

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-CR-60173-KMW

UNITED STATES OF AMERICA, Miami, Florida
Plaintiff, October 15, 2024
vs.
9:28 AM - 4:01 PM
CAROLYN DENISE WADE and DAY 3
TRACY D. WADE,
Defendants. Pages 1 to 194

TRANSCRIPT OF JURY TRIAL
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
Tracy Wade
Hendrith V.A. Smith, paralegal

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T A B L E O F C O N T E N T S

PAGE

GOVERNMENT'S WITNESSES:

PHILIP FANARA

Direct Examination by Mr. Love..... 12

Cross-Examination by Mr. Wilcox..... 18

ALEXANDER RODRIGUEZ

Direct Examination by Mr. Love..... 20

RENEE MCCLAIN

Direct Examination by Mr. Love..... 23

Cross-Examination by Mr. Wilcox..... 59

HAYDEE RIVERO

Direct Examination by Mr. Snider..... 69

Cross-Examination by Mr. Wilcox..... 129

Certificate of Reporter..... 173

DEFENSE EXHIBITS

MARKED

ADMITTED

8

156

1 (Call to the Order of the Court.)

2 THE COURT: Good morning. I hope everyone enjoyed a
3 few days off. Fortunately, no serious weather issues here in
4 Miami, but as I'm sure you all have read, quite a few issues
5 up in Ft. Pierce.

6 So we have more than one or two jurors who are late.
7 One juror called, Number 12, would be Tammie Ash to say she
8 was on 95 and expected time of arrival was 9:35, and I
9 understand there are still some others who have not arrived as
10 of yet.

11 Of more importance is Ms. Ferris, Number 11.
12 Ms. Ferris is here. She called earlier this morning to say
13 she was very sick and didn't feel well, but she was going to
14 come in in any event. She's here now and has stated to my
15 staff that she is ill. So I thought I would have her come in
16 the courtroom, and let's hear what she has to say, and then we
17 have to make some decisions about what we should do depending
18 on her health or otherwise.

19 Any comment? In other words, is there something you
20 want to say before I have her come in or address?

21 MR. SNIDER: Not from the Government.

22 THE COURT: Defense?

23 MR. MCCRAY: Just a second, Judge.

24 (Pause in the proceedings).

25 THE COURT: All right. Your position?

1 MR. MCCRAY: Your Honor, we'll just rely on the
2 Court.

3 THE COURT: All right. Let's have Juror Number 11,
4 Ms. Ferris, come in, please.

5 (Juror Ferris entered the courtroom.)

6 A JUROR: Good morning.

7 THE COURT: Good morning.

8 A JUROR: Good morning.

9 THE COURT: Ms. Ferris, we received a communication
10 that you are having some issues this morning, so we wanted to
11 explore that with you just so that we can identify what the
12 problem is.

13 A JUROR: Okay. I had a fever all weekend. I'm
14 currently sick. My throat's raw. My chest is burning. I'm
15 coughing. I have a runny nose and I just generally feel like
16 crap.

17 THE COURT: Have you taken a COVID test yet?

18 A JUROR: I took a COVID test on Sunday and it was
19 negative.

20 THE COURT: All right. Are you well enough to give
21 your attention to the case today?

22 A JUROR: Honestly, no.

23 THE COURT: All right. Well, we have a couple of
24 alternatives. We can simply not be in session today and see
25 if we can give you a day to see how you do and then you can

1 let us know if you're progressing tomorrow. That's one
2 alternative. And there's some others I can discuss with the
3 lawyers. But is that something that may resolve the issue?

4 A JUROR: Honestly, I don't know. Like, right now,
5 my hands are trembling.

6 THE COURT: I'm sorry?

7 A JUROR: Right now, my hands are trembling. I don't
8 feel good.

9 THE COURT: All right.

10 A JUROR: And I don't want to delay this any longer,
11 but I honestly don't feel good.

12 THE COURT: Have you made an appointment with your
13 physician? Do you think --

14 A JUROR: My physician has retired, so I need to find
15 a new physician, but I'm willing to go to urgent care.

16 THE COURT: Yeah, that's a good idea.

17 All right. Why don't you step out and I'll be with
18 you in just a moment.

19 A JUROR: Okay.

20 (Juror Ferris exited the courtroom.)

21 THE COURT: All right. Counsel, we have some
22 decisions to make. It seems to me that we don't have that
23 many alternatives. It appears that she is not medically fit
24 to continue today, at the very least. So we have to decide
25 whether we want to wait to see what happens today and not be

1 in session or excuse her and continue with the alternates,
2 obviously, that we have in place.

3 MR. MCCRAY: Judge, it would be our preference to
4 delay one more day just to see how the juror is feeling
5 tomorrow. I mean, obviously, she was our preference over the
6 alternates, and I do know the role of an alternate, but before
7 we decide to just continue on, I would like to give her an
8 opportunity to feel better.

9 THE COURT: You know, on any other occasion, I would,
10 without hesitation, concur. What disturbs me is that we've
11 already lost two days at the very least, and then, of course,
12 we've had an intermittent holiday. So we're really getting
13 far behind. And given her symptoms and the way she has
14 expressed them, I'm not sure we're going to get any relief,
15 frankly. But those are all issues we need to discuss.

16 Government?

17 MR. SNIDER: I concur with the Court's comments. The
18 Government is concerned about, at this point in time, getting
19 the case completed within the two-week calendar that the Court
20 has set for this trial, and we have been adjourned for a week
21 already, given the closures because of the hurricanes and the
22 federal holiday and the court not being in session on last
23 Friday anyway.

24 So the Government defers to the Court, but the
25 Government's concern is being able to finish this case within

1 the time allotted, and I think, given her symptoms, the way
2 she just described them to the Court, does not instill a lot
3 of confidence that she's going to be better tomorrow. We have
4 three alternates, not two, and I think the Court wisely
5 selected three because of the schedule here and the fact that
6 this case was going to go into a second week with all the
7 delays and closures.

8 THE COURT: The symptoms are not very positive. A
9 fever is a problem. Do we still have jurors missing?

10 A COURT SECURITY OFFICER: Yes, Your Honor.

11 MR. SNIDER: I think it would be wise to have her
12 maybe not -- maybe put her -- if she can separate from the
13 rest of the jury. I'm just concerned about the rest of the
14 jury. I don't want anyone else to get infected is what I'm
15 saying.

16 THE COURT: Well, I don't want to play doctor. We're
17 obviously going to have to excuse her today and -- I think I'm
18 going to have to excuse her. Given her symptoms with fever
19 and the way she expressed herself, I don't think it's very
20 positive that she is going to be feeling well enough to give
21 this case her undivided attention, so I am going to excuse her
22 from the jury.

23 Have her come in again, please.

24 (Juror Ferris re-entered the courtroom.)

25 THE COURT: We are very sorry you are ill, and the

1 parties selected you and really would like for you to serve;
2 however, given your medical scenario, I think it's best that I
3 excuse you. I don't like to play doctor, but when you go to
4 urgent care, would you please contact my staff and give us
5 your diagnosis, just so we have that information for the
6 record.

7 We wish you well, we hope you feel better, and we
8 will look forward to you serving sometime in the future. Do
9 you have belongings in the back room? All right. I'm going
10 to have you retrieve your items and you may be excused. You
11 are permanently excused.

12 A JUROR: I'm really sorry.

13 THE COURT: All right. Thank you very much. Good
14 luck to you, ma'am.

15 (Juror Ferris exited the courtroom.)

16 THE COURT: All right. We're going to have to await
17 the arrival of all of our panel.

18 Government, how are we progressing?

19 MR. SNIDER: The Government's case is on schedule.

20 THE COURT: I'm not sure exactly what that means
21 because we're not on schedule, so --

22 MR. SNIDER: Well, as far as -- I thought that I
23 would get this case -- the Government would complete its case
24 in chief within three days after opening, and I would say
25 right now, Judge -- there's two witnesses that were on the

1 Government's exhibit list that, based on the Court's deferral
2 on the ruling of the evidence that they were going to present
3 through their testimony and documents, the Government has
4 elected -- given the Court's posture at the last conference on
5 this, we're not going to call them as witnesses.

6 THE COURT: All right. So where --

7 MR. SNIDER: If the Court allows the documents to be
8 admitted -- they're business records for which they would be
9 admissible. There's no issue as to authenticity. We don't
10 need to --

11 THE COURT: Have you discussed this with the defense?

12 MR. SNIDER: Not yet.

13 THE COURT: Because that's really the issue.

14 MR. SNIDER: But we're not going to call those two
15 witnesses. So that's two witnesses that are not being called.
16 We've also elected not to call one of the witnesses that was
17 listed from the Broward Sheriff's Office. So I can tell you
18 right now we are calling -- the remaining witnesses for the
19 Government are a witness from AT&T is our first witness today;
20 a witness from the Broward Sheriff's Office named Alex
21 Rodriguez, whose testimony is going to be very short. He's
22 going to talk about the Broward Sheriff's Office IP address.
23 We're going to call a witness from the IRS. We're going to
24 call Ms. Rivero, and we're going to call the case agent, Kelly
25 DiPietrantonio.

1 It's five more witnesses and I expect to rest
2 tomorrow.

3 THE COURT: With regard to the business records or
4 record, that's something you all have to --

5 MR. SNIDER: I'll discuss that with -- if the Court
6 rules that they're admissible under 404(b), then I'll discuss
7 with defense counsel --

8 THE COURT: You discuss now. See, this was the
9 Court's ruling. Your last witness was supposed to be your
10 summary witness --

11 MR. SNIDER: Yes.

12 THE COURT: -- and I advised you that I would make a
13 decision prior to that witness's testimony.

14 So with regard to business records, et cetera, you
15 all can get that resolved now. Don't wait until the end to
16 resolve that issue. That's -- and I don't know if there's
17 some legal theory you have for admissibility or what, but I'll
18 decide all of that just prior to your summary witness, as I
19 advised the parties, what, two weeks ago -- a week ago at our
20 conference.

21 So with regard to foundation, I'm suggesting that you
22 not wait until that time to at least discuss the issue with
23 the defense --

24 MR. SNIDER: Okay. Very well.

25 THE COURT: -- to see where they are.

1 All right. We'll have to break until we get all 14
2 here, and then we will proceed.

3 How many are we missing now?

4 We're missing two jurors, so we will be in recess
5 until they arrive. Thank you.

6 (Recess at 9:47 AM to 9:55 AM.)

7 THE COURT: All right. We have all the jurors
8 present.

9 MR. SNIDER: I just wanted to -- there was an exhibit
10 that was received in evidence. It's Government's Exhibit 2002
11 and it is an email that was sent on May 6, 2021, from a person
12 named Odalys Concepcion.

13 THE COURT: Should I be looking at this just to get a
14 better understanding? All right. 2002 I'm looking at. Email
15 from Odalys Concepcion to Haydee Granados.

16 MR. SNIDER: Correct.

17 Attached to that email is a printout that relates to
18 the \$700,000 PPP loan that the Court has deferred a ruling on
19 about the admissibility. So at this time, I'm going to ask
20 the Court to withdraw this from evidence until the Court makes
21 its ruling. I didn't want the Court to think that -- I didn't
22 realize that this was attached.

23 THE COURT: All right. That's fine.

24 MR. SNIDER: So we're withdrawing 2002.

25 THE COURT: If we need to address that again, you can

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12

1 bring it to my attention.

2 Bring in the jury.

3 (Jury entered at 9:57 AM.)

4 THE COURT: Good morning, ladies and gentlemen.
5 Welcome back. I'm pleased that everyone was able to return,
6 and I assume no one had any issues with the hurricane and
7 tornados. It appears that we faired very well in Miami-Dade
8 County; however, in our far northern division, which includes
9 Ft. Pierce, you likely read they had some issues there. So
10 we're now ready to continue with the trial, and I will ask the
11 Government to call its next witness.

12 MR. LOVE: The United States calls Philip Fanara.
13 (Government witness, PHILIP FANARA, duly sworn.)

14 THE COURTROOM DEPUTY: State your name and spell it
15 for the record.

16 THE WITNESS: Philip Fanara, P-H-I-L-I-P,
17 F-A-N-A-R-A.

18 DIRECT EXAMINATION

19 BY MR. LOVE:

20 Q. Good morning, sir.

21 A. Good morning.

22 Q. Where do you currently work?

23 A. I'm an independent contractor for AT&T. I provide
24 testimony for them in court as a trial analyst.

25 Q. And how long have you filled that role?

1 A. I've been doing this for 11 years -- over 11 years. And
2 prior to that, I worked as an employee for them for an
3 additional 16 years.

4 Q. Based on your prior experience, are you familiar with the
5 AT&T home services and Internet services?

6 A. Yes.

7 Q. And what is it called?

8 A. The U-verse.

9 Q. Can you describe what services are provided by AT&T
10 U-verse?

11 A. A U-verse service is an Internet service for AT&T.

12 Q. Is it Internet-based?

13 A. Yes.

14 Q. And the Internet connections, what is used to provide
15 Internet connections?

16 A. As far as?

17 Q. Are you familiar with the term Internet Protocol?

18 A. Yes. That's an address assigned to an AT&T customer for
19 U-verse.

20 Q. And does AT&T have their own Internet protocols?

21 A. Yes.

22 Q. And while AT&T has those protocols, can they be assigned
23 to anyone else?

24 A. No.

25 Q. And are you familiar with the term subscriber details?

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14

1 A. Yes.

2 Q. What is that?

3 A. That's a person who is responsible for the bill and an
4 account of a U-verse customer.

5 Q. If an IP address is assigned to a subscriber, can any
6 other subscriber have access to that IP address?

7 A. No.

8 Q. Or will it be assigned to any other subscriber?

9 A. No.

10 Q. And is that IP address unique to the subscriber's Internet
11 connection at a specific service location?

12 A. Yes.

13 Q. All right. I'm going to pull up Government Exhibit 600.
14 Do you recognize this document?

15 A. Yes.

16 Q. What is it?

17 A. Subscriber information for a U-verse customer of AT&T.

18 Q. And at the top here, which I've enlarged for you, what is
19 that we're looking at?

20 A. That shows you the IP address of that particular customer.

21 Q. And what is the IP address?

22 A. 10713116184.

23 Q. Listed under the paragraph billing party, can you please
24 read who the account name is?

25 A. I believe it's pronounced Carolyn Wade, W-A-D-E.

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1 Q. And the billing address?

2 A. 6110 Reese Road, Apartment 207 -- Apartment 207 twice --
3 Davie, Florida 33314-1247.

4 Q. When was this account created?

5 A. October --

6 MR. WILCOX: Your Honor, our screen is not on.

7 I apologize, Mr. Love.

8 THE COURT: Do you have at least access to one
9 screen?

10 MR. WILCOX: Yes. And we also have a hard copy of
11 the exhibit. We're good.

12 THE COURT: We're going to have our IT people come up
13 to see if they can solve that problem.

14 You may continue.

15 MR. LOVE: Yes, Your Honor.

16 BY MR. LOVE:

17 Q. The question was what was the account creation date?

18 A. October 29, 2020.

19 Q. And the current status of the account?

20 A. Closed.

21 Q. And when was it canceled?

22 A. May 13, 2022.

23 Q. The email associated with the billing party?

24 A. Ckidd12260691@att.net.

25 Q. And I'm highlighting the service information paragraph.

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16

1 What is the name under the service information?

2 A. Carolyn Wade.

3 Q. And the service address?

4 A. 6110 Reese Road, Unit 207, Davie, Florida 33314-1215.

5 Q. And the service dates?

6 A. The service dates were from November 2, 2020, to
7 October 23, 2021.

8 Q. And what does service dates refer to?

9 A. It refers to that particular number, the service phone,
10 the (954) 314-7762, for that account.

11 Q. And the contact email for the service information?

12 A. Ckidd1226@gmail.com.

13 Q. And I'm highlighting the last portion that says IP usage.

14 Can you please describe what it is that we're looking at here?

15 A. This shows you the IP address assigned to that account and
16 the start date of that IP usage as well as the end date for
17 that usage.

18 Q. And the IP address, if you can read that?

19 A. 10713116184.

20 Q. Displaying Government Exhibit 601. Do you recognize this
21 document?

22 A. Yes.

23 Q. What is it?

24 A. Subscriber information of an AT&T U-verse customer.

25 Q. For this AT&T U-verse, what is the IP address associated

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1 with the account?

2 A. 1049107166.

3 Q. Who is listed as the billing party, the account name?

4 A. Wade's Funeral Home.

5 Q. And to the best that you can understand the billing
6 address, what is the billing address?

7 A. 315 West Pembroke Road, Hallandale Beach -- I believe
8 that's the abbreviation for Florida -- 33009-2343.

9 Q. And the account creation and cancellation date?

10 A. January 8, 2021, and canceled on January 18, 2023.

11 Q. Under the service information paragraph, what is the name
12 listed?

13 A. Tina Wade.

14 Q. And again, the best you can understand, the service
15 address?

16 A. 315 Pembroke Road, HLNDL, Florida, 33009-0000.

17 Q. And the service dates?

18 A. April 27, 2021, to May 20, 2022.

19 Q. And again, the IP usage, what does this refer to?

20 A. That's the start date and end date of that IP that was
21 associated with that account at that time.

22 Q. And the IP address?

23 A. One -- the IP address is 1049107166.

24 Q. And dropping down to page 2. Are you familiar with this
25 document?

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1 A. Yes.

2 Q. This is page 2 of Government Exhibit 601. Comparing it to
3 page 1, how is it different?

4 A. I'd have to take a look at both of them --

5 Q. Showing you the IP usage right there.

6 A. Okay. It shows the IP usage -- IP address is 1049107166
7 and the start date is 5/10/2021 to 5/13/2021.

8 MR. LOVE: One moment, Your Honor.

9 BY MR. LOVE:

10 Q. We're going to talk about the two dates that are listed
11 under service information as compared to the IP usage. And
12 I'm highlighting the IP usage. What dates do those dates
13 represent as compared to these service dates?

14 A. Well, they're contained within the service day, if that's
15 what you're looking at.

16 Q. Does it mean the IP address was active during the IP
17 usage?

18 A. Yes. On that line, you see the IP address and the IP
19 usage. That shows the start date and end date of that IP
20 usage. The service date refers to that service number, the
21 (954) 589-5696.

22 MR. LOVE: Thank you, Your Honor. No further
23 questions.

24 CROSS-EXAMINATION

25 BY MR. WILCOX:

1 Q. Sir, just briefly.

2 Are you familiar with AT&T's use of cell towers and
3 the function of the cell towers?

4 A. Am I familiar with the usage of it? I know they're used
5 for wireless phones and voice, data, and text, but as far as
6 anything else beyond that, no.

7 Q. Were you asked to produce any information -- did the
8 Government ask you to produce any information with respect to
9 cell tower usage?

10 A. No.

11 MR. WILCOX: Thank you very much.

12 MR. LOVE: No redirect, Your Honor.

13 THE COURT: Permanent excusal?

14 MR. LOVE: Yes, Your Honor.

15 MR. WILCOX: Yes, Your Honor.

16 THE COURT: You may step down. You are excused.

17 THE WITNESS: Thank you, Your Honor. Have a good
18 day.

19 MR. LOVE: Your Honor, the United States calls Alex
20 Rodriguez.

21 (Government witness, ALEXANDER RODRIGUEZ, duly
22 sworn.)

23 THE COURTROOM DEPUTY: Please state your name and
24 spell it for the record.

25 THE WITNESS: Alexander Rodriguez.

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1 DIRECT EXAMINATION

2 BY MR. LOVE:

3 Q. Good morning, Mr. Rodriguez.

4 A. Good morning.

5 Q. Where do you currently work?

6 A. Broward County Sheriff's Office.

7 Q. Is that commonly referred to as BSO?

8 A. Yes.

9 Q. What do you do for them?

10 A. I'm a senior network analyst, assigned to the cyber
11 security unit.

12 Q. How long have you been in that role?

13 A. About 20 years.

14 Q. In that role, are you familiar with the Internet service
15 offered to BSO employees?

16 A. Yes.

17 Q. Is the Internet service an open or closed network?

18 A. Closed.

19 Q. What does it mean to have a closed network?

20 A. You need a user name and password, authorized access only.

21 Q. Does BSO have a specific IP address for its employees?

22 A. Yes.

23 Q. And are there security protocols in place for the IP
24 network?

25 A. Yes.

1 Q. What are they?

2 A. Security protocols are that we have a firewall with access
3 list controls providing us, you know, isolation from public
4 Internet and our internal network.

5 Q. Are BSO employees given login credentials to access the
6 BSO network?

7 A. Yes.

8 Q. Displaying Government Exhibit 504. Do you recognize this
9 document?

10 A. Yes.

11 Q. What is it?

12 A. It's a screenshot of the interfaces on our public facing
13 firewall.

14 Q. I'm enlarging a portion of the exhibit. The highlighted
15 portion, what is that section?

16 A. The section highlighted indicates the public IP address
17 assigned to us by AT&T that identifies Broward Sheriff's
18 Office Internet connection on the Internet. This is the way
19 the public sees us on the Internet, that IP address.

20 Q. And the IP address associated with it, I want to orient
21 you to the right side of the screen. What is it?

22 A. 70.151.137.130.

23 Q. And what is that second number that's after the back
24 slash?

25 A. The second number is called the subnet mask. It

1 identifies the network and the host in regards to the first
2 set of numbers.

3 Q. The first set of numbers ending in 131, is that the IP
4 address?

5 A. The last set -- they're called octets. So an IP address
6 of IP version 4 has four octets. So the first octet, 70. The
7 second octet is 151. The third octet is 137. And the fourth
8 octet is 130. And they're separated by dots.

9 And the second set of numbers is the mask. The 255
10 in the first three sets of numbers indicates the network
11 portion. So the network is 70, 151, 137. And then the host
12 is 130.

13 Q. To access this IP address, does a BSO employee need to use
14 their login credentials?

15 A. Yes. This IP address is the gateway. So they log on to
16 the network and they access the Internet. And to go access
17 the Internet, they have to go through this interface and have
18 to use this IP address.

19 MR. LOVE: No further questions, Your Honor.

20 THE COURT: Cross-examination?

21 MR. WILCOX: No, Your Honor.

22 THE COURT: You may step down, sir.

23 Permanent excusal, counsel? May the witness be
24 permanently the excused?

25 MR. LOVE: Yes, Your Honor.

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1 MR. WILCOX: Yes, Your Honor.

2 THE COURT: You are excused, sir.

3 MR. LOVE: Your Honor, the United States calls Renee
4 McClain.

5 (Government witness, RENEE MCCLAIN, duly sworn.)

6 THE COURTROOM DEPUTY: Please state your name and
7 spell it for the record.

8 THE WITNESS: It's Rene McClain, R-E-N-E-E,
9 M-C-C-L-A-I-N.

10 DIRECT EXAMINATION

11 BY MR. LOVE:

12 Q. Good morning, Ms. McClain.

13 A. Good morning.

14 Q. Where do you currently work?

15 A. I work for Internal Revenue Service.

16 Q. Commonly referred to as the IRS?

17 A. That's correct.

18 Q. How long have you worked with the IRS?

19 A. About 13 years.

20 Q. What do you do in that role?

21 A. I am a court witness coordinator.

22 Q. What does that mean?

23 A. So -- I'm sorry. It means that I represent the commission
24 of IRS as the custodian of records. So I verify and I certify
25 that the documents are true IRS documents.

1 Q. In that role, have you become familiar with how taxes are
2 filed?

3 A. Yes, I have.

4 Q. And did you receive training from the IRS on tax filing?

5 A. Yes, I have.

6 Q. Did that training become -- excuse me -- did that training
7 include familiarity with tax forms?

8 A. Yes. That is correct.

9 Q. And can you please just give a background on that training
10 that you received?

11 A. So I have received in-person courtroom training and also
12 we have a digital training where we learn the forms and also
13 our master file.

14 Q. Are you familiar with the various IRS forms that are filed
15 in an individual's capacity?

16 A. Yes, we are.

17 Q. And how about IRS forms related to businesses?

18 A. Yes, I am.

19 Q. And did you receive training from the IRS on how forms are
20 specifically filled out?

21 A. Yes, I have.

22 Q. There's a number of documents that were received from the
23 IRS. Are you familiar with Government's Exhibits 200 to 212?

24 A. Yes, I am.

25 Q. And is your testimony based on your review of those

1 documents?

2 A. Yes, it is.

3 Q. And is it also based on the training that you received
4 from the IRS?

5 A. Yes, that's correct.

6 Q. I'm going to show you Government Exhibit 200.

7 Do you recognize this document?

8 A. Yes, I do.

9 Q. What is it?

10 A. So this is a Form 1040, which is a US Individual Income
11 Tax Return for the tax year 2018, and this is for a Carolyn
12 Wade.

13 Q. And what is the home address that is associated with this
14 tax document?

15 A. The address listed is 8447 Northwest 51st Place.

16 Q. And is this filed in an individual single capacity or
17 separately or with another?

18 A. This is filed -- the filing status is married, filing
19 separately.

20 Q. And I'm dropping down to the bottom of the screen. What
21 is displayed here?

22 A. So because this is an electronic tax return, this is
23 displaying that there's an electronic signature, which is why
24 it has the asterisk. It just means that there was a PIN
25 number that was used, so it was filed electronically.

1 Q. Is there another way to sign your taxes?

2 A. Yes. If it's a paper return, it would be a live signature
3 or ink signature.

4 Q. And what is the occupation associated with this tax
5 return?

6 A. Occupation listed is detention deputy.

7 Q. Dropping down to page 2 of Government Exhibit 200 and
8 directing your attention to line 1, what's listed in line 1?

9 A. So line 1 is for wages, salaries, tips, and et cetera,
10 which will be attached by a Form W-2.

11 Q. And in this document, was a Form W-2 attached?

12 A. Yes, it was.

13 Q. And who provides the Form W-2?

14 A. The taxpayer would.

15 Q. Dropping down to line 6, what's listed in line 6?

16 A. So line 6 is for total income in any amount from
17 Schedule I, line 22, which this is displaying a loss of
18 30,330, and the amount on line 6 is \$49,926.

19 Q. What is a Schedule I?

20 A. The Schedule I lists other income.

21 Q. For instance, where could other income come from?

22 A. It could be like business income or things like that.

23 Q. What impact did that number, which came from the
24 Schedule I, have on Carolyn Wade's taxes for the year?

25 A. This amount reduced the income.

1 Q. Dropping down to page 3, what's depicted here?

2 A. So this is the Schedule I, which is the additional income
3 and adjustments to the income.

4 Q. Directing your attention to line 12, what's listed here?

5 A. So line 12 is for business income or loss, which is a tax
6 with a Schedule C or CE-Z, and this is showing a loss of
7 \$30,330.

8 Q. What's a Schedule C?

9 A. A Schedule C is sole proprietorship or a small business
10 form.

11 Q. Going to page 10, do you recognize this?

12 A. Yes, I do.

13 Q. What is it?

14 A. This is the Schedule C, the profit and loss from business
15 form, for 2018.

16 Q. And highlighting the top portion, what business is
17 associated with this filing?

18 A. The business is 1 Step A-Head.

19 Q. And the principal business?

20 A. It is listed as hairstylist.

21 Q. And the business name?

22 A. The business name is 1 Step A-Head.

23 Q. And directing your attention to what's on box D, what's
24 listed there?

25 A. That is the EIN number, also known as the employee

1 identification number.

2 Q. Going down to part one in the income, line 7, what's
3 listed on line 7?

4 A. So line 7 is for gross income, and the amount listed is
5 3,500.

6 Q. And under part 2 of page 10, what is this section?

7 A. This is the section where you would list all your
8 expenses.

9 Q. Did this business have expenses in 2018?

10 A. Yes, they did.

11 Q. All right. Focusing on the left side of the screen, what
12 expenses were listed here?

13 A. There's an amount in line 8 which is for advertising.
14 It's \$80. There's an amount in line 9 for car and truck
15 expenses, and the amount listed is \$14,530.

16 Q. Under line 9, what are the types of expenses that can be
17 incorporated into car and truck expenses?

18 A. It could be mileage or any expenses that you would have
19 for your vehicle.

20 Q. Going down to page 11, part four, what's listed here?

21 A. So part four is the information on your vehicle.

22 Q. And highlighting line 44, what's listed on line 44?

23 A. So (a) is for business miles. So it's 24,000 that's
24 listed. There's nothing in (b) for commuting miles. And for
25 (c), other, there's 2,000 miles.

1 Q. Going back to page 10 of Government Exhibit 200,
2 enlarging, excuse me, the right side of part two, what's
3 listed on the right side?

4 A. All right. So there's an amount in line 18 for office
5 expense of 1,800. There's an amount on line 22 for supplies
6 that are not included in part three. The amount listed is
7 1,700. There is a line on 23 -- I'm sorry -- an amount on
8 line 23 for taxes and licenses. There's \$120 listed. For
9 line 24, for travel and meals, 24(a) for travel is 5,000.
10 24B, for deductible meals, is 600. There's an amount on
11 line 25 for utilities for 8,400.

12 There's an amount on line 26 for wages -- I
13 apologize. There's no amount on line 26, but there's an
14 amount on line 27A for other expenses, which is 1,600.

15 Q. And what were the total expenses for this business in
16 2018?

17 A. The total expenses listed is \$33,830.

18 Q. And did this business take a loss or a gain for 2018?

19 A. There is a loss.

20 Q. And what was that amount?

21 A. The amount is \$30,330.

22 Q. When the individual filed this tax return and they signed
23 it, did they have to certify anything under penalty of
24 perjury?

25 A. Yes, they did.

1 Q. And directing your attention, if you could please read
2 what I've highlighted.

3 A. Okay. It states, "Under penalties of perjury, I declare
4 that I have examined this return and accompanying schedules
5 and statements, and to the best of my knowledge" --

6 Q. Excuse me.

7 A. -- "and to the best of my knowledge and belief, they are
8 true, correct, and complete. Declaration of preparer, other
9 than taxpayer, is based on all information of which preparer
10 has any knowledge."

11 Q. So when an individual signs that and swears to that
12 certification, are they swearing to their taxable income?

13 A. Yes, they are.

14 Q. Are they also swearing to all the expenses that they have
15 claimed to reduce or add to a taxable income?

16 A. Yes, they are.

17 Q. Displaying Government Exhibit 201, what is that that we're
18 looking at here?

19 A. So this is a Form 1040, which is a US Individual Income
20 Tax Return. This is for the tax year of 2019 and this is for
21 Carolyn Wade.

22 Q. And what is the address that's listed with them?

23 A. The address listed is 8447 Northwest 51st Place.

24 Q. Dropping to the bottom of page 1, what's listed under
25 line 1?

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31

1 A. On line 1 is for wages, salaries, and tips, et cetera,
2 which you would attach a Form W-2. The amount listed is
3 \$90,236.

4 Q. And again, who provides the W-2?

5 A. The taxpayer.

6 Q. And line 7(a). What's listed in line 7(a)?

7 A. 7(a) is for other income from Schedule I, line 9. The
8 amount listed is a loss of \$18,615.

9 Q. Dropping down to page 2 of Government's Exhibit 201 and
10 directing your attention to the bottom portion, how does it
11 appear that this tax return was signed?

12 A. This is an electronic tax return, so it was signed
13 electronically.

14 Q. Again, how do you know that?

15 A. It has the asterisk, which symbolizes that a PIN number
16 was used.

17 Q. And I want to direct your attention to this blank area
18 under paid preparer. What does this section signify?

19 A. So this is where the paid preparer will list their
20 information if they were preparing the tax return for moneys.

21 Q. So based on this filing, does it appear that a preparer
22 helped the individual file?

23 A. No, it does not.

24 Q. If a paid preparer is used, is there an IRS obligation on
25 that paid preparer to list themselves in this section?

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32

1 A. Yes, it is.

2 Q. Going to page 9 of Government Exhibit 201, what is it that
3 we're looking at here?

4 A. So this is a Schedule I, which is additional income and
5 adjustments to income, and this is for tax year 2019.

6 Q. And for what name is this listed?

7 A. This is for Carolyn Wade.

8 Q. And what is the business income?

9 A. On line 3, the business -- there's a loss of \$18,615.

10 Q. And is that the same number that was carried up to the
11 first page that we looked at for Government Exhibit 201?

12 A. Yes, it is.

13 Q. And where does this number come from?

14 A. This is coming from a Schedule C.

15 Q. Page 13 of Government Exhibit 201, what is it that we're
16 looking at here?

17 A. So this is the Schedule C, which is a profit and loss from
18 business. Again, this is from 2019 for Carolyn Wade.

19 Q. And the principal business listed in (a)?

20 A. The principal business is a hairstylist.

21 Q. Name?

22 A. And the name listed is 1 Step A-Head.

23 Q. And the address?

24 A. The address is 8447 Northwest 51st Place, Coral Springs,
25 Florida 33067-1974.

1 Q. For 2019, did the business have any income?

2 A. Yes, it did.

3 Q. What was the income amount?

4 A. The gross income, which is on line 7, is 6,800.

5 Q. And did the business have any expenses for that year?

6 A. Yes, it did.

7 Q. Starting with the left column, under part two, lines 8 to
8 17, what expenses did the business have?

9 A. So for line 8, advertising, it says 0. On line 9, for car
10 and truck expenses, it has \$6,770. And line 13, for
11 depreciation, it has \$3,450.

12 Q. Going to page 14 of Government Exhibit 201 and directing
13 your attention to the middle portion of the page under 44(a),
14 what's listed in this line?

15 A. There's no amounts listed.

16 Q. And what does that line specifically pertain to for
17 business?

18 A. Any mileage for the business.

19 Q. Back to page 13, highlighting the right portion of part
20 two, expenses, lines 18 through 27. What's listed here?

21 A. Okay. So on line 18, for office expense, there's \$1,275.
22 For line 22, for supplies that are not included in part three,
23 it has 2,900. For line 23, taxes and licenses, it has an
24 amount of 120. For 24(a), travel, it has 0. 24(b), for
25 deductible meals, it has 1,300. For 25, for utilities, it has

1 8,900. And 27(a), for other expenses, it has 700.

2 Q. What were the total expenses for this business in 2019?

3 A. The total expenses is \$25,415.

4 Q. And did this business have a profit or a loss?

5 A. It had a loss of \$18,615.

6 Q. Is that depicted in line 29?

7 A. Yes, it is.

8 Q. Is that the number that is then carried up to the
9 individual's tax return?

10 A. Yes, it is.

11 Q. And what impact did that loss have on the individual's tax
12 return?

13 A. It will reduce the income.

14 Q. Government Exhibit 202, do you recognize this document?

15 A. Yes, I do.

16 Q. And what is this document?

17 A. So this is a Form 1040, which is a US Individual Tax
18 Return for the tax year of 2020, and this is for Carolyn Wade.

19 Q. And the address associated with this tax filing?

20 A. So the address listed is 6110 Reese Road, Apartment 207,
21 Davie, Florida, 33314-1247.

22 Q. Highlighting the bottom portion of page 1 of 202, looking
23 at line 1, what's listed here?

24 A. So the wages, salaries, tips, et cetera, and it says
25 attach a Form W-2. The amount listed is \$77,510.

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35

1 Q. Directing your attention to line 8, what's listed here?

2 A. So line 8, for other income from Schedule I, line 9, there
3 is a loss of \$7,625.

4 Q. And how did that loss impact the wages or total income for
5 this tax filing?

6 A. It reduced the income.

7 Q. Dropping down to page 2, Government Exhibit 202, how does
8 it appear that this filing was signed?

9 A. This is an electronic tax return, so it was electronically
10 signed.

11 Q. And what was certified in the year 2020?

12 A. I'm sorry. Can you repeat the question?

13 Q. What was the tax filer certifying in the year 2020?

14 A. That the tax return was true, to the best of their
15 knowledge.

16 Q. And again, that includes everything that was used to
17 calculate the numbers?

18 A. That is correct, yes.

19 Q. And was a paid preparer used to file this tax return?

20 A. No, it was not.

21 Q. Going to page 16 of Government 202, what is page 16 here?

22 A. So this is a Schedule I, which is additional income and
23 adjustments to income for the tax year of 2020, and this is
24 for Carolyn Wade.

25 Q. Directing your attention to line 3 that's highlighted,

1 what's listed here on line 3?

2 A. So line 3 is for business income or loss, and here is a
3 loss of \$7,625.

4 Q. Is that the number that was carried over for the tax
5 filing for Carolyn Wade?

6 A. Yes, it is.

7 Q. And that number reduced her overall taxable income?

8 A. Yes, it did.

9 Q. Going to page 18 of Government Exhibit 202, what's listed
10 in page 18?

11 A. So this is a Schedule C, which is a profit and loss in
12 business. This is for tax year 2020, and this is for Carolyn
13 Wade.

14 Q. And what was the principal business?

15 A. A hairstylist.

16 Q. And the business name?

17 A. And the business name listed is 1 Step A-Head.

18 Q. Did the business have any income for 2020?

19 A. Yes, it did.

20 Q. What was the gross income?

21 A. So the gross income is \$500.

22 Q. Did the business have any expenses for 2020?

23 A. Yes, it did.

24 Q. Highlighting part 2 of page 18, directing your attention
25 to the left-hand side, lines 8 to 17, what, if any, expenses

1 are listed in that column?

2 A. So for line 9, car and truck expenses, it has 0, and on
3 line 13, for depreciation, Section 179, it has \$2,075.

4 Q. And lines 18 through 27, are there any expenses listed in
5 that column?

6 A. Yes, it is.

7 Q. What expenses?

8 A. So for line 18, office expense, there's \$500. For
9 line 22, for supplies that are not included in part three,
10 there's \$1,650. For line 24(b), deductible meals, there's
11 500. For line 25, utilities, there's 3,200. For line 27(a),
12 other expenses, it's \$200.

13 Q. And the total expenses for this business in 2020?

14 A. The total expenses listed is \$8,125.

15 Q. And did this business sustain a profit or a loss?

16 A. It is a loss.

17 Q. Government Exhibit 203, do you recognize this document?

18 A. Yes, I do.

19 Q. What is it?

20 A. So this is a Form 1040, a US Individual Tax Return, for
21 2020, and this is for Carolyn Wade.

22 Q. What is an amended tax filing?

23 A. So amended tax filing means that you've made some changes
24 to your tax return.

25 Q. Did you have an opportunity to review this tax filing and

1 compare it to Government Exhibit 202?

2 A. Yes, I have.

3 Q. Were the amendments to the Schedule C?

4 A. Yes, it was.

5 Q. Going to page 4. Do you recognize this document?

6 A. Yes, I do.

7 Q. What is it?

8 A. So this is a Form 1040X, which is the amended US
9 Individual Tax Return, and this is for tax year 2020, and this
10 is for Carolyn Wade.

11 Q. Where did you look to determine what amendments were made?

12 A. So you would look at the columns. You have A for original
13 amount, the B is for net changes, and C is the correct amount.

14 Q. And that's the middle of the page?

15 A. Yes, that is correct.

16 Q. And what adjustments were made here?

17 A. So there was an adjustment on line 1, which is the
18 adjusted gross income. It was reduced by \$600.

19 Q. Any other adjustments?

20 A. The tax was reduced by \$132.

21 Q. Did the tax reduction have anything to do with the income
22 reduction?

23 A. Yes, it did.

24 Q. Can you explain that?

25 A. So when you reduce your income, you will have to pay less

1 taxes. So in this case, because the income reduced, the tax
2 liability was reduced.

3 Q. Going to page 20 you mentioned you saw the amendments to
4 Schedule C. Is this the Schedule C that you're referring to?

5 A. Yes, it is.

6 Q. And what were the amendments that you saw?

7 A. So the changes were to the gross income. It has been
8 reduced to \$300, and there was a change to line 22 for
9 supplies. The new amount is \$2,050.

10 Q. So did that have an increase or a decrease in the total
11 expenses?

12 A. So it's -- I apologize. So the total expenses listed is
13 \$8,525.

14 Q. And did this business have a profit or a loss after the
15 amended tax return?

16 A. It is a loss of \$8,225.

17 Q. Going to Government Exhibit 204, do you recognize this
18 document?

19 A. Yes, I do.

20 Q. What is this document?

21 A. So this is a Form 1040, a US Individual Income Tax Return,
22 for the tax year of 2018, and this is for Tracy Wade.

23 Q. And what was the filing status for this?

24 A. The filing status listed is head of household.

25 Q. What does that mean?

1 A. That means that the taxpayer has paid more than half of
2 the cost of them and a dependent.

3 Q. And the home address associated with this tax filing?

4 A. The address listed is 8,400 -- I'm sorry -- 8447
5 Northwest 51st Place.

6 Q. Dropping now to the bottom of page 1 of Government
7 Exhibit 204, how does it appear that this filing was signed?

8 A. So this is an electronic tax return, so it was signed
9 electronically.

10 Q. And the occupation listed?

11 A. The occupation listed is police officer.

12 Q. And the date it was signed?

13 A. The signature date is May 9, 2019.

14 Q. Was a preparer used by the tax filer?

15 A. Yes, it was.

16 Q. Who?

17 A. The preparer listed is Daniela Parisi Perez.

18 Q. And you testified earlier that if a preparer is used that
19 they have an obligation to list their identifiers here?

20 A. If a paid preparer is used, yes, they have an obligation.

21 Q. Is this what you were referring to?

22 A. Yes, that is correct.

23 Q. Going to page 2, line 1, what's listed here?

24 A. So for line 1, wages, salaries, tips, et cetera, which it
25 tells you to attach a Form W-2, the amount listed is \$100,553.

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41

1 Q. And did that number come from a W-2?

2 A. Yes, it did.

3 Q. And again, who provides the W-2?

4 A. The taxpayer did.

5 Q. And directing your attention to line 6, what's listed
6 here?

7 A. Line 6 is for total income, and you would add any amount
8 from Schedule I, line 22. The amount added here is \$7,178.
9 So that gave a total of \$107,731.

10 Q. So does it appear that their total income increased?

11 A. Yes, it did.

12 Q. Going to page 3, do you recognize this document?

13 A. Yes, I do.

14 Q. And what is listed in this document?

15 A. So this is the Schedule I, the additional income and
16 adjustments to income, for 2018 for Tracy Wade.

17 Q. Previously, we directed your attention to line 12, but now
18 I'm going to direct your attention to line 17. What's the
19 difference in the two lines?

