, 61:11, 64:18 returns [5] - 21:18, 52:10, 55:14, 63:24, 64:16 Revenue [1] - 55:16 review [1] - 114:7 ribbon.pdf [1] - 85:23 risked [1] - 49:21 Rivero [39] - 3:1, 3:4, 3:10, 4:3, 4:7, 4:13, 5:14, 6:5, 7:9, 9:8, 10:25, 12:18, 12:20, 17:6, 17:7, 17:8, 18:8, 18:24, 18:25, 28:22, 31:5, 31:6, 53:6, 62:8, 62:15, 62:25, 73:17, 81:1, 81:8, 83:1, 83:25, 89:24, 95:25, 96:2, 96:12, 96:22, 97:16 Rivero's [1] - 3:8 Riveros [5] - 12:4, 13:19, 14:12, 33:15, 85:2 road [1] - 32:8 Road [2] - 54:23, 57:24 room [1] - 46:1 roughly [2] - 8:18, 17:2 routing [2] - 84:25, 89:8 row [1] - 77:14 rows [1] - 79:6 RPR [2] - 1:21, 123:23 rule [1] - 25:11 rules [1] - 118:12 rush [1] - 108:22 rushing [1] - 72:13
S				
S-corporation [1] - 50:24 S21 [7] - 67:10, 67:13, 68:1, 68:3, 68:12, 76:5, 97:7 salary [9] - 43:6, 43:11, 44:3, 45:1, 46:11, 46:18, 46:22, 46:23, 46:24 sale [2] - 38:2, 38:14 sales [3] - 8:8, 52:8, 52:9				

salon [3] - 11:18, 16:11, 29:24 Samsung [7] - 67:10, 67:11, 67:12, 67:13, 68:11, 77:10, 97:7 sat [1] - 54:7 Savings [1] - 90:24 savings [8] - 21:15, 25:1, 25:2, 34:15, 34:16, 35:3, 35:13, 35:23 savvy [1] - 96:22 saw [12] - 3:12, 8:25, 17:10, 20:4, 30:6, 30:8, 87:16, 103:21, 109:2, 109:3, 110:24, 111:2 SBA [3] - 100:23, 108:1, 113:12 Schedule [49] - 7:10, 7:13, 7:15, 7:24, 28:12, 28:20, 29:2, 29:12, 30:7, 30:8, 32:5, 48:17, 48:18, 50:16, 52:17, 52:18, 52:19, 52:20, 52:22, 58:5, 60:8, 61:5, 61:10, 61:15, 61:21, 61:24, 62:2, 62:6, 62:12, 62:15, 62:25, 65:16, 65:21, 65:23, 66:4, 66:9, 66:12, 81:2, 81:6, 81:8, 81:18, 83:2, 83:4, 83:11, 84:1, 84:5, 104:23, 109:14 schedule [1] - 65:19 scheduled [1] - 33:22 scheduling [1] - 121:4 school [2] - 2:21, 16:22 screen [12] - 27:24, 51:12, 57:1, 57:3, 57:4, 62:23, 82:15, 83:22, 88:20, 97:1 scrolling [1] - 95:5 scrubs [3] - 98:6, 98:7, 98:10 seated [1] - 34:5 second [12] - 7:18, 22:18, 22:24, 37:25, 39:19, 44:14, 77:14, 94:13, 97:13, 104:22, 118:10	secretarial [1] - 46:2 Section [1] - 39:18 section [9] - 15:6, 15:13, 16:3, 45:18, 57:18, 59:15, 60:20, 116:13, 116:19 Security [8] - 6:23, 10:19, 31:11, 31:14, 55:22, 58:16, 58:21, 63:12 see [81] - 6:17, 7:20, 8:6, 10:8, 13:12, 13:14, 26:24, 27:24, 28:9, 28:12, 29:23, 31:11, 34:12, 35:9, 36:23, 36:24, 39:13, 50:15, 56:25, 57:4, 59:16, 60:3, 60:19, 62:23, 67:16, 67:22, 67:24, 69:16, 71:21, 74:22, 75:13, 77:19, 78:8, 78:12, 78:24, 79:3, 79:5, 79:8, 79:11, 79:12, 79:13, 79:18, 