

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

UNITED STATES OF AMERICA, Miami, Florida
Plaintiff, October 22, 2024
vs.
9:32 AM - 11:06 AM
CAROLYN DENISE WADE and
TRACY D. WADE,
Defendant. Pages 1 to 71

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

FOR THE GOVERNMENT:

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

ON BEHALF OF THE DEFENDANTS:

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

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

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

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

1 (Call to the Order of the Court.)

2 THE COURT: All right. Have the jury come in.

3 (Jury entered at 9:32 AM.)

4 THE COURT: Good morning, everyone. We are in the
5 last inning or the last quarter. You know, in sports events,
6 the last inning always seems to go very slow, and so I guess
7 that's what's happening here, but we are moving along and we
8 should complete the case today for sure.

9 Mr. Snider.

10 MR. SNIDER: We're all here? Good. Excellent.

11 CROSS-EXAMINATION (CONTINUED)

12 BY MR. SNIDER:

13 Q. Good morning, Mr. Wade.

14 A. Good morning.

15 Q. Yesterday when we were here, I went through many different
16 actions that you took in your own PPP loan application;
17 correct?

18 A. You did.

19 Q. We went through logins and transactions and uploads and
20 DocuSigns and identity verification, all of which you
21 testified was you doing when I showed it to you; right?

22 A. It was associated to an IP address.

23 Q. Actually, I believe your testimony was "Yeah, that's to
24 me"; right?

25 A. Associated to the IP addresses.

1 Q. You said, "It was me," yesterday.

2 A. Because you showed me IP addresses that were related to
3 Verizon.

4 Q. And, for example, you were the one at Wade Funeral Home?

5 A. Well, Wade Funeral Home was not a Verizon account. That
6 was our cell phone provider.

7 Q. That's a different one.

8 Are you going back on your testimony today? Do you
9 want me to go through the records again?

10 A. Yes, sir.

11 Q. Well, we ended with slide 67. This was you signing your
12 PPP forgiveness application using your IP address at home;
13 right?

14 A. Yes, sir.

15 Q. In addition to the activity that you performed in your own
16 application, you were also involved in performing activity
17 with respect to Carolyn Wade's PPP loan application; correct?

18 A. Yes, sir.

19 Q. You logged into her application; correct?

20 A. Yes, sir.

21 Q. You entered transactions in her account; correct?

22 A. Yes, sir.

23 Q. You uploaded, for example, a bank statement; correct?

24 A. I don't recall if I did that or not.

25 Q. All right. Well, we'll go through those slides.

1 First, I'm going to put two documents on your screen.

2 You're familiar with her PPP loan application?

3 A. No, sir.

4 Q. You're not.

5 A. Not with the application itself.

6 Q. I'm publishing for you Government Exhibits 117 and 116.

7 Do you see that on the left and right side of the screen?

8 A. Yes, sir.

9 Q. And you've seen these before; right?

10 A. Yes, sir.

11 Q. I'm going to enlarge the top half of 116. Do you see
12 that?

13 A. Yes, sir.

14 Q. And your wife doesn't have a business named Carolyn Wade;
15 right?

16 A. Never.

17 Q. Never has.

18 Never did business as Carolyn Wade; correct?

19 A. No, sir.

20 Q. And certainly she did not have \$113,560 from a business
21 named Carolyn Wade in 2019; correct?

22 A. No, sir.

23 Q. And there was no establishment of a business Carolyn Wade
24 in 2011; right?

25 A. No, sir.

1 Q. And she doesn't have a sole proprietorship named Carolyn
2 Wade; right?

3 A. No, sir.

4 Q. So all of this information is false. Do you agree with
5 that?

6 A. Yes, sir.

7 Q. And looking at Government Exhibit 117, you agree that this
8 is identically false; correct?

9 A. Yes, sir.

10 Q. And you would agree that these are two PPP loan
11 applications; correct?

12 A. Yes, sir.

13 Q. Now, Carolyn Wade did have a Schedule C in her individual
14 tax return for the year 2019 for a business called 1 Step
15 A-Head; correct?