20 A. So line 12 is for a small business or business income or
21 small businesses, and line 17 is for rental real estate,
22 royalties, partnerships, S corporations, trusts, et cetera,
23 and you would attach a Schedule E.

24 Q. Generally speaking, an S corporation, based on your
25 training and experience at the IRS, what does that refer to?

1 A. So the S corporation needed there are shareholders.

2 Q. What is listed in line 17 for the total for 2018?

3 A. The total listed is \$7,178.

4 Q. Moving to page 10, what is this document?

5 A. So this is a Form 8867, which is a paid preparer due
6 diligence checklist, and this is for 2018.

7 Q. Who specifically is this document for?

8 A. This is for the preparer.

9 Q. Directing your attention to line 1, can you please
10 describe what's listed and highlighted in line 1?

11 A. It says, "Did you complete the return based on information
12 for tax year 2018 provided by the taxpayer or reasonably
13 obtained by you?" And it is checked yes.

14 Q. And going down to page 17 -- excuse me -- page 15. What's
15 page 15?

16 A. This is a Schedule E, which is a supplemental income and
17 loss for 2018, and this is for Tracy Wade.

18 Q. And pulling up page 17, what's listed here?

19 A. So it lists the business name, which is Wade Funeral Home
20 LLC. It's listed as an S corporation. It has the EIN number
21 or the employer identification number. And it also lists on
22 K, which is for nonpassive income from a schedule K-1, of
23 \$7,178.

24 Q. And we've looked at Schedule Es, and this was referring to
25 a Schedule K-1. How is that different from a Schedule C?

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43

1 A. So a Schedule K-1 listed income that the taxpayer received
2 from the business.

3 Q. Did this filing for 2018 have a Schedule C attached to it?

4 A. No, it did not.

5 Q. And all these numbers when they were signed, what was the
6 certification that was made by the tax filer?

7 A. That the information was true, to the best of their
8 knowledge.

9 Q. Government Exhibit 205, do you recognize this form?

10 A. Yes, I do.

11 Q. What is it?

12 A. So this is a Form 1120-S, which is a US income tax return
13 for an S corporation, and this is for 2018, and this is for
14 Wade Funeral Home LLC.

15 Q. And the street address for this corporation?

16 A. The street address listed is 315 West Pembroke Road,
17 Hallandale, Florida 33009.

18 Q. And the date this business was incorporated?

19 A. It's January the 1st, 2012.

20 Q. Highlighting the income section, what is the gross sales
21 for this business in 2018?

22 A. So in line 1(a), the gross receipts from sales is
23 \$305,761.

24 Q. Directing your attention to line 2, what's listed in
25 line 2?

1 A. So line 2 is for the cost of goods sold, which would
2 attach an 1125-A. The amount listed is \$134,602.

3 Q. And line 3?

4 A. Line 3 is for gross profit, and the amount listed is
5 \$171,159.

6 Q. And so was there a total income or a loss for this
7 business in 2018?

8 A. So there was a total income.

9 Q. What was the number?

10 A. \$171,159.

11 Q. All right. The cost of goods sold, line 2, is that listed
12 anywhere else within this document?

13 A. Yes, it is on the Form 1125-A.

14 Q. Going to page 9, what's listed here?

15 A. So this is the Form 1125-A, which is the cost of goods
16 sold.

17 Q. And what is listed under line 9?

18 A. Line 9 is --

19 Q. Or excuse me, line 6.

20 A. Line 6 is \$134,602.

21 Q. On line 5, it says, "Attach a schedule." Was there a
22 schedule attached to this filing?

23 A. Yes, there was.

24 Q. Moving to page 12, does this appear to be that list?

25 A. Yes, it is.

1 Q. And what is the list of the cost of goods?

2 A. It is listed as funeral costs and supplies, and the amount
3 listed is \$134,602.

4 Q. Back to page 1 of Government Exhibit 205, was this
5 business's income further reduced?

6 A. Yes, it was.

7 Q. How was it reduced?

8 A. So there were some other expenses that were listed.

9 Q. And what were those other expenses?

10 A. You have line 9 for repairs and maintenance. You have
11 \$9,604. You have line 12, which is taxes and license. You
12 have \$2,512. There's line 13 for interest, \$9,106. There's
13 14 for depreciation that's not claimed on the Form 1125-A or
14 elsewhere on the return. And you would attach a Form 4562.

15 The amount listed is \$6,667. You have line 16, which
16 is advertising, of \$9,801. You have line 19, other
17 deductions, which you would attach a statement, of \$126,291.
18 So the total deductions is \$163,981.

19 Q. And the line 21, ordinary business income or loss for this
20 business in 2018?

21 A. The income was \$7,178.

22 Q. The total deductions in line 20, is that listed in another
23 area of this tax filing?

24 A. Yes, it is.

25 Q. Based on your review, did this appear to be the number

1 listed in line 20 of Government Exhibit 205?

2 A. Yes, it is.

3 Q. And just for the record, Government Exhibit 205, page 1,
4 is on the left side of the screen. Government Exhibit 205,
5 page 14, is on the right side of the screen.

6 What were the expenses -- excuse me -- further
7 deductions, rather, that this business claimed in 2018?

8 A. So they have accounting, \$750, the automobile and truck
9 expense of \$26,434, their bank charges of \$218, credit and
10 collection costs of \$877. There's dues and subscriptions for
11 \$1,097. There's insurance of \$25,804. There's meals, which
12 is 50 percent, \$1,760. Office expense, \$3,804. There's
13 outside services of \$47,566, postage for \$707. There's
14 printing for \$360, security for \$1,770. There's telephone,
15 \$5088, travel for \$3,807, and utilities for \$6,249.

16 Q. And because this is an S corporation, was that income
17 passed through to the owner Tracy Wade?

18 A. Yes, it was.

19 Q. And how did the ordinary income from the Wade Funeral Home
20 impact Tracy Wade's taxable income for 2018?

21 A. It increased his income.

22 Q. Based on your review of the 2018 taxes, did you find any
23 expenses that were related to salary or wages to employees?

24 A. No, I did not.

25 Q. Showing you Government Exhibit 206, do you recognize this

1 document?

2 A. Yes, I do.

3 Q. And what is it?

4 A. So this is a Form 1040, which is US Individual Tax Return,
5 and this is for 2019, and this is for Tracy Wade.

6 Q. Highlighting the bottom portion of page 1, directing your
7 attention to line 1, what's listed here?

8 A. So line 1 is for wages, salaries, tips, et cetera, which
9 is attached as a Form W-2. It is \$106,245.

10 Q. And line 7(a) what's listed here?

11 A. 7(a) is for other income from Schedule I, line 9. The
12 amount listed is \$9,853.

13 Q. Dropping down to page 2 at the bottom, what's displayed
14 here?

15 A. This is a paper tax return, so this is what IRS calls a
16 live signature or an ink signature, and this is showing the
17 taxpayer's signature.

18 Q. And below the taxpayer's signature, what's listed there?

19 A. This is the paid preparer's information.

20 Q. Going to page 3, Government Exhibit 206, what's here?

21 A. So this is the Schedule I, which is additional income and
22 adjustments to income, and this is for 2019 for Tracy Wade.

23 Q. And what's listed under line 5?

24 A. Line 5 is for rental real estate, royalties, partnerships,
25 S corporations, trusts, et cetera. You would attach a

1 Schedule E. The amount listed is \$9,853.

2 Q. And was a Schedule E attached?

3 A. Yes, it was.

4 Q. Moving to page 5, is this the Schedule E that was
5 associated with this tax filing?

6 A. Yes, it is.

7 Q. And for who is it?

8 A. This is for Tracy Wade.

9 Q. In relation to what business?

10 A. Wade Funeral Home LLC.

11 Q. And what was the nonpassive income listed?

12 A. It's \$9,853.

13 Q. Showing you Government Exhibit 207, what is this document?

14 A. So this is a Form 1120-S, which is a US Income Tax Return
15 for an S corporation, and this is for tax year 2019. This is
16 for Wade Funeral Home LLC.

17 Q. I want to go back to Government Exhibit 206. Was there an
18 IRS Form 1120 filed for Wade Funeral Home for 2019?

19 A. I'm sorry. Repeat the question.

20 Q. Of course.

21 Was an IRS Form 1120 filed by Wade Funeral Home in
22 2019?

23 A. Just a Form 11 -- no, there was not.

24 Q. Going to Government Exhibit 207, if you could just
25 remind -- what is this document?

1 A. This is a Form 1120-S, which is a US Income Tax Return for
2 an S corporation, and this is for Wade Funeral Home LLC.

3 Q. And what is listed as the business name?

4 A. The business name is Wade Funeral Home LLC.

5 Q. Going to the middle of the page, what's listed here?

6 A. This is the income section.

7 Q. And under line 1(a), what's listed?

8 A. Gross receipts or sales. The amount listed is \$345,359.

9 Q. And the cost of goods sold under line 2?

10 A. The amount listed is \$165,339.

11 Q. And the total income from the business?

12 A. \$180,020.

13 Q. Going back to line 2 of the cost of goods sold, was there
14 another form attached to this?

15 A. Yes, there was.

16 Q. Pulling up page 8, 207, do you recognize this document?

17 A. Yes, I do.

18 Q. Is this what was listed for the cost of goods sold in
19 line 2?

20 A. Yes, that is correct.

21 Q. What is the total?

22 A. The total is \$165,339.

23 Q. Going to page 11, what's listed here?

24 A. This is funeral cost and supplies. The amount listed is
25 \$165,339.

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50

1 Q. And so did the cost of goods reduce the total income for
2 the business?

3 A. Yes, it did.

4 Q. And was it further reduced by deductions?

5 A. Yes, it was.

6 Q. Going back to 207, page 1, columns 7 through 21. Were
7 these the other deductions that were listed?

8 A. Yes, it is.

9 Q. And did these deductions include any employee deductions?

10 A. No, it did not.

11 Q. Under line 19, where it says "other deductions," what's
12 listed there?

13 A. It says other deductions, which you would attach a
14 statement. It has \$136,228.

15 Q. And under line 21, what was the ordinary business?

16 A. The ordinary business income is \$9,853.

17 Q. The other deductions, pulling up page 13, did you have an
18 opportunity to review these deductions?

19 A. Yes, I have.

20 Q. Do any of these deductions appear -- on its face appear to
21 be deductions for employee wages or salary?

22 A. No, it does not.

23 Q. Pulling up Government Exhibit 208, do you recognize this
24 document?

25 A. Yes, I do.

1 Q. What is it?

2 A. So this is a Form 1040, a US Individual Tax Return, for
3 2020, and this is for Tracy Wade.

4 Q. And the middle of the document, page 1, were there any
5 wages?

6 A. Yes, there was.

7 Q. What was the listed wages?

8 A. \$92,470.

9 Q. And was there other income listed on line 8?

10 A. There is a loss on line 8 of \$4,649.

11 Q. And where did that number come from?

12 A. From the Schedule I, line 9.

13 Q. And what impact did that number from the Schedule I have
14 on Tracy Wade's total income for that year?

15 A. It reduced the income.

16 Q. Going to page 2, what's displayed here?

17 A. So this is a paper tax return. So this is what the IRS
18 calls an ink signature or a live signature. This is the
19 taxpayer's signature.

20 Q. And was there a preparer used?

21 A. Yes, it was.

22 Q. Who's the preparer?

23 A. The preparer listed is Daniela Parisi Perez.

24 Q. And going to page 3, is this the Schedule I that you
25 referred to earlier?

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52

1 A. Yes, it is.

2 Q. And under line 5, what's listed?

3 A. There's a loss of \$4,649.

4 Q. Page 4, Government Exhibit 208, is this where that number
5 came from?

6 A. Yes, it is.

7 Q. And so what was the total income for the business in this
8 year?

9 A. There was a loss of \$4,649.

10 Q. Pulling up Government Exhibit 209, do you recognize this
11 document?

12 A. Yes, I do.

13 Q. What is this document?

14 A. This is a Form 1120-S, which is a US Income Tax Return for
15 an S corporation, for the tax year 2020, and this is for Wade
16 Funeral Home LLC.

17 Q. What was the -- excuse me -- line 1(a), what were the
18 gross sales for this year?

19 A. It's \$332,681.

20 Q. And the cost of goods?

21 A. The amount listed is \$159,779.

22 Q. And the gross profit for this business in 2020?

23 A. It is \$172,902.

24 Q. And the total income?

25 A. \$172,902.

1 Q. Pulling up page 9 of Government Exhibit 209, what's
2 displayed on this page?

3 A. So this is the Form 1125-A, which is the cost of goods
4 sold.

5 Q. And what was the total for the cost of goods sold?

6 A. It is \$159,779.

7 Q. Pulling up page 12, what's listed here?

8 A. It's listed as funeral cost and supplies for \$159,779.

9 Q. Back to page 1 of Government Exhibit 209, was this
10 business total income further reduced?

11 A. Yes, it was.

12 Q. And it was reduced by various deductions listed under
13 lines 7 through 21?

14 A. That is correct.

15 Q. And based on your review of this 2020 filing, did you
16 appear to find any expenses for salary or wages to employees?

17 A. No, I did not.

18 Q. Under line 19, what is listed there?

19 A. For other deductions, which it says to attach a statement,
20 the amount listed is \$128,143.

21 Q. Going to page 13, Government Exhibit 209. Does this
22 appear to be where that number came from?

23 A. Yes, it is.

24 Q. Does there appear to be any expenses for salaries or wages
25 to employees listed here?

1 A. No, there were not.

2 Q. Highlighting line 21, and what was the ordinary business
3 income or loss for 2020?

4 A. It has a loss of \$4,649.

5 Q. And because this is an S corporation, was that income or
6 loss, here a loss, passed through to the owner Tracy Wade?

7 A. Yes, it was.

8 Q. And how did that ordinary loss from the Wade Funeral Home
9 impact Tracy Wade's taxable income for 2020?

10 A. It would reduce the income.

11 Q. Did you find a Schedule C for 2018?

12 A. No, I did not.

13 Q. Did you find a Schedule C for 2019?

14 A. No, I did not.

15 Q. And was there a Schedule C for the year 2020 in any of
16 these tax returns?

17 A. No, there was not.

18 Q. Government Exhibit 201, do you recognize this document?

19 A. Yes, I do.

20 Q. And what is this?

21 A. This is a Form 1120-S, which is a US Income Tax Return for
22 an S corporation, and this is for tax year 2021 for Wade
23 Funeral Home LLC.

24 Q. And what was the total income for 2021?

25 A. The total income listed is \$305,267.

1 Q. Was that number arrived at after the cost of goods sold
2 were factored in?

3 A. Yes, it was.

4 Q. And what were the cost of goods sold for 2021 for this
5 business?

6 A. It was \$427,093.

7 Q. Going to page 8 of Government Exhibit 210, line 5, does
8 this appear to be the cost of goods sold for that year?

9 A. Yes, it is.

10 Q. And what is that number?

11 A. It's \$427,093.

12 Q. Page 13, what's displayed here?

13 A. It's listed as funeral costs and supplies. The amount
14 listed is \$427,093.

15 Q. And was that income further reduced by any deductions?

16 A. Yes, it was.

17 Q. Is that listed in the column that's highlighted in yellow,
18 lines 8 through 21?

19 A. Yes, it is.

20 Q. And did you appear to find any expenses for salaries or
21 wages to employees in that column?

22 A. No, I did not.

23 Q. And directing your attention to line 19, where it says
24 "other deductions," what were the other deductions listed?

25 A. The amount listed is \$191,977.

1 Q. And so what were the total deductions for this business in
2 2021?

3 A. The amount listed is \$303,362.

4 Q. And the ordinary business income?

5 A. So the income is \$1,905.

6 Q. And because this was an S corporation, was that income
7 passed through to the owner Tracy Wade?

8 A. Yes, it was.

9 Q. And based on your review of the tax documents for 2021,
10 did you find or were there any Schedule Cs attached?

11 A. No, there was not.

12 Q. Showing a split screen, Government Exhibit 211 on the
13 left, and 212 on the right, starting with the left side, are
14 you familiar with this document?

15 A. Yes, I am.

16 Q. And what is this document?

17 A. So this is a certification of lack of record or what IRS
18 calls a Form 3050, and this is for Wade Funeral Home LLC.

19 Q. Was this provided to the Government in response to a
20 request for the records associated with Wade Funeral Home?

21 A. Yes, it was.

22 Q. At the bottom here where it indicates description of the
23 information sought, are you familiar with the Form 941?

24 A. Yes, I am.

25 Q. What is it?

1 A. So a 941 is an employee's quarterly federal tax return.

2 Q. And just to clarify, what does quarterly mean?

3 A. It means that it's filed four times a year.

4 Q. What type of information is contained in a 941?

5 A. So the 941 would have, like, wages, federal withholding,
6 social security, Medicare, how many employees that the
7 employer would have. That's what would be listed.

8 Q. So did the IRS run a search for the Form 941s for Wade
9 Funeral Home between March 31, 2018, and December 31, 2020?

10 A. Yes, they did.

11 Q. And are those periods of search listed here?

12 A. Yes, they are.

13 Q. Moving to the right side of the document, Government
14 Exhibit 212, what is this document?

15 A. So this is also a certification of lack of record or what
16 IRS calls a Form 3050, and this is also for Wade Funeral
17 Home LLC.

18 Q. And what information was sought?

19 A. So the information that was sought was a Form 1065, which
20 is a US Return of Partnership Income in a Form 940, which is
21 Employer's Annual Federal Unemployment, which is a FUTA, tax
22 return.

23 Q. And what is generally documented in a Form 940?

24 A. So 940 is for unemployment taxes employers are required to
25 file.

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58

1 Q. Highlighting the bottom portion of Government Exhibit 212,
2 did the IRS run a search for Form 940s and Form 1065s for Wade
3 Funeral Homes between the period of December 31, 2018, and
4 December 31, 2020?

5 A. December the 31st, 2018, and through December 31, 2021.

6 Q. Yes. Excuse me.

7 A. Yes, that's correct.

8 Q. And what, if anything, was found?

9 A. There was no tax returns or 1065s or 940s that were found.

10 Q. And I just want to ask, are you familiar with the Paycheck
11 Protection Program from a high-level view?

12 A. No, I'm not.

13 MR. WILCOX: Objection, Judge.

14 THE COURT: The response was no, so are you
15 withdrawing?

16 MR. LOVE: One moment, Your Honor.

17 BY MR. LOVE:

18 Q. Ms. McClain, the records that we reviewed today, are these
19 the only records that the IRS had for the taxpayers Carolyn
20 Wade and Tracy Wade for the years that we reviewed?

21 A. Yes, it is.

22 MR. LOVE: No further questions, Your Honor.

23 THE COURT: Why don't we take our morning break at
24 this time, ladies and gentlemen. Approximately 15 minutes.

25 We are in recess.

1 (Jury exited at 11:17 AM.)

2 (Recess at 11:17 AM to 11:44 AM.)

3 (Jury entered at 11:44 AM.)

4 THE COURT: You may begin.

5 CROSS-EXAMINATION

6 BY MR. WILCOX:

7 Q. Good morning, Ms. McClain. How are you?

8 A. I'm good. And you?

9 Q. Ms. McClain, to the best of your knowledge, all of the
10 files that you testified to or that you were shown by the
11 Government, they were accepted by the IRS; is that correct?

12 A. That is correct.

13 Q. Okay. And neither Carolyn Wade's taxes or Tracy Wade's
14 taxes were audited for either 2018, 2019, or 2020?

15 A. Oh, I don't know.

16 Q. You don't know.

17 To the best of your knowledge, neither Tracy Wade or
18 Carolyn Wade are on trial here for some irregularities with
19 their taxes?

20 A. I don't know.

21 Q. You don't know.

22 A. Sorry.

23 Q. You don't know whether or not there are any irregularities
24 with the Wades' tax forms; is that correct?

25 A. That is correct.

1 Q. Now, I just wanted to ask you. The IRS does have the
2 capabilities of detecting duplicate filings. Is that a
3 correct statement?

4 A. That is correct.

5 Q. So if someone was to file a Schedule C form let's say
6 before April of 2020 for the tax year 2019 and then someone
7 filed another Schedule C for that same tax year later in 2020,
8 the IRS would likely pick up on that; is that correct?

9 A. Are you saying this is for the -- I'm sorry. Can you
10 clarify? Is it for the same taxpayer?

11 Q. Yes.

12 A. They would be able to know, correct.

13 Q. Right.

14 Just like if a wife and a husband or a male and a
15 female that are separated, they claimed the same dependents,
16 the IRS would probably catch that too; is that right?

17 A. It is possible they would.

18 Q. A couple things I wanted to ask you about the exhibits.
19 One moment. I don't have them on the screen. I have to
20 actually take out the forms and put them on this ELMO.

21 I'm going to put on the ELMO Exhibit 203. Now, this
22 is the 1040 for Carolyn Wade; is that correct?

23 A. That is correct, yes.

24 Q. And what's the address there?

25 A. The address listed is 6110 Reese Road, Apartment 207.

1 Q. In Davie; right?

2 A. Yes, Davie, Florida 33314-1247.

3 Q. I'm going to try to find the Schedule C. It may take me a
4 little while. Here it is. It didn't take me as long as I
5 thought.

6 The Schedule C here, this reflects a proper loss from
7 a business; correct?

8 A. Yes, that is correct.

9 Q. What's the address there?

10 A. The business address listed is 6110 Reese Road,
11 Apartment 207, Davie Florida 33314-1247.

12 Q. Okay. And the type of business again? Just remind the
13 jury what type of business was operating there.

14 A. It says the principal business is hairstylist.

15 Q. And the name of that business?

16 A. 1 Step A-Head.

17 Q. Okay. The address is the same; right?

18 A. That's correct.

19 Q. That would suggest that this business was operated from
20 her home?

21 A. It's just what the taxpayer listed. I don't know what
22 it's suggesting.

23 Q. Well, the address for the 1040, which reflects her job as
24 a police officer -- right?

25 A. I'm sorry. Repeat the question.

1 Q. The address on the 1040, right --

2 A. Yes.

3 Q. -- and this form reflects the income she received as a
4 police officer, doesn't it?

5 A. I would need to see the whole form to see what the
6 occupation --

7 Q. All right, all right.

8 A. I'm sorry. It's on page 2.

9 Q. Page 2?

10 A. The back of the 1040.

11 Q. Thank you, thank you.

12 A. The occupation listed is a detention deputy.

13 Q. All right. So the address for the 1040 and address for
14 the Schedule C, which reflects the business income, are the
15 same; is that correct?

16 A. That is correct.

17 Q. Okay. And I want to go back to an earlier one. This
18 is -- I'm going to show you Exhibit 2001. This is Carolyn
19 Wade's 1040 for the tax year 2019, and that address is 8447
20 Northwest 51st Place; is that correct?

21 A. That is correct.

22 Q. In Coral Springs; is that right?

23 A. Yes.

24 Q. And we find the schedule -- oh, I went right to it that
25 time. The Schedule C, this is for the business; right?

1 A. Yes, it is, the Schedule C.

2 Q. It's profit or loss from business that you filed -- it
3 says the business is where? What's the address of the
4 business?

5 A. The address listed is 8447 Northwest 51st Place, Coral
6 Springs, Florida 33067-1974.

7 Q. And it is the same address that appears as the 1040;
8 correct?

9 A. It is the same address listed, correct.

10 Q. I need to correct the record. I believe I said
11 Exhibit 2001 and it was Exhibit 201. All right.

12 I want to show you Exhibit 2004 -- 204. This is the
13 1040 -- I don't want to show you that one, actually.

14 I'm showing you Exhibit 206. This is the 1040 for
15 Tracy Wade. Do you see that?

16 A. Yes, I do.

17 Q. And the address there is -- can you see it? -- 8447
18 Northwest 51st Place, Coral Springs. Do you see that?

19 A. Yes, I do.

20 Q. And this reflects his income from his job as a police
21 officer. Could you help me with this? What page would that
22 be on?

23 A. The occupation is on page 2 of the 1040.

24 Q. Okay. This is page 2?

25 A. It's down some more.

1 Q. I don't seem to find it there.

2 A. It's there.

3 MR. MCCRAY: It's next to the date.

4 MR. WILCOX: Everybody sees it but me.

5 BY MR. WILCOX:

6 Q. And then there's an 11 -- I believe it's called an 1120-S
7 that reflects his income from a corporation. Now, that
8 address is different; right?

9 A. Yes, it is.

10 Q. That's 315 Pembroke Road, Wade Funeral Home; correct?

11 A. West Pembroke Road, yes.

12 Q. Okay. I'm going to leave this one here, Exhibit 207.

13 Now, the gross receipts and sales is the same as the
14 gross income; is that correct?

15 A. You have to make it so I can see the whole section.

16 Q. Oh.

17 A. I'm sorry. Can you repeat the question for me, please?

18 Q. Gross receipts and sales are the same as gross income?

19 A. The gross receipts and sales is just gross receipts and
20 sales.

21 Q. Is that his gross income from the business?

22 A. Well, they have a line for gross profit.

23 Q. If I say gross income --

24 A. I'm going to say no because the form lists what it is, and
25 I can't call it anything other than what it lists.

1 Q. I understand. Okay.

2 But that reflects all the money he received from the
3 business; is that correct?

4 A. That is what he listed.

5 Q. Um?

6 A. That is what is listed. I don't know if the numbers are
7 true. That is what he listed.

8 Q. So let me be clear. He filed this form with the IRS
9 stating that his gross receipts or sales from that business
10 was \$345,359?

11 A. That is correct.

12 Q. Okay.

13 A. Yes.

14 Q. And in 2009, he filed another 1120-S for the tax year --
15 I'm sorry -- Exhibit 2009 -- Exhibit 209 -- Exhibit 209 for
16 the tax year 2020. He indicated that his gross receipts and
17 sales for that year were \$332,681; is that right?

18 A. That is correct, yes.

19 Q. He filed it with the IRS?

20 A. That is correct.

21 Q. And now, are you familiar with 1099 workers?

22 A. Yes, I am.

23 Q. Why don't you tell the jury what a 1099 worker is.

24 A. Well, are you referring to a 1099-Miscellaneous? I'm
25 asking for clarification. A 1099-Miscellaneous is where a

1 contractor -- one that is not an employee, who does not
2 receive a W-2, will receive a 1099-Miscellaneous.

3 Q. And what do they do with the 1099, the employee?

4 A. The employee will report their income on their tax return.

5 Q. But not the business owner? If the business owner is
6 utilizing 1099 employees, he doesn't put them on his -- he
7 doesn't list them as employees on his tax return; is that
8 correct?

9 A. I don't know.

10 Q. One moment, Your Honor.

11 Well, I mean, would a business owner report income
12 that his 1099 workers earn on his 1120-S filing?

13 A. Employer has the option to include a deduction or expenses
14 if they're considered an expense.

15 Q. One moment, Your Honor.

16 I had to get clarification.

17 If an employer uses 1099 employees, he could list
18 what he paid those employees as expenses on his 1120-S form;
19 is that correct?

20 A. That is correct.

21 Q. Okay. All right. So that would explain why only on an
22 1120-S form you wouldn't have any income or any expenses paid
23 out to employees? You wouldn't reflect wages paid out to
24 employees on the 1120-S form?

25 A. I don't think I understand your question. I'm sorry. Can

1 you repeat it for me?

2 Q. Okay. If a business owner had 1099 employees, okay, he
3 could list what he paid them on the 1120-S form as expenses of
4 operating his business; is that correct?

5 A. That is correct, yes.

6 Q. All right. But he wouldn't also list -- if he did that,
7 he wouldn't list that amount of money under wages, would he?

8 A. On the 1120-S, the wages is a deduction. If he would like
9 to have it as a deduction, he would put it there.

10 Q. You mean he would be allowed to put it twice with a 1099
11 employee?

12 A. No. He could take one deduction. So he's paying out
13 wages or expenses to contractors; he could claim it as a
14 deduction.

15 Q. He would have to do one or another. He would have to
16 claim it as expenses or he would have to claim it as wages;
17 right? He couldn't do both.

18 A. I only know of one line on the -- I mean, on the 1120-S
19 for the expense.

20 Q. All right. So the 1120-S doesn't have a spot for wages.
21 It doesn't have a line for wages; is that what you're saying?

22 A. If you put it up -- I don't know it by heart. I
23 apologize. I would have to look at it.

24 Q. What I'm asking you, Ms. McClain -- I'll try to make it
25 simple -- is that if a person didn't declare that he was

1 paying wages on an 1120-S, would the fact that he was paying
2 his employees a 1099 explain that?

3 A. I don't know.

4 Q. Here's an 1120-S -- one moment, Your Honor. I'm sorry.
5 One moment, Your Honor.

6 I'm showing you Exhibit 209. This is the 1120-S
7 filed by Wade's Funeral Home.

8 Now, under salaries and wages, that line is left
9 blank. Do you see that?

10 A. Yes, I do.

11 Q. But the taxpayer has the option of including that in other
12 deductions; is that right? I mean, that could -- what he paid
13 his 1099 workers could be reflected in other deductions; is
14 that correct?

15 A. The taxpayer could have put it there, correct.

16 Q. Okay. That's all I was trying to say.

17 One moment, Your Honor. One moment. I probably have
18 maybe one more question or no question.

19 One other question, ma'am. When these files -- like,
20 it says 2020; is that correct?

21 A. This is for the tax year 2020.

22 Q. For the tax year 2020, but the form was actually completed
23 in the following year, like 2021; is that right?

24 A. That is correct, yes.

25 MR. WILCOX: Thank you. I don't have any further

RIVERO - DIRECT

69

1 questions, Your Honor.

2 THE COURT: Any redirect?

3 MR. LOVE: No redirect, Your Honor.

4 THE COURT: Permanent excusal, counsel?

5 MR. LOVE: Yes.

6 MR. WILCOX: Yes.

7 THE COURT: You may step down. You are excused.
8 Please call your next witness.

9 MR. SNIDER: Your Honor, the United States calls
10 Haydee Rivero.

11 (Government witness, HAYDEE RIVERO, duly sworn.)

12 THE COURTROOM DEPUTY: Please state your name and
13 spell it for the record.

14 THE WITNESS: It's Haydee, H-A-Y-D-E-E, last name
15 Rivero, R-I-V-E-R-O.

16 MR. SNIDER: Can we have the HDMI for the podium,
17 please? Thank you.

18 DIRECT EXAMINATION

19 BY MR. SNIDER:

20 Q. Good morning, Ms. Rivero.

21 A. Good morning.

22 Q. How are you doing today?

23 A. I'm okay.

24 Q. Can you introduce yourself to the jury by telling them how
25 old you are?

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70

1 A. I am 43 years old.

2 Q. Where were you born?

3 A. I was born in Nicaragua.

4 Q. When did you immigrate to the United States?

5 A. June of 1986.

6 Q. And how old were you, approximately, in June of 1986?

7 A. I was five years old.

8 Q. Are you a US citizen?

9 A. Yes, I am.

10 Q. When did you become a US citizen?

11 A. May of 2014.

12 Q. Are you married?

13 A. Yes, I am.

14 Q. Who are you married to?

15 A. Eduardo Rivero.

16 Q. How long have you and Mr. Rivero been married?

17 A. We've been married legally three years.

18 Q. Were you and Mr. Rivero in a relationship before you were
19 married?

20 A. Yes, 19 years.

21 Q. Before you married Mr. Rivero, were you known by another
22 last name?

23 A. Yes. Granados, G-R-A-N-A-D-O-S.

24 Q. Ms. Rivero, do you have any children?

25 A. Yes, I do. I have three children.

RIVERO - DIRECT

71

1 Q. And without telling me their exact ages, are they still
2 living with you?

3 A. Yes. They're young and they're in school.

4 Q. Who is their primary caretaker?

5 A. I am.

6 Q. And without telling me exactly where you live, what area
7 do you live in with your family?

8 A. I live in Broward County.

9 Q. What is your highest level of education?

10 A. High school diploma.

11 Q. When did you get your high school diploma?

12 A. June of 2001.

13 Q. Where did you go to high school?

14 A. Miami Jackson Senior High.

15 Q. What type of work do you do?

16 A. I do administrative work at the funeral home I own with my
17 husband, Eduardo Rivero.

18 Q. I'm sorry. What's the name of the funeral home?

19 A. Edward Rivero Funeral Home.

20 Q. Does you own that with your husband?

21 A. Correct.

22 Q. How long have you and Mr. Rivero owned a funeral home for?

23 A. Since May of 2020.

24 Q. What kind of work are you doing for the funeral home?

25 A. Administrative work.

RIVERO - DIRECT

72

1 Q. What does that involve?

2 A. Doing the monthly reports, death certificates, paperwork
3 for ship-outs, anything that has to do with clerical.

4 Q. Clerical work?

5 A. Yes. Correct.

6 Q. And prior to owning the funeral home and doing this type
7 of work, what kind of work were you doing?

8 A. I served as an immigration interpreter for marriage
9 petitions.

10 Q. What languages do you speak?

11 A. English and Spanish.

12 Q. Does Edward Rivero Funeral Home have employees?

13 A. Yes.

14 Q. How many?

15 A. Four.

16 Q. Who are they?

17 A. Myself; my husband, Eduardo Rivero; the funeral director;
18 and the funeral attendant.

19 Q. Do you work full-time for the funeral home?

20 A. No, I do a part-time from 9:00 to 1:00.

21 Q. And when you're not at the funeral home from 9:00 to 1:00,
22 what are you doing?

23 A. I go home to wait for my children to get out of school to
24 take care of them.

25 Q. Who picks them up from school?

RIVERO - DIRECT

73

1 A. Sometimes -- I pick up my daughter, and my two boys go on
2 the bus.

3 Q. Ms. Rivero, do you have a bank account?

4 A. Yes, I do.

5 Q. Does your husband, Mr. Rivero, have a bank account?

6 A. Yes, he does.

7 Q. Are your finances combined or separate?

8 A. They're separate.

9 Q. Ms. Rivero, do you file taxes with the Internal Revenue
10 Service?

11 A. Yes, I do.

12 Q. Do you do that every year?

13 A. Yes, I do.

14 Q. Do you prepare your own taxes or do you have assistance?

15 A. No, I do my taxes with H&R Block.

16 Q. Do you review your tax returns before you file them?

17 A. Yes, I do. I make sure my children's names are correct,
18 the spelling of their name, their date of birth, social, and
19 all the information on the form is correct.

20 Q. And do you do that before you sign your tax return?

21 A. Correct.

22 Q. Ms. Rivero, do you have any accounting background?

23 A. No, I don't.

24 Q. How are your math skills?

25 A. Not good.

RIVERO - DIRECT

74

1 Q. Are you comfortable doing math?

2 A. No.

3 Q. Ms. Rivero, have you ever been charged with a crime?

4 A. Yes.

5 Q. How many times in your life have you been charged with a
6 crime?

7 A. One time.

8 Q. And when were you charged with a crime?

9 A. I was charged with a crime in July of 2024.

10 Q. What crime were you charged with in July of 2024?

11 A. Conspiracy to defraud.

12 Q. And so you were charged with a conspiracy?

13 A. Yes. Correct.

14 Q. Did the conspiracy that you were charged with include what
15 we call an object making false statements?

16 A. Yes. Correct.

17 Q. And were those false statements made to the Small Business
18 Administration?

19 A. Yes. Correct.

20 Q. And you said a conspiracy to defraud. Was that wire
21 fraud?

22 A. Yes. Correct.

23 Q. So you were charged with conspiracy to commit wire fraud
24 and make false statements to the Small Business
25 Administration?

RIVERO - DIRECT

75

1 A. Yes.

2 Q. In your words, what is it that you are accused of doing?

3 A. Submitting false information to the PPP loan application.

4 Q. Was there a particular type of information that you
5 submitted that was false?

6 A. Yes, the Schedule C form.

7 Q. And the allegations against you, did it allege that you
8 did that by yourself?

9 A. No, I did not.

10 Q. There were others involved?

11 A. Yes. Myself, Carolyn Wade, Tracy Wade, and others.

12 Q. When you were charged with this offense, did you go to
13 court?

14 A. Yes.

15 Q. And when you went to court, were you arrested and brought
16 to court or did you go on your own?

17 A. I surrendered myself with my attorney to court.

18 Q. Have you ever been arrested before?

19 A. No.

20 Q. Ms. Rivero, do you know what an indictment is?

21 A. Yes.

22 Q. And in your case, did you agree to waive the process of
23 indictment?

24 A. Yes, I did.

25 Q. And were you charged in what is known as an information

RIVERO - DIRECT

76

1 filed by the United States Attorney?

2 A. Yes. Correct.

3 Q. Ms. Rivero, did you plead guilty to the offense that you
4 are charged with, that is, conspiracy to commit wire fraud and
5 make false statements to the SBA?

6 A. Yes, I did.

7 Q. When did you plead guilty?

8 A. September 20, '24.

9 Q. Did you plead guilty to that offense pursuant to a
10 document that is known as a plea agreement?

11 A. Yes. Correct.

12 Q. Was that plea agreement an agreement between yourself and
13 the United States of America?

14 A. Yes. Correct.

15 Q. Have you seen your plea agreement before?

16 A. Yes, I did.

17 Q. And are you familiar with it?

18 A. Yes.

19 MR. SNIDER: Your Honor, publishing Government
20 Exhibit 2000 in evidence.

21 BY MR. SNIDER:

22 Q. Ms. Rivero, do you see on your screen a document with an
23 exhibit sticker 2000?

24 A. Yes, I do.

25 Q. Do you recognize it?

RIVERO - DIRECT

77

1 A. Yes.

2 Q. What is this?

3 A. It's the plea agreement.

4 Q. Whose plea agreement?

5 A. Myself.

6 Q. Is this the plea agreement that pursuant to which you pled
7 guilty in your case?

8 A. Yes. Correct.

9 Q. I'm going to go to the last page of the document. Do you
10 see the last page on your screen?

11 A. Yes, I do.

12 Q. Do you see your signature on that page?

13 A. Yes.

14 Q. And is this the plea agreement that you signed?

15 A. Correct.

16 Q. Ms. Rivero, why did you plead guilty?

17 A. Because I am guilty.

18 Q. Who made the decision for you to plead guilty?

19 A. I, myself.

20 Q. Did anyone force you to plead guilty?

21 A. No.

22 Q. Did anyone threaten or coerce you to plead guilty?

23 A. No, not at all.

24 Q. Did you acknowledge in your plea agreement that you were
25 pleading guilty on your own free will based on a decision you

RIVERO - DIRECT

78

1 made yourself?

2 A. Yes. Correct.

3 Q. Have you been sentenced yet in your case?

4 A. No, not yet.

5 Q. Do you know what your sentence will be?

6 A. No.

7 Q. Has anyone made any promises to you about what your
8 sentence will be in your case?

9 A. No.

10 Q. Who determines what your sentence will be in your case?

11 A. The judge.

12 Q. Anyone else?

13 A. No.

14 Q. Now, as part of your plea agreement with the United
15 States, did you agree to cooperate with the Government?

16 A. Yes. Correct.

17 Q. Does that cooperation include providing truthful testimony
18 at trials like this?

19 A. Yes. Correct.

20 Q. Has the Government made any promises to you in exchange
21 for your testimony in this case?

22 A. No.

23 Q. Has the Government offered to recommend to your judge any
24 sentence reduction as a result of your cooperation?

25 A. No, not at all.

RIVERO - DIRECT

79

1 Q. Is the Government under any obligation to make a
2 recommendation to your sentencing judge about what your
3 sentence should be based on cooperation?

4 A. No.

5 Q. Can the United States make a recommendation to the judge
6 to take into account your cooperation if it chooses to do so?

7 A. Yes. I hope that my consideration -- I mean my
8 cooperation takes -- in consideration.

9 Q. So you're hoping that the Government will make a
10 recommendation that takes into account your cooperation?

11 A. Yes. Correct.

12 Q. But are there any guarantees that that will happen?

13 A. No.

14 Q. Ms. Rivero, when you pled guilty to conspiracy to commit
15 wire fraud and make false statements to the SBA, did you admit
16 to certain facts?

17 A. Yes.

18 Q. And were some of those facts included in a written
19 document that is called a factual proffer?

20 A. Yes.

21 Q. Publishing Government Exhibit 2001 in evidence.

22 Ms. Rivero, do you see on your screen Government
23 Exhibit 2001?

24 A. Yes.

25 Q. What is this?

RIVERO - DIRECT

80

1 A. The factual proffer.

2 Q. Whose factual proffer?

3 A. Myself.

4 Q. Did you read this document?

5 A. Yes.

6 Q. Are you familiar with it?

7 A. Yes. I read it and I went through it with my attorney.

8 Q. And did you agree with the facts that are contained in
9 this document?

10 A. Yes.

11 Q. Did you agree that those were facts that if your case had
12 gone to trial the Government would have proved beyond a
13 reasonable doubt?

14 A. Yes.

15 Q. I am scrolling to the last page of Government
16 Exhibit 2001, which is page 6. Do you see your signature on
17 that page?

18 A. Yes, I do.

19 Q. Did you sign this document after you had read it and
20 understood and agreed with it?

21 A. Yes. Correct.

22 Q. Let's talk about the conspiracy that you pled guilty to.
23 Did you commit conspiracy by yourself?

24 A. No.

25 Q. Who else did you commit that crime with?

RIVERO - DIRECT

81

1 A. With Carolyn Wade, Tracy Wade, and others.

2 Q. Have you ever heard of a person named Jamil Hunter?

3 A. Yes.

4 Q. Was that one of the other persons that you committed this
5 crime with?

6 A. Yes. Correct.

7 Q. Approximately how many others did you commit the crime of
8 conspiracy with?

9 A. Around 20 or 21.

10 Q. Do you see any of your co-conspirators here in the
11 courtroom today?

12 A. Yes, I do.

13 Q. Who do you see?

14 A. Tracy Wade and Carolyn Wade.

15 Q. Can you identify Mrs. Wade by --

16 MR. WILCOX: Your Honor, I'm going to stipulate that
17 these two people are Tracy Wade and Carolyn Wade.

18 THE COURT: Very well.

19 BY MR. SNIDER:

20 Q. Okay. What was the purpose of the conspiracy that you
21 participated in and pled guilty to with Carolyn Wade and Tracy
22 Wade and others?