82:7, 82:9, 83:19, 84:8, 84:10, 84:11, 86:11, 86:13, 87:11, 87:17, 88:16, 88:18, 88:20, 88:21, 89:3, 91:5, 97:23, 99:16, 99:17, 100:11, 102:10, 103:3, 103:13, 105:16, 107:3, 107:9, 107:11, 108:1, 110:21, 110:22, 111:21, 118:13, 118:25, 119:7, 119:10 seeing [5] - 28:6, 28:7, 91:15, 99:17, 109:8 seek [1] - 50:4 sought [1] - 50:6 seem [1] - 80:16 selecting [1] - 104:4 self [2] - 90:12, 90:13 self-populated [2] - 90:12, 90:13 selfies [2] - 99:1, 99:9 sell [2] - 26:3, 37:24 seller [1] - 39:19 sellers [1] - 39:21 selling [1] - 26:2	send [7] - 11:21, 19:20, 23:9, 89:9, 89:21, 89:25, 115:20 sending [2] - 12:2, 78:17 sends [1] - 110:7 sense [1] - 73:4 sent [23] - 10:24, 19:4, 19:5, 23:10, 31:7, 69:10, 71:25, 72:5, 77:23, 78:1, 78:15, 78:20, 79:21, 85:11, 104:12, 104:19, 105:22, 106:24, 106:25, 110:3, 112:11, 112:16, 112:21 separate [4] - 64:19, 104:7, 114:1, 114:8 served [1] - 49:10 Service [1] - 55:17 service [5] - 4:9, 66:19, 67:2, 68:8, 70:12 services [2] - 45:25, 46:2 set [3] - 3:15, 16:14, 97:13 sets [2] - 106:7, 106:12 settlement [1] - 39:4 seven [1] - 88:8 several [3] - 64:16, 111:18, 121:23 share [2] - 73:15, 73:19 shared [2] - 73:13, 73:14 sheet [2] - 51:15, 51:17 sheriff's [2] - 20:9, 30:21 Sheriff's [1] - 30:10 ship [2] - 3:12, 17:25 ship-outs [2] - 3:12, 17:25 short [1] - 51:20 shortly [1] - 48:10 show [28] - 7:12, 7:18, 10:1, 11:8, 34:10, 35:1, 35:8, 35:18, 37:15, 37:19, 38:6, 40:6, 40:24, 42:23, 43:9, 44:14, 44:16, 51:5, 70:25, 75:10, 76:15, 78:12, 80:21, 81:13,	91:13, 92:6, 99:20, 111:3 showed [7] - 24:20, 99:19, 99:24, 100:11, 109:25, 110:2 showing [6] - 58:5, 78:18, 78:19, 78:23, 100:2, 120:9 shown [3] - 63:22, 101:9, 101:10 shows [27] - 17:11, 24:15, 44:17, 76:24, 77:6, 78:19, 80:23, 82:14, 83:17, 86:15, 86:16, 88:2, 88:25, 91:2, 92:22, 92:25, 93:17, 93:24, 95:2, 99:14, 104:15, 104:19, 106:23, 109:22, 110:2, 112:10, 112:11 side [3] - 57:2, 57:3, 103:4 sidebar [2] - 121:3, 121:5 sign [10] - 4:2, 108:16, 110:4, 110:8, 114:7, 119:18, 120:12, 120:16, 120:19 signature [11] - 28:3, 28:4, 104:1, 104:3, 104:4, 105:14, 106:19, 107:16, 110:8, 114:19, 115:17 signatures [1] - 107:3 signed [22] - 12:16, 100:16, 101:1, 101:7, 101:21, 104:15, 104:20, 105:16, 105:20, 105:22, 106:2, 106:23, 107:1, 107:21, 107:22, 108:12, 109:9, 111:23, 112:7, 115:16, 119:15, 120:23 signer [1] - 106:23 signing [13] - 17:23, 100:19, 102:11, 104:8, 104:11, 104:13, 105:17, 