16 A. From what I saw in the trial, yes.

17 Q. And that Schedule C represented -- I should say reported
18 to the IRS that the business 1 Step A-Head in 2019 made \$6,800
19 in gross income; right?

20 A. I don't know. You would have to show me.

21 Q. Sure.

22 Publishing Government Exhibit 201, page 13. This is
23 the Schedule C for the business 1 Step A-Head and in line 7 it
24 shows \$6,800 gross income for the year 2019; correct?

25 A. Yes, sir.

1 Q. All right. No reason to dispute the accuracy of this. I
2 mean, this is your wife's tax return; correct?

3 A. Correct.

4 Q. And you never gave that tax return to -- that Schedule C
5 to Haydee Rivero; correct?

6 A. I never saw --

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

8 Did you ever give it to Haydee Rivero?

9 A. No, sir. I never saw it.

10 Q. And I asked you yesterday, you never asked Perez
11 Accounting, your long-time trusted accountant, for assistance
12 with your PPP loan application and you said, "No"; correct?

13 A. Never a need.

14 Q. That's a "no," you never --

15 A. That's a "no."

16 Q. That's a "no."

17 And you never asked Perez Accounting for any
18 assistance with any PPP loan application for Carolyn Wade?

19 A. No, sir.

20 Q. Now, in 2021, this time frame we're talking about --
21 April, May, June, July, August -- Carolyn Wade also had
22 Verizon Wireless?

23 A. I have Verizon Wireless. Carolyn Wade had Verizon
24 Wireless, and from 2012 to 2023 Haydee Granados also had
25 Verizon Wireless.

1 Q. I'm not sure how you know that. That also wasn't my
2 question --

3 A. I hired a private investigator last night, and he pulled
4 the records.

5 Q. So last night you hired a private investigator. That's
6 what you did?

7 A. Yes, sir.

8 Q. Okay. So your testimony to this jury is that when Haydee
9 Granados was here and she said that she had T-Mobile, she's
10 never had Verizon, that she's not telling the truth. Is that
11 what you're saying?

12 A. The phone number associated about her Verizon account ends
13 in 5338, which is Eduardo Rivero's phone number.

14 Q. I'm asking you, sir --

15 MR. MCCRAY: Judge --

16 BY MR. SNIDER:

17 Q. -- did your wife have Verizon at the same time that you
18 did in 2021?

19 A. Yes, sir.

20 Q. And she was on your account. Yes?

21 A. Yes.

22 Q. And her phone ended in 6800?

23 A. Yes, sir.

24 Q. And you've seen from the records that in this time frame
25 she had a Samsung Note 20 Ultra 5G; correct?

1 A. If I can see the document, please.

2 Q. This is your bill for Verizon for your account; correct?

3 A. Yes, sir.

4 Q. And it shows that Carolyn Wade, with a phone number ending
5 in 6800, during this time frame, had a Note 20 Ultra 5G. Can
6 you accept that as true?

7 A. Yes, sir.

8 Q. And just like you, Carolyn Wade also used her cell phone
9 to access the Internet; correct?

10 A. Yes, sir.

11 Q. And she did that sometimes when she was not on a Wi-Fi
12 network but out on Verizon's wireless network; correct?

13 A. If I wasn't with her, I won't be able to answer that.

14 Q. I'm sorry?

15 A. I won't be able to answer.

16 Q. So you've never been with your wife when she was on her
17 phone like in a car or some other place?

18 A. Sometimes, yes.

19 Q. And you've seen her on the Internet or social media, doing
20 things when she was not on a Wi-Fi network; right?

21 A. Yes.

22 Q. And in 2021, this time frame, you and Carolyn Wade were
23 married and you were living together; correct?

24 A. Yes, sir.

25 Q. And so you shared that IP address, that's at your home,

1 ending in 84?