23 A. To obtain the loan.

24 Q. What loan?

25 A. The PP [sic] loan.

RIVERO - DIRECT

82

1 Q. And when you say PPP loan, are you referring to the
2 Paycheck Protection Program?

3 A. Yes. Correct --

4 MR. WILCOX: Objection. Leading.

5 THE COURT: Wait. One moment. Overruled.

6 BY MR. SNIDER:

7 Q. So the record is clear, when I say PPP, do you know what
8 I'm referring to --

9 A. Yes. Correct.

10 Q. -- or you say PPP, what do you mean by PPP?

11 A. The Paycheck Protection Program.

12 Q. So you said the purpose was to get Paycheck Protection
13 Program loans?

14 A. Correct.

15 Q. Was that based on true information or false information?

16 A. False information.

17 Q. So the purpose was to get PPP loans based on false
18 information?

19 A. Yes. Correct.

20 Q. Did you have a specific role in the conspiracy?

21 A. Yes, I did.

22 Q. What was your role in the conspiracy?

23 A. To upload the Schedule C to the Womply website.

24 Q. Did have you a role in preparing a Schedule C in the
25 conspiracy?

RIVERO - DIRECT

83

1 A. Yes. Correct.

2 Q. Did that role include preparing a Schedule C that
3 contained false information?

4 A. Yes.

5 Q. And we'll get into this more in a second, but I think you
6 just said another part of your role was to upload that
7 Schedule C that you had created with false information to a
8 website?

9 A. Yes. Correct.

10 Q. What was that website?

11 A. Womply.

12 Q. Ms. Rivero, did you create a Schedule C for Tracy Wade's
13 PPP loan application that contained false information?

14 A. Yes, I did.

15 Q. Did you create a Schedule C that contained false
16 information for Carolyn Wade's PPP loan application?

17 A. Yes, I did.

18 Q. Did you create Schedule Cs that contained false
19 information for other people that were involved in this
20 conspiracy?

21 A. Yes, I did.

22 Q. Okay. So let's tell the jury how it is or was that you
23 created these Schedule C forms with false information. Let's
24 walk them through.

25 A. I went on a website to obtain the form, the Schedule C

RIVERO - DIRECT

84

1 form. Once I downloaded it, I would put in the person's full
2 name, address, social, and the amount that was required in
3 order to obtain the PP loan.

4 Q. So when you downloaded the form, was it empty?

5 A. Correct.

6 Q. And how did you learn where to go to to download the form?
7 Which website? How did you learn that?

8 A. Jamil Hunter taught me how to do the application and where
9 to download the form -- the Schedule C form.

10 Q. Did Mr. Hunter ever give you a sample of a Schedule C
11 form?

12 A. Yes, he did.

13 Q. And did you use that sample as a guide -- let me just ask
14 you this. What did you use it for?

15 A. I used it as a sample to guide myself to do the other
16 Schedule C forms.

17 Q. Does a Schedule C form contain a bunch of numbers?

18 A. Yes.

19 Q. And in the Schedule C forms that you created, where did
20 you get the numbers that were in the forms?

21 A. I made them up.

22 Q. Ms. Rivero, in connection with preparing these Schedule C
23 forms, did anyone for whom you were preparing them for give
24 you any tax information?

25 A. No. No one did.

1 Q. Did you request tax information for anyone for whom you
2 were preparing these Schedule C forms?

3 A. No, I didn't.

4 Q. Let's walk through the process now of taking the
5 Schedule C form that you created and uploading it to Womply.
6 Okay?

7 A. Okay.

8 Q. So how is it that you were able to get the Schedule C form
9 that you filled out with made-up numbers to Womply?

10 A. Each individual will have to initiate the application.
11 They would start the application. Once they receive an email
12 stating that the Schedule C needed to be uploaded onto the
13 Womply page, that person would let me know, and they would
14 have to login and provide me with a one-time code.

15 Q. So what do you need in order to log into Womply's website?

16 A. A code.

17 Q. And the code, is that something that you received yourself
18 or was it given to you?

19 A. It was given to me.

20 Q. And why is it that you can't receive that code yourself?

21 A. Because the -- my phone number or email is not attached to
22 that application, so it has to be given to me by the person.

23 Q. And these codes, did they ever expire?

24 A. Yes, they do.

25 Q. Approximately how quickly are they valid for?

RIVERO - DIRECT

86

1 A. Ten minutes only.

2 Q. So if you went to log in and the code was expired, what
3 did you do?

4 A. The person -- I will let the person know they need to log
5 in and obtain a new code.

6 Q. And did that happen?

7 A. Yes, sometimes.

8 Q. Did you ever log into Womply's website from a computer?

9 A. Yes.

10 Q. And where was that computer located?

11 A. In my home.

12 Q. What kind of computer were you using in 2021 and
13 specifically when you were uploading Schedule C forms to
14 Womply's website?

15 A. An HP computer.

16 Q. Is that a Windows machine?

17 A. Yes. Correct.

18 Q. Ms. Rivero, did you ever log into Womply's website from
19 your cell phone?

20 A. Yes, I did, sometimes.

21 Q. Ms. Rivero, in 2021, what kind of cell phone did you have?

22 A. An iPhone.

23 Q. In 2021, and specifically when you were participating in
24 this conspiracy that you've pled guilty to, who was your cell
25 phone service provider?

RIVERO - DIRECT

87

1 A. It was T-Mobile and it's still T-Mobile now.

2 Q. Ms. Rivero, have you ever had cell phone service provided
3 by Verizon?

4 A. No.

5 Q. Now, when it was your turn to upload the Schedule C, the
6 application you were uploading it to, was it already started
7 or was it something you had to start?

8 A. Can you repeat the question again?

9 Q. Sure.

10 When you went to upload the Schedule C, was the
11 application at that point already started?

12 A. Yes, it was already started.

13 Q. Was that something that you had started?

14 A. No. Each individual had to start their own application.

15 Q. How did you know when it was your time to upload a
16 Schedule C for someone?

17 A. The person would contact me to let me know that they had
18 received an email stating that the Schedule C needed to be
19 uploaded, that that was the next step.

20 Q. Okay. And in addition to uploading a Schedule C that you
21 created with false information, did you also have to input
22 into Womply's website a number from one of the lines on the
23 Schedule C?

24 A. Yes. Correct.

25 Q. And did you do that?

RIVERO - DIRECT

88

1 A. Yes, I did.

2 THE COURT: All right, sir. I'm going to stop you
3 there. We're going to break for lunch at this time. Please
4 remember not to discuss the case in any way, ladies and
5 gentlemen, and we're going to resume at 1:35 PM.

6 MR. SNIDER: 1:35?

7 THE COURT: 1:35.

8 Enjoy your lunch.

9 (Jury exited at 12:30 PM.)

10 (Lunch recess from 12:30 PM to 1:41PM.)

11 (Jury entered at 1:41 PM.)

12 MR. SNIDER: Thank you, Your Honor.

13 BY MR. SNIDER:

14 Q. Ms. Rivero, before the lunch break, I asked you whether in
15 addition to creating a Schedule C with false information and
16 uploading that to Womply's website for the individuals that
17 you were doing that for, I asked you whether you also inputted
18 into Womply's website one of the numbers from the Schedule C.

19 A. Yes. Correct.

20 Q. And the answer you gave was that -- was what?

21 A. Yes, I did. I input one of the numbers on the Schedule C
22 on the Womply website.

23 Q. With respect to your role in this process, after you had
24 uploaded the false Schedule C and inputted a number from that
25 Schedule C in the website, did you have another part in the

RIVERO - DIRECT

89

1 application process?

2 A. No.

3 Q. Was there a part of the PPP application process that
4 required an electronic signature?

5 A. Yes, correct.

6 Q. And do you remember the type of program that was used for
7 that electronic signature?

8 A. Yes.

9 Q. What was it?

10 A. DocuSign.

11 Q. Was there a component of the PPP loan application process
12 that required certifying that all the information in the PPP
13 application and any supporting documents was all true?

14 A. Yes. Correct.

15 Q. Ms. Rivero, did you certify for Tracy Wade in his
16 application that the information was true?

17 A. No, I did not certify it.

18 Q. Did you certify for Carolyn Wade that the information in
19 her application was true?

20 A. No, I did not.

21 Q. Ms. Rivero, did you sign via DocuSign any PPP loan
22 application for Tracy Wade?

23 A. No, I did not.

24 Q. Did you sign via DocuSign any PPP loan application for
25 Carolyn Wade?

RIVERO - DIRECT

90

1 A. No, I did not.

2 Q. Did you sign any PPP loan application for anyone else
3 other than yourself?

4 A. No. Only for myself.

5 Q. We'll get to yours in a second.

6 Ms. Rivero, did you get paid for creating Schedule C
7 forms that had false information?

8 A. Yes, I did.

9 Q. And how much did you typically receive for preparing false
10 Schedule Cs?

11 A. Between a thousand and \$2,000 for each application.

12 Q. Did you receive money from Tracy Wade?

13 A. Yes, I did.

14 Q. How much did you receive from Tracy Wade?

15 A. A thousand dollars via Zelle.

16 Q. Did you receive money from Carolyn Wade?

17 A. Yes, I did.

18 Q. How much did you receive from Carolyn Wade?

19 A. A thousand dollars via Zelle.

20 Q. Now, before you created a false Schedule C for Tracy Wade
21 and Carolyn Wade and any others, did you yourself get a
22 Paycheck Protection Program loan?

23 A. Yes, I did.

24 Q. Did anyone assist you with your PPP loan?

25 A. Yes.

RIVERO - DIRECT

91

1 Q. Who was that?

2 A. Jamil Hunter.

3 Q. Who is Jamil Hunter?

4 A. He's a friend of my husband and I.

5 Q. Approximately when did you, Ms. Rivero, apply for your PPP
6 loan?

7 A. Around April of 2021.

8 Q. Ms. Rivero, did you have your own business in April of
9 2021 in your name?

10 A. No.

11 Q. You weren't a sole proprietor?

12 A. No.

13 Q. Did your PPP loan application contain false information?

14 A. Yes. Correct.

15 Q. What was false in your PPP loan application?

16 A. The Schedule C form.

17 Q. Did you know that your PPP loan application contained
18 false information?

19 A. Yes, I did. Correct.

20 Q. Did you know that when you were applying for it?

21 A. Yes.

22 Q. You said that there was a false Schedule C with your PPP
23 loan application?

24 A. Yes, correct.

25 Q. Who created that?

RIVERO - DIRECT

92

1 A. Jamil Hunter.

2 Q. Did you know that Jamil Hunter had created a false
3 Schedule C for your PPP loan application?

4 A. Yes, I did.

5 Q. With respect to your PPP loan application, did you sign
6 your PPP loan application via DocuSign?

7 A. Yes, I did.

8 Q. And when you signed your PPP loan application via
9 DocuSign, were you able to see the document that you were
10 signing?

11 A. Yes.

12 Q. Did you see the false information in the document that you
13 were signing?

14 A. Yes.

15 Q. Did you sign it anyway?

16 A. Yes, I did.

17 Q. Did you initial that all the information was true?

18 A. Correct.

19 Q. When you initialed all the information was true, did you
20 know that it wasn't?

21 A. Correct.

22 Q. Did you know what you were doing was wrong?

23 A. Yes. A hundred percent.

24 Q. Did you know that you were violating the law?

25 A. Yes, I did.

RIVERO - DIRECT

93

1 Q. Why did you apply for a PPP loan that you knew contained
2 false information?

3 A. Because I needed the money.

4 Q. Did you think you were going to get caught?

5 A. No, not at all.

6 Q. Why not?

7 A. Because the loan was forgivable.

8 Q. Because it was forgivable, you didn't think that anyone
9 would be checking?

10 A. Correct.

11 Q. How many PPP loans did you get?

12 A. Two.

13 Q. And was the application process for the second one similar
14 or different than to the first?

15 A. I don't remember how the second one was, but it was not --
16 you didn't have to put that much information as the first one.

17 Q. Why did you apply for a second one?

18 A. It was given to me automatically. Womply offered it.

19 Q. Was it based on the same false information?

20 A. Yes. Correct.

21 Q. Did you know that at the time?

22 A. Yes.

23 Q. So you testified a moment ago that you did this because
24 you needed the money?

25 A. Yes. Correct.

RIVERO - DIRECT

94

1 Q. What did you do with the PPP loan money that you got from
2 your PPP loans?

3 A. I spent it on expenses, on my kids, credit card bills, and
4 utility bills at my home.

5 Q. And with respect to your children, what is it that you
6 were purchasing with this PPP money?

7 A. I paid part of my boys' orthodontic treatment, my
8 daughter's aftercare, my two boys' school bus, credit cards,
9 and utility bills at home.

10 Q. Did Mr. Hunter charge you a fee for creating a false
11 Schedule C for your PPP loan application?

12 A. Yes, he did.

13 Q. What did he charge you?

14 A. \$2,000.

15 Q. And did you pay him?

16 A. Yes, I did.

17 Q. Did you use PPP money that you had received to pay
18 Mr. Hunter \$2,000?

19 A. Yes, I did.

20 Q. Ms. Rivero, you testified a moment ago that you thought
21 that these loans were forgivable?

22 A. Correct.

23 Q. Did you apply for forgiveness?

24 A. Yes, I did.

25 Q. With respect to both PPP loans?

RIVERO - DIRECT

95

1 A. Yes, correct.

2 Q. And were they forgiven?

3 A. Yes.

4 Q. I want to turn now more specifically to the loans that you
5 were involved with for Tracy Wade and Carolyn Wade.

6 How do you know Tracy Wade and Carolyn Wade?

7 A. I met Tracy Wade in 2020 at our funeral home, and I met
8 Carolyn Wade through Tracy Wade.

9 Q. Did you know them before 2020?

10 A. No, I did not.

11 Q. In 2021, did you ever socialize with Mr. and Mrs. Wade?

12 A. Yes, I did.

13 Q. Did you have social gatherings at your house in the spring
14 time frame 2021?

15 A. Yes. We had gatherings every other weekend.

16 Q. Did you ever invite Tracy Wade and Carolyn Wade to those
17 gatherings?

18 A. My husband invited Tracy Wade.

19 Q. And was Mr. and/or Mrs. Wade ever at those gatherings at
20 your home?

21 A. I -- what I can remember, Carolyn Wade, maybe two or three
22 times, but Tracy Wade was there more often than his wife.

23 Q. Now, at these gatherings at your home in the spring of
24 2021, did the subject of the Paycheck Protection Program ever
25 come up?

RIVERO - DIRECT

96

1 A. Yes, it did.

2 Q. And how did it come up?

3 A. My husband brought it up to Tracy Wade, mentioned to him
4 that there was a PPP loan application going around and if --
5 he asked him if he wanted to apply for one.

6 Q. I'm sorry. Who asked?

7 A. Edward Rivero told Tracy Wade about the PPP loan that was
8 going around, and he asked -- my husband, Eduardo Rivero,
9 asked Tracy Wade if he wanted to apply for the loan.

10 Q. Did Mr. Wade express interest in obtaining a PPP loan?

11 A. Yes, he did.

12 Q. Were you the person who originally was going to assist
13 Mr. Wade with his PPP loan, specifically the Schedule C?

14 A. No, I was not.

15 Q. Who was that person?

16 A. It was Jamil Hunter.

17 Q. To your knowledge, did Jamil Hunter ever assist Mr. Wade
18 with his PPP loan?

19 A. No, he did not.

20 Q. Do you know why?

21 A. He was not available.

22 Q. Did Mr. Wade ever ask you for assistance with his PPP loan
23 application?

24 A. I offered myself to help him do the PPP loan application
25 for him since Jamil Hunter was not available.

1 MR. WILCOX: Your Honor, could she repeat the answer?
2 I didn't hear the first part.

3 THE WITNESS: I told Tracy Wade that I would be the
4 one doing his PPP loan application since Jamil Hunter was not
5 available.

6 BY MR. SNIDER:

7 Q. And you testified earlier that Mr. Hunter was the person
8 that essentially taught you how to complete -- where to go for
9 the Schedule C and how to complete it?

10 A. Correct.

11 Q. And is he the person that taught you how to do it with
12 respect to the loan for Tracy Wade?

13 A. Yes. He taught me how to go answer every step of the PPP
14 loan application and he told me how to do the Schedule C form.
15 He gave me a copy so that I can guide myself to go ahead and
16 complete those Schedule C forms.

17 Q. After that, did you explain to Tracy Wade what the process
18 would be for applying for a PPP loan?

19 A. Yes, I did.

20 Q. What did you explain to Tracy Wade?

21 A. In order to apply for the PPP loan application, I had to
22 create a Schedule C form and that an amount of 100,000 or over
23 had to be put in that form in order to qualify for the 20,000.

24 Q. And what was Mr. Wade's response when you explained that
25 to him?

RIVERO - DIRECT

98

1 A. He was fine with it. He didn't say anything.

2 Q. You said a \$20,000 PPP loan?

3 A. Correct.

4 Q. What was the maximum, if you know, a sole proprietor could
5 obtain from the PPP loan program if applying as a sole
6 proprietor?

7 A. The max was 20,000.

8 Q. And how much income did you need to put in in order to
9 obtain a loan for \$20,000?

10 A. A little over a hundred thousand.

11 Q. Is that what you explained to Mr. Wade?

12 A. Correct.

13 Q. Did you ever ask Tracy Wade for any tax information?

14 A. No, I did not.

15 Q. Did Tracy Wade ever offer to give you any tax information
16 for his PPP loan?

17 A. No, he did not.

18 Q. Did Tracy Wade provide you with any information about Wade
19 Funeral Home?

20 A. No, he did not.

21 Q. Did he ever tell you what the income was for Wade Funeral
22 Home?

23 A. No, he did not.

24 Q. Did you have an understanding at the time that you were
25 engaged with Mr. Wade whether or not Mr. Wade understood that

RIVERO - DIRECT

99

1 the loan that you were helping with --

2 MR. WILCOX: Object to the leading and to the form of
3 the question, Your Honor.

4 THE COURT: Sustained.

5 BY MR. SNIDER:

6 Q. Did you ever explain to Mr. Wade who this loan was on
7 behalf of?

8 A. Yes, I did. I told him it was under the personal -- it
9 was a personal loan. I never requested any information
10 regarding his funeral home because it was not a business loan.
11 It was a personal loan.

12 Q. When you say a personal loan, it was a loan --

13 A. Under the person's name, not the business.

14 Q. Did you know how to do Paycheck Protection Program loans
15 for a business like a, for example, limited liability company?

16 A. No, I did not.

17 Q. Did you know how to do Paycheck Protection Program loans
18 for anyone other than a sole proprietor?

19 A. Only the sole proprietor.

20 Q. How often were you in touch with Tracy Wade during the PPP
21 loan application process?

22 A. We were in touch throughout the whole process of the PPP
23 loan application.

24 Q. And how did you communicate with him?

25 A. We communicated via phone, email, or text.

RIVERO - DIRECT

100

1 Q. Did you give any instructions to Tracy Wade about how to
2 begin the process of applying for a PPP loan?

3 A. Yes, I did.

4 Q. What did you tell him?

5 A. I told him he needed to log into the Womply website,
6 initiate the application by putting in his name, email, or
7 phone number, and then, once he had initiated, to let me know
8 so that I could go ahead and upload the Schedule C.

9 Q. Did you need to collect any information from Tracy Wade in
10 order to prepare a Schedule C for him?

11 A. Yes, I did.

12 Q. What did you collect?

13 A. His name, address, and social security number.

14 Q. But no tax information?

15 A. No tax information.

16 Q. Did you understand that the document you were creating was
17 a tax document?

18 A. Yes. Correct.

19 Q. So did Mr. Wade provide to you his social security number?

20 A. Yes, he gave me his phone -- I mean, his social security
21 number, his name, and address.

22 Q. How did he give that information to you?

23 A. Over the phone.

24 Q. Did you write it down?

25 A. Yes, I wrote it down on a piece of paper.

RIVERO - DIRECT

101

1 Q. Do you still have that piece of paper?

2 A. No, I don't.

3 Q. Why not?

4 A. As soon as he gave me the information and I created the
5 Schedule C, I tossed the paper away because I didn't need that
6 information anymore.

7 MR. SNIDER: Your Honor, give me one moment here. I
8 need to unlock my computer.

9 I am publishing what is in evidence as Government
10 Exhibit 154.

11 BY MR. SNIDER:

12 Q. Ms. Rivero, do you see Government Exhibit 154 on your
13 screen?

14 A. Yes, I do.

15 Q. Do you recognize it?

16 A. Yes.

17 Q. What is in Government Exhibit 154?

18 A. It's the Schedule C form that I created for Tracy Wade.

19 Q. Do you see his name?

20 A. Yes, I do.

21 Q. Do you see a social security number?

22 A. Yes.

23 Q. Did you put in that social security number?

24 A. Yes, I did.

25 Q. Did you put in his name?

RIVERO - DIRECT

102

1 A. Correct.

2 Q. Do you see an address?

3 A. Yes.

4 Q. Did you put in that address?

5 A. Yes, I did.

6 Q. Is that the same social and address that Tracy Wade gave
7 to you over the phone?

8 A. Yes. Correct.

9 Q. Now let's enlarge part one and two of this document. Do
10 you see lines 1 through 31?

11 A. Yes.

12 Q. Do you see numbers in some of those lines?

13 A. Yes, I do.

14 Q. Who put in those numbers?

15 A. I did myself.

16 Q. Where did you get those numbers?

17 A. I created them.

18 Q. Is this a copy of the Schedule C that you also uploaded to
19 the PPP loan application for Tracy Wade on Womply's website?

20 A. Yes, I did.

21 Q. And did you take one of the lines here and enter that
22 information into the website?

23 A. Yes, I did.

24 Q. How is it that you were able to log into Tracy Wade's PPP
25 loan application on Womply's website and upload this document

RIVERO - DIRECT

103

1 and enter the information?

2 A. Tracy had to provide me with a code in order to enter into
3 his application on Womply.

4 Q. Did Tracy Wade provide you with a code?

5 A. Yes, he did.

6 Q. Do you remember where you were when you logged in to
7 upload this Schedule C?

8 A. I was at home.

9 Q. What were you using at home, if you remember, to access
10 the Internet and log in to this?

11 A. My computer.

12 Q. Is that the HP that you testified about earlier?

13 A. Yes. Correct.

14 Q. Now, you testified a moment ago that one of the ways in
15 which you communicated with Tracy Wade during this process was
16 by telephone?

17 A. Correct.

18 Q. How frequently were you speaking with Mr. Wade over the
19 phone?

20 A. We spoke most of the time -- throughout the week until the
21 application -- through the whole process of the application we
22 were in contact.

23 Q. Prior to you engaging with Tracy Wade in the PPP loan
24 application process, were you frequently on the phone with
25 him?

RIVERO - DIRECT

104

1 A. Before the application, no.

2 Q. How about after the application?

3 A. After the application, not anymore.

4 Q. During the phone calls that you had with Tracy Wade during
5 the PPP loan application process, did you discuss anything
6 other than the PPP loans?

7 A. No, only about the PP loan.

8 Q. Ms. Rivero, what was your cell phone number that you were
9 using in 2021?

10 A. (954) 394-3563.

11 Q. You testified earlier that your cell phone service was
12 provided by T-Mobile?

13 A. Yes. Correct.

14 Q. During these phone calls that you had with Mr. Wade during
15 the PPP loan application process, can you describe how
16 Mr. Wade was with you on the phone?

17 A. He was eager and anxious to have the application completed
18 and done. I felt pressure by him to have the application
19 completed right away.

20 Q. Did Mr. Wade ever ask you about when he could expect to
21 receive his money?

22 A. Yes, he did.

23 Q. Did he ask you that once?

24 A. Two or three times.

25 Q. And did you ever sign any application for Tracy Wade?

RIVERO - DIRECT

105

1 A. No, I did not.

2 Q. Now, did there come a point in time when Mr. Wade brought
3 up the subject of a Schedule C for his wife, Carolyn Wade?

4 A. Yes, he did.

5 Q. How did that come up?

6 A. As soon as his application was completed, that he signed
7 his application, he asked me if I can go ahead and do the
8 application for his wife, Carolyn Wade.

9 Q. And was he asking for the whole application or the
10 Schedule C?

11 A. The Schedule C.

12 Q. And what did you tell him?

13 A. I said that, yes, I can go ahead and do the Schedule C for
14 his wife.

15 Q. Did you explain anything to Mr. Wade about the Schedule C
16 for Carolyn Wade?

17 A. Yes. Well, he already knew and I told him that it had to
18 be the same way I did his in order to qualify for the 20,000,
19 that the Schedule C had to have the amount of a hundred -- a
20 little over a hundred thousand dollars in order to qualify for
21 the PPP loan application.

22 Q. To qualify for the maximum amount?

23 A. Yes. Correct.

24 Q. Did Mr. Wade ever try to put you in touch with Carolyn
25 Wade?

RIVERO - DIRECT

106

1 A. He gave me her phone number. He asked me to contact her
2 so that I can explain to her how to initiate the application.

3 Q. Did you ever speak with Mrs. Carolyn Wade?

4 A. No, I did not.

5 Q. At the time that you had agreed to prepare a Schedule C
6 for Carolyn Wade similar to the one that you had done for
7 Tracy Wade, did you know what Carolyn Wade did for a living?

8 A. Yes.

9 Q. What was that?

10 A. I knew that she worked for BS0.

11 Q. Is that the Broward Sheriff's Office?

12 A. Correct.

13 Q. Did you know whether Carolyn Wade had any other business?

14 A. No, I did not.

15 Q. At the time that you were creating the Schedule C for
16 Carolyn Wade, had you ever heard of a company called 1 Step
17 A-Head?

18 A. No, I've never heard of it.

19 Q. Did Mr. Wade ever tell you about 1 Step A-Head?

20 A. No, he did not.

21 Q. Did you need information from Carolyn Wade in order to
22 create the Schedule C for her?

23 A. Yes. I needed her name, her address, and social security
24 number.

25 Q. Did you need any tax information?

RIVERO - DIRECT

107

1 A. No, I did not.

2 Q. Why?

3 A. Because I didn't need that information because the
4 information I was putting on the Schedule C was false
5 information.

6 Q. Did you ever ask Tracy Wade for any tax information for
7 Carolyn Wade?

8 A. No, I did not.

9 Q. Did Mr. Wade ever offer to provide you any tax information
10 for Carolyn Wade?

11 A. No, he did not.

12 Q. So you said a moment ago that you did not have contact
13 with Carolyn Wade over the phone; is that right?

14 A. No.

15 Q. How did you know when it was time to upload the Schedule C
16 that you were creating for Carolyn Wade?

17 A. Tracy Wade would -- gave me the one-time code in order for
18 me to log into Carolyn Wade's application.

19 Q. I'm publishing for you what is in evidence as Government
20 Exhibit 113.

21 Do you see 113 on your screen?

22 A. Yes, I do.

23 Q. Do you recognize it?

24 A. Yes.

25 Q. What is it?

RIVERO - DIRECT

108

1 A. It is Carolyn Wade's Schedule C form I created.

2 Q. Do you see the section where it says "name of proprietor"?

3 A. Yes. It says "Carolyn Wade."

4 Q. Who put that there?

5 A. I did.

6 Q. Do you see where it says "principal business" in line A
7 right below it?

8 A. Yes. It says "Carolyn Wade."

9 Q. Who put that there?

10 A. I did.

11 Q. Do you see a social security number?

12 A. Yes.

13 Q. Did you enter that?

14 A. Correct.

15 Q. Is that the social security number that Mr. Wade gave you?

16 A. Yes.

17 Q. How about the address?

18 A. Yes. That's the address that was given to me by Tracy
19 Wade for Carolyn Wade.

20 Q. Now, I'm enlarging part one and part two of this document.

21 Do you see that?

22 A. Yes.

23 Q. Do you see these numbers?

24 A. Yes.

25 Q. Where did those numbers come from?

RIVERO - DIRECT

109

1 A. I made them up.

2 Q. Is this the copy of the Schedule C that you uploaded to
3 Womply's website for Carolyn Wade's PPP loan application?

4 A. Yes, I did.

5 Q. Did you also enter from one of these lines, 1 through 31,
6 the piece of information that you had created?

7 A. Yes.

8 Q. You said a moment ago that when it was time to upload the
9 Schedule C that we're looking at here for Carolyn Wade's PPP
10 loan application you got the code from Tracy Wade?

11 A. Yes. Correct.

12 Q. Did you have an understanding of where Tracy Wade got the
13 code?

14 A. Yes. From his wife.

15 Q. How is it that you understood that?

16 A. Because each application you can only put the person's
17 email or phone number. You can't use the same phone number or
18 email on the application. Everyone had to have an individual
19 phone number or email.

20 Q. Did any of the codes that you received in order to log
21 into Carolyn Wade's application -- did any of those codes when
22 you went to put it in expire?

23 A. Yes.

24 Q. And what did you do when that code expired?

25 A. I would let Tracy Wade know that it had expired and that

RIVERO - DIRECT

110

1 Carolyn Wade had to request a new one.

2 Q. What did Tracy Wade say when you told him the code was
3 expired?

4 A. Sometimes he would put me on hold and try to get ahold of
5 her and I'd wait for him to provide it to me over the phone or
6 he would send it to me via text.

7 Q. Ms. Rivero, did you sign any PPP loan application for
8 Ms. Carolyn Wade?

9 A. No, I did not.

10 Q. Ms. Rivero, did Tracy Wade ever give you access to any
11 email account of his?

12 A. No, he did not.

13 Q. Did Tracy Wade ever give you access to Tracy Wade's cell
14 phone?

15 A. No, he did not.

16 Q. Were you ever together in the same physical space as Tracy
17 Wade during the PPP application process that you did for Tracy
18 Wade?

19 A. No.

20 Q. Did Carolyn Wade, either herself or through Tracy Wade,
21 ever give you access to an email account for Carolyn Wade?

22 A. No, he did not.

23 Q. And did you ever get access from Carolyn Wade?

24 A. Not from her either, no.

25 Q. Did you ever have access to Carolyn Wade's cell phone?

RIVERO - DIRECT

111

1 A. No.

2 Q. Were you ever physically present with Carolyn Wade during
3 the PPP loan application process for Carolyn Wade's
4 application?

5 A. No.

6 Q. Ms. Rivero, to your knowledge, did Tracy Wade receive a
7 PPP loan?

8 A. Yes, he did.

9 Q. And did you receive payment from Tracy Wade?

10 A. Yes, I did.

11 Q. What was your understanding of why -- let me ask you this.
12 Sorry.

13 How much did you receive?

14 A. A thousand dollars.

15 Q. What was your understanding of why you received a thousand
16 dollars from Tracy Wade?

17 A. He was paying me for the Schedule C form I created for him
18 in order for him to get the PPP loan application.

19 Q. To your knowledge, did Carolyn Wade receive a PPP loan?

20 A. Yes, she did.

21 Q. Did you receive money from Carolyn Wade?

22 A. Yes, I did.

23 Q. How much?

24 A. A thousand dollars.

25 Q. What was your understanding of why you received a thousand

RIVERO - DIRECT

112

1 dollars from Carolyn Wade?

2 A. She was paying me for the Schedule C form I created for
3 the PPP loan application.

4 Q. So you received in total \$2,000 from Tracy and Carolyn
5 Wade?

6 A. Yes. Correct.

7 Q. Did you want more than that?

8 A. Yes.

9 Q. Did you communicate that you wanted more?

10 A. Well, my husband had spoke with him about the percentage
11 that needed to be paid in order for me to complete the
12 Schedule C form.

13 Q. But you never received anything more than these \$2,000?

14 A. No, I did not.

15 Q. To your knowledge, did your husband receive any
16 compensation from Tracy or Carolyn Wade for your role in their
17 PPP loan applications?

18 A. Not that I'm aware of.

19 Q. Did you ever discuss loan forgiveness for the PPP loans
20 with Carolyn or Tracy Wade?

21 A. No, I did not.

22 Q. Were you involved in any way with the loan forgiveness
23 application for Carolyn Wade?

24 A. No.

25 Q. Were you involved in any way with the loan forgiveness

RIVERO - DIRECT

113

1 application for Tracy Wade?

2 A. No, I was not.

3 Q. Now, Ms. Rivero, earlier during your testimony, you said
4 that there were other individuals that you created false
5 Schedule Cs for; is that right?

6 A. Yes. Correct.

7 Q. You were involved in PPP loan applications for other
8 people?

9 A. Yes. Correct.

10 Q. I want to walk through some names with you.

11 A. Okay.

12 Q. Do you know Aliec Vale? I'll spell it for the court
13 reporter. A-L-I-E-C, V-A-L-E.

14 A. Yes, I do.

15 Q. Who is that?

16 A. She is the wife of my husband's cousin.

17 Q. What area does she live in?

18 A. She's in Miami, Florida.

19 Q. Were you involved in a PPP loan application for Aliec
20 Vale?

21 A. Yes, I was.

22 Q. Did you create a Schedule C for Aliec Vale?

23 A. No, I did not.

24 Q. Why not?

25 A. Her identity couldn't be confirmed with the Womply

RIVERO - DIRECT

114

1 website, and we didn't continue with the application.

2 Q. Did you receive any payment from Aliec Vale?

3 A. No, I did not.

4 Q. Do you know Angela de la Cruz?

5 A. Yes. She's my sister-in-law.

6 Q. And what area does she live in?

7 A. She's in Tamarac, Florida.

8 Q. Were you involved in a PPP loan application for Angela de
9 la Cruz?

10 A. Yes, I was.

11 Q. Did you create a Schedule C for a PPP loan application for
12 Angela de la Cruz?

13 A. Yes, I did.

14 Q. Did that Schedule C contain false information?

15 A. Yes. Correct.

16 Q. Does Angela de la Cruz know that you had created a
17 Schedule C that had false information?

18 A. Yes, she was aware. When I uploaded the Schedule C, she
19 was in my home when we completed it.

20 Q. Did Ms. Angela de la Cruz get a PPP loan based on the
21 information that you had put in the Schedule C?

22 A. Yes. Correct.

23 Q. And did you get paid by her?

24 A. Yes, I did.

25 Q. How much?

RIVERO - DIRECT

115

1 A. A thousand dollars.

2 Q. How about Barbara Abreu?

3 A. She was not able to confirm her identity through the
4 Womply as well.

5 Q. Were you involved in a PPP application for her?

6 A. Yes. Correct.

7 Q. Did you create a Schedule C?

8 A. I was not able to.

9 Q. You were not able to because why?

10 A. Her identity couldn't be confirmed through the Womply
11 website.

12 Q. Did you receive any payment from Barbara Abreu?

13 A. No, I did not.

14 Q. How about Carlos Fandino?

15 A. He's my husband's ex-brother-in-law.

16 Q. Were you involved in a PPP loan application for Carlos
17 Fandino?

18 A. Yes. Correct.

19 Q. Did you create a Schedule C?

20 A. Yes, I did.

21 Q. Did that Schedule C contain false information?

22 A. Yes. Correct.

23 Q. Did Mr. Fandino know that you had created a Schedule C
24 that contained false information?

25 A. Yes, I did.

RIVERO - DIRECT

116

1 Q. I'm sorry?

2 A. Yes, he did. I'm sorry.

3 Q. How did he know that?

4 A. I explained to him over the phone as well that the amount
5 that I was going to put on the Schedule C had to be a little
6 bit over a hundred thousand in order to get the maximum amount
7 on the PPP loan application, which was 20,000.

8 Q. And did Mr. Fandino get a PPP loan?

9 A. Yes, he did.

10 Q. And did he pay you for your role in creating a fake
11 Schedule C?

12 A. Yes, he did.

13 Q. How much?

14 A. A thousand dollars.

15 Q. Do you know the name Clemente Perez?

16 A. Yes, I do.

17 Q. Who's that?

18 A. He's a childhood friend of my husband.

19 Q. Were you involved in a PPP loan application for Clemente
20 Perez?

21 A. Yes. Correct.

22 Q. Did you create a Schedule C for that application?

23 A. No, I did not.

24 Q. Why not?

25 A. His identity couldn't be confirmed either with the Womply

RIVERO - DIRECT

117

1 website.

2 Q. Did you receive any payment from Mr. Perez?

3 A. No, I did not.

4 Q. Do you know the name Edison Rogers?

5 A. I don't recall him.

6 Q. Do you recall being involved in a PPP loan application for
7 Edison Rogers?

8 A. No. I don't remember that name or that person.

9 Q. Okay. How about Jorge Rivero?

10 A. That's my husband's brother.

11 Q. Were you involved in a PPP loan application for Jorge
12 Rivero?

13 A. Yes, I was.

14 Q. Did you create a Schedule C for that application?

15 A. Yes, I did.

16 Q. Did it contain false information?

17 A. Yes. Correct.

18 Q. Did Jorge know that you had created a Schedule C with
19 false information?

20 A. Yes, he knew, and I explained to him over the phone.

21 Q. Where does he live?

22 A. He's in New York.

23 Q. Did Mr. Jorge Rivero get a PPP loan?

24 A. Yes, he did.

25 Q. And did you get paid for creating a fake Schedule C?

RIVERO - DIRECT

118

1 A. Yes, I did.

2 Q. How much?

3 A. A thousand dollars.

4 Q. How about Jose Rivero? Who is that?

5 A. He's a cousin of Jorge Rivero.

6 Q. And where does he live?

7 A. He's in New York.

8 Q. Were you involved in a PPP loan application for Jose
9 Rivero?

10 A. Yes. Correct.

11 Q. Did you create a Schedule C?

12 A. Yes, I did.

13 Q. Did it contain false information?

14 A. Yes.

15 Q. Did Jose Rivero know that you had created a Schedule C
16 with false information?

17 A. Yes, he knew. I explained to him over the phone the
18 process of the Schedule C form.

19 Q. Did Mr. Jose Rivero get a PPP loan?

20 A. Yes, he did.

21 Q. Did you get paid by him?

22 A. Yes.

23 Q. How much?

24 A. 2,000.

25 Q. How about Julio Arena?

RIVERO - DIRECT

119

1 A. Julio Arena is a friend of Jorge Rivero.

2 Q. Where does he live?

3 A. He's in New York.

4 Q. Were you involved in a PPP loan application for Julio
5 Arena?

6 A. Yes.

7 Q. Did you create a Schedule C?

8 A. Yes.

9 Q. Did it contain false information?

10 A. Yes.

11 Q. Did Mr. Arena know that you had created a Schedule C for
12 his application that contained false information?

13 A. Yes, he knew.

14 Q. How did he know?

15 A. I explained to him over the phone.

16 Q. Did Mr. Arena get a PPP loan?

17 A. Yes, he did.

18 Q. And did you get paid by Mr. Arena for creating a false
19 Schedule C?

20 A. Yes.

21 Q. How much?

22 A. 2,000.

23 Q. Do you know the name Katelin Acevedo?

24 A. No, I don't recall that person.

25 Q. Do you recall ever doing a PPP loan application for

RIVERO - DIRECT

120

1 Katelin Acevedo?

2 A. No.

3 Q. How about Michael Jimenez?

4 A. He's a friend of my husband.

5 Q. Where does he live?

6 A. New Jersey.

7 Q. Were you involved in a PPP loan application for
8 Mr. Jimenez?

9 A. Yes.

10 Q. Did you create a Schedule C?

11 A. No.

12 Q. Why not?

13 A. His identity couldn't be confirmed with the Womply
14 website.

15 Q. Did you receive any money from Mr. Jimenez?

16 A. No.

17 Q. How about Mohamed Faitrouni? First name, M-O-H-A-M-E-D,
18 last name, F-A-I-T-R-O-U-N-I. Do you know who that person is?

19 A. No, I don't recall.

20 Q. Do you remember doing a PPP loan application for that
21 person?

22 A. No.

23 Q. How about Nichole Alamazar, spelled N-I-C-H-O-L-E, last
24 name, A-L-A-M-A-Z-A-R?

25 A. She's a friend of my husband and I.

RIVERO - DIRECT

121

1 Q. Where does she live?

2 A. New Jersey.

3 Q. Were you involved in a PPP loan application for

4 Ms. Alamazar?

5 A. Yes.

6 Q. Did you create a Schedule C for her?

7 A. No.

8 Q. Why not?

9 A. When she initiated the application and it was time to
10 upload the Schedule C, she wouldn't provide me with the code
11 on time, and the code would expire, so she would have to
12 request a new one. So it was always the same thing. She
13 wouldn't give it to me on time or I was not available, so we
14 never continued with the application.

15 Q. How about Nilda Rivera?

16 A. She's a friend of my husband and I.

17 Q. Where does she live?

18 A. New Jersey.

19 Q. Were you involved in a PPP loan application for Nilda
20 Rivera?

21 A. Yes.

22 Q. Did you create a Schedule C?

23 A. Yes, I did.

24 Q. Did it contain false information?

25 A. Yes. Correct.

RIVERO - DIRECT

122

1 Q. Did Ms. Rivera know that you had created a Schedule C that
2 contained false information?

3 A. Yes, she did.

4 Q. How did she know that?

5 A. I explained to her over the phone.

6 Q. Did Ms. Rivero get a PPP loan?

7 A. Yes, she did.

8 Q. Did she pay you?

9 A. Yes, she did.

10 Q. How much?

11 A. 2,000.

12 Q. Do you know the name Onimer Lazaro Garcia Chapotten?

13 A. Yes. He's a friend of my husband and I.

14 Q. I'll spell the last name for the court reporter:

15 C-H-A-P-O-T-T-E-N. The first name is Onimer, O-N-I-M-E-R.

16 Who is that person?

17 A. He's a friend of my husband and I.

18 Q. Where does he live?

19 A. Miami, Florida.

20 Q. Were you involved in a PPP loan application for

21 Mr. Chapotten?

22 A. Yes.

23 Q. Did you create a Schedule C?

24 A. No.

25 Q. Why not?

RIVERO - DIRECT

123

1 A. His identity couldn't be confirmed with the Womply
2 website.

3 Q. Do you know the name Steve Alison?

4 A. No, I don't recall that person.

5 Q. Do you remember creating a PPP loan application for Steve
6 Alison?

7 A. No.

8 Q. How about Walter Wright, W-R-I-G-H-T?

9 A. He's a friend of my husband.

10 Q. Were you involved in a PPP loan application for
11 Mr. Wright?

12 A. Yes. Correct.

13 Q. Did you create a Schedule C for him?

14 A. No, I did not.

15 Q. Why not?

16 A. He was never available after he initiated the application.
17 When he would receive the code and it was time for him to
18 provide it for me, the code would expire. So then we would be
19 going back and forth. And again, we were not able to complete
20 because either he would provide it too late or I was not
21 available.