111:4, 112:19, 115:24, 119:25, 120:8, 120:22	simple [3] - 7:5, 12:1, 13:13 simply [1] - 28:18 simultaneous [1] - 78:1 simultaneously [1] - 78:17 single [3] - 69:23, 69:24, 79:5 sit [4] - 16:14, 113:4, 113:5, 113:7 site [1] - 30:24 sitting [2] - 62:5, 69:7 six [4] - 86:3, 91:7, 99:1, 99:9 slide [15] - 37:7, 74:21, 75:7, 76:2, 76:10, 76:15, 76:24, 77:6, 77:13, 79:25, 80:2, 86:3, 88:8, 91:3, 119:8 slides [4] - 77:18, 92:4, 92:6, 95:9 slow [1] - 108:21 small [1] - 25:14 smaller [1] - 10:6 Smith [1] - 1:19 Snider [4] - 53:16, 108:19, 109:19, 110:6 SNIDER [36] - 1:13, 34:22, 36:11, 38:23, 40:20, 41:8, 53:11, 53:14, 66:17, 71:6, 80:12, 80:15, 82:1, 82:5, 90:22, 91:24, 96:15, 103:11, 108:21, 108:23, 109:20, 110:13, 113:18, 119:17, 121:8, 121:12, 121:15, 121:17, 121:19, 121:25, 122:3, 122:8, 122:10, 122:13, 122:17, 122:23 Social [8] - 6:23, 10:19, 31:11, 31:14, 55:22, 58:16, 58:21, 63:12 social [4] - 13:1, 58:18, 58:19 sold [2] - 26:6, 38:16 sole [3] - 55:9, 57:18, 57:19 someone [9] - 23:9, 30:24, 46:6, 49:2, 49:3, 65:3, 113:6, 120:11
--	---	---	--	--

sometime ^[1] - 6:25 sometimes ^[9] - 16:16, 46:7, 64:9, 68:21, 68:25, 73:1, 73:13, 73:25, 78:1 somewhat ^[2] - 113:23, 113:24 somewhere ^[2] - 14:4, 26:5 son ^[1] - 27:1 sorry ^[19] - 10:9, 10:10, 11:24, 33:9, 36:24, 37:8, 44:16, 48:19, 75:16, 78:6, 80:22, 88:13, 90:4, 93:3, 94:19, 96:14, 101:15, 108:21, 112:5 sort ^[1] - 54:10 source ^[2] - 78:9, 88:23 source.ACH ^[1] - 88:17 South ^[1] - 2:14 Southeast ^[1] - 38:16 Southern ^[1] - 123:24 SOUTHERN ^[1] - 1:1 space ^[1] - 47:22 speaking ^[1] - 53:20 specific ^[1] - 3:21 speed ^[1] - 121:25 spend ^[2] - 118:4, 123:9 spent ^[2] - 117:20, 117:22 spoken ^[3] - 17:8, 53:17, 74:3 spotless ^[1] - 49:9 spreadsheet ^[1] - 78:11 Springs ^[4] - 25:21, 25:24, 26:1, 26:8 St ^[4] - 26:9, 38:1, 38:17 staff ^[1] - 3:14 stamp ^[1] - 82:9 stands ^[1] - 64:11 Star ^[1] - 86:10 start ^[10] - 5:9, 14:16, 25:19, 36:18, 57:10, 94:22, 119:24, 121:15, 123:4 started ^[9] - 12:1, 30:22, 32:9, 69:12, 74:13, 74:19, 87:24, 99:19, 99:20 starting ^[3] - 88:6, 92:13, 100:14 state ^[1] - 17:1	statement ^[16] - 12:16, 29:16, 31:21, 37:10, 37:16, 37:20, 39:10, 40:11, 40:13, 41:2, 41:3, 41:4, 42:7, 42:10, 79:7, 84:22 statements ^[2] - 6:22, 28:6 STATES ^[3] - 1:1, 1:4, 1:11 states ^[1] - 120:18 States ^[6] - 1:14, 1:22, 8:12, 21:23, 69:11, 123:24 stationed ^[1] - 43:18 STEINBEISSER ^[1] - 1:21 Steinbeisser ^[2] - 123:22, 123:22 stenography ^[1] - 1:24 stenotype ^[1] - 123:20 Step ^[8] - 2:17, 11:17, 11:19, 23:9, 29:20, 29:23, 31:4, 45:10 step ^[2] - 60:12, 93:11 stick ^[1] - 82:21 still ^[2] - 2:23, 52:11 stipulation ^[1] - 50:18 stop ^[2] - 91:17, 121:1 storage ^[4] - 47:9, 47:12, 47:13, 47:22 storages ^[2] - 47:14, 47:17 straight ^[1] - 110:7 strike ^[1] - 13:17 submitted ^[1] - 50:11 subpoenaed ^[1] - 52:2 subsequently ^[1] - 6:6 substantially ^[1] - 49:22 success ^[2] - 75:13, 75:14 successful ^[3] - 75:20, 75:24, 80:8 suggest ^[1] - 121:23 summary ^[3] - 81:24, 81:25, 82:1 SunTrust ^[9] - 11:3, 40:9, 41:2, 41:15, 44:12, 45:7, 45:9, 45:11, 46:21	supplies ^[4] - 2:22, 47:8, 47:14, 47:18 supply ^[1] - 71:16 supporting ^[3] - 103:18, 105:10, 106:17 supposed ^[3] - 9:16, 19:7, 31:3 surrounding ^[1] - 109:2 suspicious ^[2] - 7:7, 53:8 sustained ^[3] - 66:15, 71:5, 110:12 sworn ^[1] - 99:8 symbol ^[3] - 60:1, 60:2, 60:3 T tab ^[1] - 82:6 tablet ^[1] - 27:15 tax ^[13] - 7:16, 7:23, 21:18, 50:23, 51:9, 55:14, 55:18, 61:11, 63:24, 64:13, 64:15, 64:18 taxable ^[1] - 29:25 taxes ^[8] - 32:22, 33:4, 33:8, 33:12, 49:3, 65:5, 65:11 ten ^[4] - 116:20, 117:2, 117:3, 117:18 tender ^[1] - 53:10 testified ^[22] - 6:8, 20:18, 22:14, 48:16, 51:20, 56:7, 57:11, 58:10, 61:13, 62:16, 69:12, 81:3, 86:17, 95:10, 96:4, 100:15, 104:9, 105:18, 109:15, 111:23, 114:4, 115:25 testify ^[5] - 81:10, 96:6, 96:7, 96:9, 115:8 testifying ^[1] - 84:7 TESTIMONY ^[1] - 1:10 testimony ^[19] - 2:5, 49:2, 61:16, 72:18, 74:5, 74:10, 74:11, 75:19, 79:20, 83:14, 84:3, 87:4, 87:6, 87:11, 87:23, 99:8, 107:22,	110:3, 112:21 Texas ^[2] - 23:15, 43:18 text ^[3] - 18:19, 72:1 Thakral ^[1] - 87:23 THE ^[60] - 1:11, 1:12, 1:15, 2:4, 25:11, 33:21, 34:5, 34:8, 34:23, 36:5, 36:9, 36:12, 36:16, 38:8, 38:10, 38:22, 38:25, 40:4, 40:19, 40:21, 41:9, 41:12, 50:20, 50:22, 50:25, 51:3, 66:14, 66:15, 71:5, 80:14, 81:22, 81:24, 82:3, 90:20, 90:21, 91:17, 91:21, 91:23, 96:14, 103:9, 108:19, 109:19, 110:12, 113:16, 119:16, 121:1, 121:6, 121:10, 121:13, 121:18, 121:20, 122:1, 122:5, 122:9, 122:12, 122:15, 122:18, 122:21, 122:24, 123:3 thereabouts ^[1] - 64:21 therefore ^[1] - 115:20 thousand ^[8] - 8:19, 8:21, 8:24, 14:9, 14:14, 14:15, 38:4, 44:4 three ^[22] - 17:9, 57:1, 74:3, 74:5, 74:6, 75:25, 76:11, 97:3, 100:23, 101:8, 101:13, 101:21, 107:21, 107:24, 109:12, 110:1, 111:17, 112:20, 