2 A. Yes, sir.

3 Q. Now, you started Carolyn Wade's PPP loan application;
4 correct?

5 A. Correct.

6 Q. You were the one that put in her phone number and email
7 address, and you were the one that put in the business Carolyn
8 Wade?

9 A. I'm not sure of that, sir.

10 Q. Well, that's what the data shows; right?

11 A. Not necessarily.

12 Q. Not necessarily?

13 A. No, sir.

14 Q. Publishing for you Government Exhibit 1000. We're going
15 to look at slide 15. Do you see logins here on May 13, 2021?

16 A. I'm looking at it, yes, sir.

17 Q. And it shows logins from the Wade Funeral Home -- two of
18 them?

19 A. I see the first login, the identifier saying
20 ckidd1226@gmail.com. And if you go all the way to the end, it
21 says the IP address ending in 34.

22 Q. Correct.

23 And right below that, there's a login from the Wade
24 Funeral Home?

25 A. And it says -- the one underneath is 166 and the one

1 underneath is 125.

2 Q. Yep.

3 There's multiple people logging into this; correct?

4 A. Yes, sir.

5 Q. And you're one of them?

6 A. Yes, sir.

7 Q. And your wife is one of them?

8 A. Undeniably.

9 Q. I'm sorry?

10 A. Undeniably.

11 Q. "Undeniably."

12 A. Yes.

13 Q. This is the same slide with a little more detail. You
14 said "undeniably," and that's because this is your wife's
15 phone; right? That's the phone that she had. I just showed
16 you from -- that's your wife's phone, that Note Ultra 5G?

17 A. Yes. Yes, sir.

18 Q. She logged in five times on May 13?

19 A. Yes, sir.

20 Q. Did you log into your wife's PPP loan account from the
21 Broward Sheriff's Office network?

22 A. Can you repeat that question, please?

23 Q. Did you ever log into your wife's PPP loan account while
24 using the Broward Sheriff's Office network?

25 A. No, sir.

1 Q. So this login on page 30 from the Broward Sheriff's Office
2 IP, that's your wife logging in from work. Yes?

3 A. Yes, sir.

4 Q. And on slide 34 now, that's your wife logging into her PPP
5 loan application from home. Yes?

6 A. Yes, sir.

7 Q. And on slide 35, that's your wife logging into her PPP
8 loan application from Verizon's network. Yes?

9 A. No, that just clearly shows someone with a Verizon account
10 logging into that.

11 Q. Do you see where it says -- this is no different than the
12 slide we looked at before. Do you see how it says "user agent
13 SM-N986U?

14 A. Yes, sir.

15 Q. And that's the phone your wife was holding in her hands
16 when she identified her identity. That's what's shown in
17 Government 114.1?

18 A. What this shows is a Verizon user signing into this
19 account.

20 Q. Yeah, with a certain phone. And that phone belongs to
21 Carolyn Wade; correct?

22 A. I don't -- I can't deny or agree with that.

23 Q. Well, a moment ago you said undeniably that was her.
24 What's different about this slide?

25 MR. MCCRAY: Judge, objection.

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12

1 THE COURT: Yes, sir, please.

2 THE WITNESS: I said there was no question.

3 THE COURT: Excuse me. Let's have one person speak
4 at a time.

5 MR. SNIDER: Very well.

6 THE COURT: Please.

7 THE WITNESS: So I said to you that there was no
8 question if I or my wife had ever signed into the Womply
9 account. That's what you said.

10 BY MR. SNIDER:

11 Q. Okay. And now we're looking at a slide that shows it's
12 your wife's phone logging into the account; correct?

13 A. I said Verizon IP address. That means anybody from a
14 Verizon account could have logged in.

15 Q. So that's different now. You're changing your testimony?

16 THE COURT: Sir, please.

17 Mr. Snider, come sidebar. Come sidebar.

18 MR. SNIDER: Sure.

19 (The following proceedings were held sidebar:)

20 THE COURT: You've done this several times. Don't
21 speak. Don't say you're changing your testimony. Ask a
22 question. Don't comment on it.