22 Q. Did you get paid anything for Mr. Wright?

23 A. No.

24 Q. How about Yaosca, Y-A-O-S-C-A, Granados?

25 A. That's my sister.

RIVERO - DIRECT

124

1 Q. Were you involved in a PPP loan application for your
2 sister Ms. Granados?

3 A. Yes.

4 Q. Did you create a Schedule C for your sister?

5 A. No, I did not.

6 Q. Why not?

7 A. When she initiated the application, the system -- the
8 Womply page gave her like an error message and she couldn't
9 continue with the application.

10 Q. Ms. Rivero, the names that we just went over -- and I
11 understand you didn't remember all of them -- but for the ones
12 that you did, does this include all of the people who you were
13 involved with in the PPP loan application process --

14 A. Yes. Correct.

15 Q. -- in addition to Carolyn Wade and Tracy Wade?

16 A. Yes. Correct.

17 Q. Did I miss anyone?

18 A. No.

19 Q. Ms. Rivero, at the time that you were involved in these
20 PPP loan applications, some of which you created false
21 Schedule Cs for, did you know what you were doing was wrong?

22 A. Yes.

23 Q. Did you know what you were doing was illegal?

24 A. Yes. Correct.

25 Q. Why is it that you created false Schedule Cs for these

RIVERO - DIRECT

125

1 other people?

2 A. Because I needed the money and I was greedy.

3 Q. Do you regret it?

4 A. A hundred percent.

5 Q. Did you ever do a PPP loan for your husband, Eduardo
6 Rivero?

7 A. No.

8 Q. Was Mr. Rivero aware of what you were doing at the time
9 you were doing it?

10 A. Yes.

11 Q. Has the Government made any promises to you about whether
12 or not it will charge any of the individuals that you just
13 testified about?

14 A. No.

15 Q. Does that include your husband?

16 A. Correct.

17 Q. That includes your sister?

18 A. Yes.

19 Q. No promises about whether the Government will or will not
20 charge them?

21 A. No promises.

22 Q. Ms. Rivero, when was the first time that you met with
23 anyone from the Government related to this case?

24 A. June 14 of 2024.

25 Q. How is it that you remember that date so well?

RIVERO - DIRECT

126

1 A. It was the day after my birthday.

2 Q. Did you respond to questions during that meeting from the
3 Government?

4 A. Yes, I did.

5 Q. Now, after that meeting in June of 2024, when did you next
6 meet with the Government?

7 A. September 24, 2024.

8 Q. And did you meet with the Government to include myself,
9 Mr. Love, and Kelly DiPietrantonio to prepare for your
10 testimony?

11 A. Yes. Correct.

12 Q. Did we meet a few times?

13 A. Yes, we did.

14 Q. Before you met with anyone from the Government in this
15 case in June of 2024, did you ever meet with the attorneys for
16 Mr. and Mrs. Wade who are here today?

17 A. Yes.

18 Q. When was it that you met with the attorneys for Mr. and
19 Mrs. Wade?

20 A. Around April of 2024.

21 Q. And how is it that you came to meet with the attorneys for
22 Mr. and Mrs. Wade?

23 A. I came home on a Friday night at 11 o'clock at night from
24 having dinner with my husband and our daughter, and we found a
25 subpoena taped on our door.

RIVERO - DIRECT

127

1 Q. What did you do in response to that?

2 A. I immediately contacted an attorney that same night.

3 Q. And did you ultimately go to a meeting with the attorneys
4 for Carolyn and Tracy Wade?

5 A. Yes.

6 Q. Where did that meet take place?

7 A. The attorney's office.

8 Q. Who was there at that meeting with you?

9 A. My husband and the attorney I had at that time.

10 Q. Ms. Rivero, did you want to meet with the attorneys for
11 Carolyn and Tracy Wade when you met with them in April of
12 2024?

13 A. No, I did not.

14 Q. Why did you meet with them?

15 A. I met with them because the subpoena was posted on the
16 door stating that I needed to show to their office, and I was
17 advised by the attorney that I had to go in person to meet
18 with them.

19 Q. How were you feeling when you met with them?

20 A. I was uncomfortable, nervous, and scared.

21 Q. And why were you uncomfortable, nervous, and scared?

22 A. Because I knew that they were going to ask me questions
23 regarding the PPP loan application.

24 Q. And did the attorneys for Mr. and Mrs. Wade ask you
25 questions about the PPP loan application process during that

RIVERO - DIRECT

128

1 meeting?

2 A. Yes. Correct.

3 Q. Did they ask you questions about Carolyn Wade's loan?

4 A. Yes.

5 Q. Did you answer their questions?

6 A. Yes, I did, but not truthfully.

7 Q. Did you tell the attorneys about your role in creating
8 false Schedule Cs?

9 A. No, I did not.

10 Q. Did you tell them that you created a fake Schedule C for
11 Carolyn Wade?

12 A. No, I did not.

13 Q. Did you tell them that you made a fake Schedule C for
14 Tracy Wade?

15 A. No, I did not.

16 Q. Did you deny your involvement in the PPP loan application
17 for Carolyn and Tracy Wade?

18 A. Yes, I did, a hundred percent.

19 Q. Did you admit to the defense attorneys any of the facts
20 that you've admitted to here today?

21 A. No.

22 Q. Why was that?

23 A. Because he was -- he's representing them, not me, and I
24 know that they don't have their best interest in me. So I
25 didn't feel like I had to be honest with them, because if I

RIVERO - DIRECT

129

1 did, I felt somewhere down the line that was going to
2 incriminate me.

3 Q. And why are you here testifying today?

4 A. Because I want to say the truth of what really happened
5 and because I am -- I regret what I did as well.

6 MR. SNIDER: The Government tenders the witness for
7 cross-examination.

8 MR. WILCOX: Your Honor, I'm going to need a little
9 while to get situated, maybe about ten minutes. Is that okay?

10 THE COURT: Are you situated?

11 MR. WILCOX: No.

12 THE COURT: Let's take a ten-minute break, ladies and
13 gentlemen.

14 (Jury exited at 2:33 PM.)

15 (Recess from 2:33 PM to 2:50 PM.)

16 THE COURT: Just from your information, Counsel, we
17 received a communication from Ms. Ferris, who apparently has
18 an inner ear infection, and the doctor instructed her no
19 activity until 10/18. So that's the scenario. There are some
20 other elements, including a cold, et cetera.

21 Bring the jury in, please.

22 (Jury entered at 2:50 PM.)

23 THE COURT: Be seated, ladies and gentlemen.

24 Cross-examination.

25 CROSS-EXAMINATION

RIVERO - CROSS

130

1 BY MR. WILCOX:

2 Q. Good afternoon, Ms. Rivero.

3 A. Good afternoon.

4 Q. Before you got married, you were known as Ms. Granados?

5 A. Correct.

6 Q. That was your name?

7 A. Yes.

8 Q. And you indicated on direct examination that you were born
9 in Nicaragua?

10 A. Yes.

11 Q. You ended up in the United States when you were five years
12 old?

13 A. Yes.

14 Q. Your husband, Eduardo Rivero, and you have been together
15 for 19 years and you've been married for three years?

16 A. Yes.

17 Q. Now, you're friends with Carolyn and Tracy Wade. Is that
18 a fair statement?

19 A. Yes.

20 Q. Okay. Well, you were friends with them before you helped
21 them prepare PPP loan applications?

22 A. I knew Tracy Wade through my husband.

23 Q. You knew Tracy Wade --

24 A. Yes.

25 Q. -- through your husband.

1 And would you say that your husband and Tracy Wade
2 were good friends?

3 A. Yes.

4 Q. Okay. They were in the funeral home business together?

5 A. Yes.

6 Q. Okay. Have you ever been to Wade Funeral Home?

7 A. Have I ever been to his funeral home?

8 Q. Yes.

9 A. No, never.

10 Q. But you knew it existed?

11 A. Yes. Correct.

12 Q. You knew he had employees?

13 A. I don't know anything that has to do regarding his funeral
14 home.

15 Q. Okay. Your husband runs a funeral home; is that correct?

16 A. Yes, me and my husband run the funeral home.

17 Q. And you have employees?

18 A. Yes. Correct.

19 Q. You didn't think Mr. Wade was running a funeral home by
20 himself, did you?

21 A. Of course not, but again, I don't know anything regarding
22 his funeral home. I don't know how many employees he has or
23 if he has any --

24 Q. Ma'am, I didn't ask you how many employees he had. I
25 asked you you didn't think he was running the funeral home by

1 himself. You didn't think that, did you?

2 A. Of course not.

3 Q. Okay. Now, just to reiterate, you would say that your
4 husband, -- Eduardo Rivero -- and Mr. Tracy Wade were good
5 friends; is that right?

6 A. Yes.

7 Q. They helped each other in the funeral home business; is
8 that right?

9 A. Yes.

10 Q. Okay. When Mr. Wade needed some item or some assistance
11 with respect to his business, he could go to your husband and
12 your husband would assist him and vice versa; correct?

13 A. Yes. That was between them.

14 Q. I understand.

15 A. Mm-hmm.

16 Q. Now, you became involved with the PPP loan because this
17 friend -- this person Jamil Hunter asked you did you want to
18 get a paycheck protection loan; is that correct?

19 A. Yes.

20 Q. Jamil Hunter was a Realtor; is that right?

21 A. Yes.

22 Q. And he helped you obtain a PPP loan for what, the \$20,833?

23 A. Yes.

24 Q. And the name on the PPP loan application was your name,
25 not the funeral home?

1 A. My name, yes.

2 Q. And Mr. Hunter told you to list an income of \$100,000.

3 Did you have to actually write that somewhere or fill that in
4 somewhere?

5 A. He completed the Schedule C for me.

6 Q. Okay. But I'm asking. I want you to listen very
7 carefully. Did you ever have to write that you made \$100,000
8 on any form?

9 A. For mine -- my --

10 Q. I'm talking about your application.

11 A. Jamil Hunter did that for me.

12 Q. Okay. And as far as you know, the only thing he had to do
13 was put it in a Schedule C, and it appeared on the PPP loan
14 application?

15 A. Yes.

16 Q. Okay. But you knew it was against the law to put a
17 hundred thousand dollars that you made in a business when you
18 knew you didn't have a business?

19 A. Correct.

20 Q. But you agreed to do it anyway?

21 A. Yes.

22 Q. You agreed to make a false statement to the Small Business
23 Administration and tell them that you had \$100,000 of income?

24 A. Yes.

25 Q. And you did that because you didn't think you would get

1 caught?

2 A. Correct.

3 Q. You did not think you were going to get caught because
4 \$20,000 was a lower amount; right?

5 A. I didn't think I was going to get caught because the loan
6 was forgivable.

7 Q. Now, I believe you said on June 14 you met with Mr. Snider
8 and Mr. Love and Agent DiPietrantonio?

9 A. Yes. Correct.

10 Q. Do you remember telling them that you didn't think you
11 would get caught because it was such a lower amount?

12 A. I said I didn't think I was going to get caught because
13 the loan was forgivable.

14 Q. Okay. I want you to listen to my question again.

15 Do you recall ever telling them that you didn't think
16 you were going to get caught because you thought the loan was
17 for such a lower amount?

18 A. No, I don't remember.

19 Q. Now, in order for you to complete your loan, you went to
20 the Womply website and created an account?

21 A. Yes.

22 Q. Now, exactly what did you do to do that?

23 A. You have to do the application by putting in your email or
24 phone number.

25 Q. Is that the only thing that you had to put in?

1 A. You have to put in your email or phone number so that they
2 can send you a code and then you're able to log in to put your
3 information in.

4 Q. What other information did you have to put into the Womply
5 account?

6 A. I don't remember. It could be name, date of birth,
7 address.

8 Q. You didn't have to put your salary in or how much you made
9 to start the process?

10 A. I don't remember.

11 Q. Now, you testified that Mr. Hunter prepared a fake
12 Schedule C to submit with your PPP loan application?

13 A. Yes.

14 Q. Did he upload that for you?

15 A. Yes.

16 Q. Okay. Now, at your meeting with Mr. Snider, Mr. Love, and
17 Agent DiPietrantonio, were you shown that Schedule C?

18 A. I don't remember.

19 Q. You don't remember being shown the Schedule C?

20 A. No, I don't.

21 Q. You don't remember saying that that was the first time you
22 had seen the Schedule C?

23 A. I don't remember.

24 Q. Did you see the Schedule C prior to it being uploaded?

25 A. No.

1 Q. Okay. And you still don't recall seeing the Schedule C
2 that was submitted with your PPP loan application?

3 A. I didn't see my Schedule C when Jamil did it. I saw
4 when -- it was before I signed, but I didn't see the actual
5 form.

6 Q. You've never seen the Schedule C?

7 A. Mine, no. When Jamil did it for myself, he didn't show it
8 to me, and I don't remember if David Snider showed it to me at
9 the meeting. I don't remember.

10 MR. WILCOX: One moment, Your Honor.

11 May I approach the witness, Your Honor?

12 THE COURT: Yes, sir.

13 BY MR. WILCOX:

14 Q. I just want you to look at it and advise me whether or not
15 you recognize it now.

16 THE COURT: How is it marked, Counsel?

17 MR. WILCOX: Hmm?

18 THE COURT: How is it marked?

19 MR. WILCOX: One second, Your Honor. I apologize.

20 Your Honor, I'm going to mark it for identification
21 Number 2.

22 THE COURT: Defense 2 for ID. All right.

23 BY MR. WILCOX:

24 Q. Do you recognize that, ma'am?

25 A. Yeah, I see my name and my address and social.

1 Q. Okay. Your name, address, and social is on the document,
2 but do you recognize the document, ma'am?

3 A. No.

4 Q. You don't?

5 A. No.

6 Q. You've never seen that before?

7 A. Jamil Hunter didn't show it me when he submitted it. And
8 if David Snider showed it to me on June 14, if he did, I don't
9 remember.

10 Q. All right. Thank you very much.

11 Do you remember seeing your actual PPP loan
12 application?

13 A. Can you repeat it again?

14 Q. Do you remember seeing your actual PPP loan application,
15 the one that you received the loan for?

16 A. If I remember seeing it?

17 Q. Yes.

18 A. Right before you sign you can see what the -- the
19 numbers -- before you sign the application at the end, you can
20 see the numbers.

21 Q. You can see the numbers?

22 A. From that Schedule C form.

23 Q. From the Schedule C form?

24 A. Yes. At the end, when Womply sends you the DocuSign to
25 sign it, you can see it.

1 Q. Okay. The numbers that are in the application are from
2 the Schedule C form?

3 A. There's a section where you put one of those numbers on
4 the Schedule C on the application.

5 Q. I'm asking you, are you saying that the numbers from the
6 Schedule C form are put in the application form?

7 A. There's one section that you put one of those numbers on
8 the Womply website.

9 Q. And how do you know that?

10 A. Because I inputted it on the applications that I did.

11 Q. Excuse me?

12 A. Because I inputted it on some of the -- on the
13 applications that I did.

14 Q. I just want to be clear. You inputted the dollar amount
15 on the PPP applications?

16 A. In one of the sections on the website, yes. There's a
17 section on the website -- on the Womply website that you put
18 one of those numbers that's on the Schedule C on the website.

19 Q. And that number eventually appears in the application that
20 you sign?

21 A. Yes.

22 Q. Okay.

23 MR. WILCOX: May I approach the witness, Your Honor?

24 THE COURT: Yes, sir.

25 MR. WILCOX: I'm handing the witness what's been

1 marked as Defense, for identification, Number 3.

2 BY MR. WILCOX:

3 Q. Ms. Rivero, do you recognize that document?

4 A. Yes.

5 Q. Would you tell the jury what that document is?

6 A. That's the information that was put on the Schedule C
7 form.

8 Q. What form is that, ma'am?

9 A. The Schedule C form that you just showed me, for the one
10 that you just showed me right now.

11 Q. What form is in your hand right now?

12 A. I have no idea.

13 Q. Excuse me?

14 A. I have no idea.

15 Q. You haven't seen that before?

16 A. I saw the numbers on the website and I've seen this
17 before, yes.

18 Q. Have you seen that application before?

19 A. Yes.

20 Q. Okay. And what is it?

21 A. It's the application form for the loan.

22 Q. For the PPP loan?

23 A. Yes.

24 Q. Actually, it's the application for the Second Draw; right?
25 Take your time and look at it. We're in no rush.

1 A. I don't know if it's for the second draw, but this is for
2 the PPP application.

3 Q. And it is for your PPP application?

4 A. Yes.

5 Q. Now, before you applied for your PPP loan application, did
6 you know what a Schedule C was?

7 A. No.

8 Q. You never heard of it before?

9 A. No.

10 MR. WILCOX: May I approach?

11 THE COURT: Yes, sir.

12 BY MR. WILCOX:

13 Q. Now, when you signed your PPP loan application, you didn't
14 pay attention to the numbers; is that right?

15 A. Correct.

16 Q. Because you knew they were false; right?

17 A. Correct.

18 Q. And you don't remember which page you DocuSigned, do you?

19 A. DocuSign sends you an email to sign.

20 Q. Right.

21 And when the DocuSign sends you -- but you don't
22 remember which page of the form you signed?

23 A. No.

24 Q. But by causing this application to be processed and to be
25 processed with a Schedule C, you knew you were stealing from

1 the Government?

2 A. Yes.

3 Q. So you're admitting to being a thief?

4 A. Well, I did a mistake and I submitted false information
5 and I was lying on the application.

6 Q. But you stole from the Government; right?

7 A. Yes.

8 Q. And that's what a thief does; right? Steal.

9 A. If that's what you want to call me.

10 Q. No --

11 A. I did something wrong, yes. Okay. I did something wrong
12 and I'm admitting to my mistake.

13 Q. But what you did wrong --

14 A. And I'm here to say the truth.

15 Q. Okay. But what you did wrong was steal.

16 A. Okay.

17 Q. So at least with respect to this loan, you were a thief?

18 A. Yeah. I lied -- I provided false information.

19 Q. So you lied?

20 A. Yes. Correct.

21 Q. So you're a liar and a thief?

22 A. If that's what you want to call me.

23 Q. I am calling you that.

24 A. Okay.

25 Q. Are you saying that?

1 A. I'm here to say the truth and to admit my mistake --

2 Q. And the truth is --

3 A. -- the false information I provided.

4 Q. Okay. And the truth is with respect to the 21 loans that
5 you filed, you lied and you stole?

6 A. Yes, I lied on all of them, and that's what I said
7 earlier. I'm admitting to what I did.

8 Q. Now, did your husband, Edward Rivero, also receive a PPP
9 loan?

10 A. Not the personal one.

11 Q. I didn't ask you whether it was a personal one or not. I
12 just asked you did he receive a PPP --

13 A. Yes, he did.

14 Q. -- in the name of his business?

15 A. Correct.

16 Q. For how much?

17 A. I believe around 500. I'm not sure of the exact number.

18 Q. 500 what?

19 A. Thousand.

20 Q. \$500,000?

21 A. That's correct.

22 Q. Okay. Your husband received a PPP loan in the name of his
23 business for \$500,000?

24 A. Yes.

25 Q. Do you know if all the information on that application was

1 correct?

2 A. I had nothing to do with that application.

3 Q. You had nothing to do with it?

4 A. No, I didn't.

5 Q. Now, you also received -- one moment, Your Honor.

6 Did your husband, Eduardo, only receive one PPP loan?

7 A. One that I know of. I don't know anything that -- what he
8 does with his business or any other PPP loan. I only know of
9 one. I'm not sure if he has another one.

10 Q. Now, your PPP loan was forgiven; is that correct?

11 A. Yes.

12 Q. And you paid him 10 percent of the loan amount?

13 A. I paid him \$2,000.

14 Q. Okay. And after you received your two PPP loans -- and
15 you were forgiven for both of them. Am I correct?

16 A. Yes.

17 Q. -- you recruited friends and family members to apply for
18 PPP loans?

19 A. My husband told friends and family if they wanted to do
20 the PPP loan.

21 Q. Okay. You didn't recruit them. Your husband recruited
22 them?

23 A. My husband told friends and family about it.

24 Q. Isn't that recruiting them? What's the difference?

25 A. Okay.

1 Q. So after you got your two PPP loans, your husband went out
2 and recruited other people for you to get PPP loans; right?

3 A. He told friends and family, yes.

4 Q. And one of the friends that he told was Tracy Wade?

5 A. Yeah, he told Tracy Wade about it.

6 MR. WILCOX: One second, Your Honor.

7 BY MR. WILCOX:

8 Q. Just to clear something up, now you did testify that you
9 were a co-owner of the funeral home with your husband; right?

10 A. Yes.

11 Q. But you didn't have anything to do with applying for any
12 PPP loan that your husband may have received?

13 A. The funeral home -- there was never no PPP loan
14 application under Edward Rivero Funeral Home.

15 Q. Excuse me?

16 A. There's no PPP loan under Edward Rivero Funeral Home.

17 Q. At what --

18 A. Edward Rivero Funeral Home.

19 Q. Never applied for a PPP loan?

20 A. Edward Rivero Funeral Home, no.

21 Q. How about Edward Rivero and Rivero Holdings Inc.?

22 A. That's not a company. Edward Rivero and Rivero & Rivero
23 Holdings Inc. are two different companies.

24 Q. I understand that. Well, I don't -- Edward Rivero Funeral
25 Home or Edward Rivero Inc. -- Holdings Inc. applied for a PPP

1 loan; is that correct?

2 A. Edward Rivero Funeral Home Incorporated, which is my
3 company, under my name, has never had a PP loan.

4 Q. That's not what I asked you. I want you to listen.

5 Did your husband apply for a PPP loan under his
6 company's name?

7 A. He has a PP loan under Rivero & Rivero Holdings.

8 MR. WILCOX: May I approach, Your Honor?

9 THE COURT: Yes, sir.

10 BY MR. WILCOX:

11 Q. This is going to be marked as Defense Exhibit for
12 identification Number 4. Does that refresh your memory as to
13 whether Rivero Funeral Home ever got a PPP loan?

14 A. That says Rivero Funeral Home, not Edward Rivero. That's
15 a different company.

16 Q. That's not associated with your husband?

17 A. My husband is on the Sunbiz, I believe, but Edward Rivero
18 and Rivero Funeral Home are two different corporations.

19 Q. You just testified that they're two different
20 corporations --

21 A. Correct.

22 Q. -- but does this refresh you whether your husband got a
23 PPP loan for \$474,130?

24 A. I'm not aware of that PP loan.

25 Q. Okay. You're not aware of it.

1 A. Yes.

2 Q. Okay. Now, your husband, Edward Rivero, approached Tracy
3 Wade about PPP loans; is that correct?

4 A. Yes.

5 Q. You heard your husband tell Tracy Wade that Mr. Hunter had
6 gotten you a PP loan and he could also get Tracy a PPP loan?

7 A. Yes.

8 Q. And initially, Mr. Hunter was supposed to complete Tracy
9 Wade's PPP loan but you ended up doing it?

10 A. Yes.

11 Q. And Jamil Hunter taught you how to create PPP loan
12 applications?

13 A. Yes.

14 Q. He taught you how to create a fraudulent Schedule C?

15 A. Yes.

16 Q. He taught you how to download, from a website, blank
17 fillable Schedule Cs; is that right?

18 A. Yes.

19 Q. I mean, the schedules come from the website, they're
20 blank, and then you fill in the information?

21 A. Correct.

22 Q. And again, prior to you being involved with this, you had
23 never seen a Schedule C before?

24 A. No.

25 Q. Now, Mr. Wade was not the first person that you helped

1 complete a PPP application for, was he?

2 A. I believe -- I don't remember if he was the first one.

3 Q. Now, all the Schedule Cs that you included in the PPP
4 applications you completed for other people were fake; right?

5 A. Yes. It was false information.

6 Q. You just made them up?

7 A. Yes.

8 Q. But all of them were between like a hundred thousand and
9 \$110,000 with respect to the gross income?

10 A. It was a little over a hundred thousand.

11 Q. A little over?

12 A. Yes.

13 Q. It had to be at least a hundred thousand?

14 A. Yes.

15 Q. And your testimony is that you told Tracy Wade that you
16 were going to prepare a fake IRS form to include in this PPP
17 application?

18 A. I explained to him that I will have to create a Schedule C
19 with the amount of over a hundred thousand in order to qualify
20 for the maximum amount of 20,000 for the PP loan application.

21 Q. Okay. Did you tell him that what you were doing was
22 illegal?

23 A. Well, if I'm explaining to him that it had to be over a
24 hundred thousand and it's false information, he knows that.

25 Q. Just a minute -- okay. You knew he had a funeral home?

1 A. Yes.

2 Q. Okay. And you knew that his funeral home made money;
3 right?

4 A. I don't know that. I don't have any knowledge -- no, I
5 don't.

6 Q. Okay. That's fine. You didn't know.

7 A. No.

8 Q. But you didn't know whether this funeral home company made
9 more than a hundred thousand, did you?

10 A. Well, the loan wasn't based on his business.

11 Q. Excuse me.

12 You didn't know whether his funeral home made more
13 than a hundred thousand?

14 A. No.

15 Q. All you told him is that you were going to have to put
16 that he made a hundred thousand dollars for him to get the
17 application?

18 A. Yes. I told him that the PP loan was -- I needed to put
19 over a hundred thousand and it had to be under his name.

20 Q. You keep saying that you told him it was a personal loan.

21 A. Yes.

22 Q. Tell me exactly what words you used.

23 A. Under his name, that the loan is under his name, not the
24 funeral home.

25 Q. Okay. You told him that the loan -- you told him, look,

1 this loan is going to be under your name and not the funeral
2 home. When did you tell him that?

3 A. When I told him about the application.

4 Q. When was that?

5 A. Around May of 2021.

6 Q. Somewhere around May of '21?

7 A. Yes.

8 Q. What were the circumstances around that?

9 A. What do you mean?

10 Q. I mean, where were you? Were you at his house? Were you
11 at your house? What was going on when you told him that?

12 A. It was over the phone.

13 Q. It was over the phone?

14 A. Yes.

15 Q. Sometime in May you told him over the phone. Can you
16 remember exactly what you told him, to the best of your
17 recollection?

18 A. What I said to David earlier, that in order to qualify for
19 the 20,000, which was the max amount, the amount on the
20 Schedule C needed to be over a hundred thousand.

21 Q. Okay. And Mr. Wade didn't say to you, "Wait a minute. I
22 made 300,000 last year"?

23 A. No.

24 Q. He didn't say that to you. My funeral home made 300,000
25 last year.

1 A. No.

2 Q. Now, the PPP loan application that was submitted was for a
3 sole proprietor; is that right?

4 A. Yes.

5 Q. But a sole proprietor is a business; right? I mean, it's
6 not a personal loan?

7 A. Yes. It's under the person's name, yes.

8 Q. What now?

9 A. It's under the person's name.

10 Q. A sole proprietorship means a business; right? It means
11 that there's a business that one person runs; is that right?

12 A. Yes.

13 Q. That's not the same as a personal loan, is it?

14 A. Okay. Yes.

15 Q. Okay. So he's saying he's getting a PPP loan. It means a
16 Paycheck Protection Program loan; right? Doesn't that suggest
17 that he's getting a loan for his business?

18 A. You're asking me a question?

19 Q. Yes. Yes, I am.

20 A. Can you repeat it again?

21 Q. If he's applying for a Paycheck Protection Program loan --
22 that's what it's called -- doesn't that imply that he's
23 seeking a loan for a business?

24 A. I was not -- the application that I did was not for the
25 business name.

1 Q. I know it wasn't --

2 A. Exactly.

3 Q. -- but did you communicate that clearly to him?

4 A. I told him that it was going to be under his name, not the
5 business.

6 Q. Okay. It's under his name, Tracy Wade?

7 A. Tracy Wade, yes.

8 Q. Okay. What information did you have to get from Mr. Wade
9 in order to start the application?

10 A. In order to do the Schedule C form, I needed his name,
11 address, and social security.

12 Q. Address and social security.

13 Do you know what address he gave you?

14 A. He gave me an address. I don't know it by heart.

15 Q. Let me see if I can refresh your recollection.

16 Exhibit 159 will do -- 157 -- one of those.

17 And while I'm getting this ready, do you remember
18 asking Mr. and Mrs. Wade for void checks?

19 A. No, I don't remember.

20 Q. Do you remember them emailing you a voided check?

21 A. There is an email with a voided check, but I don't
22 remember asking them for it.

23 Q. Okay. But you know that there existed an email where they
24 sent you voided checks?

25 A. There's one, yes.

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152

1 Q. Excuse me?

2 A. There's one email with a voided check.

3 Q. Okay. And who is that email from?

4 A. I don't remember.

5 Q. Okay. I'm showing you what's been introduced as
6 Government's Exhibit 159.

7 That is a PPP loan application for Mr. Wade. It's
8 been introduced as Government's Exhibit 159. Is there an
9 address on that document?

10 A. Yes.

11 Q. What's the address?

12 A. 315 West Pembroke Road, Hallandale.

13 Q. Is that his home address or the address of the funeral
14 home?

15 A. I don't know.

16 Q. You don't know, okay.

17 One second. Your Honor, I don't know if I did -- may
18 I approach the witness?

19 Could you read the address in the record? I'm not
20 sure if I did. What's the address on that PPP loan
21 application?

22 A. 315 West Pembroke Road, Hallandale.

23 Q. One second, Your Honor.

24 Have you ever been to the Wade Funeral Home?

25 A. No.

1 Q. Do you remember when you were interviewed by Mr. Snider,
2 Mr. Love, and Agent DiPietrantonio telling them that you had
3 been to the funeral home twice?

4 A. Never.

5 Q. You never told them that?

6 A. I've never told them that I've been to his funeral home
7 twice.

8 Q. Did you --

9 A. I've never been inside his funeral home.

10 Q. I hear you saying that you've never been inside his
11 funeral home. What I'm asking you now, do you remember
12 telling these three people that you had been to his funeral
13 home?

14 A. I have never told them that. They have been to our
15 funeral home. I have never been to Tracy Wade's funeral home.

16 Q. Now, you received -- one moment, Your Honor.

17 MR. WILCOX: Your Honor, may I approach the witness?

18 THE COURT: Yes, sir.

19 BY MR. WILCOX:

20 Q. Showing the witness composite exhibit defendant's exhibit
21 for identification 8.

22 Before I continue with that, do you remember what
23 your email was back on March 22, 2021?

24 A. It's hgranados29@gmail.com.

25 Q. At Gmail.com?

1 A. Yes.

2 Q. Was it hgranados29@gmail.com?

3 A. Yes.

4 MR. WILCOX: May I approach the witness, Your Honor?

5 THE COURT: Yes, sir.

6 BY MR. WILCOX:

7 Q. If you can look at the other documents as well.

8 A. Okay.

9 Q. Do you recall receiving that email from Mr. Wade?

10 A. Yes.

11 Q. Do you recall receiving that voided check?

12 A. Yes.

13 Q. Did you ask Mr. Wade to send you a voided check?

14 A. That was probably my husband who told him to send me the
15 information.

16 Q. Wait a minute. The information came to you; right?

17 A. Yes, it came to me.

18 Q. Okay. And you're saying your husband told him to send the
19 information to you?

20 A. Yes. I never requested that information from him.

21 Q. That's okay.

22 Did you need this voided check?

23 A. I didn't need that for the application that I did.

24 Q. But it was sent to you?

25 A. Yes.

1 Q. And on this voided check, it says clearly "Wade Funeral
2 Home"; is that right?

3 A. Correct. Correct.

4 Q. But you're saying you didn't ask for that. Your husband
5 asked for that?

6 A. Yes. I didn't need that information for the
7 application --

8 Q. I didn't ask whether you needed it. I asked whether you
9 asked for it.

10 A. I didn't ask for that either.

11 Q. You needed the driver's license, though, didn't you?

12 A. But that was not for the application that I did.

13 Q. Excuse me?

14 A. I didn't need -- none of the information you have there
15 was for me to do the application that I did for him.

16 Q. But it was sent to you --

17 A. Yes, it was.

18 Q. -- because your husband asked Mr. Wade to send it to you?

19 A. Correct.

20 MR. WILCOX: May I introduce Defense Exhibit 8? I'm
21 seeking to introduce Defense Exhibit 8.

22 THE COURT: Which item again is 8?

23 MR. WILCOX: Eight.

24 THE COURT: Which item is it?

25 MR. WILCOX: It is -- oh, I'm sorry. It's email and

1 email attachments sent from Tracy Wade to Haydee Granados on
2 March 22, 2021.

3 THE COURT: All right. Any objection?

4 MR. SNIDER: No objection.

5 THE COURT: Received.

6 (Defense Exhibit 8 was received in evidence.)

7 BY MR. WILCOX:

8 Q. And you see here that the email is to you from Wade
9 Funeral Home; is that correct?

10 A. Yes.

11 Q. And this was March 22, 2021?

12 A. Yes.

13 Q. So around the time that we started the PPP loan
14 application process?

15 A. I don't remember starting the PP loan application process
16 in March.

17 Q. This is his identification; is that correct?

18 A. Correct.

19 Q. Social security number; right?

20 A. Yes.

21 Q. You needed the social security number to start the
22 application; right?

23 A. Correct.

24 Q. Okay. And this void check, do you see that?

25 A. Yes.

1 Q. It's just a check that he sent along with this email, and
2 it's a check from Wade Funeral Home; is that right?

3 A. Correct.

4 Q. Okay. So he didn't send you a void check from Tracy
5 Wade's personal account; right?

6 A. No, he didn't. And again, that email with all that
7 information was not for the PP loan application I did.

8 Q. What was it for?

9 A. It was for a business loan he was applying for.

10 Q. You didn't apply for a business loan, though, did you?

11 A. I did not. Someone else did.

12 Q. Now, on that voided check, the EIN number was on there as
13 well; right?

14 A. I didn't see it right now.

15 Q. Okay. One second.

16 A. Yes, I see it now.

17 Q. I want to show you what's been marked as Exhibit 207.

18 It's already been introduced into evidence. Do you see this
19 document, ma'am? Can you see it on your screen?

20 A. Yes.

21 Q. Okay. Here's a Form 1120-S that was filed by Wade's
22 funeral home that shows his gross receipts were \$345,359. Do
23 you see that?

24 A. Yes.

25 Q. Okay. And it's your testimony today that even though --

1 even though Mr. Wade filed an income tax return showing that
2 he made over \$300,000, he authorized you to apply for an
3 application -- to apply for a PPP loan that showed he made
4 around a hundred thousand?

5 A. Correct.

6 Q. Now, of all the people you prepared PPP loans for, you
7 never asked for a true and correct copy of their Schedule C or
8 any other correct income tax form; is that correct?

9 A. Yes, I never asked for any tax information.

10 Q. And you received payments for preparing PPP applications;
11 is that right?

12 A. Yes. Correct.

13 Q. So it wasn't like the reason why the people were paying
14 you is to prepare a PPP application and for them receiving a
15 PPP loan?

16 A. I got paid for preparing a Schedule C form.

17 Q. Is that what you told them, "I'm charging you a thousand
18 dollars to prepare this fake Schedule C"?

19 A. In order to get the loan, yes.

20 Q. You told them -- you told each?

21 A. Each and every one of the persons I did the application
22 for, yes.

23 Q. That I'm preparing a fake Schedule C and I'm charging you
24 a thousand dollars for that?

25 A. Yes. I told every individual I'm preparing a Schedule C

1 form that is going to have the amount over a hundred thousand
2 in order to qualify for 20,000. I told every single person I
3 did the application -- the Schedule C.

4 Q. But they were paying you for the loan, not the fake
5 Schedule C?

6 A. They were paying me for the Schedule C I uploaded because
7 that's the only way they were going to get the 20,000.

8 Q. So that was the only way they were going to get the 20,000
9 is if you prepared the fake Schedule C?

10 A. Yes. Correct.

11 Q. It was all part and parcel of the process?

12 A. Yes.

13 Q. Okay. The fake Schedule C and the loan application and
14 them receiving the loan was all part of the fee?

15 A. Only the Schedule C, which is the only part I did on the
16 application.

17 Q. They didn't -- I mean -- you didn't fill out -- when you
18 did your application, the only part -- you didn't do anything.
19 You didn't put in any numbers. Eduardo filled out the
20 Schedule C and the application -- and the application was
21 produced by Womply?

22 A. No. I initiated the application. I put my name, address,
23 date of birth. Jamil uploaded the Schedule C for me, not
24 Eduardo.

25 Q. I guess the point I was making to you is that you didn't

1 put in the money?

2 A. Jamil Hunter did the Schedule C for me, and that's what I
3 paid him for.

4 Q. But the money amount appears on the application. You
5 didn't put the money amount on --

6 A. Jamil Hunter did that part for me because he's the one who
7 did the Schedule C for me.

8 Q. Right. And I'm not trying to argue. I'm just saying once
9 you put in the Schedule C -- once the Schedule C is uploaded
10 into the Womply portal, that figure that's on the Schedule C
11 or -- and other information is automatically included in the
12 application?

13 A. I don't remember. I know that I uploaded the Schedule C,
14 I created the Schedule C with false information, and there's a
15 section where I put the amount of over a hundred thousand. I
16 don't remember very detailed the application.

17 Q. You didn't put a hundred thousand dollars in your
18 application?

19 A. Jamil Hunter did the Schedule C for me.

20 Q. Right.

21 Is that a reason why you can't say that I did not
22 write a hundred thousand dollars on any application?

23 A. I didn't write the hundred thousand dollars on my
24 application because Jamil Hunter did the application for me.

25 Q. Okay. You didn't write the hundred thousand dollars on

1 any application?

2 A. I explained earlier that I did the Schedule C form and I
3 made up the numbers.

4 Q. Okay. I understand that. I just want to make sure that
5 everybody's clear.

6 The only thing you had to do as far as writing in a
7 number is put it in on a Schedule C; right?

8 A. No. I had to put -- fill in the whole form and create the
9 numbers. I don't understand what is your question because I
10 keep saying the same thing.

11 Q. I may be asking the question inartfully.

12 Okay. Other than filling out the Schedule C, did you
13 fill out any other information for any of the other 20 people
14 that you filled out forms for?

15 A. No.

16 Q. The only thing you did was fill out the Schedule C?

17 A. Correct.

18 Q. And the application just generated after that; right?

19 A. After submitting the Schedule C, I believe the next part
20 was to sign the application.

21 Q. Right.

22 But the information had to get from the Schedule C to
23 the application, okay?

24 A. Mm-hmm.

25 Q. Okay. But Womply did that; correct?

1 A. I don't understand what you're asking me.

2 Q. The numbers on the Schedule C -- right? -- the numbers on
3 the Schedule C -- just a minute. Maybe I can make it simpler.

4 Once you filled out the Schedule C for anybody,
5 including yourself -- right? -- you didn't have to put the
6 numbers anywhere else; right?

7 A. I don't remember. I uploaded the Schedule C and I said
8 there was a section where you had to put a hundred thousand or
9 above in one section.

10 Q. Of the Schedule C?

11 A. On the website.

12 Q. On the website?

13 A. Correct.

14 Q. Okay. So you were putting in the money on the website
15 too?

16 A. I was putting one of the numbers on the line on the
17 Schedule C on one section on Womply.

18 Q. Okay. So you put the number in two places?

19 A. I put it on the Schedule C form and in one section on the
20 website.

21 Q. On the Womply application?

22 A. On the Womply website, yes.

23 Q. Okay. Okay.

24 So you made the false statement twice?

25 A. I submitted the false statement, the Schedule C, and I put

1 the amount in the website, yes.

2 Q. And after that, the only thing a person had to do was sign
3 it; right?

4 A. Yes, I believe the next step was that, to sign the --

5 Q. After you put the fake number in the Schedule C and the
6 fake number on the Womply website, the only thing else the
7 person that was applying for the loan had to do was just sign;
8 is that correct?

9 A. Yes.

10 Q. Okay. So I just want to show you a paragraph in the
11 indictment. I want to show the witness paragraph 26 of the
12 indictment -- actually, paragraph 23.

13 So this paragraph of the indictment, paragraph 23,
14 could you read that? Can you see it?

15 A. Yes.

16 Q. Could you read that, please?

17 A. "Haydee Rivero, a/k/a Haydee Granados, uploaded and
18 transmitted through the Internet via loan processor's website
19 materially false and fictitious IRS Schedule C forms for
20 inclusion with and in support of PPP loan applications for
21 Carolyn Denise Wade and Tracy D. Wade."

22 Q. Is that true?

23 A. Yes, I submitted a Schedule C form with false statements
24 for Carolyn Wade and Tracy Wade.

25 Q. And how about paragraph 22?

1 A. That's the same thing.

2 Q. No. No, it's not. It's not the same thing.

3 Paragraph 22 says "Haydee Granados inputted and
4 transmitted through the Internet via Loan Processor 1's
5 website" -- the Government has already identified Loan
6 Processor 1 as Womply -- "materially false information for PPP
7 loan applications."

8 It doesn't mention Schedule C here?

9 A. Well, the only false information I submitted was the
10 Schedule C and the amount in one section.

11 Q. So you're saying that this is just -- this is extra?

12 A. I don't know what that is. I uploaded the Schedule C and
13 I put the amount in a section in the website. I don't know
14 what other information you're referring to.

15 Q. One moment. I just want to publish the rest of Exhibit 8
16 to the jury.

17 Now, you indicated that -- on direct that you
18 prepared fake Schedule Cs and submitted false information in
19 the PPP applications or attempted -- you attempted to get --
20 let me back up.