116:7, 116:10, 121:24 throughout ^[1] - 69:8 timely ^[2] - 20:13, 20:23 TIN ^[2] - 58:15 today ^[2] - 62:5, 123:8 tomorrow ^[3] - 123:4, 123:9, 123:14 took ^[3] - 93:9, 94:22, 98:15 top ^[13] - 42:9, 45:13, 57:11, 57:18,	59:18, 59:19, 60:23, 61:3, 89:5, 101:3, 107:11, 115:24, 116:11 topic ^[2] - 66:18, 122:11 total ^[5] - 14:10, 58:4, 109:13, 110:14, 118:8 totaling ^[1] - 15:19 tough ^[1] - 81:15 Trace ^[1] - 115:17 TRACY ^[2] - 1:8, 1:10 Tracy ^[62] - 11:10, 46:15, 54:12, 54:16, 54:20, 55:3, 56:13, 56:16, 56:17, 56:21, 56:22, 57:12, 57:14, 57:15, 57:19, 57:24, 58:10, 58:20, 62:5, 63:4, 63:5, 63:6, 63:9, 63:18, 75:6, 75:10, 75:24, 80:8, 82:16, 84:8, 92:1, 92:11, 92:14, 92:19, 92:21, 93:6, 93:12, 93:17, 93:25, 94:4, 94:24, 94:25, 98:17, 98:20, 98:23, 99:1, 99:4, 99:15, 99:21, 100:2, 100:3, 100:8, 106:2, 106:19, 108:1, 109:13, 112:5, 112:6, 115:25, 116:1, 116:3, 116:8 transaction ^[5] - 38:15, 38:19, 39:4, 86:22, 88:17 transactions ^[16] - 71:9, 74:25, 75:1, 87:22, 87:25, 88:5, 88:9, 88:15, 91:4, 91:7, 91:9, 91:11, 91:12, 92:6, 92:10, 95:7 transcript ^[1] - 1:24 TRANSCRIPT ^[1] - 1:10 transcription ^[2] - 1:25, 123:20 transit ^[2] - 3:24, 18:1 transmitted ^[1] - 94:15 Treasury ^[1] - 52:25 trial ^[1] - 69:8
---	--	---	--	--

TRIAL ^[1] - 1:10 tried ^[2] - 20:23, 31:17 tries ^[1] - 49:3 trouble ^[2] - 31:20, 101:18 troubled ^[2] - 2:20, 2:21 true ^[13] - 53:23, 68:6, 68:7, 69:21, 70:10, 75:17, 75:18, 75:19, 75:22, 103:19, 105:10, 106:16, 118:18 Truist ^[1] - 11:4 trust ^[9] - 5:14, 6:1, 20:19, 21:6, 21:7, 65:3, 65:5, 65:9, 65:20 trusted ^[5] - 5:17, 5:19, 53:6, 113:10 trusting ^[1] - 5:22 try ^[3] - 18:19, 122:4, 123:8 trying ^[7] - 10:6, 30:19, 30:25, 31:10, 31:20, 101:16, 121:22 turn ^[1] - 52:3 TV ^[1] - 16:17 TW ^[6] - 102:13, 102:16, 102:23, 105:3, 118:15, 118:19 twice ^[2] - 76:21, 114:25 two ^[48] - 2:16, 15:16, 15:24, 16:11, 17:8, 46:7, 47:14, 47:17, 49:13, 49:17, 74:3, 74:5, 74:6, 74:21, 74:25, 75:1, 75:25, 76:11, 76:18, 76:24, 83:19, 83:20, 85:17, 87:22, 87:24, 99:4, 99:5, 99:10, 100:23, 102:19, 105:3, 106:7, 107:3, 107:17, 111:9, 111:10, 111:14, 112:20, 113:15, 114:18, 121:10, 121:17, 121:21, 121:22, 121:24, 122:14 Two ^[1] - 2:18 type ^[7] - 3:21, 16:24, 33:14, 52:6, 82:10,	85:21, 87:19 typed ^[3] - 87:21, 99:17, 99:20 typically ^[1] - 44:25 typo ^[1] - 31:25 Typo ^[1] - 31:25 U ultimately ^[1] - 104:20 Ultra ^[1] - 67:10 unable ^[2] - 11:23, 11:25 unaware ^[1] - 4:19 unclear ^[1] - 100:2 uncommon ^[2] - 17:16, 43:21 under ^[7] - 8:5, 9:13, 30:20, 64:22, 75:14, 109:4, 110:23 unfamiliar ^[1] - 30:19 unit ^[2] - 18:22, 18:23 UNITED ^[3] - 1:1, 1:4, 1:11 United ^[6] - 1:14, 1:22, 8:12, 21:22, 69:11, 123:24 unless ^[1] - 81:10 unlike ^[1] - 114:12 up ^[38] - 3:15, 8:6, 14:4, 16:14, 17:12, 20:8, 20:9, 24:6, 24:15, 26:2, 26:5, 28:1, 30:25, 31:25, 33:23, 42:12, 44:15, 48:22, 49:4, 49:24, 50:9, 62:17, 62:18, 62:19, 64:23, 73:1, 75:7, 78:5, 78:7, 82:12, 94:7, 104:6, 104:22, 109:22, 109:25, 110:2, 111:3, 121:25 upload ^[6] - 82:11, 83:3, 85:21, 86:7, 86:25, 95:18 uploaded ^[17] - 12:15, 18:25, 19:6, 81:1, 81:6, 81:8, 81:18, 83:12, 83:25, 84:5, 84:22, 85:17, 85:24, 86:10, 87:13, 95:23 uploading ^[8] - 81:13, 82:25, 83:1, 83:4, 83:6, 97:2,	98:20, 99:4 uploads ^[6] - 82:11, 82:16, 83:24, 99:9, 99:10, 100:13 USAA ^[15] - 23:13, 23:15, 24:6, 24:7, 24:15, 26:21, 26:23, 34:15, 34:16, 35:3, 35:13, 35:22, 43:17, 56:10, 90:24 user ^[1] - 112:6 UTC ^[1] - 82:10 utilize ^[1] - 45:24 utilized ^[5] - 3:13, 3:14, 45:25 V V.A ^[1] - 1:19 variety ^[1] - 46:3 vehicle ^[1] - 113:5 vehicles ^[3] - 3:14, 4:11 vendors ^[3] - 33:3, 45:20, 117:9 ventures ^[1] - 5:18 verbally ^[1] - 73:16 verification ^[1] - 95:17 verify ^[5] - 74:17, 74:18, 95:14, 97:13, 99:6 Verizon ^[22] - 66:20, 66:22, 66:24, 67:3, 67:19, 68:8, 69:10, 69:12, 69:19, 76:4, 78:5, 78:7, 79:1, 88:12, 95:8, 104:16, 105:21, 106:24, 115:5, 115:10, 115:13 Verizon's ^[3] - 68:19, 69:1, 76:12 version ^[1] - 88:18 via ^[1] - 106:2 viewed ^[3] - 104:19, 105:22, 106:25 violation ^[1] - 5:23 virtually ^[1] - 20:8 voided ^[6] - 6:23, 10:20, 10:23, 11:17, 20:5, 23:8 vs ^[1] - 1:6 W W-2 ^[1] - 117:14 wade ^[1] - 92:10	WADE ^[3] - 1:7, 1:8, 1:10 Wade ^[157] - 1:19, 2:9, 2:11, 2:14, 7:23, 9:9, 9:13, 10:13, 10:20, 10:23, 11:1, 11:10, 11:11, 11:21, 15:16, 18:6, 18:15, 25:16, 31:13, 32:15, 33:14, 40:1, 40:24, 41:14, 42:22, 43:2, 43:10, 44:10, 44:11, 44:17, 44:20, 44:24, 44:25, 45:14, 45:23, 46:11, 46:15, 47:12, 50:24, 51:9, 52:6, 53:2, 53:15, 54:10, 54:12, 54:16, 54:20, 55:4, 55:13, 55:17, 56:2, 56:13, 56:14, 56:16, 56:17, 56:21, 56:23, 57:5, 57:12, 57:14, 57:15, 57:19, 57:24, 58:10, 58:20, 61:25, 62:5, 63:4, 63:5, 63:6, 63:9, 63:18, 63:21, 63:24, 64:18, 64:24, 66:19, 70:1, 70:6, 70:17, 70:25, 71:7, 71:12, 72:11, 75:3, 75:6, 75:10, 75:24, 76:7, 76:11, 