23 MR. SNIDER: Fair enough.

24 THE COURT: You're not allowed to elaborate.

25 MR. SNIDER: Understood.

1 THE COURT: You're not the MC. You have to ask
2 questions and then you get an answer. And if you don't like
3 the answer, you ask another question. Please.

4 MR. SNIDER: I won't do that again.

5 THE COURT: All right. Thank you.

6 (The following proceedings were held in open court:)

7 BY MR. SNIDER:

8 Q. Mr. Wade, on slide 35, do you agree this shows this is
9 your wife's phone logging into her own PPP loan application on
10 May 22?

11 A. Again, I testified to I see Carolyn Wade's name at the
12 bottom of -- on the screen with her phone number and a phone.
13 Up at the top it says an IP address that is associated to a
14 Verizon network. That's what I said to you the first time and
15 the second time.

16 Q. Take a look at the last column where it says user agent.
17 Do you the letters SM-N986U?

18 A. Yes, sir.

19 Q. Do you understand that that is a model cell phone?

20 A. If that's what you're telling me.

21 Q. Slide 39, May 27, 2021. This is another login that your
22 wife performed from the Broward Sheriff's Office network;
23 correct?

24 A. Can I see both forms side by side?

25 Q. I'm sorry?

1 A. The first login and this login, can I see it side by side?

2 Q. Just answer the question, sir. Do you see this as a
3 login, or not, from the Broward network?

4 A. Okay. But I was trying to confirm if it was the same date
5 or not.

6 Q. Okay. This is May 27. I'll show you slide 30. That's
7 May 19.

8 A. Okay.

9 Q. So that's a second login from Broward sheriff's network?

10 A. Yes, sir.

11 Q. Slide 47, this is another login from your wife's phone at
12 her home Internet using her home Internet to her PPP
13 application; correct?

14 A. Yes, sir.

15 Q. Now we're looking at slide 63. This is another login.
16 This is July 26, 2021. Carolyn Wade logging in using her cell
17 phone from Verizon's network; correct?

18 A. What that shows me is another Verizon user logging into
19 the network in this account.

20 Q. You don't see that as your wife's phone?

21 A. I see a Verizon user.

22 Q. Okay. You don't see user agent -- that same cell phone
23 model we just went over?

24 A. I see it there.

25 Q. So that's 11 -- correct me if I'm wrong, that's 11 logins

1 that your wife performed on her own into her own PPP
2 application. Yes?

3 A. I didn't count them, but if you're saying 11...

4 Q. Now, do you see -- we're looking at slide 63. Do you see
5 where it says identifier on the left side? I'll make it
6 bigger for you.

7 A. Yes, sir.

8 Q. That's the cell phone number to which the code was sent
9 for this login; correct?

10 A. Yes, sir.

11 Q. And that's your wife's phone?

12 A. Yes, sir.

13 Q. So she received the code?

14 A. Which code?

15 Q. The code to log into Womply, the one-time code.

16 A. The first one, yes.

17 Q. And she receives multiple codes to log into Womply because
18 every time you log into Womply you need a separate code;
19 right?

20 A. As I testified yesterday.

21 Q. It's a yes-or-no question, sir.

22 MR. MCCRAY: Your Honor, I'm going to object.

23 THE COURT: The witness can respond yes or no, but
24 then the witness may explain the answer.

25 THE WITNESS: Thank you, Judge.

1 Do you want to ask the question again, sir?

2 BY MR. SNIDER:

3 Q. Your wife received multiple codes to her phone to log into
4 Womply?

5 A. She may have received -- yes. The answer to your question
6 is yes.

7 Q. Thank you.

8 A. She may have received a couple of codes. But as I
9 testified to yesterday, I believe the codes were also sent to
10 your email address. That's why Ms. Rivero or Ms. Granados
11 wanted access to our emails because they didn't want to wait
12 because I guess it was time-sensitive and the codes were going
13 to the emails.