21 You attempted to get PPP loans for 18 other people
22 besides yourself, Carolyn Wade, and Tracy Wade?

23 A. Yes.

24 Q. That's right?

25 A. Yes.

1 Q. So in each of those cases, you attempted to steal from the
2 Government and lie to the Government?

3 A. Yes. Correct.

4 Q. Okay. So now, on Barbara Abreu, do you remember who she
5 was?

6 A. Yes. She's a friend of mine.

7 Q. What happened with that one?

8 A. Her identity couldn't be confirmed.

9 Q. But you started the process?

10 A. Yes. Correct.

11 Q. And when you start the process, that means --

12 A. But she initiated the application.

13 Q. Initiated the application at your direction?

14 A. Yes.

15 Q. Did you input any information for Barbara Abreu?

16 A. No, because her identity couldn't be confirmed.

17 Q. Did you check the Womply website or anything?

18 A. I don't remember.

19 Q. You don't remember, okay.

20 Now, Katelin -- now, are you familiar with the Fast
21 Lane application?

22 A. No.

23 Q. You don't know what a Fast Lane application is?

24 A. No.

25 Q. Okay. For Katelin Acevedo, what did you do for her?

1 A. I don't remember. I don't recall that person.

2 Q. You don't recall that person?

3 A. No.

4 Q. Okay. But you do remember --

5 A. I don't remember anything at all from that person.

6 Q. You don't remember anything at all from her?

7 A. No.

8 Q. Okay. Steve Alison?

9 A. I don't remember him as well.

10 Q. Nichole Alamazar?

11 A. We tried to do the application, but she couldn't give me
12 the code in time. So every time we got in touch, she always
13 gave me the code late. She would have to request a new one,
14 and it was like that back and forth, and the application was
15 never submitted.

16 Q. Angela de la Cruz, that was a successfully funded loan?

17 A. Yes. That's my sister-in-law.

18 Q. And she received one loan?

19 A. She received both loans.

20 Q. She received two loans?

21 A. Yes.

22 Q. So she received two \$20,000 loans?

23 A. Correct.

24 Q. So that's \$40,000 that you've taken from the Government?

25 A. That she got the loan based on the false information I

1 gave, yes.

2 Q. Well, that's \$40,000 that you've taken from the
3 Government; right?

4 A. Yeah, that she got from the Womply application website.
5 Yes.

6 Q. Well, you helped her?

7 A. Yes, I did.

8 Q. Mohamed Faitrouni?

9 A. I don't remember anything about him.

10 Q. You don't remember anything about him?

11 A. No.

12 Q. Okay. Do you remember preparing a Schedule C for him?

13 A. No.

14 Q. One moment, Your Honor.

15 One moment, Your Honor. I beg the Court's
16 indulgence.

17 Carlos Fandino?

18 A. Yes. What about him?

19 Q. Did you obtain a PPP loan for him?

20 A. Yes.

21 Q. How many did he get?

22 A. I don't remember if he got one -- I know he got the first
23 one. I don't recall the second one.

24 Q. He could have gotten the second one too?

25 A. I don't remember.

1 Q. You don't remember?

2 A. No.

3 Q. Well, when you say you don't remember, he may have; he may
4 not have. You just don't know?

5 A. Correct.

6 Q. So he got at least 20,000?

7 A. Correct.

8 Q. So we're up to 60,000?

9 A. Okay.

10 Q. Plus the 40 that you got; right?

11 A. Correct.

12 Q. That's a hundred thousand.

13 And you told all these people that they were in a
14 conspiracy with you?

15 A. I let them know that the information I was putting on the
16 Schedule C was false.

17 Q. And none of them asked you why you had to do that?

18 A. They knew that in order to get the 20,000 I had to put the
19 false information.

20 Q. How about Onimer Lazaro Garcia Chapotten?

21 A. He didn't get a loan.

22 Q. He didn't get a loan?

23 A. No.

24 Q. Did you make a Schedule C for him?

25 A. No.

1 MR. WILCOX: May I approach the witness?

2 THE COURT: Yes, sir.

3 BY MR. WILCOX:

4 Q. Showing the witness what the defense marked for
5 identification 5, Your Honor.

6 I just asked you whether or not you applied for -- I
7 asked you whether you prepared a Schedule C --

8 A. And I did not prepare this Schedule C. I never got to do
9 a Schedule C for him. When he did -- initiated the
10 application, he couldn't confirm his identity. If he got it
11 from somebody else, it wasn't from me. I did not create the
12 Schedule C for him. All the Schedule Cs that I created are
13 with blue ink, not black.

14 Q. Okay.

15 A. So I didn't create the Schedule C.

16 Q. But that is a Schedule C for --

17 A. Onimer Garcia.

18 Q. Right.

19 Garcia Chapotten, that's his last name; is that
20 right?

21 A. Yes.

22 Q. But you remember him --

23 A. I remember him initiating the application --

24 Q. Application --

25 A. -- and his identity couldn't be confirmed --

1 Q. But you said --

2 A. -- and that Schedule C is not from me.

3 Q. Is not from you?

4 A. No.

5 Q. Now, your brother-in-law -- excuse me. Now I want to make
6 sure I -- now Michael Jimenez?

7 A. Yes. He's a -- he couldn't confirm his identity.

8 Q. Did you prepare a Schedule C for him?

9 A. No, I did not.

10 Q. You're certain?

11 A. I did not prepare a Schedule C for him.

12 Q. I'm sorry, ma'am. I want to approach you -- what
13 exhibit -- ma'am, I just want to ask.

14 Do you remember filling out a Schedule C for Onimer
15 Garcia?

16 A. No. You just asked me and I said no.

17 MR. WILCOX: Well, may I approach the witness?

18 THE COURT: Yes, sir.

19 BY MR. WILCOX:

20 Q. I'm going to show the jury what's been marked for
21 identification Exhibit 5 --

22 MR. SNIDER: Why are you publishing it?

23 BY MR. WILCOX:

24 Q. I'm going to show you what's going to be marked for
25 identification Exhibit 5A -- defense exhibit for

1 identification 5A.

2 Is that the same person?

3 A. That's the same person, but I didn't do the Schedule C for
4 him --

5 Q. That's the blue ink, though, isn't it?

6 A. Correct, but I didn't do the Schedule C for him. It was
7 never uploaded. We never went any further. I recall he was
8 in my home and his identity couldn't be confirmed.

9 Q. Just so I'm clear --

10 A. No, it's in blue ink, but I didn't do the Schedule C.

11 Q. Can I ask you a question? Okay.

12 So you met with this fellow -- and let me not call
13 him a fellow --

14 A. Onimer Garcia.

15 Q. Say it a little slower.

16 A. Onimer Garcia.

17 Q. And could you spell it? I don't have it with me.

18 A. O-N-I-M-E-R Garcia.

19 Q. Okay. He started a PPP loan process --

20 A. Correct.

21 Q. -- right?

22 A. Correct.

23 Q. That means you approached him about getting him a PPP
24 loan; right?

25 A. Yes. My husband did, yes.

1 Q. Right.

2 There's a Schedule C in his name --

3 A. Yes.

4 Q. -- in blue ink --

5 A. Correct.

6 Q. -- but you didn't do it?

7 A. We didn't get to that part because his identity couldn't
8 be confirmed, and I know that because he came to my home.

9 MR. WILCOX: All right.

10 THE COURT: All right. It is 4:00 PM. We are going
11 to recess for today and we will resume tomorrow morning at
12 9:30 AM.

13 Please remember not to discuss the case in any way.
14 Have a good evening.

15 (Jury exited at 4:00 PM.)

16 THE COURT: Ms. Granados, please do not discuss your
17 testimony with anyone. We would like for you to be here by
18 9:25 AM tomorrow morning.

19 THE WITNESS: Okay.

20 THE COURT: Thank you.

21 All right. Any additional issues?

22 MR. MCCRAY: Not from the defense, Judge.

23 THE COURT: All right. Thank you. We are in recess.
24 I will see you, ready to go, at 9:30 AM. Have a good evening.

25 (Proceedings concluded at 4:01 PM.)

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CERTIFICATE OF REPORTER

I certify that the foregoing is a correct transcription of the record of proceedings in the above-entitled matter prepared from my stenotype notes.

DATE: 14th of May, 2025

/s/Lance W. Steinbeisser
Lance W. Steinbeisser,
FCRR, RPR, FPR-C
Official Court Reporter
United States District Court
Southern District of Florida
Miami, Florida

\$	\$305,761 [1] - 43:23	1	157:21	2
\$1,097 [1] - 46:11	\$33,830 [1] - 29:17		1125-A [5] - 44:2,	2 [24] - 16:6, 17:24,
\$1,275 [1] - 33:21	\$332,681 [2] - 52:19,	1 [34] - 1:8, 18:3,	44:13, 44:15,	18:2, 26:7, 28:6,
\$1,650 [1] - 37:10	65:17	26:8, 26:9, 27:18,	45:13, 53:3	31:9, 35:7, 36:24,
\$1,760 [1] - 46:12	\$345,359 [3] - 49:8,	27:22, 30:24,	113 [2] - 107:20,	40:23, 43:24,
\$1,770 [1] - 46:14	65:10, 157:22	30:25, 31:1, 32:22,	107:21	43:25, 44:1, 44:11,
\$1,905 [1] - 56:5	\$360 [1] - 46:14	34:22, 34:23,	11:17 [2] - 59:1, 59:2	47:13, 49:9, 49:13,
\$100,000 [3] - 133:2,	\$4,649 [4] - 51:10,	36:17, 38:17, 40:6,	11:44 [2] - 59:2, 59:3	49:19, 51:16, 62:8,
133:7, 133:23	52:3, 52:9, 54:4	40:23, 40:24, 42:9,	12 [9] - 2:4, 3:7, 27:4,	62:9, 63:23, 63:24,
\$100,553 [1] - 40:25	\$40,000 [2] - 166:24,	42:10, 45:4, 46:3,	27:5, 41:17, 41:20,	136:21, 136:22
\$106,245 [1] - 47:9	167:2	47:6, 47:7, 47:8,	44:24, 45:11, 53:7	
\$107,731 [1] - 41:9	\$427,093 [3] - 55:6,	50:6, 51:4, 53:9,	120 [1] - 33:24	2,000 [4] - 28:25,
\$110,000 [1] - 147:9	55:11, 55:14	61:16, 102:10,	129 [1] - 2:10	118:24, 119:22,
\$120 [1] - 29:8	\$47,566 [1] - 46:13	106:16, 106:19,	12:30 [2] - 88:9,	122:11
\$126,291 [1] - 45:17	\$474,130 [1] - 145:23	109:5, 164:6	88:10	2,900 [1] - 33:23
\$128,143 [1] - 53:20	\$49,926 [1] - 26:18	1's [1] - 164:4	13 [10] - 15:22, 23:19,	20 [9] - 2:6, 17:18,
\$132 [1] - 38:20	\$500 [2] - 36:21, 37:8	1(a) [3] - 43:22, 49:7,	32:15, 33:10,	20:13, 39:3, 45:22,
\$134,602 [3] - 44:2,	\$500,000 [2] - 142:20,	52:17	33:19, 37:3, 45:12,	46:1, 76:8, 81:9,
44:20, 45:3	142:23	1,300 [1] - 33:25	50:17, 53:21, 55:12	161:13
\$136,228 [1] - 50:14	\$5088 [1] - 46:15	1,600 [1] - 29:14	130 [2] - 22:8, 22:12	20,000 [11] - 97:23,
\$14,530 [1] - 28:15	\$6,249 [1] - 46:15	1,700 [1] - 29:7	131 [1] - 22:3	98:7, 105:18,
\$159,779 [3] - 52:21,	\$6,667 [1] - 45:15	1,800 [1] - 29:5	137 [2] - 22:7, 22:11	116:7, 147:20,
53:6, 53:8	\$6,770 [1] - 33:10	10 [5] - 27:11, 28:6,	14 [7] - 11:1, 33:12,	149:19, 159:2,
\$163,981 [1] - 45:18	\$600 [1] - 38:18	29:1, 42:4, 143:12	45:13, 46:5,	159:7, 159:8,
\$165,339 [3] - 49:10,	\$7,178 [4] - 41:8,	10/18 [1] - 129:19	125:24, 134:7,	168:6, 168:18
49:22, 49:25	42:3, 42:23, 45:21	100,000 [1] - 97:22	137:8	200 [4] - 24:23, 25:6,
\$171,159 [2] - 44:5,	\$7,625 [2] - 35:3,	1040 [17] - 25:10,	15 [4] - 1:4, 42:14,	26:7, 29:1
44:10	36:3	30:19, 34:17,	42:15, 58:24	2000 [2] - 76:20,
\$172,902 [2] - 52:23,	\$700,000 [1] - 11:18	37:20, 39:21, 47:4,	151 [2] - 22:7, 22:11	76:23
52:25	\$707 [1] - 46:13	51:2, 60:22, 61:23,	154 [3] - 101:10,	2001 [6] - 62:18,
\$18,615 [3] - 31:8,	\$750 [1] - 46:8	62:1, 62:10, 62:13,	101:12, 101:17	63:11, 71:12,
32:9, 34:5	\$77,510 [1] - 34:25	62:19, 63:7, 63:13,	156 [1] - 2:13	79:21, 79:23, 80:16
\$180,020 [1] - 49:12	\$8,125 [1] - 37:14	63:14, 63:23	157 [1] - 151:16	2002 [3] - 11:10,
\$191,977 [1] - 55:25	\$8,225 [1] - 39:16	1040X [1] - 38:8	159 [3] - 151:16,	11:14, 11:24
\$2,000 [6] - 90:11,	\$8,525 [1] - 39:13	1049107166 [3] -	152:6, 152:8	2004 [1] - 63:12
94:14, 94:18,	\$80 [1] - 28:14	17:2, 17:23, 18:6	16 [4] - 13:3, 35:21,	2009 [2] - 65:14,
112:4, 112:13,	\$877 [1] - 46:10	1065 [1] - 57:19	45:15	65:15
143:13	\$9,106 [1] - 45:12	1065s [2] - 58:2, 58:9	17 [7] - 33:8, 36:25,	201 [8] - 30:17, 31:9,
\$2,050 [1] - 39:9	\$9,604 [1] - 45:11	10713116184 [2] -	41:18, 41:21, 42:2,	32:2, 32:11, 32:15,
\$2,075 [1] - 37:3	\$9,801 [1] - 45:16	14:22, 16:19	42:14, 42:18	33:12, 54:18, 63:11
\$2,512 [1] - 45:12	\$9,853 [4] - 47:12,	1099 [10] - 65:21,	173 [2] - 1:8, 2:10	2012 [1] - 43:19
\$20,000 [4] - 98:2,	48:1, 48:12, 50:16	65:23, 66:3, 66:6,	179 [1] - 37:3	2014 [1] - 70:11
98:9, 134:4, 166:22	\$90,236 [1] - 31:3	66:12, 66:17, 67:2,	18 [11] - 2:4, 17:10,	2018 [24] - 25:11,
\$20,833 [1] - 132:22	\$92,470 [1] - 51:8	67:10, 68:2, 68:13	29:4, 33:20, 33:21,	27:15, 28:9, 29:16,
\$200 [1] - 37:12		1099-Miscellaneous	36:9, 36:10, 36:24,	29:18, 39:22,
\$218 [1] - 46:9		[3] - 65:24, 65:25,	37:4, 37:8, 164:21	41:16, 42:2, 42:6,
\$25,415 [1] - 34:3		66:2	19 [6] - 45:16, 50:11,	42:12, 42:17, 43:3,
\$25,804 [1] - 46:11	'21 [1] - 149:6	11 [9] - 3:11, 4:3,	53:18, 55:23,	43:13, 43:21, 44:7,
\$26,434 [1] - 46:9	'24 [1] - 76:8	13:1, 28:20, 48:23,	70:20, 130:15	45:20, 46:7, 46:20,
\$3,450 [1] - 33:11		49:23, 64:6, 126:23	1986 [2] - 70:5, 70:6	46:22, 54:11, 57:9,
\$3,804 [1] - 46:12		1120 [2] - 48:18,	1:00 [2] - 72:20,	58:3, 58:5, 59:14
\$3,807 [1] - 46:15		48:21	72:21	2019 [15] - 30:20,
\$30,330 [2] - 27:7,	/s/Lance [1] - 173:5	1120-S [19] - 43:12,	1:35 [3] - 88:5, 88:6,	32:5, 32:18, 33:1,
29:21		48:14, 49:1, 52:14,	88:7	34:2, 40:13, 47:5,
\$300 [1] - 39:8	0	54:21, 64:6, 65:14,	1:41 [1] - 88:11	47:22, 48:15,
\$300,000 [1] - 158:2		66:12, 66:18,	1:41PM [1] - 88:10	48:18, 48:22,
\$303,362 [1] - 56:3	0 [3] - 33:9, 33:24,	66:22, 66:24, 67:3,	1st [1] - 43:19	54:13, 59:14, 60:6,
\$305,267 [1] - 54:25	37:2	67:8, 67:18, 67:20,		62:19
		68:1, 68:4, 68:6,		202 [6] - 34:14,

34:22, 35:7, 35:21, 36:9, 38:1 2020 [31] - 15:18, 16:6, 34:18, 35:11, 35:13, 35:23, 36:12, 36:18, 36:22, 37:13, 37:21, 38:9, 51:3, 52:15, 52:22, 53:15, 54:3, 54:9, 54:15, 57:9, 58:4, 59:14, 60:6, 60:7, 65:16, 68:20, 68:21, 68:22, 71:23, 95:7, 95:9 2021 [24] - 11:11, 16:7, 17:10, 17:18, 54:22, 54:24, 55:4, 56:2, 56:9, 58:5, 68:23, 86:12, 86:21, 86:23, 91:7, 91:9, 95:11, 95:14, 95:24, 104:9, 149:5, 153:23, 156:2, 156:11 2022 [2] - 15:22, 17:18 2023 [1] - 17:10 2024 [9] - 1:4, 74:9, 74:10, 125:24, 126:5, 126:7, 126:15, 126:20, 127:12 2025 [1] - 173:5 203 [2] - 37:17, 60:21 204 [3] - 39:17, 40:7, 63:12 205 [5] - 43:9, 45:4, 46:1, 46:3, 46:4 206 [4] - 46:25, 47:20, 48:17, 63:14 207 [12] - 15:2, 16:4, 34:20, 48:13, 48:24, 49:16, 50:6, 60:25, 61:11, 64:12, 157:17 208 [2] - 50:23, 52:4 209 [7] - 52:10, 53:1, 53:9, 53:21, 65:15, 68:6 21 [8] - 45:19, 50:6, 50:15, 53:13, 54:2, 55:18, 81:9, 142:4 210 [1] - 55:7 211 [1] - 56:12 212 [4] - 24:23, 56:13, 57:14, 58:1 22 [11] - 26:17, 29:5, 33:22, 37:9, 39:8, 41:8, 153:23,	156:2, 156:11, 163:25, 164:3 23 [7] - 2:7, 16:7, 29:7, 29:8, 33:23, 163:12, 163:13 23-CR-60173-KMW [1] - 1:2 23rd [1] - 173:5 24 [2] - 29:9, 126:7 24(a) [2] - 29:9, 33:24 24(b) [2] - 33:24, 37:10 24,000 [1] - 28:23 24B [1] - 29:10 25 [3] - 29:11, 33:25, 37:11 255 [1] - 22:9 26 [3] - 29:12, 29:13, 163:11 27 [3] - 17:18, 33:20, 37:4 27(a) [2] - 34:1, 37:11 27A [1] - 29:14 29 [2] - 15:18, 34:6 2:33 [2] - 129:14, 129:15 2:50 [2] - 129:15, 129:22	33128 [1] - 1:23 33314-1215 [1] - 16:4 33314-1247 [4] - 15:3, 34:21, 61:2, 61:11 394-3563 [1] - 104:10	7 7 [6] - 28:2, 28:3, 28:4, 33:4, 50:6, 53:13 7(a) [4] - 31:6, 31:7, 47:10, 47:11 7(a) [1] - 31:6 70 [2] - 22:6, 22:11 70.151.137.130 [1] - 21:22 700 [1] - 34:1	A A-Head [7] - 27:18, 27:22, 32:22, 36:17, 61:16, 106:17, 106:19 a/k/a [1] - 163:17 abbreviation [1] - 17:8 able [11] - 6:25, 12:5, 60:12, 85:8, 92:9, 102:24, 115:3, 115:8, 115:9, 123:19, 135:2 above-entitled [1] - 173:4 Abreu [4] - 115:2, 115:12, 165:4, 165:15 accepted [1] - 59:11 access [14] - 14:6, 15:8, 20:20, 21:2, 21:5, 22:13, 22:16, 103:9, 110:10, 110:13, 110:21, 110:23, 110:25 accompanying [1] - 30:4 account [20] - 14:4, 14:24, 15:4, 15:17, 15:19, 16:10, 16:15, 17:1, 17:3, 17:9, 17:21, 73:3, 73:5, 79:6, 79:10, 110:11, 110:21, 134:20, 135:5, 157:5 accounting [2] - 46:8, 73:22 accused [1] - 75:2 Acevedo [3] - 119:23, 120:1, 165:25 acknowledge [1] - 77:24 active [1] - 18:16 activity [1] - 129:19 actual [3] - 136:4, 137:11, 137:14 ADAM [1] - 1:13 add [2] - 30:15, 41:7 added [1] - 41:8 addition [3] - 87:20, 88:15, 124:15 additional [7] - 13:3, 27:2, 32:4, 35:22, 41:15, 47:21, 172:21 address [82] - 3:20, 9:22, 11:25, 13:18,
	3	4 4 [4] - 22:6, 38:5, 52:4, 145:12 40 [1] - 168:10 400 [1] - 1:22 404(b) [1] - 10:6 43 [1] - 70:1 44 [2] - 28:22 44(a) [1] - 33:13 4562 [1] - 45:14 4:00 [2] - 172:10, 172:15 4:01 [2] - 1:6, 172:25	8 8 [19] - 2:13, 17:10, 28:13, 33:7, 33:9, 35:1, 35:2, 36:25, 49:16, 51:9, 51:10, 55:7, 55:18, 153:21, 155:20, 155:21, 155:22, 156:6, 164:15 8,400 [2] - 29:11, 40:4 8,900 [1] - 34:1 8447 [7] - 25:15, 30:23, 32:24, 40:4, 62:19, 63:5, 63:17 8867 [1] - 42:5	A
		5 5 [8] - 44:21, 47:23, 47:24, 48:4, 52:2, 55:7, 169:5, 170:21 5,000 [1] - 29:9 5/10/2021 [1] - 18:7 5/13/2021 [1] - 18:7 50 [1] - 46:12 500 [3] - 37:11, 142:17, 142:18 504 [1] - 21:8 51st [7] - 25:15, 30:23, 32:24, 40:5, 62:20, 63:5, 63:18 589-5696 [1] - 18:21 59 [1] - 2:8 5A [2] - 170:25, 171:1	9 9 [15] - 28:14, 28:16, 31:7, 32:2, 33:9, 35:2, 37:2, 40:13, 44:14, 44:17, 44:18, 45:10, 47:11, 51:12, 53:1 940 [3] - 57:20, 57:23, 57:24 940s [2] - 58:2, 58:9 941 [4] - 56:23, 57:1, 57:4, 57:5 941s [1] - 57:8 95 [1] - 3:8 954 [3] - 16:10, 18:21, 104:10 9:00 [2] - 72:20, 72:21 9:25 [1] - 172:18 9:28 [1] - 1:6 9:30 [2] - 172:12, 172:24 9:35 [1] - 3:8 9:47 [1] - 11:6 9:55 [1] - 11:6 9:57 [1] - 12:3	
		6 6 [10] - 11:11, 26:15, 26:16, 26:18, 41:5, 41:7, 44:19, 44:20, 80:16 6,800 [1] - 33:4 60,000 [1] - 168:8 600 [2] - 14:13, 29:10 601 [2] - 16:20, 18:2 6110 [5] - 15:2, 16:4, 34:20, 60:25, 61:10 69 [1] - 2:9		

14:5, 14:6, 14:10, 14:20, 14:21, 15:1, 16:3, 16:15, 16:18, 16:25, 17:6, 17:15, 17:22, 17:23, 18:6, 18:16, 18:18, 20:21, 21:16, 21:19, 21:20, 22:4, 22:5, 22:13, 22:15, 22:18, 25:13, 25:15, 30:22, 30:23, 32:23, 32:24, 34:19, 34:20, 40:3, 40:4, 43:15, 43:16, 60:24, 60:25, 61:9, 61:10, 61:17, 61:23, 62:1, 62:13, 62:19, 63:3, 63:5, 63:7, 63:9, 63:17, 64:8, 84:2, 100:13, 100:21, 102:2, 102:4, 102:6, 106:23, 108:17, 108:18, 135:7, 136:25, 137:1, 151:11, 151:12, 151:13, 151:14, 152:9, 152:11, 152:13, 152:19, 152:20, 159:22	aftercare [1] - 94:8 afternoon [2] - 130:2, 130:3 Agent [3] - 134:8, 135:17, 153:2 agent [1] - 9:24 ages [1] - 71:1 ago [7] - 10:19, 93:23, 94:20, 103:14, 107:12, 109:8 agree [4] - 75:22, 78:15, 80:8, 80:11 agreed [4] - 80:20, 106:5, 133:20, 133:22 agreement [10] - 76:10, 76:12, 76:15, 77:3, 77:4, 77:6, 77:14, 77:24, 78:14 ahead [4] - 97:15, 100:8, 105:7, 105:13 ahold [1] - 110:4 aided [1] - 1:25 Alamazar [3] - 120:23, 121:4, 166:10 ALAMAZAR [1] - 120:24 Alex [2] - 9:20, 19:19 ALEXANDER [2] - 2:5, 19:21 Alexander [1] - 19:25 Aliec [4] - 113:12, 113:19, 113:22, 114:2 ALIEC [1] - 113:13 Alison [3] - 123:3, 123:6, 166:8 allegations [1] - 75:7 allege [1] - 75:7 allotted [1] - 7:1 allowed [1] - 67:10 allows [1] - 9:7 ALSO [1] - 1:18 alternate [1] - 6:6 alternates [3] - 6:1, 6:6, 7:4 alternative [1] - 5:2 alternatives [2] - 4:24, 5:23 AM [11] - 1:6, 11:6, 12:3, 59:1, 59:2, 59:3, 172:12, 172:18, 172:24 amended [4] - 37:22, 37:23, 38:8, 39:15 amendments [4] -	38:3, 38:11, 39:3, 39:6 America [1] - 76:13 AMERICA [1] - 1:3 amount [65] - 26:16, 26:18, 26:25, 28:4, 28:13, 28:14, 28:15, 29:4, 29:5, 29:6, 29:7, 29:10, 29:12, 29:13, 29:14, 29:20, 29:21, 31:2, 31:8, 33:3, 33:24, 34:25, 38:13, 39:9, 40:25, 41:7, 41:8, 44:2, 44:4, 45:2, 45:15, 47:12, 48:1, 49:8, 49:10, 49:24, 52:21, 53:20, 55:13, 55:25, 56:3, 67:7, 84:2, 97:22, 105:19, 105:22, 116:4, 116:6, 134:4, 134:11, 134:17, 138:14, 143:12, 147:19, 147:20, 149:19, 159:1, 160:4, 160:5, 160:15, 163:1, 164:10, 164:13 amounts [1] - 33:15 analyst [2] - 12:24, 20:10 Angela [6] - 114:4, 114:8, 114:12, 114:16, 114:20, 166:16 Annual [1] - 57:21 answer [4] - 88:20, 97:1, 97:13, 128:5 anxious [1] - 104:17 anyway [3] - 6:23, 92:15, 133:20 Apartment [5] - 15:2, 34:20, 60:25, 61:11 apologize [5] - 15:7, 29:13, 39:12, 67:23, 136:19 appear [14] - 31:11, 31:21, 35:8, 40:7, 41:10, 44:24, 45:25, 50:20, 53:16, 53:22, 53:24, 55:8, 55:20 appeared [1] - 133:13 application [181] - 75:3, 83:13, 83:16, 84:8, 85:10, 85:11,	85:22, 87:6, 87:11, 87:14, 89:1, 89:3, 89:11, 89:13, 89:16, 89:19, 89:22, 89:24, 90:2, 90:11, 91:13, 91:15, 91:17, 91:23, 92:3, 92:5, 92:6, 92:8, 93:13, 94:11, 96:4, 96:23, 96:24, 97:4, 97:14, 97:21, 99:21, 99:23, 100:6, 102:19, 102:25, 103:3, 103:21, 103:24, 104:1, 104:2, 104:3, 104:5, 104:15, 104:17, 104:18, 104:25, 105:6, 105:7, 105:8, 105:9, 105:21, 106:2, 107:18, 109:3, 109:10, 109:16, 109:18, 109:21, 110:7, 110:17, 111:3, 111:4, 111:18, 112:3, 112:23, 113:1, 113:19, 114:1, 114:8, 114:11, 115:5, 115:16, 116:7, 116:19, 116:22, 117:6, 117:11, 117:14, 118:8, 119:4, 119:12, 119:25, 120:7, 120:20, 121:3, 121:9, 121:14, 121:19, 122:20, 123:5, 123:10, 123:16, 124:1, 124:7, 124:9, 124:13, 127:23, 127:25, 128:16, 132:24, 133:10, 133:14, 134:23, 135:12, 136:2, 137:12, 137:14, 137:19, 138:1, 138:4, 138:6, 138:19, 139:18, 139:21, 139:24, 140:2, 140:3, 140:5, 140:13, 140:24, 141:5, 142:25, 143:2, 144:14, 147:1, 147:17, 147:20, 148:17, 149:3,	150:2, 150:24, 151:9, 152:7, 152:21, 154:23, 155:7, 155:12, 155:15, 156:14, 156:15, 156:22, 157:7, 158:3, 158:14, 158:21, 159:3, 159:13, 159:16, 159:18, 159:20, 159:22, 160:4, 160:12, 160:16, 160:18, 160:22, 160:24, 161:1, 161:18, 161:20, 161:23, 162:21, 165:12, 165:13, 165:21, 165:23, 166:11, 166:14, 167:4, 169:10, 169:23, 169:24 applications [13] - 112:17, 113:7, 124:20, 130:21, 138:10, 138:13, 138:15, 146:12, 147:4, 158:10, 163:20, 164:7, 164:19 applied [4] - 140:5, 144:19, 144:25, 169:6 apply [12] - 91:5, 93:1, 93:17, 94:23, 96:5, 96:9, 97:21, 143:17, 145:5, 157:10, 158:2, 158:3 applying [8] - 91:20, 97:18, 98:5, 100:2, 144:11, 150:21, 157:9, 163:7 appointment [1] - 5:12 approach [10] - 136:11, 138:23, 140:10, 145:8, 152:18, 153:17, 154:4, 169:1, 170:12, 170:17 approached [2] - 146:2, 171:23 April [7] - 17:18, 60:6, 91:7, 91:8, 126:20, 127:11, 173:5 area [5] - 31:17, 45:23, 71:6, 113:17, 114:6
--	---	--	---	--

Arena [5] - 118:25, 119:1, 119:5, 119:11, 119:18 arena [1] - 119:16 argue [1] - 160:8 arrested [2] - 75:15, 75:18 arrival [2] - 3:8, 8:17 arrive [1] - 11:5 arrived [2] - 3:9, 55:1 Ash [1] - 3:7 assigned [7] - 13:18, 13:22, 14:5, 14:8, 16:15, 20:10, 21:17 assist [4] - 90:24, 96:12, 96:17, 132:12 assistance [3] - 73:14, 96:22, 132:10 associated [12] - 15:23, 16:25, 17:21, 21:20, 25:13, 26:4, 27:17, 34:19, 40:3, 48:5, 56:20, 145:16 assume [1] - 12:6 asterisk [2] - 25:24, 31:15 AT&T [12] - 9:19, 12:23, 13:5, 13:9, 13:11, 13:18, 13:20, 13:22, 14:17, 16:24, 16:25, 21:17 AT&T's [1] - 19:2 attach [10] - 31:2, 34:25, 40:25, 41:23, 44:2, 45:14, 45:17, 47:25, 50:13, 53:19 Attach [1] - 44:21 attached [11] - 11:17, 11:22, 26:10, 26:11, 43:3, 44:22, 47:9, 48:2, 49:14, 56:10, 85:21 attachments [1] - 156:1 attempted [4] - 164:19, 164:21, 165:1 attendant [1] - 72:18 attention [21] - 4:21, 7:21, 12:1, 26:8, 27:4, 27:23, 30:1, 31:10, 31:17, 33:13, 35:1, 35:25, 36:24, 41:5, 41:17, 41:18, 42:9, 43:24,	47:7, 55:23, 140:14 attorney [5] - 75:17, 80:7, 127:2, 127:9, 127:17 Attorney [1] - 76:1 Attorney's [1] - 1:14 attorney's [1] - 127:7 attorneys [8] - 126:15, 126:18, 126:21, 127:3, 127:10, 127:24, 128:7, 128:19 audited [1] - 59:14 AUSA [2] - 1:13, 1:13 authenticity [1] - 9:9 authorized [2] - 20:20, 158:2 automatically [2] - 93:18, 160:11 automobile [1] - 46:8 available [6] - 96:21, 96:25, 97:5, 121:13, 123:16, 123:21 Avenue [1] - 1:22 await [1] - 8:16 aware [5] - 112:18, 114:18, 125:8, 145:24, 145:25	belief [1] - 30:7 belongings [1] - 8:9 below [2] - 47:18, 108:7 best [11] - 8:2, 17:5, 17:14, 30:5, 30:7, 35:14, 43:7, 59:9, 59:17, 128:24, 149:16 better [4] - 6:8, 7:3, 8:7, 11:14 between [6] - 57:9, 58:3, 76:12, 90:11, 132:13, 147:8 beyond [2] - 19:6, 80:12 bill [1] - 14:3 billing [6] - 14:23, 15:1, 15:23, 17:3, 17:5, 17:6 bills [3] - 94:3, 94:4, 94:9 birth [3] - 73:18, 135:6, 159:23 birthday [1] - 126:1 bit [1] - 116:6 black [1] - 169:13 blank [4] - 31:17, 68:9, 146:16, 146:20 Block [1] - 73:15 blue [4] - 169:13, 171:5, 171:10, 172:4 born [3] - 70:2, 70:3, 130:8 bottom [9] - 25:20, 30:24, 31:10, 34:22, 40:6, 47:6, 47:13, 56:22, 58:1 box [1] - 27:23 boys [1] - 73:1 boys' [2] - 94:7, 94:8 break [5] - 11:1, 58:23, 88:3, 88:14, 129:12 briefly [1] - 19:1 bring [3] - 12:1, 12:2, 129:21 brother [3] - 115:15, 117:10, 170:5 brother-in-law [1] - 170:5 brought [3] - 75:15, 96:3, 105:2 Broward [7] - 9:17, 9:20, 9:22, 20:6, 21:17, 71:8, 106:11 BSO [7] - 20:7, 20:15, 20:21, 21:5, 21:6,	22:13, 106:10 bunch [1] - 84:17 burning [1] - 4:14 bus [2] - 73:2, 94:8 business [106] - 9:8, 10:3, 10:14, 26:22, 27:5, 27:9, 27:14, 27:16, 27:18, 27:19, 27:21, 27:22, 28:9, 28:23, 29:15, 29:18, 32:8, 32:9, 32:18, 32:19, 32:20, 33:1, 33:5, 33:8, 33:17, 33:18, 34:2, 34:4, 36:2, 36:12, 36:14, 36:16, 36:17, 36:18, 36:22, 37:13, 37:15, 39:14, 41:20, 42:19, 43:2, 43:18, 43:21, 44:7, 45:19, 45:20, 46:7, 48:9, 49:3, 49:4, 49:11, 50:2, 50:15, 50:16, 52:7, 52:22, 53:10, 54:2, 55:5, 56:1, 56:4, 61:7, 61:10, 61:12, 61:13, 61:14, 61:15, 61:19, 62:14, 62:25, 63:2, 63:3, 63:4, 64:21, 65:3, 65:9, 66:5, 66:11, 67:2, 67:4, 91:8, 99:10, 99:13, 99:15, 106:13, 108:6, 131:4, 132:7, 132:11, 133:17, 133:18, 142:14, 142:23, 143:8, 148:10, 150:5, 150:10, 150:11, 150:17, 150:23, 150:25, 151:5, 157:9, 157:10 Business [3] - 74:17, 74:24, 133:22 business's [1] - 45:5 businesses [2] - 24:17, 41:21 BY [30] - 12:19, 15:16, 18:9, 18:25, 20:2, 23:11, 58:17, 59:6, 64:5, 69:19, 76:21, 81:19, 82:6, 88:13, 97:6, 99:5, 101:11, 130:1, 136:13, 136:23,	139:2, 140:12, 144:7, 145:10, 153:19, 154:6, 156:7, 169:3, 170:19, 170:23
C				
C-H-A-P-O-T-T-E-N [1] - 122:15 calculate [1] - 35:17 calendar [1] - 6:19 canceled [2] - 15:21, 17:10 cancellation [1] - 17:9 capabilities [1] - 60:2 capacity [2] - 24:15, 25:16 car [4] - 28:14, 28:17, 33:9, 37:2 card [1] - 94:3 cards [1] - 94:8 care [3] - 5:15, 8:4, 72:24 carefully [1] - 133:7 caretaker [1] - 71:4 Carlos [3] - 115:14, 115:16, 167:17 CAROLYN [1] - 1:7 Carolyn [82] - 1:18, 14:25, 16:2, 25:11, 26:24, 30:21, 32:7, 32:18, 34:18, 35:24, 36:5, 36:12, 37:21, 38:10, 58:19, 59:13, 59:18, 60:22, 62:18, 75:11, 81:1, 81:14, 81:17, 81:21, 83:16, 89:18, 89:25, 90:16, 90:18, 90:21, 95:5, 95:6, 95:8, 95:16, 95:21, 105:3, 105:8, 105:16, 105:24, 106:3, 106:6, 106:7, 106:13, 106:16, 106:21, 107:7, 107:10, 107:13, 107:16, 107:18, 108:1, 108:3, 108:8, 108:19, 109:3, 109:9, 109:21, 110:1, 110:8, 110:20, 110:21, 110:23, 110:25, 111:2, 111:3,				

111:19, 111:21, 112:1, 112:4, 112:16, 112:20, 112:23, 124:15, 127:4, 127:11, 128:3, 128:11, 128:17, 130:17, 163:21, 163:24, 164:22 carried [3] - 32:10, 34:8, 36:4 CASE [1] - 1:2 case [21] - 4:21, 6:19, 6:25, 7:6, 7:21, 8:19, 8:23, 9:24, 39:1, 75:22, 77:7, 78:3, 78:8, 78:10, 78:21, 80:11, 88:4, 125:23, 126:15, 172:13 cases [1] - 165:1 catch [1] - 60:16 caught [7] - 93:4, 134:1, 134:3, 134:5, 134:11, 134:12, 134:16 causing [1] - 140:24 CE [1] - 27:6 CE-Z [1] - 27:6 cell [11] - 19:2, 19:3, 19:9, 86:19, 86:21, 86:24, 87:2, 104:8, 104:11, 110:13, 110:25 certain [2] - 79:16, 170:10 CERTIFICATE [1] - 173:1 Certificate [1] - 2:10 certificates [1] - 72:2 certification [4] - 30:12, 43:6, 56:17, 57:15 certified [1] - 35:11 certify [6] - 23:24, 29:23, 89:15, 89:17, 89:18, 173:3 certifying [2] - 35:13, 89:12 cetera [9] - 10:14, 26:9, 31:1, 34:24, 40:24, 41:22, 47:8, 47:25, 129:20 change [1] - 39:8 changes [3] - 37:23, 38:13, 39:7 Chapotten [3] - 122:12, 168:20, 169:19 chapotten [1] -	122:21 charge [4] - 94:10, 94:13, 125:12, 125:20 charged [11] - 74:3, 74:5, 74:8, 74:9, 74:10, 74:12, 74:14, 74:23, 75:12, 75:25, 76:4 charges [1] - 46:9 charging [2] - 158:17, 158:23 check [13] - 151:20, 151:21, 152:2, 154:11, 154:13, 154:22, 155:1, 156:24, 157:1, 157:2, 157:4, 157:12, 165:17 checked [1] - 42:13 checking [1] - 93:9 checklist [1] - 42:6 checks [2] - 151:18, 151:24 chest [1] - 4:14 chief [1] - 8:24 childhood [1] - 116:18 children [4] - 70:24, 70:25, 72:23, 94:5 children's [1] - 73:17 chooses [1] - 79:6 circumstances [1] - 149:8 citizen [2] - 70:8, 70:10 ckidd12260691@att .net [1] - 15:24 ckidd1226@gmail. com [1] - 16:12 claim [3] - 67:13, 67:16 claimed [4] - 30:15, 45:13, 46:7, 60:15 clarification [2] - 65:25, 66:16 clarify [2] - 57:2, 60:10 clear [6] - 65:8, 82:7, 138:14, 144:8, 161:5, 171:9 clearly [2] - 151:3, 155:1 Clemente [2] - 116:15, 116:19 clerical [2] - 72:3, 72:4 closed [4] - 15:20, 20:17, 20:18, 20:19 closures [2] - 6:21,	7:7 co [2] - 81:10, 144:9 co-conspirators [1] - 81:10 co-owner [1] - 144:9 code [20] - 85:14, 85:16, 85:17, 85:20, 86:2, 86:5, 103:2, 103:4, 107:17, 109:10, 109:13, 109:24, 110:2, 121:10, 121:11, 123:17, 123:18, 135:2, 166:12, 166:13 codes [3] - 85:23, 109:20, 109:21 coerce [1] - 77:22 cold [1] - 129:20 collect [2] - 100:9, 100:12 collection [1] - 46:10 column [5] - 33:7, 37:1, 37:5, 55:17, 55:21 columns [2] - 38:12, 50:6 combined [1] - 73:7 comfortable [1] - 74:1 coming [1] - 32:14 comment [1] - 3:19 comments [1] - 6:17 commission [1] - 23:23 commit [6] - 74:23, 76:4, 79:14, 80:23, 80:25, 81:7 committed [1] - 81:4 commonly [2] - 20:7, 23:16 communicate [3] - 99:24, 112:9, 151:3 communicated [2] - 99:25, 103:15 communication [2] - 4:9, 129:17 commuting [1] - 28:24 companies [1] - 144:23 company [6] - 99:15, 106:16, 144:22, 145:3, 145:15, 148:8 company's [1] - 145:6 compare [1] - 38:1 compared [2] - 18:11, 18:13	comparing [1] - 18:2 compensation [1] - 112:16 complete [11] - 8:23, 30:8, 42:11, 97:8, 97:9, 97:16, 112:11, 123:19, 134:19, 146:8, 147:1 completed [8] - 6:19, 68:22, 104:17, 104:19, 105:6, 114:19, 133:5, 147:4 component [1] - 89:11 composite [1] - 153:20 computer [7] - 1:25, 86:8, 86:10, 86:12, 86:15, 101:8, 103:11 computer-aided [1] - 1:25 Concepcion [2] - 11:12, 11:15 concern [1] - 6:25 concerned [2] - 6:18, 7:13 concluded [1] - 172:25 concur [2] - 6:10, 6:17 conference [2] - 9:4, 10:20 confidence [1] - 7:3 confirm [3] - 115:3, 169:10, 170:7 confirmed [10] - 113:25, 115:10, 116:25, 120:13, 123:1, 165:8, 165:16, 169:25, 171:8, 172:8 connection [3] - 14:11, 21:18, 84:22 connections [2] - 13:14, 13:15 consideration [2] - 79:7, 79:8 considered [1] - 66:14 conspiracy [17] - 74:11, 74:12, 74:14, 74:20, 74:23, 76:4, 79:14, 80:22, 80:23, 81:8, 81:20, 82:20, 82:22, 82:25, 83:20, 86:24,	168:14 conspirators [1] - 81:10 contact [6] - 8:4, 16:11, 87:17, 103:22, 106:1, 107:12 contacted [1] - 127:2 contain [8] - 84:17, 91:13, 114:14, 115:21, 117:16, 118:13, 119:9, 121:24 contained [12] - 18:14, 57:4, 80:8, 83:3, 83:13, 83:15, 83:18, 91:17, 93:1, 115:24, 119:12, 122:2 continue [8] - 5:24, 6:1, 6:7, 12:10, 15:14, 114:1, 124:9, 153:22 continued [1] - 121:14 contractor [2] - 12:23, 66:1 contractors [1] - 67:13 controls [1] - 21:3 cooperate [1] - 78:15 cooperation [6] - 78:17, 78:24, 79:3, 79:6, 79:8, 79:10 coordinator [1] - 23:21 copy [5] - 15:10, 97:15, 102:18, 109:2, 158:7 Coral [4] - 32:24, 62:22, 63:5, 63:18 corporation [13] - 41:24, 42:1, 42:20, 43:13, 43:15, 46:16, 48:15, 49:2, 52:15, 54:5, 54:22, 56:6, 64:7 corporations [4] - 41:22, 47:25, 145:18, 145:20 correct [171] - 11:16, 23:17, 24:8, 25:5, 30:8, 35:18, 38:13, 38:15, 40:22, 49:20, 53:14, 58:7, 59:11, 59:12, 59:24, 59:25, 60:3, 60:4, 60:8, 60:12, 60:22, 60:23, 61:7, 61:8, 61:18, 62:15,
---	---	--	---	--