76:20, 77:2, 77:9, 77:14, 78:22, 80:3, 80:8, 84:8, 85:1, 85:18, 87:24, 88:9, 89:25, 90:1, 90:25, 91:9, 91:25, 92:1, 92:11, 92:15, 92:17, 92:19, 92:21, 93:6, 93:13, 93:18, 93:19, 93:20, 93:21, 93:25, 94:4, 94:7, 94:24, 94:25, 95:6, 98:17, 98:20, 98:23, 99:1, 99:4, 99:15, 99:21, 100:1, 100:2, 100:4, 100:8, 106:2, 106:20, 108:2, 108:3, 109:13, 110:21, 110:23, 112:5, 112:6, 113:2,	113:20, 115:25, 116:1, 116:3, 116:8, 117:13, 117:15, 118:6 Wade's ^[1] - 45:10 Wade.pdf ^[1] - 82:17 wait ^[2] - 108:20, 121:10 Wait ^[1] - 31:11 waiting ^[1] - 25:8 walk ^[1] - 43:19 wear ^[1] - 98:7 wearing ^[3] - 98:5, 98:6, 98:10 website ^[10] - 73:11, 74:16, 77:4, 77:16, 80:9, 85:7, 91:10, 91:13, 92:2, 92:7 websites ^[1] - 72:22 week ^[1] - 52:1 weeks ^[1] - 19:11 West ^[2] - 54:23, 57:23 whole ^[1] - 112:20 Wi ^[3] - 68:17, 68:23, 69:1 Wi-Fi ^[3] - 68:17, 68:23, 69:1 wife ^[40] - 2:9, 2:17, 3:18, 4:23, 4:25, 5:3, 12:5, 12:18, 12:24, 13:4, 13:13, 13:24, 14:12, 16:8, 16:20, 18:9, 18:25, 19:5, 19:7, 21:13, 21:18, 21:25, 23:12, 24:22, 25:17, 26:22, 27:4, 29:4, 29:18, 29:19, 30:9, 30:20, 32:1, 32:4, 32:7, 37:24, 48:10, 71:11, 73:17, 96:17 wife's ^[8] - 11:17, 12:10, 27:1, 27:15, 29:7, 29:14, 31:20, 56:11 WILCOX ^[1] - 1:18 Wireless ^[9] - 66:20, 68:9, 69:10, 69:19, 76:4, 88:12, 104:16, 105:21, 115:6 Wireless's ^[1] - 106:24 withdrawal ^[1] - 43:19 withholding ^[2] - 33:4, 33:12 WITNESS ^[3] - 38:10,
---	--	--	---	---

66:14, 90:21 witness [6] - 34:7, 51:20, 53:10, 69:12, 81:24, 122:25 witnesses [1] - 6:8 Womply [8] - 70:21, 78:11, 89:2, 89:8, 89:21, 92:2, 92:7, 94:15 Womply's [15] - 71:1, 71:8, 71:14, 71:16, 73:11, 74:16, 76:20, 77:3, 77:15, 80:9, 85:7, 91:10, 91:12, 93:6, 94:17 word [1] - 67:15 words [2] - 60:3, 99:11 workers [4] - 32:19, 45:23, 45:24, 118:2 works [1] - 117:13 worry [1] - 20:19 worth [2] - 26:13, 26:14 wow [2] - 32:10, 38:3 write [3] - 44:25, 47:3, 47:10 writing [1] - 103:4 written [2] - 47:5 wrote [8] - 43:2, 43:10, 44:1, 44:4, 44:6, 44:24, 45:14, 99:15	14:15, 15:24 zero [2] - 87:23, 88:5 ZIP [1] - 38:17
Y	
year [10] - 2:22, 4:8, 8:19, 17:2, 29:25, 37:6, 37:23, 52:13, 56:18, 58:13 years [11] - 2:11, 7:14, 19:12, 30:2, 49:9, 64:16, 64:25, 65:17, 113:3, 113:7, 119:21 yes-or-no [1] - 65:22 yourself [16] - 48:2, 71:7, 74:14, 87:20, 92:2, 92:7, 93:22, 95:13, 95:14, 97:4, 97:13, 97:18, 97:22, 98:15, 108:17, 108:24 youth [1] - 2:21	
Z	
Zelle [3] - 14:9,	