14 Q. But Ms. Rivero -- so you're testifying -- we'll move on.

15 Your wife in some instances gave you the code;
16 correct?

17 A. Yes, sir.

18 Q. And in some instances you gave that code to Ms. Rivero?

19 A. In every instance.

20 Q. In every instance?

21 A. Yes, sir.

22 Q. Except for the ones where you were logging in yourself?

23 A. The initial one.

24 Q. We're looking at slide five. This is an event that
25 occurred on May 4, 2021, in Carolyn Wade's PPP loan

1 application, and that's you, sir, uploading and linking a bank
2 account; correct?

3 A. That's what the document refers to.

4 Q. Any reason to doubt it?

5 A. No, sir.

6 Can we go back to that document, please.

7 Q. We're now on slide 21.

8 These are events on May 13, 2021, and these show
9 Carolyn Wade's cell phone model conducting six events. Yes?

10 A. So at the top it says 125, the ending IP, and then it goes
11 underneath to 184.

12 Q. And with respect to 184, those are four instances of
13 Carolyn Wade's cell phone uploading documents to her own PPP
14 loan application. Yes?

15 A. It shows that someone from that IP address went into the
16 portal.

17 Q. And do you see her cell phone model there in the user
18 agent column? It's highlighted in yellow. It's the same one
19 we've been looking at. Do you see it?

20 A. No, I don't see it.

21 Q. Do you see it now?

22 A. Okay. Yes.

23 Q. Looking at slide 3, these are transactions from May 4,
24 2021, and there's 11 transactions performed from the Wade
25 Funeral Home network. Yes?

1 A. Yes. However, each time you upload something or you log
2 in -- for example, if I have seven bank statements, each time
3 it's considered as a login. It's not one upload for
4 everything.

5 Q. We're looking at transactions, sir. So yes --

6 A. That's a transaction for each bank statement, sir.

7 Q. Correct. Well, it's for something; right?

8 A. It would be for seven bank documents.

9 Q. Did you upload seven bank statements to Carolyn Wade's PPP
10 loan application?

11 A. Sir, if I look at my bank statement, it's never just one
12 page. It's three pages at a minimum.

13 Q. Now we're on slide 17. This is a different day. This is
14 May 13. That's six additional transactions that you performed
15 from the Wade Funeral Home in Carolyn Wade's PPP loan
16 application. Yes?

17 A. Yes.

18 Q. Looking at slide 18, these are, I believe, 15 transactions
19 performed in Carolyn Wade's PPP application on Verizon's
20 network. Yes?

21 A. It shows a Verizon user is going into the account.

22 Q. Now --

23 A. What it shows is someone that had a Verizon account has
24 access to this document.

25 Q. Who also has the exact same phone model as your wife?

1 A. It doesn't say a phone model on here.

2 Q. All right. Your wife verified her identity in connection
3 with her PPP loan; correct? You didn't do that for her?

4 A. Yeah, she did.

5 Q. And she did that multiple times; right?

6 A. Until it passed.

7 Q. Until it passed.

8 Which took more than one time?

9 A. Yes. And each time you do it, that's considered a login.

10 Q. It's considered a transaction. It's different --

11 A. Transaction, login, or however you document it. As
12 Persona testified to, each time it's a login.

13 Q. This is your wife taking a photo of herself using her Note
14 20 Ultra 5G. Yes?

15 A. Yes.

16 Q. And this is her taking three photos of herself again using
17 the same cell phone on Verizon's network. Yes?

18 A. Yes, she took a picture.

19 Q. Now, your wife also signed her PPP loan application via
20 DocuSign; correct?

21 A. I believe so, yes. She signed one of them.

22 Q. Are you saying that you signed another one?

23 A. I did sign one of them.

24 Q. When was that?

25 A. I'm not exactly sure on the date of which one I signed,

1 but I did sign one of them.

2 Q. Do you remember previously testifying in another
3 proceeding that it was at 2:15 PM?

4 A. I think that's what the DocuSign said on it, but I think
5 based on my knowledge -- I think because of the UTC time or
6 whatever, I may have misstated because I was unaware of that.