62:16, 62:20, 62:21, 63:8, 63:9, 63:10, 64:10, 64:14, 65:3, 65:11, 65:18, 65:20, 66:8, 66:19, 66:20, 67:4, 67:5, 68:14, 68:15, 68:20, 68:24, 71:21, 72:5, 73:17, 73:19, 73:21, 74:13, 74:16, 74:19, 74:22, 76:2, 76:11, 76:14, 77:8, 77:15, 78:2, 78:16, 78:19, 79:11, 80:21, 81:6, 82:3, 82:9, 82:14, 82:19, 83:1, 83:9, 84:5, 86:17, 87:24, 88:19, 89:5, 89:14, 91:14, 91:19, 91:24, 92:18, 92:21, 93:10, 93:20, 93:25, 94:22, 95:1, 97:10, 98:3, 98:12, 100:18, 102:1, 102:8, 103:13, 103:17, 104:13, 105:23, 106:12, 108:14, 109:11, 112:6, 113:6, 113:9, 114:15, 114:22, 115:6, 115:18, 115:22, 116:21, 117:17, 118:10, 121:25, 123:12, 124:14, 124:16, 124:24, 125:16, 126:11, 128:2, 130:5, 131:11, 131:15, 131:18, 132:12, 132:18, 133:19, 134:2, 134:9, 140:15, 140:17, 141:20, 142:15, 142:21, 143:1, 143:10, 143:15, 145:1, 145:21, 146:3, 146:21, 155:3, 155:19, 156:9, 156:17, 156:18, 156:23, 157:3, 158:5, 158:7, 158:8, 158:12, 159:10, 161:17, 161:25, 162:13, 163:8, 165:3, 165:10, 166:23, 168:5,	168:7, 168:11, 171:6, 171:20, 171:22, 172:5, 173:3 cost [17] - 40:2, 44:1, 44:11, 44:15, 45:1, 49:9, 49:13, 49:18, 49:24, 50:1, 52:20, 53:3, 53:5, 53:8, 55:1, 55:4, 55:8 costs [3] - 45:2, 46:10, 55:13 coughing [1] - 4:15 Counsel [2] - 129:16, 136:16 counsel [4] - 5:21, 10:7, 22:23, 69:4 County [3] - 12:8, 20:6, 71:8 couple [2] - 4:23, 60:18 course [4] - 6:11, 48:20, 131:21, 132:2 Court [16] - 1:21, 1:22, 3:1, 4:2, 6:19, 6:24, 7:2, 7:4, 9:7, 10:5, 11:18, 11:20, 11:21, 173:7, 173:7 court [9] - 6:22, 12:24, 23:21, 75:13, 75:15, 75:16, 75:17, 113:12, 122:14 COURT [76] - 1:1, 3:2, 3:22, 3:25, 4:3, 4:7, 4:9, 4:17, 4:20, 4:23, 5:6, 5:9, 5:12, 5:16, 5:21, 6:9, 7:8, 7:10, 7:16, 7:25, 8:13, 8:16, 8:20, 9:6, 9:11, 9:13, 10:3, 10:8, 10:12, 10:25, 11:7, 11:13, 11:23, 11:25, 12:4, 15:8, 15:12, 19:13, 19:16, 22:20, 22:22, 23:2, 58:14, 58:23, 59:4, 69:2, 69:4, 69:7, 81:18, 82:5, 88:2, 88:7, 99:4, 129:10, 129:12, 129:16, 129:23, 136:12, 136:16, 136:18, 136:22, 138:24, 140:11, 145:9, 153:18, 154:5, 155:22, 155:24, 156:3, 156:5,	169:2, 170:18, 172:10, 172:16, 172:20, 172:23 Court's [5] - 6:17, 9:1, 9:4, 10:9, 167:15 COURTROOM [4] - 12:14, 19:23, 23:6, 69:12 courtroom [7] - 3:16, 4:5, 5:20, 7:24, 8:15, 24:11, 81:11 cousin [2] - 113:16, 118:5 COVID [2] - 4:17, 4:18 crap [1] - 4:16 create [25] - 83:12, 83:15, 83:18, 97:22, 106:22, 113:22, 114:11, 115:7, 115:19, 116:22, 117:14, 118:11, 119:7, 120:10, 121:6, 121:22, 122:23, 123:13, 124:4, 146:11, 146:14, 147:18, 161:8, 169:11, 169:15 created [29] - 15:4, 83:7, 83:23, 84:19, 85:5, 87:21, 90:20, 91:25, 92:2, 101:4, 101:18, 102:17, 108:1, 109:6, 111:17, 112:2, 113:4, 114:16, 115:23, 117:18, 118:15, 119:11, 122:1, 124:20, 124:25, 128:10, 134:20, 160:14, 169:12 creating [11] - 88:15, 90:6, 94:10, 100:16, 106:15, 107:16, 116:10, 117:25, 119:18, 123:5, 128:7 creation [2] - 15:17, 17:9 credentials [2] - 21:5, 22:14 credit [3] - 46:9, 94:3, 94:8 crime [8] - 74:3, 74:6, 74:8, 74:9, 74:10, 80:25, 81:5, 81:7 CROSS [3] - 18:24,	59:5, 129:25 cross [3] - 22:20, 129:7, 129:24 Cross [3] - 2:4, 2:8, 2:10 CROSS- EXAMINATION [3] - 18:24, 59:5, 129:25 cross-examination [3] - 22:20, 129:7, 129:24 Cross-Examination [3] - 2:4, 2:8, 2:10 Cruz [6] - 114:4, 114:9, 114:12, 114:16, 114:20, 166:16 Cs [11] - 56:10, 83:18, 90:10, 113:5, 124:21, 124:25, 128:8, 146:17, 147:3, 164:18, 169:12 current [1] - 15:19 custodian [1] - 23:24 customer [5] - 13:18, 14:4, 14:17, 14:20, 16:24 cyber [1] - 20:10	8:24 de [6] - 114:4, 114:8, 114:12, 114:16, 114:20, 166:16 death [1] - 72:2 December [5] - 57:9, 58:3, 58:4, 58:5 decide [3] - 5:24, 6:7, 10:18 decision [3] - 10:13, 77:18, 77:25 decisions [2] - 3:17, 5:22 declaration [1] - 30:8 declare [2] - 30:3, 67:25 decrease [1] - 39:10 deductible [3] - 29:10, 33:25, 37:10 deduction [5] - 66:13, 67:8, 67:9, 67:12, 67:14 deductions [22] - 45:17, 45:18, 45:22, 46:7, 50:4, 50:7, 50:9, 50:11, 50:13, 50:17, 50:18, 50:20, 50:21, 53:12, 53:19, 55:15, 55:24, 56:1, 68:12, 68:13 defendant's [1] - 153:20 Defendants [1] - 1:8 DEFENDANTS [1] - 1:15 Defense [5] - 139:1, 145:11, 155:20, 155:21, 156:6 DEFENSE [1] - 2:12 defense [9] - 3:22, 9:11, 10:7, 10:23, 128:19, 136:22, 169:4, 170:25, 172:22 deferral [1] - 9:1 deferred [1] - 11:18 defers [1] - 6:24 defraud [2] - 74:11, 74:20 delay [2] - 5:10, 6:4 delays [1] - 7:7 Denise [1] - 163:21 DENISE [1] - 1:7 deny [1] - 128:16 dependent [1] - 40:2 dependents [1] - 60:15 depicted [2] - 27:1,
--	---	--	--	--

34:6 depreciation [3] - 33:11, 37:3, 45:13 DEPUTY [4] - 12:14, 19:23, 23:6, 69:12 deputy [2] - 26:6, 62:12 describe [4] - 13:9, 16:14, 42:10, 104:15 described [1] - 7:2 description [1] - 56:22 detailed [1] - 160:16 details [1] - 13:25 detecting [1] - 60:2 detention [2] - 26:6, 62:12 determine [1] - 38:11 determines [1] - 78:10 diagnosis [1] - 8:5 difference [2] - 41:19, 143:24 different [8] - 18:3, 42:25, 64:8, 93:14, 144:23, 145:15, 145:18, 145:19 digital [1] - 24:12 diligence [1] - 42:6 dinner [1] - 126:24 DiPietrantonio [5] - 9:25, 126:9, 134:8, 135:17, 153:2 diploma [2] - 71:10, 71:11 Direct [4] - 2:4, 2:6, 2:7, 2:9 DIRECT [4] - 12:18, 20:1, 23:10, 69:18 direct [4] - 31:17, 41:18, 130:8, 164:17 directed [1] - 41:17 directing [14] - 26:8, 27:4, 27:23, 30:1, 31:10, 33:12, 35:1, 35:25, 36:24, 41:5, 42:9, 43:24, 47:6, 55:23 direction [1] - 165:13 director [1] - 72:17 discuss [11] - 5:2, 6:15, 10:5, 10:6, 10:8, 10:22, 88:4, 104:5, 112:19, 172:13, 172:16 discussed [1] - 9:11 displayed [5] - 25:21, 47:13, 51:16, 53:2,	55:12 displaying [5] - 16:20, 21:8, 25:23, 26:17, 30:17 DISTRICT [3] - 1:1, 1:1, 1:11 District [3] - 1:22, 173:7, 173:8 disturbs [1] - 6:10 division [1] - 12:8 doctor [3] - 7:16, 8:3, 129:18 document [51] - 14:14, 16:21, 17:25, 21:9, 25:7, 25:14, 26:11, 34:14, 34:16, 37:17, 38:5, 39:18, 39:20, 41:12, 41:14, 42:4, 42:7, 44:12, 47:1, 48:13, 48:25, 49:16, 50:24, 51:4, 52:11, 52:13, 54:18, 56:14, 56:16, 57:13, 57:14, 76:10, 76:22, 77:9, 79:19, 80:4, 80:9, 80:19, 92:9, 92:12, 100:16, 100:17, 102:9, 102:25, 108:20, 137:1, 137:2, 139:3, 139:5, 152:9, 157:19 documented [1] - 57:23 documents [9] - 9:3, 9:7, 23:25, 24:22, 25:1, 56:9, 89:13, 154:7 DocuSign [8] - 89:10, 89:21, 89:24, 92:6, 92:9, 137:24, 140:19, 140:21 DocuSigned [1] - 140:18 dollar [1] - 138:14 dollars [18] - 90:15, 90:19, 105:20, 111:14, 111:16, 111:24, 112:1, 115:1, 116:14, 118:3, 133:17, 148:16, 158:18, 158:24, 160:17, 160:22, 160:23, 160:25 DONALD [1] - 1:10 done [2] - 104:18,	106:6 door [2] - 126:25, 127:16 dots [1] - 22:8 doubt [1] - 80:13 down [18] - 17:24, 19:16, 22:22, 25:20, 26:7, 26:15, 27:1, 28:2, 28:20, 31:9, 35:7, 42:14, 47:13, 63:25, 69:7, 100:24, 100:25, 129:1 download [3] - 84:6, 84:9, 146:16 downloaded [2] - 84:1, 84:4 Draw [1] - 139:24 draw [1] - 140:1 driver's [1] - 155:11 dropping [10] - 17:24, 25:20, 26:7, 26:15, 27:1, 30:24, 31:9, 35:7, 40:6, 47:13 due [1] - 42:5 dues [1] - 46:10 duly [4] - 12:13, 19:21, 23:5, 69:11 duplicate [1] - 60:2 during [12] - 18:16, 99:20, 103:15, 104:4, 104:14, 110:17, 111:2, 113:3, 126:2, 127:25	E eager [1] - 104:17 ear [1] - 129:18 earn [1] - 66:12 Edison [2] - 117:4, 117:7 Eduardo [10] - 70:15, 71:17, 72:17, 96:8, 125:5, 130:14, 132:4, 143:6, 159:19, 159:24 education [1] - 71:9 Edward [16] - 71:19, 72:12, 96:7, 142:8, 144:14, 144:16, 144:18, 144:20, 144:21, 144:22, 144:24, 144:25, 145:2, 145:14, 145:17, 146:2 eight [1] - 155:23	EIN [3] - 27:25, 42:20, 157:12 either [6] - 59:14, 110:20, 110:24, 116:25, 123:20, 155:10 elected [2] - 9:4, 9:16 electronic [7] - 25:22, 25:23, 31:12, 35:9, 40:8, 89:4, 89:7 electronically [4] - 25:25, 31:13, 35:9, 40:9 elements [1] - 129:20 ELMO [2] - 60:20, 60:21 elsewhere [1] - 45:14 email [29] - 11:11, 11:14, 11:17, 15:23, 16:11, 85:11, 85:21, 87:18, 99:25, 100:6, 109:17, 109:18, 109:19, 110:11, 110:21, 134:23, 135:1, 140:19, 151:21, 151:23, 152:2, 152:3, 153:23, 154:9, 155:25, 156:1, 156:8, 157:1, 157:6 emailing [1] - 151:20 employee [9] - 13:2, 22:13, 27:25, 50:9, 50:21, 66:1, 66:3, 66:4, 67:11 employee's [1] - 57:1 employees [21] - 20:15, 20:21, 21:5, 46:23, 53:16, 53:25, 55:21, 57:6, 66:6, 66:7, 66:17, 66:18, 66:23, 66:24, 67:2, 68:2, 72:12, 131:12, 131:17, 131:22, 131:24 employer [4] - 42:21, 57:7, 66:13, 66:17 Employer's [1] - 57:21 employers [1] - 57:24 empty [1] - 84:4 end [6] - 10:15, 16:16, 17:20, 18:19, 137:19, 137:24 ended [2] - 130:11,	146:9 ending [1] - 22:3 engaged [1] - 98:25 engaging [1] - 103:23 English [1] - 72:11 enjoy [1] - 88:8 enjoyed [1] - 3:2 enlarge [1] - 102:9 enlarged [1] - 14:18 enlarging [3] - 21:14, 29:2, 108:20 enter [5] - 102:21, 103:1, 103:2, 108:13, 109:5 entered [6] - 4:5, 7:24, 12:3, 59:3, 88:11, 129:22 entitled [1] - 173:4 error [1] - 124:8 Es [1] - 42:24 ESQ [2] - 1:16, 1:17 essentially [1] - 97:8 estate [2] - 41:21, 47:24 et [9] - 10:14, 26:9, 31:1, 34:24, 40:24, 41:22, 47:8, 47:25, 129:20 evening [2] - 172:14, 172:24 event [1] - 3:14 eventually [1] - 138:19 evidence [9] - 9:2, 11:10, 11:20, 76:20, 79:21, 101:9, 107:19, 156:6, 157:18 ex [1] - 115:15 ex-brother-in-law [1] - 115:15 exact [2] - 71:1, 142:17 exactly [6] - 8:20, 71:6, 134:22, 148:22, 149:16, 151:2 examination [4] - 22:20, 129:7, 129:24, 130:8 Examination [7] - 2:4, 2:4, 2:6, 2:7, 2:8, 2:9, 2:10 EXAMINATION [7] - 12:18, 18:24, 20:1, 23:10, 59:5, 69:18, 129:25 examined [1] - 30:4 example [1] - 99:15
---	--	---	--	---	---

exchange [1] - 78:20 excusal [3] - 19:13, 22:23, 69:4 excuse [20] - 6:1, 7:17, 7:18, 7:21, 8:3, 24:6, 29:2, 30:6, 42:14, 44:19, 46:6, 52:17, 58:6, 138:11, 139:13, 144:15, 148:11, 152:1, 155:13, 170:5 excused [6] - 8:10, 8:11, 19:16, 22:24, 23:2, 69:7 Exhibit [71] - 11:10, 14:13, 16:20, 18:2, 21:8, 25:6, 26:7, 29:1, 30:17, 31:9, 32:2, 32:11, 32:15, 33:12, 34:14, 35:7, 36:9, 37:17, 38:1, 39:17, 40:7, 43:9, 45:4, 46:1, 46:3, 46:4, 46:25, 47:20, 48:13, 48:17, 48:24, 50:23, 52:4, 52:10, 53:1, 53:9, 53:21, 54:18, 55:7, 56:12, 57:14, 58:1, 60:21, 62:18, 63:11, 63:12, 63:14, 64:12, 65:15, 68:6, 76:20, 79:21, 79:23, 80:16, 101:10, 101:12, 101:17, 107:20, 145:11, 152:6, 152:8, 155:20, 155:21, 156:6, 157:17, 164:15, 170:21, 170:25 exhibit [10] - 9:1, 11:9, 15:11, 21:14, 76:23, 151:16, 153:20, 170:13, 170:25 Exhibits [1] - 24:23 EXHIBITS [1] - 2:12 exhibits [1] - 60:18 existed [2] - 131:10, 151:23 exited [6] - 5:20, 8:15, 59:1, 88:9, 129:14, 172:15 expect [2] - 10:1, 104:20 expected [1] - 3:8 expense [7] - 29:5,	33:21, 37:8, 46:9, 46:12, 66:14, 67:19 expenses [42] - 28:8, 28:9, 28:12, 28:15, 28:16, 28:17, 28:18, 29:14, 29:15, 29:17, 30:14, 33:5, 33:8, 33:10, 33:20, 34:1, 34:2, 34:3, 36:22, 36:25, 37:2, 37:4, 37:7, 37:12, 37:13, 37:14, 39:11, 39:12, 45:8, 45:9, 46:6, 46:23, 53:16, 53:24, 55:20, 66:13, 66:18, 66:22, 67:3, 67:13, 67:16, 94:3 experience [2] - 13:4, 41:25 expire [4] - 85:23, 109:22, 121:11, 123:18 expired [4] - 86:2, 109:24, 109:25, 110:3 explain [8] - 38:24, 66:21, 68:2, 97:17, 97:20, 99:6, 105:15, 106:2 explained [9] - 97:24, 98:11, 116:4, 117:20, 118:17, 119:15, 122:5, 147:18, 161:2 explaining [1] - 147:23 explore [1] - 4:11 express [1] - 96:10 expressed [2] - 6:14, 7:19 extra [1] - 164:11	fair [1] - 130:18 faired [1] - 12:7 Faitrouni [2] - 120:17, 167:8 fake [15] - 116:10, 117:25, 128:10, 128:13, 135:11, 147:4, 147:16, 158:18, 158:23, 159:4, 159:9, 159:13, 163:5, 163:6, 164:18 false [67] - 74:15, 74:17, 74:24, 75:3, 75:5, 76:5, 79:15, 82:15, 82:16, 82:17, 83:3, 83:7, 83:13, 83:15, 83:18, 83:23, 87:21, 88:15, 88:24, 90:7, 90:9, 90:20, 91:13, 91:15, 91:18, 91:22, 92:2, 92:12, 93:2, 93:19, 94:10, 107:4, 113:4, 114:14, 114:17, 115:21, 115:24, 117:16, 117:19, 118:13, 118:16, 119:9, 119:12, 119:18, 121:24, 122:2, 124:20, 124:25, 128:8, 133:22, 140:16, 141:4, 141:18, 142:3, 147:5, 147:24, 160:14, 162:24, 162:25, 163:19, 163:23, 164:6, 164:9, 164:18, 166:25, 168:16, 168:19 familiar [17] - 13:4, 13:17, 13:25, 17:24, 19:2, 19:4, 20:14, 24:1, 24:14, 24:23, 56:14, 56:23, 58:10, 65:21, 76:17, 80:6, 165:20 familiarity [1] - 24:7 family [5] - 71:7, 143:17, 143:19, 143:23, 144:3 Fanara [2] - 12:12, 12:16 FANARA [2] - 2:3, 12:13 Fandino [5] - 115:14,	115:17, 115:23, 116:8, 167:17 far [7] - 6:13, 8:22, 12:8, 13:16, 19:5, 133:12, 161:6 Fast [2] - 165:20, 165:23 FCRR [2] - 1:21, 173:6 federal [3] - 6:22, 57:1, 57:5 Federal [1] - 57:21 fee [2] - 94:10, 159:14 fellow [2] - 171:12, 171:13 felt [2] - 104:18, 129:1 female [1] - 60:15 Ferris [9] - 3:11, 3:12, 4:4, 4:5, 4:9, 5:20, 7:24, 8:15, 129:17 fever [3] - 4:13, 7:9, 7:18 few [3] - 3:3, 3:4, 126:12 fictitious [1] - 163:19 figure [1] - 160:10 file [7] - 24:13, 31:22, 35:19, 57:25, 60:5, 73:9, 73:16 filed [19] - 24:2, 24:14, 25:16, 25:18, 25:25, 29:22, 48:18, 48:21, 57:3, 60:7, 63:2, 65:8, 65:14, 65:19, 68:7, 76:1, 142:5, 157:21, 158:1 filer [3] - 35:13, 40:14, 43:6 files [2] - 59:10, 68:19 filing [22] - 24:4, 25:18, 27:17, 31:21, 34:19, 35:5, 35:8, 36:5, 37:22, 37:23, 37:25, 39:23, 39:24, 40:3, 40:7, 43:3, 44:22, 45:23, 48:5, 53:15, 66:12 filings [1] - 60:2 fill [6] - 133:3, 146:20, 159:17, 161:8, 161:13, 161:16 fillable [1] - 146:17	filled [6] - 12:25, 24:20, 85:9, 159:19, 161:14, 162:4 filling [2] - 161:12, 170:14 finances [1] - 73:7 fine [3] - 11:23, 98:1, 148:6 finish [1] - 6:25 firewall [2] - 21:2, 21:13 first [16] - 9:19, 22:1, 22:3, 22:6, 22:10, 32:11, 93:14, 93:16, 97:2, 120:17, 122:15, 125:22, 135:21, 146:25, 147:2, 167:22 fit [1] - 5:23 five [3] - 10:1, 70:7, 130:11 FLORIDA [1] - 1:1 Florida [17] - 1:3, 1:23, 15:3, 16:4, 17:8, 17:16, 32:25, 34:21, 43:17, 61:2, 61:11, 63:6, 113:18, 114:7, 122:19, 173:8, 173:8 focusing [1] - 28:11 following [1] - 68:23 FOR [1] - 1:12 force [1] - 77:20 foregoing [1] - 173:3 forgivable [5] - 93:7, 93:8, 94:21, 134:6, 134:13 forgiven [3] - 95:2, 143:10, 143:15 forgiveness [4] - 94:23, 112:19, 112:22, 112:25 form [59] - 27:10, 27:15, 43:9, 49:14, 60:5, 62:3, 62:5, 64:24, 65:8, 66:18, 66:22, 66:24, 67:3, 68:22, 73:19, 75:6, 83:25, 84:1, 84:4, 84:6, 84:9, 84:11, 84:17, 85:5, 85:8, 91:16, 97:14, 97:22, 97:23, 99:2, 101:18, 108:1, 111:17, 112:2, 112:12, 118:18, 133:8, 136:5,
---	--	---	--	---

137:22, 137:23, 138:2, 138:6, 139:7, 139:8, 139:9, 139:11, 139:21, 140:22, 147:16, 151:10, 158:8, 158:16, 159:1, 161:2, 161:8, 162:19, 163:23 Form [39] - 25:10, 26:10, 26:11, 26:13, 30:19, 31:2, 34:17, 34:25, 37:20, 38:8, 39:21, 40:25, 42:5, 43:12, 44:13, 44:15, 45:13, 45:14, 47:4, 47:9, 48:14, 48:18, 48:21, 48:23, 49:1, 51:2, 52:14, 53:3, 54:21, 56:18, 56:23, 57:8, 57:16, 57:19, 57:20, 57:23, 58:2, 157:21 forms [18] - 24:7, 24:12, 24:14, 24:17, 24:19, 59:24, 60:20, 83:23, 84:16, 84:19, 84:20, 84:23, 85:2, 86:13, 90:7, 97:16, 161:14, 163:19 forth [2] - 123:19, 166:14 fortunately [1] - 3:3 forward [1] - 8:8 foundation [1] - 10:21 four [5] - 22:6, 28:20, 28:21, 57:3, 72:15 fourth [1] - 22:7 FPR [2] - 1:21, 173:6 FPR-C [2] - 1:21, 173:6 frame [1] - 95:14 frankly [1] - 6:15 fraud [4] - 74:21, 74:23, 76:4, 79:15 fraudulent [1] - 146:14 free [1] - 77:25 frequently [2] - 103:18, 103:24 Friday [2] - 6:23, 126:23 friend [11] - 91:4, 116:18, 119:1, 120:4, 120:25,	121:16, 122:13, 122:17, 123:9, 132:17, 165:6 friends [9] - 130:17, 130:20, 131:2, 132:5, 143:17, 143:19, 143:23, 144:3, 144:4 Ft [2] - 3:5, 12:9 full [2] - 72:19, 84:1 full-time [1] - 72:19 function [1] - 19:3 funded [1] - 166:16 Funeral [38] - 17:4, 42:19, 43:14, 46:19, 48:10, 48:16, 48:18, 48:21, 49:2, 49:4, 52:16, 54:8, 54:23, 56:18, 56:20, 57:9, 57:16, 58:3, 64:10, 68:7, 71:19, 72:12, 98:19, 98:21, 131:6, 144:14, 144:16, 144:18, 144:20, 144:24, 145:2, 145:13, 145:14, 145:18, 152:24, 155:1, 156:9, 157:2 funeral [43] - 45:2, 49:24, 53:8, 55:13, 71:16, 71:18, 71:22, 71:24, 72:6, 72:17, 72:18, 72:19, 72:21, 95:7, 99:10, 131:4, 131:7, 131:13, 131:15, 131:16, 131:19, 131:22, 131:25, 132:7, 132:25, 144:9, 144:13, 147:25, 148:2, 148:8, 148:12, 148:24, 149:1, 149:24, 152:13, 153:3, 153:6, 153:9, 153:11, 153:12, 153:15, 157:22 FUTA [1] - 57:21 future [1] - 8:8	169:19, 170:15, 171:14, 171:16, 171:18 gateway [1] - 22:15 gatherings [5] - 95:13, 95:15, 95:17, 95:19, 95:23 generally [3] - 4:15, 41:24, 57:23 generated [1] - 161:18 gentlemen [5] - 12:4, 58:24, 88:5, 129:13, 129:23 given [12] - 6:13, 6:21, 7:1, 7:18, 8:2, 9:4, 21:5, 85:18, 85:19, 85:22, 93:18, 108:18 Gmail.com [1] - 153:25 goods [14] - 44:1, 44:11, 44:15, 45:1, 49:9, 49:13, 49:18, 50:1, 52:20, 53:3, 53:5, 55:1, 55:4, 55:8 government [1] - 54:18 GOVERNMENT [1] - 1:12 Government [85] - 3:21, 6:16, 6:18, 6:24, 8:18, 8:23, 9:3, 9:19, 12:11, 12:13, 14:13, 16:20, 18:2, 19:8, 19:21, 21:8, 23:5, 25:6, 26:7, 29:1, 30:17, 32:2, 32:11, 32:15, 33:12, 34:14, 35:7, 35:21, 36:9, 37:17, 38:1, 39:17, 40:6, 43:9, 45:4, 46:1, 46:3, 46:4, 46:25, 47:20, 48:13, 48:17, 48:24, 50:23, 52:4, 52:10, 53:1, 53:9, 53:21, 55:7, 56:12, 56:19, 57:13, 58:1, 59:11, 69:11, 76:19, 78:15, 78:20, 78:23, 79:1, 79:9, 79:21, 79:22, 80:12, 80:15, 101:9, 101:12, 101:17, 107:19, 125:11, 125:19, 125:23, 126:3,	126:6, 126:8, 126:14, 129:6, 141:1, 141:6, 164:5, 165:2, 166:24, 167:3 GOVERNMENT'S [1] - 2:2 Government's [8] - 6:25, 8:19, 9:1, 11:10, 24:23, 31:9, 152:6, 152:8 GRAHAM [1] - 1:10 Granados [9] - 11:15, 70:23, 123:24, 124:2, 130:4, 156:1, 163:17, 164:3, 172:16 greedy [1] - 125:2 gross [25] - 28:4, 33:4, 36:20, 36:21, 38:18, 39:7, 43:20, 43:22, 44:4, 49:8, 52:18, 52:22, 64:13, 64:14, 64:18, 64:19, 64:21, 64:22, 64:23, 65:9, 65:16, 147:9, 157:22 guarantees [1] - 79:12 guess [1] - 159:25 guide [3] - 84:13, 84:15, 97:15 guilty [14] - 76:3, 76:7, 76:9, 77:7, 77:16, 77:17, 77:18, 77:20, 77:22, 77:25, 79:14, 80:22, 81:21, 86:24	156:1, 163:17, 164:3 HDMI [1] - 69:16 Head [7] - 27:18, 27:22, 32:22, 36:17, 61:16, 106:17, 106:19 head [1] - 39:24 health [1] - 3:18 hear [3] - 3:16, 97:2, 153:10 heard [5] - 81:2, 106:16, 106:18, 140:8, 146:5 heart [2] - 67:22, 151:14 HELD [1] - 1:10 help [2] - 63:21, 96:24 helped [6] - 31:22, 130:20, 132:7, 132:22, 146:25, 167:6 helping [1] - 99:1 Hendrith [1] - 1:19 herself [2] - 7:19, 110:20 hesitation [1] - 6:10 hgranados29@ gmail.com [2] - 153:24, 154:2 High [1] - 71:14 high [4] - 58:11, 71:10, 71:11, 71:13 high-level [1] - 58:11 highest [1] - 71:9 highlighted [6] - 21:14, 21:16, 30:2, 35:25, 42:10, 55:17 highlighting [12] - 15:25, 16:13, 18:12, 27:16, 28:22, 33:19, 34:22, 36:24, 43:20, 47:6, 54:2, 58:1 himself [2] - 131:20, 132:1 HLNDL [1] - 17:16 hmm [3] - 132:15, 136:17, 161:24 hold [1] - 110:4 Holdings [4] - 144:21, 144:23, 144:25, 145:7 holiday [2] - 6:12, 6:22 home [54] - 13:5, 25:13, 40:3, 61:20, 71:16, 71:18,
	G		H	
	G-R-A-N-A-D-O-S [1] - 70:23 gain [1] - 29:18 Garcia [8] - 122:12, 168:20, 169:17,		H&R [1] - 73:15 hairstylist [4] - 27:20, 32:20, 36:15, 61:14 half [1] - 40:1 Hallandale [4] - 17:7, 43:17, 152:12, 152:22 hand [2] - 36:25, 139:11 handing [1] - 138:25 hands [2] - 5:5, 5:7 hard [1] - 15:10 HAYDEE [3] - 2:9, 69:11, 69:14 Haydee [7] - 11:15, 69:10, 69:14,	

71:22, 71:24, 72:6, 72:19, 72:21, 72:23, 86:11, 94:4, 94:9, 95:7, 95:20, 95:23, 99:10, 103:8, 103:9, 114:19, 126:23, 131:4, 131:7, 131:14, 131:15, 131:16, 131:19, 131:22, 131:25, 132:7, 132:25, 144:9, 144:13, 147:25, 148:2, 148:8, 148:12, 148:24, 149:2, 149:24, 152:13, 152:14, 153:3, 153:6, 153:9, 153:11, 153:13, 153:15, 157:22, 171:8, 172:8 Home [37] - 17:4, 42:19, 43:14, 46:19, 48:10, 48:16, 48:18, 48:21, 49:2, 49:4, 52:16, 54:8, 54:23, 56:18, 56:20, 57:9, 57:17, 64:10, 68:7, 71:19, 72:12, 98:19, 98:22, 131:6, 144:14, 144:16, 144:18, 144:20, 144:25, 145:2, 145:13, 145:14, 145:18, 152:24, 155:2, 156:9, 157:2 Homes [1] - 58:3 honest [1] - 128:25 honestly [3] - 4:22, 5:4, 5:11 Honor [49] - 4:1, 7:10, 15:6, 15:15, 18:8, 18:22, 19:12, 19:14, 19:15, 19:17, 19:19, 22:19, 22:21, 22:25, 23:1, 23:3, 58:16, 58:22, 66:10, 66:15, 68:4, 68:5, 68:17, 69:1, 69:3, 69:9, 76:19, 81:16, 88:12, 97:1, 99:3, 101:7, 129:8, 136:10, 136:11, 136:19, 136:20, 138:23, 143:5, 144:6, 145:8,	152:17, 152:23, 153:16, 153:17, 154:4, 167:14, 167:15, 169:5 HONORABLE [1] - 1:10 hope [3] - 3:2, 8:7, 79:7 hoping [1] - 79:9 host [2] - 22:1, 22:11 house [3] - 95:13, 149:10, 149:11 household [1] - 39:24 HP [2] - 86:15, 103:12 hundred [27] - 92:23, 98:10, 105:19, 105:20, 116:6, 125:4, 128:18, 133:17, 147:8, 147:10, 147:13, 147:19, 147:24, 148:9, 148:13, 148:16, 148:19, 149:20, 158:4, 159:1, 160:15, 160:17, 160:22, 160:23, 160:25, 162:8, 168:12 Hunter [22] - 81:2, 84:8, 84:10, 91:2, 91:3, 92:1, 92:2, 94:10, 96:16, 96:17, 96:25, 97:4, 132:17, 132:20, 133:2, 133:11, 137:7, 146:11, 160:2, 160:6, 160:19, 160:24 hunter [5] - 94:18, 97:7, 135:11, 146:5, 146:8 hurricane [1] - 12:6 hurricanes [1] - 6:21 husband [51] - 60:14, 71:17, 71:20, 72:17, 73:5, 91:4, 95:18, 96:3, 96:8, 112:10, 112:15, 116:18, 120:4, 120:25, 121:16, 122:13, 122:17, 123:9, 125:5, 125:15, 126:24, 127:9, 130:14, 130:22, 130:25, 131:1, 131:15, 131:16, 132:4, 132:11, 132:12,	142:8, 142:22, 143:6, 143:19, 143:21, 143:23, 144:1, 144:9, 144:12, 145:5, 145:16, 145:17, 145:22, 146:2, 146:5, 154:14, 154:18, 155:4, 155:18, 171:25 husband's [3] - 113:16, 115:15, 117:10 I ID [1] - 136:22 idea [3] - 5:16, 139:12, 139:14 identification [11] - 28:1, 42:21, 136:20, 139:1, 145:12, 153:21, 156:17, 169:5, 170:21, 170:25, 171:1 identified [1] - 164:5 identifiers [1] - 40:19 identifies [2] - 21:17, 22:1 identify [2] - 4:11, 81:15 identity [13] - 113:25, 115:3, 115:10, 116:25, 120:13, 123:1, 165:8, 165:16, 169:10, 169:25, 170:7, 171:8, 172:7 ill [2] - 3:15, 7:25 illegal [2] - 124:23, 147:22 immediately [1] - 127:2 immigrate [1] - 70:4 immigration [1] - 72:8 impact [6] - 26:23, 34:11, 35:4, 46:20, 51:13, 54:9 imply [1] - 150:22 importance [1] - 3:11 in-person [1] - 24:11 inartfully [1] - 161:11 Inc [4] - 144:21, 144:23, 144:25 include [10] - 24:7, 50:9, 66:13, 74:14, 78:17, 83:2,	124:12, 125:15, 126:8, 147:16 included [6] - 29:6, 33:22, 37:9, 79:18, 147:3, 160:11 includes [3] - 12:8, 35:16, 125:17 including [3] - 68:11, 129:20, 162:5 inclusion [1] - 163:20 income [96] - 26:16, 26:20, 26:21, 26:22, 26:25, 27:2, 27:3, 27:5, 28:2, 28:4, 30:12, 30:15, 31:7, 32:4, 32:5, 32:8, 33:1, 33:3, 33:4, 34:13, 35:2, 35:4, 35:6, 35:22, 35:23, 36:2, 36:7, 36:18, 36:20, 36:21, 38:18, 38:21, 38:25, 39:1, 39:7, 41:7, 41:10, 41:15, 41:16, 41:20, 42:16, 42:22, 43:1, 43:12, 43:20, 44:6, 44:8, 45:5, 45:19, 45:21, 46:16, 46:19, 46:20, 46:21, 47:11, 47:21, 47:22, 48:11, 49:6, 49:11, 50:1, 50:16, 51:9, 51:14, 51:15, 52:7, 52:24, 53:10, 54:3, 54:5, 54:9, 54:10, 54:24, 54:25, 55:15, 56:4, 56:5, 56:6, 62:3, 62:14, 63:20, 64:7, 64:14, 64:18, 64:21, 64:23, 66:4, 66:11, 66:22, 98:8, 98:21, 133:2, 133:23, 147:9, 158:1, 158:8 Income [8] - 25:10, 30:19, 39:21, 48:14, 49:1, 52:14, 54:21, 57:20 Incorporated [1] - 145:2 incorporated [2] - 28:17, 43:18 increase [1] - 39:10 increased [2] - 41:10, 46:21 incriminate [1] - 129:2	independent [1] - 12:23 indicated [3] - 65:16, 130:8, 164:17 indicates [3] - 21:16, 22:10, 56:22 indictment [5] - 75:20, 75:23, 163:11, 163:12, 163:13 Individual [8] - 25:10, 30:19, 34:17, 37:20, 38:9, 39:21, 47:4, 51:2 individual [8] - 25:16, 29:22, 30:11, 31:22, 85:10, 87:14, 109:18, 158:25 individual's [3] - 24:15, 34:9, 34:11 individuals [3] - 88:16, 113:4, 125:12 indulgence [1] - 167:16 infected [1] - 7:14 infection [1] - 129:18 information [115] - 8:5, 14:17, 15:25, 16:1, 16:11, 16:24, 17:11, 18:11, 19:7, 19:8, 28:21, 30:9, 31:20, 42:11, 43:7, 47:19, 56:23, 57:4, 57:18, 57:19, 73:19, 75:3, 75:4, 75:25, 82:15, 82:16, 82:18, 83:3, 83:7, 83:13, 83:16, 83:19, 83:23, 84:24, 85:1, 87:21, 88:15, 89:12, 89:16, 89:18, 90:7, 91:13, 91:18, 92:12, 92:17, 92:19, 93:2, 93:16, 93:19, 98:13, 98:15, 98:18, 99:9, 100:9, 100:14, 100:15, 100:22, 101:4, 101:6, 102:22, 103:1, 106:21, 106:25, 107:3, 107:4, 107:5, 107:6, 107:9, 109:6, 114:14, 114:17, 114:21, 115:21, 115:24, 117:16,
---	--	--	---	---

117:19, 118:13, 118:16, 119:9, 119:12, 121:24, 122:2, 129:16, 135:3, 135:4, 139:6, 141:4, 141:18, 142:3, 142:25, 146:20, 147:5, 147:24, 151:8, 154:15, 154:16, 154:19, 154:20, 155:6, 155:14, 157:7, 158:9, 160:11, 160:14, 161:13, 161:22, 164:6, 164:9, 164:14, 164:18, 165:15, 166:25, 168:15, 168:19 initial [1] - 92:17 initialed [1] - 92:19 initiate [3] - 85:10, 100:6, 106:2 initiated [8] - 100:7, 121:9, 123:16, 124:7, 159:22, 165:12, 165:13, 169:9 initiating [1] - 169:23 ink [7] - 26:3, 47:16, 51:18, 169:13, 171:5, 171:10, 172:4 inner [1] - 129:18 input [3] - 87:21, 88:21, 165:15 inputted [6] - 88:17, 88:24, 138:10, 138:12, 138:14, 164:3 inside [2] - 153:9, 153:10 instance [1] - 26:21 instill [1] - 7:2 instructed [1] - 129:18 instructions [1] - 100:1 insurance [1] - 46:11 interest [3] - 45:12, 96:10, 128:24 interface [1] - 22:17 interfaces [1] - 21:12 intermittent [1] - 6:12 Internal [2] - 23:15, 73:9 internal [1] - 21:4 Internet [19] - 13:5, 13:11, 13:12,	13:14, 13:15, 13:17, 13:20, 14:10, 20:14, 20:17, 21:4, 21:18, 21:19, 22:16, 22:17, 103:10, 163:18, 164:4 Internet-based [1] - 13:12 interpreter [1] - 72:8 interviewed [1] - 153:1 introduce [3] - 69:24, 155:20, 155:21 introduced [3] - 152:5, 152:8, 157:18 invite [1] - 95:16 invited [1] - 95:18 involve [1] - 72:1 involved [25] - 75:10, 83:19, 95:5, 112:22, 112:25, 113:7, 113:19, 114:8, 115:5, 115:16, 116:19, 117:6, 117:11, 118:8, 119:4, 120:7, 121:3, 121:19, 122:20, 123:10, 124:1, 124:13, 124:19, 132:16, 146:22 involvement [1] - 128:16 IP [36] - 9:22, 14:5, 14:6, 14:10, 14:20, 14:21, 16:13, 16:15, 16:16, 16:18, 16:25, 17:19, 17:20, 17:22, 17:23, 18:5, 18:6, 18:11, 18:12, 18:16, 18:18, 18:19, 20:21, 20:23, 21:16, 21:19, 21:20, 22:3, 22:5, 22:6, 22:13, 22:15, 22:18 iPhone [1] - 86:22 irregularities [2] - 59:18, 59:23 IRS [30] - 9:23, 23:16, 23:18, 23:24, 23:25, 24:4, 24:14, 24:17, 24:19, 24:23, 25:4, 31:24, 41:25, 47:15, 48:18, 48:21, 51:17, 56:17, 57:8,	57:16, 58:2, 58:19, 59:11, 60:1, 60:8, 60:16, 65:8, 65:19, 147:16, 163:19 isolation [1] - 21:3 issue [5] - 5:3, 9:9, 9:13, 10:16, 10:22 issues [7] - 3:3, 3:4, 4:10, 6:15, 12:6, 12:9, 172:21 IT [1] - 15:12 item [3] - 132:10, 155:22, 155:24 items [1] - 8:10 J Jackson [1] - 71:14 Jamil [22] - 81:2, 84:8, 91:2, 91:3, 92:1, 92:2, 96:16, 96:17, 96:25, 97:4, 132:17, 132:20, 133:11, 136:3, 136:7, 137:7, 146:11, 159:23, 160:2, 160:6, 160:19, 160:24 January [3] - 17:10, 43:19 Jersey [3] - 120:6, 121:2, 121:18 Jimenez [4] - 120:3, 120:8, 120:15, 170:6 job [2] - 61:23, 63:20 JOHNNY [1] - 1:16 Johnny [1] - 1:16 Jorge [6] - 117:9, 117:11, 117:18, 117:23, 118:5, 119:1 Jose [4] - 118:4, 118:8, 118:15, 118:19 JR [1] - 1:16 Jr [1] - 1:16 Judge [5] - 3:23, 6:3, 8:25, 58:13, 172:22 JUDGE [1] - 1:11 judge [4] - 78:11, 78:23, 79:2, 79:5 Julio [3] - 118:25, 119:1, 119:4 July [2] - 74:9, 74:10 June [8] - 70:5, 70:6, 71:12, 125:24, 126:5, 126:15, 134:7, 137:8	juror [5] - 3:7, 4:5, 5:20, 6:4, 7:24 Juror [2] - 4:3, 8:15 JUROR [11] - 4:6, 4:8, 4:13, 4:18, 4:22, 5:4, 5:7, 5:10, 5:14, 5:19, 8:12 jurors [4] - 3:6, 7:9, 11:4, 11:7 Jury [8] - 12:3, 59:1, 59:3, 88:9, 88:11, 129:14, 129:22, 172:15 jury [12] - 7:13, 7:14, 7:22, 12:2, 61:13, 65:23, 69:24, 83:22, 129:21, 139:5, 164:16, 170:20 JURY [1] - 1:10 K K-1 [3] - 42:22, 42:25, 43:1 Katelin [4] - 119:23, 120:1, 165:20, 165:25 keep [2] - 148:20, 161:10 Kelly [2] - 9:24, 126:9 kids [1] - 94:3 kind [4] - 71:24, 72:7, 86:12, 86:21 knowledge [12] - 30:5, 30:7, 30:10, 35:15, 43:8, 59:9, 59:17, 96:17, 111:6, 111:19, 112:15, 148:4 known [5] - 27:25, 70:21, 75:25, 76:10, 130:4 knows [1] - 147:24 L lack [2] - 56:17, 57:15 ladies [5] - 12:4, 58:24, 88:4, 129:12, 129:23 LANCE [1] - 1:21 Lance [1] - 173:6 Lane [2] - 165:21, 165:23 languages [1] - 72:10 last [16] - 6:22, 9:4, 10:9, 16:13, 22:5,	69:14, 70:22, 77:9, 77:10, 80:15, 120:18, 120:23, 122:14, 149:22, 149:25, 169:19 late [3] - 3:6, 123:20, 166:13 law [6] - 92:24, 114:5, 115:15, 133:16, 166:17, 170:5 Law [1] - 1:16 lawyers [1] - 5:3 Lazaro [2] - 122:12, 168:20 leading [2] - 82:4, 99:2 learn [3] - 24:12, 84:6, 84:7 least [7] - 5:24, 6:11, 10:22, 15:8, 141:17, 147:13, 168:6 leave [1] - 64:12 left [7] - 28:11, 33:7, 36:25, 46:4, 56:13, 68:8 left-hand [1] - 36:25 legal [1] - 10:17 legally [1] - 70:17 less [1] - 38:25 level [2] - 58:11, 71:9 liability [2] - 39:2, 99:15 liar [1] - 141:21 license [2] - 45:11, 155:11 licenses [2] - 29:8, 33:23 lie [1] - 165:2 lied [4] - 141:18, 141:19, 142:5, 142:6 life [1] - 74:5 likely [2] - 12:9, 60:8 limited [1] - 99:15 line [120] - 18:18, 26:8, 26:9, 26:15, 26:16, 26:17, 26:18, 27:4, 27:5, 28:2, 28:3, 28:4, 28:13, 28:14, 28:16, 28:22, 29:4, 29:5, 29:7, 29:8, 29:9, 29:11, 29:12, 29:13, 29:14, 30:25, 31:1, 31:6, 31:7, 32:9, 33:4, 33:9, 33:10, 33:14, 33:16, 33:21, 33:22, 33:23, 34:6,
--	---	---	--	--

34:23, 35:1, 35:2, 35:25, 36:1, 36:2, 37:2, 37:3, 37:8, 37:9, 37:10, 37:11, 38:17, 39:8, 40:23, 40:24, 41:5, 41:7, 41:8, 41:17, 41:18, 41:20, 41:21, 42:2, 42:9, 42:10, 43:22, 43:24, 43:25, 44:1, 44:3, 44:4, 44:11, 44:17, 44:18, 44:19, 44:20, 44:21, 45:10, 45:11, 45:12, 45:15, 45:16, 45:19, 45:22, 46:1, 47:7, 47:8, 47:10, 47:11, 47:23, 47:24, 49:7, 49:9, 49:13, 49:19, 50:11, 50:15, 51:9, 51:10, 51:12, 52:2, 52:17, 53:18, 54:2, 55:7, 55:23, 64:22, 67:18, 67:21, 68:8, 108:6, 129:1, 162:16 lines [12] - 33:7, 33:20, 36:25, 37:4, 41:19, 53:13, 55:18, 87:22, 102:10, 102:12, 102:21, 109:5 list [14] - 9:1, 21:3, 28:7, 31:19, 31:25, 40:19, 44:24, 45:1, 66:7, 66:17, 67:3, 67:6, 67:7, 133:2 listed [120] - 9:17, 14:23, 17:3, 17:12, 18:10, 25:15, 26:6, 26:8, 26:15, 27:4, 27:20, 27:24, 28:3, 28:4, 28:12, 28:15, 28:20, 28:22, 28:24, 29:3, 29:6, 29:8, 29:17, 30:22, 30:23, 30:24, 31:2, 31:6, 31:8, 32:6, 32:19, 32:22, 33:14, 33:15, 33:20, 34:20, 34:23, 34:25, 35:1, 36:1, 36:9, 36:17, 37:1, 37:4, 37:14, 39:12, 39:24, 40:4, 40:10, 40:11, 40:17, 40:23, 40:25, 41:5, 41:14, 42:2, 42:3, 42:10,	42:18, 42:20, 43:1, 43:16, 43:24, 44:2, 44:4, 44:11, 44:14, 44:17, 45:2, 45:3, 45:8, 45:15, 45:22, 46:1, 47:7, 47:10, 47:12, 47:18, 47:23, 48:1, 48:11, 49:3, 49:5, 49:7, 49:8, 49:10, 49:18, 49:23, 49:24, 50:7, 50:12, 51:7, 51:9, 51:23, 52:2, 52:21, 53:7, 53:8, 53:12, 53:18, 53:20, 53:25, 54:25, 55:13, 55:14, 55:17, 55:24, 55:25, 56:3, 57:7, 57:11, 60:25, 61:10, 61:21, 62:12, 63:5, 63:9, 65:4, 65:6, 65:7 listen [3] - 133:6, 134:14, 145:4 lists [5] - 26:20, 42:19, 42:21, 64:24, 64:25 live [15] - 26:2, 47:16, 51:18, 71:6, 71:7, 71:8, 113:17, 114:6, 117:21, 118:6, 119:2, 120:5, 121:1, 121:17, 122:18 living [2] - 71:2, 106:7 LLC [10] - 42:20, 43:14, 48:10, 48:16, 49:2, 49:4, 52:16, 54:23, 56:18, 57:17 loan [189] - 11:18, 75:3, 81:23, 81:24, 81:25, 82:1, 83:13, 83:16, 84:3, 89:11, 89:21, 89:24, 90:2, 90:22, 90:24, 91:6, 91:13, 91:15, 91:17, 91:23, 92:3, 92:5, 92:6, 92:8, 93:1, 93:7, 94:1, 94:11, 96:4, 96:7, 96:9, 96:10, 96:13, 96:18, 96:22, 96:24, 97:4, 97:12, 97:14, 97:18, 97:21, 98:2, 98:5, 98:9, 98:16, 99:1, 99:6, 99:9, 99:10,	99:11, 99:12, 99:21, 99:23, 100:2, 102:19, 102:25, 103:23, 104:5, 104:7, 104:15, 105:21, 109:3, 109:10, 110:7, 111:3, 111:7, 111:18, 111:19, 112:3, 112:17, 112:19, 112:22, 112:25, 113:7, 113:19, 114:8, 114:11, 114:20, 115:16, 116:7, 116:8, 116:19, 117:6, 117:11, 117:23, 118:8, 118:19, 119:4, 119:16, 119:25, 120:7, 120:20, 121:3, 121:19, 122:6, 122:20, 123:5, 123:10, 124:1, 124:13, 124:20, 125:5, 127:23, 127:25, 128:3, 128:16, 130:21, 132:16, 132:18, 132:22, 132:24, 133:13, 134:5, 134:13, 134:16, 134:19, 135:12, 136:2, 137:11, 137:14, 137:15, 139:21, 139:22, 140:5, 140:13, 141:17, 142:9, 142:22, 143:6, 143:8, 143:10, 143:12, 143:20, 144:12, 144:13, 144:16, 144:19, 145:1, 145:3, 145:5, 145:7, 145:13, 145:23, 145:24, 146:6, 146:9, 146:11, 147:20, 148:10, 148:18, 148:20, 148:23, 148:25, 149:1, 150:2, 150:6, 150:13, 150:15, 150:16, 150:17, 150:21, 150:23, 152:7, 152:20, 156:13, 156:15, 157:7, 157:9, 157:10, 158:3, 158:15,	158:19, 159:4, 159:13, 159:14, 163:7, 163:18, 163:20, 164:7, 166:16, 166:18, 166:25, 167:19, 168:21, 168:22, 171:19, 171:24 Loan [2] - 164:4, 164:5 loans [22] - 82:13, 82:17, 93:11, 94:2, 94:21, 94:25, 95:4, 99:14, 99:17, 104:6, 112:19, 142:4, 143:14, 143:18, 144:1, 144:2, 146:3, 158:6, 164:21, 166:19, 166:20, 166:22 located [1] - 86:10 location [1] - 14:11 log [12] - 22:15, 85:15, 86:2, 86:4, 86:8, 86:18, 100:5, 102:24, 103:10, 107:18, 109:20, 135:2 logged [1] - 103:6 login [3] - 21:5, 22:14, 85:14 look [9] - 8:8, 18:4, 38:11, 38:12, 67:23, 136:14, 139:25, 148:25, 154:7 looked [2] - 32:11, 42:24 looking [10] - 11:13, 11:14, 14:19, 16:14, 18:15, 30:18, 32:3, 32:16, 34:22, 109:9 loss [34] - 26:17, 27:5, 27:6, 27:14, 29:18, 29:19, 31:8, 32:9, 32:17, 34:4, 34:5, 34:11, 35:3, 35:4, 36:2, 36:3, 36:11, 37:15, 37:16, 39:14, 39:16, 42:17, 44:6, 45:19, 51:10, 52:3, 52:9, 54:3, 54:4, 54:6, 54:8, 61:6, 63:2 lost [1] - 6:11 love [5] - 15:7, 126:9, 134:8, 135:16,	153:2 LOVE [21] - 1:13, 12:12, 12:19, 15:15, 15:16, 18:8, 18:9, 18:22, 19:12, 19:14, 19:19, 20:2, 22:19, 22:25, 23:3, 23:11, 58:16, 58:17, 58:22, 69:3, 69:5 Love [3] - 2:4, 2:6, 2:7 lower [3] - 134:4, 134:11, 134:17 luck [1] - 8:14 lunch [3] - 88:3, 88:8, 88:14 Lunch [1] - 88:10 lying [1] - 141:5
M				
M-C-C-L-A-I-N [1] - 23:9 ma'am [9] - 8:14, 68:19, 131:24, 136:24, 137:2, 139:8, 157:19, 170:12, 170:13 machine [1] - 86:16 made-up [1] - 85:9 maintenance [1] - 45:10 male [1] - 60:14 March [5] - 57:9, 153:23, 156:2, 156:11, 156:16 mark [1] - 136:20 MARKED [1] - 2:12 marked [8] - 136:16, 136:18, 139:1, 145:11, 157:17, 169:4, 170:20, 170:24 marriage [1] - 72:8 married [9] - 25:18, 70:12, 70:14, 70:16, 70:17, 70:19, 70:21, 130:4, 130:15 mask [2] - 21:25, 22:9 master [1] - 24:13 materially [2] - 163:19, 164:6 math [2] - 73:24, 74:1 matter [1] - 173:4 max [2] - 98:7, 149:19				

maximum ^[4] - 98:4, 105:22, 116:6, 147:20 MCCLAIN ^[2] - 2:7, 23:5 McClain ^[7] - 23:4, 23:8, 23:12, 58:18, 59:7, 59:9, 67:24 MCCRAY ^[6] - 1:16, 3:23, 4:1, 6:3, 64:3, 172:22 McCray ^[1] - 1:16 meals ^[5] - 29:9, 29:10, 33:25, 37:10, 46:11 mean ^[18] - 6:5, 18:16, 20:19, 23:22, 39:25, 57:2, 66:11, 67:10, 67:18, 68:12, 79:7, 82:10, 100:20, 146:19, 149:9, 149:10, 150:5, 159:17 means ^[11] - 8:20, 23:23, 25:24, 37:23, 40:1, 57:3, 150:10, 150:15, 165:11, 171:23 mechanical ^[1] - 1:24 medical ^[1] - 8:2 medically ^[1] - 5:23 Medicare ^[1] - 57:6 meet ^[9] - 126:6, 126:8, 126:12, 126:15, 126:21, 127:6, 127:10, 127:14, 127:17 meeting ^[7] - 126:2, 126:5, 127:3, 127:8, 128:1, 135:16, 136:9 members ^[1] - 143:17 memory ^[1] - 145:12 mention ^[1] - 164:8 mentioned ^[2] - 39:3, 96:3 message ^[1] - 124:8 met ^[10] - 95:7, 125:22, 126:14, 126:18, 127:11, 127:15, 127:19, 134:7, 171:12 Miami ^[9] - 1:3, 1:22, 1:23, 3:4, 12:7, 71:14, 113:18, 122:19, 173:8 Miami-Dade ^[1] - 12:7 Michael ^[2] - 120:3,	170:6 middle ^[4] - 33:13, 38:14, 49:5, 51:4 mileage ^[2] - 28:18, 33:18 miles ^[3] - 28:23, 28:24, 28:25 mine ^[3] - 133:9, 136:7, 165:6 minute ^[5] - 129:12, 147:25, 149:21, 154:16, 162:3 minutes ^[3] - 58:24, 86:1, 129:9 miss ^[1] - 124:17 missing ^[3] - 7:9, 11:3, 11:4 mistake ^[3] - 141:4, 141:12, 142:1 Mobile ^[3] - 87:1, 104:12 Mohamed ^[2] - 120:17, 167:8 MOHAMED ^[1] - 120:17 moment ^[23] - 5:18, 18:8, 58:16, 60:19, 66:10, 66:15, 68:4, 68:5, 68:17, 82:5, 93:23, 94:20, 101:7, 103:14, 107:12, 109:8, 136:10, 143:5, 153:16, 164:15, 167:14, 167:15 money ^[18] - 65:2, 67:7, 90:12, 90:16, 93:3, 93:24, 94:1, 94:6, 94:17, 104:21, 111:21, 120:15, 125:2, 148:2, 160:1, 160:4, 160:5, 162:14 moneys ^[1] - 31:20 monthly ^[1] - 72:2 morning ^[19] - 3:2, 3:12, 4:6, 4:7, 4:8, 4:10, 12:4, 12:20, 12:21, 20:3, 20:4, 23:12, 23:13, 58:23, 59:7, 69:20, 69:21, 172:11, 172:18 most ^[1] - 103:20 moving ^[4] - 42:4, 44:24, 48:4, 57:13 MR ^[104] - 3:21, 3:23, 4:1, 6:3, 6:17, 7:11, 8:19, 8:22, 9:7,	9:12, 9:14, 10:5, 10:11, 10:24, 11:9, 11:16, 11:24, 12:12, 12:19, 15:6, 15:10, 15:15, 15:16, 18:8, 18:9, 18:22, 18:25, 19:11, 19:12, 19:14, 19:15, 19:19, 20:2, 22:19, 22:21, 22:25, 23:1, 23:3, 23:11, 58:13, 58:16, 58:17, 58:22, 59:6, 64:3, 64:4, 64:5, 68:25, 69:3, 69:5, 69:6, 69:9, 69:16, 69:19, 76:19, 76:21, 81:16, 81:19, 82:4, 82:6, 88:6, 88:12, 88:13, 97:1, 97:6, 99:2, 99:5, 101:7, 101:11, 129:6, 129:8, 129:11, 130:1, 136:10, 136:13, 136:17, 136:19, 136:23, 138:23, 138:25, 139:2, 140:10, 140:12, 144:6, 144:7, 145:8, 145:10, 153:17, 153:19, 154:4, 154:6, 155:20, 155:23, 155:25, 156:4, 156:7, 169:1, 169:3, 170:17, 170:19, 170:22, 170:23, 172:9, 172:22	120:24, 122:12, 122:14, 122:15, 123:3, 130:6, 132:24, 133:1, 135:6, 136:25, 137:1, 142:14, 142:22, 145:3, 145:6, 148:19, 148:23, 149:1, 150:7, 150:9, 150:25, 151:4, 151:6, 151:10, 159:22, 169:19, 172:2 named ^[3] - 9:20, 11:12, 81:2 names ^[3] - 73:17, 113:10, 124:10 need ^[22] - 5:14, 6:15, 9:10, 11:25, 20:20, 22:13, 62:5, 63:10, 85:15, 86:4, 98:8, 100:9, 101:5, 101:8, 106:21, 106:25, 107:3, 129:8, 154:22, 154:23, 155:6, 155:14 needed ^[17] - 42:1, 85:12, 87:18, 93:3, 93:24, 100:5, 106:23, 112:11, 125:2, 127:16, 132:10, 148:18, 149:20, 151:10, 155:8, 155:11, 156:21 negative ^[1] - 4:19 nervous ^[2] - 127:20, 127:21 net ^[1] - 38:13 network ^[10] - 20:10, 20:17, 20:19, 20:24, 21:4, 21:6, 22:1, 22:10, 22:11, 22:16 never ^[27] - 99:9, 106:18, 112:13, 121:14, 123:16, 131:9, 136:6, 137:6, 140:8, 144:13, 144:19, 145:3, 146:23, 153:4, 153:5, 153:6, 153:9, 153:10, 153:14, 153:15, 154:20, 158:7, 158:9, 166:15, 169:8, 171:7	New ^[6] - 117:22, 118:7, 119:3, 120:6, 121:2, 121:18 new ^[6] - 5:15, 39:9, 86:5, 110:1, 121:12, 166:13 next ^[7] - 12:11, 64:3, 69:8, 87:19, 126:5, 161:19, 163:4 Nicaragua ^[2] - 70:3, 130:9 Nichole ^[2] - 120:23, 166:10 NICHOLE ^[1] - 120:23 night ^[3] - 126:23, 127:2 Nilda ^[2] - 121:15, 121:19 NO ^[1] - 1:2 none ^[2] - 155:14, 168:17 nonpassive ^[2] - 42:22, 48:11 North ^[1] - 1:22 northern ^[1] - 12:8 Northwest ^[7] - 25:15, 30:23, 32:24, 40:5, 62:20, 63:5, 63:18 nose ^[1] - 4:15 notes ^[1] - 173:4 nothing ^[3] - 28:24, 143:2, 143:3 November ^[1] - 16:6 Number ^[6] - 3:7, 3:11, 4:3, 136:21, 139:1, 145:12 number ^[54] - 16:9, 18:20, 21:23, 21:25, 24:22, 25:25, 26:23, 27:25, 28:1, 31:15, 32:10, 32:13, 34:8, 36:4, 36:7, 41:1, 42:20, 42:21, 44:9, 45:25, 51:11, 51:13, 52:4, 53:22, 55:1, 55:10, 85:21, 87:22, 88:24, 100:7, 100:13, 100:19, 100:21, 101:21, 101:23, 104:8, 106:1, 106:24, 108:11, 108:15, 109:17, 109:19, 134:24, 135:1, 138:19, 142:17, 156:19,
---	---	---	---	--

156:21, 157:12, 161:7, 162:18, 163:5, 163:6 numbers [34] - 22:2, 22:3, 22:9, 22:10, 35:17, 43:5, 65:6, 84:17, 84:20, 85:9, 88:18, 88:21, 102:12, 102:14, 102:16, 108:23, 108:25, 137:19, 137:20, 137:21, 138:1, 138:3, 138:5, 138:7, 138:18, 139:16, 140:14, 159:19, 161:3, 161:9, 162:2, 162:6, 162:16	78:23, 93:18, 96:24 Office [8] - 1:14, 1:16, 9:17, 9:20, 9:22, 20:6, 21:18, 106:11 office [6] - 29:4, 33:21, 37:8, 46:12, 127:7, 127:16 officer [4] - 40:11, 61:24, 62:4, 63:21 OFFICER [1] - 7:10 Official [2] - 1:21, 173:7 often [2] - 95:22, 99:20 old [5] - 69:25, 70:1, 70:6, 70:7, 130:12 ON [1] - 1:15 once [7] - 84:1, 85:11, 100:7, 104:23, 160:8, 160:9, 162:4 one [95] - 3:6, 3:7, 5:1, 6:4, 9:16, 12:6, 15:8, 17:23, 18:8, 28:2, 58:16, 60:19, 62:17, 63:13, 64:12, 66:1, 66:10, 66:15, 67:12, 67:15, 67:18, 68:4, 68:5, 68:17, 68:18, 68:19, 74:7, 81:4, 82:5, 84:25, 85:14, 87:22, 88:18, 88:21, 93:13, 93:15, 93:16, 93:17, 96:5, 97:4, 101:7, 102:9, 102:21, 103:14, 106:6, 107:17, 108:20, 109:5, 110:1, 121:12, 136:10, 136:19, 137:15, 138:3, 138:7, 138:16, 138:18, 139:9, 142:10, 142:11, 143:5, 143:6, 143:7, 143:9, 144:4, 144:6, 147:2, 150:11, 151:16, 151:25, 152:2, 152:17, 152:23, 153:16, 157:15, 158:21, 160:6, 162:9, 162:16, 162:17, 162:19, 164:10, 164:15, 165:7, 166:13, 166:18,	167:14, 167:15, 167:22, 167:23, 167:24 one-time [2] - 85:14, 107:17 ones [1] - 124:11 Onimer [7] - 122:12, 122:15, 168:20, 169:17, 170:14, 171:14, 171:16 ONIMER [1] - 171:18 open [1] - 20:17 opening [1] - 8:24 operated [1] - 61:19 operating [2] - 61:13, 67:4 opportunity [3] - 6:8, 37:25, 50:18 option [2] - 66:13, 68:11 order [23] - 84:3, 85:15, 97:21, 97:23, 98:8, 100:10, 103:2, 105:18, 105:20, 106:21, 107:17, 109:20, 111:18, 112:11, 116:6, 134:19, 147:19, 149:18, 151:9, 151:10, 158:19, 159:2, 168:18 Order [1] - 3:1 ordinary [7] - 45:19, 46:19, 50:15, 50:16, 54:2, 54:8, 56:4 orient [1] - 21:20 original [1] - 38:12 originally [1] - 96:12 orthodontic [1] - 94:7 otherwise [1] - 3:18 outs [1] - 72:3 outside [1] - 46:13 overall [1] - 36:7 overruled [1] - 82:5 own [8] - 13:20, 71:16, 71:20, 73:14, 75:16, 77:25, 87:14, 91:8 owned [1] - 71:22 owner [8] - 46:17, 54:6, 56:7, 66:5, 66:11, 67:2, 144:9 owning [1] - 72:6	P P.A [1] - 1:16 page [75] - 17:24, 18:2, 18:3, 26:7, 27:1, 27:11, 28:6, 28:20, 29:1, 30:24, 31:9, 32:2, 32:11, 32:15, 33:12, 33:13, 33:19, 34:22, 35:7, 35:21, 36:9, 36:10, 36:24, 38:5, 38:14, 39:3, 40:6, 40:23, 41:12, 42:4, 42:14, 42:15, 42:18, 44:14, 44:24, 45:4, 46:3, 46:5, 47:6, 47:13, 47:20, 48:4, 49:5, 49:16, 49:23, 50:6, 50:17, 51:4, 51:16, 51:24, 52:4, 53:1, 53:2, 53:7, 53:9, 53:21, 55:7, 55:12, 62:8, 62:9, 63:21, 63:23, 63:24, 77:9, 77:10, 77:12, 80:15, 80:16, 80:17, 85:13, 124:8, 140:18, 140:22 PAGE [1] - 2:2 Pages [1] - 1:8 paid [26] - 31:18, 31:19, 31:24, 31:25, 35:19, 40:1, 40:20, 42:5, 47:19, 66:18, 66:22, 66:23, 67:3, 68:12, 90:6, 94:7, 112:11, 114:23, 117:25, 118:21, 119:18, 123:22, 143:12, 143:13, 158:16, 160:3 panel [1] - 8:17 paper [6] - 26:2, 47:15, 51:17, 100:25, 101:1, 101:5 paperwork [1] - 72:2 paragraph [10] - 14:23, 15:25, 17:11, 163:10, 163:11, 163:12, 163:13, 163:25, 164:3 paralegal [1] - 1:19 parcel [1] - 159:11	Parisi [2] - 40:17, 51:23 part [28] - 28:2, 28:6, 28:20, 28:21, 29:2, 29:6, 33:7, 33:19, 33:22, 36:24, 37:9, 72:20, 78:14, 83:6, 88:25, 89:3, 94:7, 97:2, 102:9, 108:20, 159:11, 159:14, 159:15, 159:18, 160:6, 161:19, 172:7 part-time [1] - 72:20 participated [1] - 81:21 participating [1] - 86:23 particular [3] - 14:20, 16:9, 75:4 parties [2] - 8:1, 10:19 Partnership [1] - 57:20 partnerships [2] - 41:22, 47:24 party [3] - 14:23, 15:23, 17:3 passed [3] - 46:17, 54:6, 56:7 password [1] - 20:20 Pause [1] - 3:24 pay [6] - 38:25, 94:15, 94:17, 116:10, 122:8, 140:14 Paycheck [10] - 58:10, 82:2, 82:11, 82:12, 90:22, 95:24, 99:14, 99:17, 150:16, 150:21 paycheck [1] - 132:18 paying [8] - 67:12, 68:1, 111:17, 112:2, 158:13, 159:4, 159:6 payment [4] - 111:9, 114:2, 115:12, 117:2 payments [1] - 158:10 Pembroke [7] - 17:7, 17:16, 43:16, 64:10, 64:11, 152:12, 152:22 penalties [1] - 30:3 penalty [1] - 29:23 people [14] - 15:12,
O o'clock [1] - 126:23 O-N-I-M-E-R [1] - 122:15 object [2] - 74:15, 99:2 objection [4] - 58:13, 82:4, 156:3, 156:4 obligation [4] - 31:24, 40:19, 40:20, 79:1 obtain [8] - 81:23, 83:25, 84:3, 86:5, 98:5, 98:9, 132:22, 167:19 obtained [1] - 42:13 obtaining [1] - 96:10 obviously [3] - 6:2, 6:5, 7:17 occasion [1] - 6:9 occupation [7] - 26:4, 26:6, 40:10, 40:11, 62:6, 62:12, 63:23 octet [4] - 22:6, 22:7, 22:8 octets [2] - 22:5, 22:6 October [4] - 1:4, 15:5, 15:18, 16:7 Odalys [2] - 11:12, 11:15 OF [5] - 1:1, 1:3, 1:10, 1:15, 173:1 offense [3] - 75:12, 76:3, 76:9 offer [2] - 98:15, 107:9 offered [4] - 20:15,				

81:17, 83:19, 113:8, 124:12, 125:1, 144:2, 147:4, 153:12, 158:6, 158:13, 161:13, 164:21, 168:13 percent [5] - 46:12, 92:23, 125:4, 128:18, 143:12 percentage [1] - 112:10 Perez [5] - 40:17, 51:23, 116:15, 116:20, 117:2 period [1] - 58:3 periods [1] - 57:11 perjury [2] - 29:24, 30:3 permanent [3] - 19:13, 22:23, 69:4 permanently [2] - 8:11, 22:24 person [32] - 11:11, 14:3, 24:11, 67:25, 81:2, 85:13, 85:22, 86:4, 87:17, 96:12, 96:15, 97:7, 97:11, 117:8, 119:24, 120:18, 120:21, 122:16, 123:4, 127:17, 132:17, 146:25, 150:11, 159:2, 163:2, 163:7, 166:1, 166:2, 166:5, 171:2, 171:3 person's [5] - 84:1, 99:13, 109:16, 150:7, 150:9 personal [10] - 99:8, 99:9, 99:11, 99:12, 142:10, 142:11, 148:20, 150:6, 150:13, 157:5 persons [2] - 81:4, 158:21 pertain [1] - 33:16 petitions [1] - 72:9 PHILIP [3] - 2:3, 12:13, 12:16 Philip [2] - 12:12, 12:16 phone [36] - 16:9, 85:21, 86:19, 86:21, 86:25, 87:2, 99:25, 100:7, 100:20, 100:23, 102:7, 103:19, 103:24, 104:4,	104:8, 104:11, 104:14, 104:16, 106:1, 107:13, 109:17, 109:19, 110:5, 110:14, 110:25, 116:4, 117:20, 118:17, 119:15, 122:5, 134:24, 135:1, 149:12, 149:13, 149:15 phones [1] - 19:5 physical [1] - 110:16 physically [1] - 111:2 physician [3] - 5:13, 5:14, 5:15 pick [2] - 60:8, 73:1 picks [1] - 72:25 piece [3] - 100:25, 101:1, 109:6 Pierce [2] - 3:5, 12:9 PIN [2] - 25:24, 31:15 place [3] - 6:2, 20:23, 127:6 Place [7] - 25:15, 30:23, 32:24, 40:5, 62:20, 63:5, 63:18 places [1] - 162:18 Plaintiff [1] - 1:4 play [2] - 7:16, 8:3 plea [9] - 76:10, 76:12, 76:15, 77:3, 77:4, 77:6, 77:14, 77:24, 78:14 plead [7] - 76:3, 76:7, 76:9, 77:16, 77:18, 77:20, 77:22 pleading [1] - 77:25 pleased [1] - 12:5 pled [5] - 77:6, 79:14, 80:22, 81:21, 86:24 plus [1] - 168:10 PM [12] - 1:6, 88:5, 88:9, 88:10, 88:11, 129:14, 129:15, 129:22, 172:10, 172:15, 172:25 podium [1] - 69:16 point [4] - 6:18, 87:11, 105:2, 159:25 police [4] - 40:11, 61:24, 62:4, 63:20 portal [1] - 160:10 portion [11] - 16:13, 21:14, 21:15, 22:11, 27:16, 31:10, 33:13, 33:19, 34:22, 47:6, 58:1	position [1] - 3:25 positive [2] - 7:8, 7:20 possible [1] - 60:17 postage [1] - 46:13 posted [1] - 127:15 posture [1] - 9:4 PP [11] - 81:25, 84:3, 104:7, 145:3, 145:7, 145:24, 146:6, 147:20, 148:18, 156:15, 157:7 PPP [159] - 11:18, 75:3, 82:1, 82:7, 82:10, 82:17, 83:13, 83:16, 89:3, 89:11, 89:12, 89:21, 89:24, 90:2, 90:24, 91:5, 91:13, 91:15, 91:17, 91:22, 92:3, 92:5, 92:6, 92:8, 93:1, 93:11, 94:1, 94:2, 94:6, 94:11, 94:17, 94:25, 96:4, 96:7, 96:10, 96:13, 96:18, 96:22, 96:24, 97:4, 97:13, 97:18, 97:21, 98:2, 98:5, 98:16, 99:20, 99:22, 100:2, 102:19, 102:24, 103:23, 104:5, 104:6, 104:15, 105:21, 109:3, 109:9, 110:7, 110:17, 111:3, 111:7, 111:18, 111:19, 112:3, 112:17, 112:19, 113:7, 113:19, 114:8, 114:11, 114:20, 115:5, 115:16, 116:7, 116:8, 116:19, 117:6, 117:11, 117:23, 118:8, 118:19, 119:4, 119:16, 119:25, 120:7, 120:20, 121:3, 121:19, 122:6, 122:20, 123:5, 123:10, 124:1, 124:13, 124:20, 125:5, 127:23, 127:25, 128:16, 130:21, 132:16, 132:22, 132:24, 133:13,	135:12, 136:2, 137:11, 137:14, 138:15, 139:22, 140:2, 140:3, 140:5, 140:13, 142:8, 142:12, 142:22, 143:6, 143:8, 143:10, 143:14, 143:18, 143:20, 144:1, 144:2, 144:12, 144:13, 144:16, 144:19, 144:25, 145:5, 145:13, 145:23, 146:3, 146:6, 146:9, 146:11, 147:1, 147:3, 147:16, 150:2, 150:15, 152:7, 152:20, 156:13, 158:3, 158:6, 158:10, 158:14, 158:15, 163:20, 164:6, 164:19, 164:21, 167:19, 171:19, 171:23 preference [2] - 6:3, 6:5 prepare [11] - 73:14, 100:10, 106:5, 126:9, 130:21, 147:16, 158:14, 158:18, 169:8, 170:8, 170:11 prepared [6] - 135:11, 158:6, 159:9, 164:18, 169:7, 173:4 preparer [17] - 30:8, 30:9, 31:18, 31:19, 31:21, 31:24, 31:25, 35:19, 40:14, 40:17, 40:18, 40:20, 42:5, 42:8, 51:20, 51:22, 51:23 preparer's [1] - 47:19 preparing [12] - 31:20, 82:24, 83:2, 84:22, 84:23, 85:2, 90:9, 158:10, 158:16, 158:23, 158:25, 167:12 PRESENT [1] - 1:18 present [3] - 9:2, 11:8, 111:2 pressure [1] - 104:18 previously [1] - 41:17 primary [1] - 71:4	principal [6] - 27:19, 32:19, 32:20, 36:14, 61:14, 108:6 printing [1] - 46:14 printout [1] - 11:17 problem [3] - 4:12, 7:9, 15:13 proceed [1] - 11:2 Proceedings [2] - 1:24, 172:25 proceedings [1] - 173:3 proceedings [1] - 3:24 process [28] - 75:22, 85:4, 88:23, 89:1, 89:3, 89:11, 93:13, 97:17, 99:21, 99:22, 100:2, 103:15, 103:21, 103:24, 104:5, 104:15, 110:17, 111:3, 118:18, 124:13, 127:25, 135:9, 156:14, 156:15, 159:11, 165:9, 165:11, 171:19 processed [2] - 140:24, 140:25 Processor [2] - 164:4, 164:6 processor's [1] - 163:18 produce [2] - 19:7, 19:8 produced [2] - 1:25, 159:21 proffer [3] - 79:19, 80:1, 80:2 profit [10] - 27:14, 32:17, 34:4, 36:11, 37:15, 39:14, 44:4, 52:22, 63:2, 64:22 program [2] - 89:6, 98:5 Program [10] - 58:11, 82:2, 82:11, 82:13, 90:22, 95:24, 99:14, 99:17, 150:16, 150:21 progressing [2] - 5:1, 8:18 promises [5] - 78:7, 78:20, 125:11, 125:19, 125:21 pronounced [1] - 14:25 proper [1] - 61:6 proprietor [8] -
--	--	---	--	---

91:11, 98:4, 98:6, 99:18, 99:19, 108:2, 150:3, 150:5 proprietorship [2] - 27:9, 150:10 protection [1] - 132:18 Protection [10] - 58:11, 82:2, 82:11, 82:12, 90:22, 95:24, 99:14, 99:17, 150:16, 150:21 Protocol [1] - 13:17 protocols [4] - 13:20, 13:22, 20:23, 21:2 proved [1] - 80:12 provide [12] - 12:23, 13:14, 85:14, 98:18, 100:19, 103:2, 103:4, 107:9, 110:5, 121:10, 123:18, 123:20 provided [7] - 13:9, 42:12, 56:19, 87:2, 104:12, 141:18, 142:3 provider [1] - 86:25 provides [3] - 26:13, 31:4, 41:3 providing [2] - 21:3, 78:17 public [4] - 21:3, 21:12, 21:16, 21:19 publish [1] - 164:15 publishing [5] - 76:19, 79:21, 101:9, 107:19, 170:22 pull [1] - 14:13 pulling [7] - 42:18, 49:16, 50:17, 50:23, 52:10, 53:1, 53:7 purchasing [1] - 94:6 purpose [3] - 81:20, 82:12, 82:17 pursuant [2] - 76:9, 77:6 put [55] - 7:12, 60:20, 60:21, 66:6, 67:9, 67:10, 67:22, 68:15, 84:1, 93:16, 97:23, 98:8, 101:23, 101:25, 102:4, 102:14, 105:24, 108:4, 108:9, 109:16, 109:22, 110:4,	114:21, 116:5, 133:13, 133:16, 134:25, 135:1, 135:2, 135:4, 135:8, 138:3, 138:6, 138:7, 138:17, 139:6, 148:15, 148:18, 159:19, 159:22, 160:1, 160:5, 160:9, 160:15, 160:17, 161:7, 161:8, 162:5, 162:8, 162:18, 162:19, 162:25, 163:5, 164:13, 168:18 putting [6] - 100:6, 107:4, 134:23, 162:14, 162:16, 168:15 Q qualify [7] - 97:23, 105:18, 105:20, 105:22, 147:19, 149:18, 159:2 quarterly [2] - 57:1, 57:2 questions [9] - 18:23, 22:19, 58:22, 69:1, 126:2, 127:22, 127:25, 128:3, 128:5 quickly [1] - 85:25 quite [1] - 3:4 R R-I-V-E-R-O [1] - 69:15 rather [1] - 46:7 raw [1] - 4:14 re [1] - 7:24 re-entered [1] - 7:24 read [11] - 3:4, 12:9, 14:24, 16:18, 30:1, 80:4, 80:7, 80:19, 152:19, 163:14, 163:16 ready [3] - 12:10, 151:17, 172:24 real [2] - 41:21, 47:24 realize [1] - 11:22 really [5] - 6:12, 8:1, 8:12, 9:13, 129:4 Realtor [1] - 132:20 reason [2] - 158:13,	160:21 reasonable [1] - 80:13 reasonably [1] - 42:12 receipts [9] - 43:22, 49:8, 64:13, 64:18, 64:19, 65:9, 65:16, 157:22 receive [26] - 24:4, 24:19, 66:2, 85:11, 85:20, 90:9, 90:12, 90:14, 90:16, 90:18, 104:21, 111:6, 111:9, 111:13, 111:19, 111:21, 112:15, 114:2, 115:12, 117:2, 120:15, 123:17, 142:8, 142:12, 143:6 received [31] - 4:9, 11:10, 24:10, 24:11, 24:22, 25:3, 43:1, 62:3, 65:2, 85:17, 87:18, 94:17, 109:20, 111:15, 111:25, 112:4, 112:13, 129:17, 137:15, 142:22, 143:5, 143:14, 144:12, 153:16, 156:5, 156:6, 158:10, 166:18, 166:19, 166:20, 166:22 receiving [4] - 154:9, 154:11, 158:14, 159:14 recess [5] - 11:4, 58:25, 88:10, 172:11, 172:23 Recess [3] - 11:6, 59:2, 129:15 recognize [23] - 14:14, 16:20, 21:8, 25:7, 27:11, 34:14, 37:17, 38:5, 39:17, 41:12, 43:9, 46:25, 49:16, 50:23, 52:10, 54:18, 76:25, 101:15, 107:23, 136:15, 136:24, 137:2, 139:3 recollection [2] - 149:17, 151:15 recommend [1] - 78:23 recommendation [3]	- 79:2, 79:5, 79:10 record [13] - 8:6, 10:4, 12:15, 19:24, 23:7, 46:3, 56:17, 57:15, 63:10, 69:13, 82:7, 152:19, 173:3 recorded [1] - 1:24 records [7] - 9:8, 10:3, 10:14, 23:24, 56:20, 58:18, 58:19 recruit [1] - 143:21 recruited [3] - 143:17, 143:21, 144:2 recruiting [1] - 143:24 redirect [3] - 19:12, 69:2, 69:3 reduce [5] - 30:15, 34:13, 38:25, 50:1, 54:10 reduced [15] - 26:25, 35:6, 36:7, 38:18, 38:20, 39:1, 39:2, 39:8, 45:5, 45:7, 50:4, 51:15, 53:10, 53:12, 55:15 reduction [3] - 38:21, 38:22, 78:24 Reese [5] - 15:2, 16:4, 34:20, 60:25, 61:10 refer [3] - 16:8, 17:19, 41:25 referred [3] - 20:7, 23:16, 51:25 referring [7] - 39:4, 40:21, 42:24, 65:24, 82:1, 82:8, 164:14 refers [2] - 16:9, 18:20 reflect [1] - 66:23 reflected [1] - 68:13 reflects [7] - 61:6, 61:23, 62:3, 62:14, 63:20, 64:7, 65:2 refresh [3] - 145:12, 145:22, 151:15 regard [3] - 10:3, 10:14, 10:21 regarding [4] - 99:10, 127:23, 131:13, 131:21 regards [1] - 22:1 regret [2] - 125:3, 129:5 reiterate [1] - 132:3 related [3] - 24:17,	46:23, 125:23 relates [1] - 11:17 relation [1] - 48:9 relationship [1] - 70:18 relief [1] - 6:14 rely [1] - 4:1 remaining [1] - 9:18 remember [60] - 88:4, 89:6, 93:15, 95:21, 103:6, 103:9, 117:8, 120:20, 123:5, 124:11, 125:25, 134:10, 134:18, 135:6, 135:10, 135:18, 135:19, 135:21, 135:23, 136:8, 136:9, 137:9, 137:11, 137:14, 137:16, 140:18, 140:22, 147:2, 149:16, 151:17, 151:19, 151:20, 151:22, 152:4, 153:1, 153:11, 153:22, 156:15, 160:13, 160:16, 162:7, 165:4, 165:18, 165:19, 166:1, 166:4, 166:5, 166:6, 166:9, 167:9, 167:10, 167:12, 167:22, 167:25, 168:1, 168:3, 169:22, 169:23, 170:14, 172:13 remind [2] - 48:25, 61:12 Rene [1] - 23:8 RENEE [3] - 2:7, 23:5, 23:8 Renee [1] - 23:3 rental [2] - 41:21, 47:24 repairs [1] - 45:10 repeat [9] - 35:12, 48:19, 61:25, 64:17, 67:1, 87:8, 97:1, 137:13, 150:20 report [2] - 66:4, 66:11 reporter [2] - 113:13, 122:14 REPORTER [1] - 173:1 Reporter [2] - 1:21, 173:7
--	---	--	--	---

Reporter	58:20	112:16, 116:10, 128:7	83:7, 83:12, 83:15, 83:18, 83:23, 83:25, 84:9, 84:10, 84:16, 84:17, 84:19, 84:22, 85:2, 85:5, 85:8, 85:12, 86:13, 87:5, 87:10, 87:16, 87:18, 87:20, 87:23, 88:15, 88:18, 88:21, 88:24, 88:25, 90:6, 90:10, 90:20, 91:16, 91:22, 92:3, 94:11, 96:13, 97:9, 97:14, 97:16, 97:22, 100:8, 100:10, 101:5, 101:18, 102:18, 103:7, 105:3, 105:10, 105:11, 105:13, 105:15, 105:19, 106:5, 106:15, 106:22, 107:4, 107:15, 108:1, 109:2, 109:9, 111:17, 112:2, 112:12, 113:5, 113:22, 114:11, 114:14, 114:17, 114:18, 114:21, 115:7, 115:19, 115:21, 115:23, 116:5, 116:11, 116:22, 117:14, 117:18, 117:25, 118:11, 118:15, 118:18, 119:7, 119:11, 119:19, 120:10, 121:6, 121:10, 121:22, 122:1, 122:23, 123:13, 124:4, 124:21, 124:25, 128:8, 128:10, 128:13, 133:5, 133:13, 135:12, 135:17, 135:19, 135:22, 135:24, 136:1, 136:3, 136:6, 137:22, 137:23, 138:2, 138:4, 138:6, 138:18, 139:6, 139:9, 140:6, 140:25, 146:14, 146:17, 146:23, 147:3, 147:18, 149:20, 151:10, 158:7, 158:16, 158:18, 158:23,	158:25, 159:3, 159:5, 159:6, 159:9, 159:13, 159:15, 159:20, 159:23, 160:2, 160:7, 160:9, 160:10, 160:13, 160:14, 160:19, 161:2, 161:7, 161:12, 161:16, 161:19, 161:22, 162:2, 162:3, 162:4, 162:7, 162:10, 162:17, 162:19, 162:25, 163:5, 163:19, 163:23, 164:8, 164:10, 164:12, 164:18, 167:12, 168:16, 168:24, 169:7, 169:8, 169:9, 169:12, 169:15, 169:16, 170:2, 170:8, 170:11, 170:14, 171:3, 171:6, 171:10, 172:2
reports [1] - 72:2	Rivera [3] - 121:15, 121:20, 122:1	room [1] - 8:9		schedule [7] - 7:5, 8:19, 8:21, 42:22, 44:21, 44:22, 62:24
represent [2] - 18:13, 23:23	RIVERO [2] - 2:9, 69:11	royalties [2] - 41:22, 47:24	S	schedules [2] - 30:4, 146:19
representing [1] - 128:23	Rivero [87] - 9:24, 69:10, 69:15, 69:20, 70:15, 70:16, 70:18, 70:21, 70:24, 71:17, 71:19, 71:22, 72:12, 72:17, 73:3, 73:5, 73:9, 73:22, 74:3, 75:20, 76:3, 76:22, 77:16, 79:14, 79:22, 83:12, 84:22, 86:18, 86:21, 87:2, 88:14, 89:15, 89:21, 90:6, 91:5, 91:8, 94:20, 96:7, 96:8, 101:12, 104:8, 110:7, 110:10, 111:6, 113:3, 117:9, 117:12, 117:23, 118:4, 118:5, 118:9, 118:15, 118:19, 119:1, 122:6, 124:10, 124:19, 125:6, 125:8, 125:22, 127:10, 130:2, 130:14, 132:4, 139:3, 142:8, 144:14, 144:16, 144:18, 144:20, 144:21, 144:22, 144:24, 144:25, 145:2, 145:7, 145:13, 145:14, 145:17, 145:18, 146:2, 163:17	RPR [2] - 1:21, 173:6		school [7] - 71:3, 71:10, 71:11, 71:13, 72:23, 72:25, 94:8
request [5] - 56:20, 85:1, 110:1, 121:12, 166:13		rules [1] - 10:6	salaries [8] - 26:9, 31:1, 34:24, 40:24, 47:8, 53:24, 55:20, 68:8	screen [15] - 15:6, 15:9, 21:21, 25:20, 28:11, 46:4, 46:5, 56:12, 60:19, 76:22, 77:10, 79:22, 101:13, 107:21, 157:19
requested [2] - 99:9, 154:20		ruling [4] - 9:2, 10:9, 11:18, 11:21	salary [4] - 46:23, 50:21, 53:16, 135:8	screenshot [1] - 21:12
required [4] - 57:24, 84:2, 89:4, 89:12		run [3] - 57:8, 58:2, 131:16	sales [10] - 43:20, 43:22, 49:8, 52:18, 64:13, 64:18, 64:19, 64:20, 65:9, 65:17	scrolling [1] - 80:15
resolve [2] - 5:3, 10:16		running [2] - 131:19, 131:25	sample [3] - 84:10, 84:13, 84:15	search [3] - 57:8, 57:11, 58:2
resolved [1] - 10:15		runny [1] - 4:15	saw [4] - 39:3, 39:6, 136:3, 139:16	seated [1] - 129:23
respect [10] - 19:8, 88:23, 92:5, 94:5, 94:25, 97:12, 132:11, 141:17, 142:4, 147:9		runs [2] - 131:15, 150:11	SBA [2] - 76:5, 79:15	Second [1] - 139:24
respond [1] - 126:2		rush [1] - 139:25	scared [2] - 127:20, 127:21	second [19] - 3:23, 7:6, 21:23, 21:25, 22:7, 22:9, 83:5, 90:5, 93:13, 93:15, 93:17, 136:19, 140:1, 144:6, 152:17, 152:23, 157:15, 167:23, 167:24
response [4] - 56:19, 58:14, 97:24, 127:1			scenario [2] - 8:2, 129:19	section [20] - 21:15,
responsible [1] - 14:3			Schedule [237] - 26:17, 26:19, 26:20, 26:24, 27:2, 27:6, 27:8, 27:9, 27:14, 31:7, 32:4, 32:14, 32:17, 35:2, 35:22, 36:11, 38:3, 39:4, 41:8, 41:15, 41:23, 42:16, 42:24, 42:25, 43:1, 43:3, 47:11, 47:21, 48:1, 48:2, 48:4, 51:12, 51:13, 51:24, 54:11, 54:13, 54:15, 56:10, 60:5, 60:7, 61:3, 61:6, 62:14, 62:25, 63:1, 75:6, 82:23, 82:24, 83:2,	
rest [4] - 7:13, 10:1, 164:15			Rodriguez [4] - 9:21, 19:20, 19:25, 20:3	
result [1] - 78:24			Rogers [2] - 117:4, 117:7	
resume [2] - 88:5, 172:11			role [15] - 6:6, 12:25, 20:12, 20:14, 23:20, 24:1, 82:20, 82:22, 82:24, 83:2, 83:6, 88:23,	
retired [1] - 5:14				
retrieve [1] - 8:10				
Return [13] - 25:11, 30:20, 34:18, 37:20, 38:9, 39:21, 47:4, 48:14, 49:1, 51:2, 52:14, 54:21, 57:20				
return [28] - 12:5, 25:22, 26:2, 26:5, 29:22, 30:4, 31:11, 31:12, 31:20, 34:9, 34:12, 35:9, 35:14, 35:19, 37:24, 39:15, 40:8, 42:11, 43:12, 45:14, 47:15, 51:17, 57:1, 57:22, 66:4, 66:7, 73:20, 158:1				
returns [3] - 54:16, 58:9, 73:16				
Revenue [2] - 23:15, 73:9				
review [8] - 24:25, 37:25, 45:25, 46:22, 50:18, 53:15, 56:9, 73:16				
reviewed [2] - 58:18,				

21:16, 28:6, 28:7, 31:18, 31:25, 43:20, 49:6, 64:15, 108:2, 138:3, 138:7, 138:17, 160:15, 162:8, 162:9, 162:17, 162:19, 164:10, 164:13 Section [1] - 37:3 sections [1] - 138:16 SECURITY [1] - 7:10 security [17] - 20:11, 20:23, 21:2, 46:14, 57:6, 100:13, 100:19, 100:20, 101:21, 101:23, 106:23, 108:11, 108:15, 151:11, 151:12, 156:19, 156:21 see [54] - 4:24, 4:25, 5:25, 6:4, 10:8, 10:25, 15:13, 18:18, 62:5, 63:15, 63:17, 63:18, 64:15, 68:9, 76:22, 77:10, 77:12, 79:22, 80:16, 81:10, 81:13, 92:9, 92:12, 101:12, 101:19, 101:21, 102:2, 102:10, 102:12, 107:21, 108:2, 108:6, 108:11, 108:21, 108:23, 135:24, 136:3, 136:4, 136:25, 137:18, 137:20, 137:21, 137:25, 151:15, 156:8, 156:24, 157:14, 157:16, 157:18, 157:19, 157:23, 163:14, 172:24 seeing [4] - 136:1, 137:11, 137:14, 137:16 seeking [2] - 150:23, 155:21 seem [1] - 64:1 sees [2] - 21:19, 64:4 selected [2] - 7:5, 8:1 send [7] - 110:6, 135:2, 154:13, 154:14, 154:18, 155:18, 157:4 sends [3] - 137:24, 140:19, 140:21	Senior [1] - 71:14 senior [1] - 20:10 sent [6] - 11:11, 151:24, 154:24, 155:16, 156:1, 157:1 sentence [5] - 78:5, 78:8, 78:10, 78:24, 79:3 sentenced [1] - 78:3 sentencing [1] - 79:2 separate [3] - 7:12, 73:7, 73:8 separated [2] - 22:8, 60:15 separately [2] - 25:17, 25:19 September [2] - 76:8, 126:7 serious [1] - 3:3 serve [1] - 8:1 served [1] - 72:8 service [24] - 13:11, 14:11, 15:25, 16:1, 16:3, 16:5, 16:6, 16:8, 16:9, 16:11, 17:11, 17:14, 17:17, 18:11, 18:13, 18:14, 18:20, 20:14, 20:17, 86:25, 87:2, 104:11 Service [2] - 23:15, 73:10 services [4] - 13:5, 13:9, 46:13 serving [1] - 8:8 session [3] - 4:24, 6:1, 6:22 set [5] - 6:20, 22:2, 22:3, 22:5, 22:9 sets [1] - 22:10 shareholders [1] - 42:1 Sheriff's [6] - 9:17, 9:20, 9:22, 20:6, 21:17, 106:11 ship [1] - 72:3 ship-outs [1] - 72:3 short [1] - 9:21 show [12] - 25:6, 62:18, 63:12, 63:13, 127:16, 136:7, 137:7, 157:17, 163:10, 163:11, 170:20, 170:24 showed [5] - 136:8, 137:8, 139:9, 139:10, 158:3	showing [12] - 18:5, 27:6, 46:25, 47:16, 48:13, 56:12, 63:14, 68:6, 152:5, 153:20, 158:1, 169:4 shown [3] - 59:10, 135:17, 135:19 shows [5] - 14:20, 16:15, 18:6, 18:19, 157:22 sic [1] - 81:25 sick [2] - 3:13, 4:14 side [9] - 21:21, 28:11, 29:2, 29:3, 36:25, 46:4, 46:5, 56:13, 57:13 sign [19] - 26:1, 73:20, 80:19, 89:21, 89:24, 90:2, 92:5, 92:15, 104:25, 110:7, 137:18, 137:19, 137:25, 138:20, 140:19, 161:20, 163:2, 163:4, 163:7 signature [15] - 25:23, 26:2, 26:3, 40:13, 47:16, 47:17, 47:18, 51:18, 51:19, 77:12, 80:16, 89:4, 89:7 signed [15] - 29:22, 31:11, 31:12, 35:8, 35:10, 40:7, 40:8, 40:12, 43:5, 77:14, 92:8, 105:6, 136:4, 140:13, 140:22 signify [1] - 31:18 signing [2] - 92:10, 92:13 signs [1] - 30:11 similar [2] - 93:13, 106:6 simple [1] - 67:25 simpler [1] - 162:3 simply [1] - 4:24 single [2] - 25:16, 159:2 sister [6] - 114:5, 123:25, 124:2, 124:4, 125:17, 166:17 sister-in-law [2] - 114:5, 166:17 situated [2] - 129:9, 129:10 skills [1] - 73:24 slash [1] - 21:24	slower [1] - 171:15 small [3] - 27:9, 41:20, 41:21 Small [3] - 74:17, 74:24, 133:22 Smith [1] - 1:19 SNIDER [32] - 1:13, 3:21, 6:17, 7:11, 8:19, 8:22, 9:7, 9:12, 9:14, 10:5, 10:11, 10:24, 11:9, 11:16, 11:24, 69:9, 69:16, 69:19, 76:19, 76:21, 81:19, 82:6, 88:6, 88:12, 88:13, 97:6, 99:5, 101:7, 101:11, 129:6, 156:4, 170:22 Snider [5] - 134:7, 135:16, 136:8, 137:8, 153:1 Snider..... [1] - 2:9 social [19] - 57:6, 73:18, 84:2, 95:13, 100:13, 100:19, 100:20, 101:21, 101:23, 102:6, 106:23, 108:11, 108:15, 136:25, 137:1, 151:11, 151:12, 156:19, 156:21 socialize [1] - 95:11 sold [11] - 44:1, 44:11, 44:16, 49:9, 49:13, 49:18, 53:4, 53:5, 55:1, 55:4, 55:8 sole [9] - 27:9, 91:11, 98:4, 98:5, 99:18, 99:19, 150:3, 150:5, 150:10 solve [1] - 15:13 someone [4] - 60:5, 60:6, 87:16, 157:11 sometime [2] - 8:8, 149:15 sometimes [4] - 73:1, 86:7, 86:20, 110:4 somewhere [4] - 129:1, 133:3, 133:4, 149:6 soon [2] - 101:4, 105:6 sorry [23] - 5:6, 7:25, 8:12, 23:23, 29:7, 35:12, 40:4, 48:19, 59:22, 60:9, 61:25,	62:8, 64:17, 65:15, 66:25, 68:4, 71:18, 96:6, 111:12, 116:1, 116:2, 155:25, 170:12 sought [3] - 56:23, 57:18, 57:19 Southern [1] - 173:8 SOUTHERN [1] - 1:1 space [1] - 110:16 Spanish [1] - 72:11 speaking [2] - 41:24, 103:18 specific [3] - 14:11, 20:21, 82:20 specifically [7] - 24:20, 33:16, 42:7, 86:13, 86:23, 95:4, 96:13 spell [7] - 12:14, 19:24, 23:7, 69:13, 113:12, 122:14, 171:17 spelled [1] - 120:23 spelling [1] - 73:18 spent [1] - 94:3 split [1] - 56:12 spot [1] - 67:20 spring [2] - 95:13, 95:23 Springs [4] - 32:24, 62:22, 63:6, 63:18 staff [2] - 3:15, 8:4 start [11] - 16:16, 17:20, 18:7, 18:19, 85:11, 87:7, 87:14, 135:9, 151:9, 156:21, 165:11 started [7] - 87:6, 87:11, 87:12, 87:13, 156:13, 165:9, 171:19 starting [3] - 33:7, 56:13, 156:15 state [4] - 12:14, 19:23, 23:6, 69:12 statement [8] - 45:17, 50:14, 53:19, 60:3, 130:18, 133:22, 162:24, 162:25 statements [7] - 30:5, 74:15, 74:17, 74:24, 76:5, 79:15, 163:23 STATES [3] - 1:1, 1:3, 1:11 states [1] - 30:3 States [13] - 1:14, 1:22, 12:12, 19:19,
---	---	---	--	---

23:3, 69:9, 70:4, 76:1, 76:13, 78:15, 79:5, 130:11, 173:7 stating [4] - 65:9, 85:12, 87:18, 127:16 status [4] - 15:19, 25:18, 39:23, 39:24 steal [3] - 141:8, 141:15, 165:1 stealing [1] - 140:25 STEINBEISSER [1] - 1:21 Steinbeisser [2] - 173:5, 173:6 stenography [1] - 1:24 stereotype [1] - 173:4 Step [7] - 27:18, 27:22, 32:22, 36:17, 61:16, 106:16, 106:19 step [7] - 5:17, 19:16, 22:22, 69:7, 87:19, 97:13, 163:4 Steve [3] - 123:3, 123:5, 166:8 sticker [1] - 76:23 still [6] - 3:9, 7:9, 71:1, 87:1, 101:1, 136:1 stipulate [1] - 81:16 stole [2] - 141:6, 142:5 stop [1] - 88:2 street [2] - 43:15, 43:16 subject [2] - 95:24, 105:3 submit [1] - 135:12 submitted [10] - 75:5, 136:2, 137:7, 141:4, 150:2, 162:25, 163:23, 164:9, 164:18, 166:15 submitting [2] - 75:3, 161:19 subnet [1] - 21:25 subpoena [2] - 126:25, 127:15 subscriber [6] - 13:25, 14:5, 14:6, 14:8, 14:17, 16:24 subscriber's [1] - 14:10 subscriptions [1] - 46:10 successfully [1] - 166:16	suggest [2] - 61:19, 150:16 suggesting [2] - 10:21, 61:22 summary [2] - 10:10, 10:18 Sunbiz [1] - 145:17 Sunday [1] - 4:18 supplemental [1] - 42:16 supplies [8] - 29:5, 33:22, 37:9, 39:9, 45:2, 49:24, 53:8, 55:13 support [1] - 163:20 supporting [1] - 89:13 supposed [2] - 10:9, 146:8 surrendered [1] - 75:17 sustain [1] - 37:15 sustained [1] - 99:4 swearing [2] - 30:12, 30:14 swears [1] - 30:11 sworn [4] - 12:13, 19:22, 23:5, 69:11 symbolizes [1] - 31:15 symptoms [4] - 6:13, 7:1, 7:8, 7:18 system [1] - 124:7	39:22, 40:3, 40:8, 40:14, 42:12, 43:6, 43:12, 45:23, 47:15, 48:5, 48:15, 51:17, 52:15, 54:16, 54:22, 56:9, 57:1, 57:21, 58:9, 59:24, 60:6, 60:7, 62:19, 65:14, 65:16, 66:4, 66:7, 68:21, 68:22, 73:16, 73:20, 84:24, 85:1, 98:13, 98:15, 100:14, 100:15, 100:17, 106:25, 107:6, 107:9, 158:1, 158:8, 158:9 Tax [12] - 25:11, 30:20, 34:17, 37:20, 38:9, 39:21, 47:4, 48:14, 49:1, 51:2, 52:14, 54:21 taxable [5] - 30:12, 30:15, 36:7, 46:20, 54:9 taxes [15] - 24:1, 26:1, 26:24, 29:8, 33:23, 39:1, 45:11, 46:22, 57:24, 59:13, 59:14, 59:19, 73:9, 73:14, 73:15 taxpayer [11] - 26:14, 30:9, 31:5, 40:1, 41:4, 42:12, 43:1, 60:10, 61:21, 68:11, 68:15 taxpayer's [3] - 47:17, 47:18, 51:19 taxpayers [1] - 58:19 telephone [2] - 46:14, 103:16 ten [3] - 86:1, 129:9, 129:12 ten-minute [1] - 129:12 tenders [1] - 129:6 term [2] - 13:17, 13:25 test [2] - 4:17, 4:18 testified [11] - 40:18, 59:10, 93:23, 94:20, 97:7, 103:12, 103:14, 104:11, 125:13, 135:11, 145:19 testify [1] - 144:8 testifying [1] - 129:3 testimony [12] - 9:3,	9:21, 10:13, 12:24, 24:25, 78:17, 78:21, 113:3, 126:10, 147:15, 157:25, 172:17 text [3] - 19:5, 99:25, 110:6 THE [88] - 1:10, 1:12, 1:15, 3:2, 3:22, 3:25, 4:3, 4:7, 4:9, 4:17, 4:20, 4:23, 5:6, 5:9, 5:12, 5:16, 5:21, 6:9, 7:8, 7:16, 7:25, 8:13, 8:16, 8:20, 9:6, 9:11, 9:13, 10:3, 10:8, 10:12, 10:25, 11:7, 11:13, 11:23, 11:25, 12:4, 12:14, 12:16, 15:8, 15:12, 19:13, 19:16, 19:17, 19:23, 19:25, 22:20, 22:22, 23:2, 23:6, 23:8, 58:14, 58:23, 59:4, 69:2, 69:4, 69:7, 69:12, 69:14, 81:18, 82:5, 88:2, 88:7, 97:3, 99:4, 129:10, 129:12, 129:16, 129:23, 136:12, 136:16, 136:18, 136:22, 138:24, 140:11, 145:9, 153:18, 154:5, 155:22, 155:24, 156:3, 156:5, 169:2, 170:18, 172:10, 172:16, 172:19, 172:20, 172:23 themselves [1] - 31:25 theory [1] - 10:17 thief [4] - 141:3, 141:8, 141:17, 141:21 third [1] - 22:7 thousand [36] - 90:11, 90:15, 90:19, 98:10, 105:20, 111:14, 111:15, 111:24, 111:25, 115:1, 116:6, 116:14, 118:3, 133:17, 142:19, 147:8, 147:10, 147:13, 147:19, 147:24, 148:9, 148:13,	148:16, 148:19, 149:20, 158:4, 158:17, 158:24, 159:1, 160:15, 160:17, 160:22, 160:23, 160:25, 162:8, 168:12 threaten [1] - 77:22 three [13] - 7:4, 7:5, 8:24, 22:10, 29:6, 33:22, 37:9, 70:17, 70:25, 95:21, 104:24, 130:15, 153:12 throat's [1] - 4:14 throughout [2] - 99:22, 103:20 Tina [1] - 17:13 tips [5] - 26:9, 31:1, 34:24, 40:24, 47:8 today [14] - 4:21, 4:24, 5:24, 5:25, 7:17, 9:19, 58:18, 69:22, 81:11, 126:16, 128:20, 129:3, 157:25, 172:11 together [3] - 110:16, 130:14, 131:4 tomorrow [6] - 5:1, 6:5, 7:3, 10:2, 172:11, 172:18 took [1] - 4:18 top [2] - 14:18, 27:16 tornados [1] - 12:7 tossed [1] - 101:5 total [32] - 26:16, 29:15, 29:17, 34:2, 34:3, 35:4, 37:13, 37:14, 39:10, 39:12, 41:7, 41:9, 41:10, 42:2, 42:3, 44:6, 44:8, 45:18, 45:22, 49:11, 49:21, 49:22, 50:1, 51:14, 52:7, 52:24, 53:5, 53:10, 54:24, 54:25, 56:1, 112:4 touch [4] - 99:20, 99:22, 105:24, 166:12 tower [1] - 19:9 towers [2] - 19:2, 19:3 Tracy [105] - 1:19, 39:22, 41:16, 42:17, 46:17, 46:20, 47:5, 47:22, 48:8, 51:3, 51:14, 54:6, 54:9, 56:7,
T				
T-Mobile [3] - 87:1, 104:12 Tamarac [1] - 114:7 Tammie [1] - 3:7 taped [1] - 126:25 taught [7] - 84:8, 97:8, 97:11, 97:13, 146:11, 146:14, 146:16 tax [78] - 24:4, 24:7, 25:11, 25:14, 25:22, 26:4, 27:5, 29:22, 30:20, 31:11, 31:12, 31:20, 32:5, 34:9, 34:11, 34:18, 34:19, 35:5, 35:9, 35:13, 35:14, 35:19, 35:23, 36:4, 36:12, 37:22, 37:23, 37:24, 37:25, 38:9, 38:20, 38:21, 39:1, 39:15,				

58:20, 59:13, 59:17, 63:15, 75:11, 81:1, 81:14, 81:17, 81:21, 83:12, 89:15, 89:22, 90:12, 90:14, 90:20, 95:5, 95:6, 95:7, 95:8, 95:16, 95:18, 95:22, 96:3, 96:7, 96:9, 97:3, 97:12, 97:17, 97:20, 98:13, 98:15, 98:18, 99:20, 100:1, 100:9, 101:18, 102:6, 102:19, 102:24, 103:2, 103:4, 103:15, 103:23, 104:4, 104:25, 106:7, 107:6, 107:17, 108:18, 109:10, 109:12, 109:25, 110:2, 110:10, 110:13, 110:16, 110:17, 110:20, 111:6, 111:9, 111:16, 112:4, 112:16, 112:20, 113:1, 124:15, 127:4, 127:11, 128:14, 128:17, 130:17, 130:22, 130:23, 131:1, 132:4, 144:4, 144:5, 146:2, 146:5, 146:6, 146:8, 147:15, 151:6, 151:7, 153:15, 156:1, 157:4, 163:21, 163:24, 164:22 TRACY [1] - 1:7 training [9] - 24:4, 24:6, 24:9, 24:11, 24:12, 24:19, 25:3, 41:25 transcript [1] - 1:24 TRANSCRIPT [1] - 1:10 transcription [2] - 1:25, 173:3 transmitted [2] - 163:18, 164:4 travel [4] - 29:9, 33:24, 46:15 treatment [1] - 94:7 trembling [2] - 5:5, 5:7	trial [5] - 6:20, 12:10, 12:24, 59:18, 80:12 TRIAL [1] - 1:10 trials [1] - 78:18 tried [1] - 166:11 truck [5] - 28:14, 28:17, 33:10, 37:2, 46:8 true [13] - 23:25, 30:8, 35:14, 43:7, 65:7, 82:15, 89:13, 89:16, 89:19, 92:17, 92:19, 158:7, 163:22 trusts [2] - 41:22, 47:25 truth [5] - 129:4, 141:14, 142:1, 142:2, 142:4 truthful [1] - 78:17 truthfully [1] - 128:6 try [4] - 61:3, 67:24, 105:24, 110:4 trying [2] - 68:16, 160:8 turn [2] - 87:5, 95:4 twice [5] - 15:2, 67:10, 153:3, 153:7, 162:24 two [30] - 3:6, 6:11, 6:19, 7:4, 8:25, 9:14, 9:15, 10:19, 11:4, 18:10, 29:2, 33:7, 33:20, 41:19, 73:1, 81:17, 93:12, 94:8, 95:21, 102:9, 104:24, 108:20, 143:14, 144:1, 144:23, 145:18, 145:19, 162:18, 166:20, 166:22 two-week [1] - 6:19 type [7] - 57:4, 61:12, 61:13, 71:15, 72:6, 75:4, 89:6 types [1] - 28:16 typically [1] - 90:9	18:11, 28:6, 28:16, 29:23, 30:24, 31:18, 33:7, 33:13, 44:17, 47:23, 49:7, 49:9, 50:11, 50:15, 52:2, 53:12, 53:18, 67:7, 68:8, 79:1, 99:8, 99:13, 144:14, 144:16, 145:3, 145:5, 145:7, 148:19, 148:23, 149:1, 150:7, 150:9, 151:4, 151:6 Under [1] - 30:3 understood [3] - 80:20, 98:25, 109:15 undivided [1] - 7:21 Unemployment [1] - 57:21 unemployment [1] - 57:24 unique [1] - 14:10 unit [1] - 20:11 Unit [1] - 16:4 UNITED [3] - 1:1, 1:3, 1:11 United [13] - 1:14, 1:22, 12:12, 19:19, 23:3, 69:9, 70:4, 76:1, 76:13, 78:14, 79:5, 130:11, 173:7 unlock [1] - 101:8 up [31] - 3:5, 14:13, 15:12, 32:10, 34:8, 42:18, 49:16, 50:17, 50:23, 52:10, 53:1, 53:7, 60:8, 67:22, 72:25, 73:1, 84:21, 85:9, 95:25, 96:2, 96:3, 105:3, 105:5, 109:1, 130:11, 144:8, 146:9, 147:6, 161:3, 164:20, 168:8 upload [12] - 82:23, 83:6, 87:5, 87:10, 87:15, 100:8, 102:25, 103:7, 107:15, 109:8, 121:10, 135:14 uploaded [15] - 85:12, 87:19, 88:24, 102:18, 109:2, 114:18, 135:24, 159:6, 159:23, 160:9, 160:13, 162:7,	163:17, 164:12, 171:7 uploading [5] - 85:5, 86:13, 87:6, 87:20, 88:16 urgent [2] - 5:15, 8:4 US [16] - 25:10, 30:19, 34:17, 37:20, 38:8, 39:21, 43:12, 47:4, 48:14, 49:1, 51:2, 52:14, 54:21, 57:20, 70:8, 70:10 usage [13] - 16:13, 16:16, 16:17, 17:19, 18:5, 18:6, 18:11, 18:12, 18:17, 18:19, 18:20, 19:4, 19:9 user [1] - 20:20 uses [1] - 66:17 utilities [4] - 29:11, 33:25, 37:11, 46:15 utility [2] - 94:4, 94:9 utilizing [1] - 66:6	152:2, 154:11, 154:13, 154:22, 155:1, 157:12 vs [1] - 1:5
	U		V	
	U-verse [8] - 13:8, 13:10, 13:11, 13:19, 14:4, 14:17, 16:24, 16:25 ultimately [1] - 127:3 uncomfortable [2] - 127:20, 127:21 under [39] - 10:6, 14:23, 16:1, 17:11,		V-A-L-E [1] - 113:13 V.A [1] - 1:19 Vale [4] - 113:12, 113:20, 113:22, 114:2 valid [1] - 85:25 various [2] - 24:14, 53:12 vehicle [2] - 28:19, 28:21 verify [1] - 23:24 Verizon [1] - 87:3 versa [1] - 132:12 verse [8] - 13:8, 13:10, 13:11, 13:19, 14:4, 14:17, 16:24, 16:25 version [1] - 22:6 via [10] - 89:21, 89:24, 90:15, 90:19, 92:6, 92:8, 99:25, 110:6, 163:18, 164:4 vice [1] - 132:12 view [1] - 58:11 violating [1] - 92:24 voice [1] - 19:5 void [3] - 151:18, 156:24, 157:4 voided [9] - 151:20, 151:21, 151:24,	W-2 [11] - 26:10, 26:11, 26:13, 31:2, 31:4, 34:25, 40:25, 41:1, 41:3, 47:9, 66:2 W-A-D-E [1] - 14:25 Wade [219] - 1:18, 1:19, 14:25, 16:2, 17:13, 25:12, 30:21, 32:7, 32:18, 34:18, 35:24, 36:5, 36:13, 37:21, 38:10, 39:22, 41:16, 42:17, 42:19, 43:14, 46:17, 46:19, 47:5, 47:22, 48:8, 48:10, 48:16, 48:18, 48:21, 49:2, 49:4, 51:3, 52:15, 54:6, 54:8, 54:22, 56:7, 56:18, 56:20, 57:8, 57:16, 58:2, 58:20, 59:17, 59:18, 60:22, 63:15, 64:10, 75:11, 81:1, 81:14, 81:15, 81:17, 81:21, 81:22, 89:15, 89:18, 89:22, 89:25, 90:12, 90:14, 90:16, 90:18, 90:20, 90:21, 95:5, 95:6, 95:7, 95:8, 95:11, 95:16, 95:18, 95:19, 95:21, 95:22, 96:3, 96:7, 96:9, 96:10, 96:13, 96:17, 96:22, 97:3, 97:12, 97:17, 97:20, 98:11, 98:13, 98:15, 98:18, 98:21, 98:25, 99:6, 99:20, 100:1, 100:9, 100:19, 101:18, 102:6, 102:19, 103:4, 103:15, 103:18, 103:23, 104:4, 104:14, 104:16, 104:20, 104:25, 105:2,

105:3, 105:8, 105:15, 105:16, 105:24, 105:25, 106:3, 106:6, 106:7, 106:13, 106:16, 106:19, 106:21, 107:6, 107:7, 107:9, 107:10, 107:13, 107:16, 107:17, 108:3, 108:8, 108:15, 108:19, 109:10, 109:12, 109:25, 110:1, 110:2, 110:8, 110:10, 110:13, 110:17, 110:18, 110:20, 110:21, 110:23, 111:2, 111:6, 111:9, 111:16, 111:19, 111:21, 112:1, 112:5, 112:16, 112:20, 112:23, 113:1, 124:15, 126:16, 126:19, 126:22, 127:4, 127:11, 127:24, 128:11, 128:14, 128:17, 130:17, 130:22, 130:23, 131:1, 131:6, 131:19, 132:4, 132:10, 144:4, 144:5, 146:3, 146:5, 146:25, 147:15, 149:21, 151:6, 151:7, 151:8, 151:18, 152:7, 152:24, 154:9, 154:13, 155:1, 155:18, 156:1, 156:8, 157:2, 158:1, 163:21, 163:24, 164:22 WADE [2] - 1:7, 1:7 Wade's [26] - 17:4, 26:24, 46:20, 51:14, 54:9, 59:13, 62:19, 68:7, 83:12, 83:16, 97:24, 102:24, 107:18, 108:1, 109:3, 109:9, 109:21, 110:13, 110:25, 111:3, 128:3, 146:9, 153:15, 157:5, 157:21 Wades' [1] - 59:24 wages [24] - 26:9,	29:12, 31:1, 34:24, 35:4, 40:24, 46:23, 47:8, 50:21, 51:5, 51:7, 53:16, 53:24, 55:21, 57:5, 66:23, 67:7, 67:8, 67:13, 67:16, 67:20, 67:21, 68:1, 68:8 wait [7] - 5:25, 10:15, 10:22, 72:23, 82:5, 110:5, 154:16 Wait [1] - 149:21 waive [1] - 75:22 walk [3] - 83:24, 85:4, 113:10 Walter [1] - 123:8 ways [1] - 103:14 weather [1] - 3:3 website [45] - 82:23, 83:8, 83:10, 83:25, 84:7, 85:15, 86:8, 86:14, 86:18, 87:22, 88:16, 88:18, 88:22, 88:25, 100:5, 102:19, 102:22, 102:25, 109:3, 114:1, 115:11, 117:1, 120:14, 123:2, 134:20, 138:8, 138:16, 138:17, 138:18, 139:16, 146:16, 146:19, 162:11, 162:12, 162:14, 162:20, 162:22, 163:1, 163:6, 163:18, 164:5, 164:13, 165:17, 167:4 week [5] - 6:19, 6:20, 7:6, 10:19, 103:20 weekend [2] - 4:13, 95:15 weeks [1] - 10:19 welcome [1] - 12:5 West [5] - 17:7, 43:16, 64:11, 152:12, 152:22 whole [6] - 62:5, 64:15, 99:22, 103:21, 105:9, 161:8 wife [7] - 60:14, 95:22, 105:3, 105:8, 105:14, 109:14, 113:16 WILCOX [49] - 1:17, 15:6, 15:10, 18:25, 19:11, 19:15,	22:21, 23:1, 58:13, 59:6, 64:4, 64:5, 68:25, 69:6, 81:16, 82:4, 97:1, 99:2, 129:8, 129:11, 130:1, 136:10, 136:13, 136:17, 136:19, 136:23, 138:23, 138:25, 139:2, 140:10, 140:12, 144:6, 144:7, 145:8, 145:10, 153:17, 153:19, 154:4, 154:6, 155:20, 155:23, 155:25, 156:7, 169:1, 169:3, 170:17, 170:19, 170:23, 172:9 Wilcox [3] - 2:4, 2:8, 2:10 willing [1] - 5:15 Windows [1] - 86:16 wire [4] - 74:20, 74:23, 76:4, 79:15 wireless [1] - 19:5 wise [1] - 7:11 wisely [1] - 7:4 wish [1] - 8:7 withdraw [1] - 11:20 withdrawing [2] - 11:24, 58:15 withholding [1] - 57:5 witness [27] - 9:19, 9:20, 9:23, 10:9, 10:10, 10:18, 12:11, 12:13, 19:21, 22:23, 23:5, 23:21, 69:8, 69:11, 129:6, 136:11, 138:23, 138:25, 152:18, 153:17, 153:20, 154:4, 163:11, 169:1, 169:4, 170:17 WITNESS [7] - 12:16, 19:17, 19:25, 23:8, 69:14, 97:3, 172:19 witness's [1] - 10:13 WITNESSES [1] - 2:2 witnesses [7] - 8:25, 9:5, 9:15, 9:16, 9:18, 10:1 Womply [31] - 82:23, 83:11, 85:5, 85:9, 85:13, 88:22, 93:18, 100:5, 103:3, 113:25,	115:4, 115:10, 116:25, 120:13, 123:1, 124:8, 134:20, 135:4, 137:24, 138:8, 138:17, 159:21, 160:10, 161:25, 162:17, 162:21, 162:22, 163:6, 164:6, 165:17, 167:4 Womply's [10] - 85:15, 86:8, 86:14, 86:18, 87:22, 88:16, 88:18, 102:19, 102:25, 109:3 words [3] - 3:19, 75:2, 148:22 worker [1] - 65:23 workers [3] - 65:21, 66:12, 68:13 Wright [3] - 123:8, 123:11, 123:22 WRIGHT [1] - 123:8 write [6] - 100:24, 133:3, 133:7, 160:22, 160:23, 160:25 writing [1] - 161:6 written [1] - 79:18 wrote [1] - 100:25	young [1] - 71:3 yourself [11] - 69:24, 75:8, 76:12, 78:1, 80:23, 85:17, 85:20, 90:3, 90:21, 162:5, 164:22
Z				
Zelle [2] - 90:15, 90:19				
Y				
Yaosca [1] - 123:24 YAOSCA [1] - 123:24 year [34] - 25:11, 26:24, 30:20, 32:5, 33:5, 34:18, 35:11, 35:13, 35:23, 36:12, 38:9, 39:22, 42:12, 48:15, 51:14, 52:8, 52:15, 52:18, 54:15, 54:22, 55:8, 57:3, 60:6, 60:7, 62:19, 65:14, 65:16, 65:17, 68:21, 68:22, 68:23, 73:12, 149:22, 149:25 years [13] - 13:1, 13:3, 20:13, 23:19, 58:20, 70:1, 70:7, 70:17, 70:20, 130:11, 130:15 yellow [1] - 55:17 York [3] - 117:22, 118:7, 119:3				