7 Q. Right.

8 So you testified that you signed it at 2:15 and now
9 you're saying that that wasn't your memory. That was you just
10 looking at the DocuSign certificate?

11 A. Sir, if you can publish the document, then I can testify
12 to it factually.

13 Q. Ms. Rivero never signed anything for your wife?

14 A. I can't say that.

15 Q. You can't say that?

16 A. No, sir.

17 Q. This is your wife signing her PPP loan application using
18 Verizon on May 19, 2021; correct?

19 A. I believe that's my name.

20 Q. That's yours. Sorry.

21 Here we go. Is that your wife signing that?

22 A. This shows me that someone had access that was a Verizon
23 customer, had access to the IP tower of 224, and signed that
24 document.

25 Q. We're looking at slide 25. This is the history for that

1 signing event. Yes?

2 A. Yes, sir.

3 Q. And the user for this who opened, viewed, signed, and then
4 viewed four additional times is Carolyn Wade. Yes?

5 A. Again, what this shows me at the end is someone that had
6 the user ID of IP tower 224 that had a Verizon account
7 accessed it. It's going to say source user because the
8 account was opened under Carolyn Wade's name. So any
9 transaction that was done in there is going to refer as
10 Carolyn Wade.

11 Q. Right.

12 And this was sent to Carolyn Wade's email address.
13 That's how DocuSign works; right?

14 A. The code was sent to Carolyn Wade's --

15 Q. No, I'm talking about the documents to execute the
16 DocuSign.

17 A. Okay. Yes.

18 Q. And this is the history for the second signing of Carolyn
19 Wade's PPP loan application. Yes?

20 A. I don't know if it's first or second. It doesn't refer to
21 the number.

22 Q. Well, here's the date, which is May 28, which is different
23 than the date we just looked at, May 18.

24 A. Yes.

25 Q. Here's the signing event -- correct? -- from her home?

1 That's their IP address ending in 84?

2 A. That's the home IP address.

3 Q. Yeah.

4 And this is the history for that; correct?

5 A. Yes, again.

6 Q. I'm sorry. The answer -- you said "yes, again"?

7 A. Yes.

8 Q. This is Carolyn Wade's PPP loan forgiveness application.
9 Yes?

10 A. Yes.

11 Q. And this information at the top, the business name label
12 is Carolyn Wade. That's false?

13 A. Yes.

14 Q. And the d/b/a trade name is false?

15 A. I don't know how her business is listed. I don't know if
16 she's 1 Step A-Head d/b/a Carolyn Wade. I don't know, so I
17 don't know that to be false or true.

18 Q. Well, you saw this on the -- I showed it to you on the
19 original application. You said that the whole thing was
20 false; right?

21 A. Well, because what you're asking me. If you own a
22 business, there's different ways that you can incorporate a
23 business. So she can have her business as 1 Step -- Carolyn
24 Wade d/b/a 1 Step A-Head, and she can refer to her business
25 every time as 1 Step A-Head or she can say Carolyn Wade d/b/a

1 1 Step A-Head. So when you're saying d/b/a Carolyn Wade, I
2 can't say that's true or not.

3 Q. Okay. Well, you know that there is no business named
4 Carolyn Wade. We agree on that?

5 A. There's no independent business named Carolyn Wade.

6 Q. Okay. And this is your wife's signature at the bottom of
7 this application. Yes?

8 A. That's what's shown.

9 Q. I'm sorry?

10 A. That's what's shown. Yes.

11 Q. You recognize her signature?

12 A. No, I don't.

13 Q. You don't?

14 A. I know that's her name.

15 Q. You don't know your wife's signature?

16 A. You can't create an accurate signature on a DocuSign. No
17 one can.

18 Q. Do you see those two signatures that I've put up? One is
19 from Government Exhibit 118. That's the signature from the
20 PPP loan forgiveness application. And Government Exhibit 304,
21 the first page, which is a check that Carolyn Wade wrote.

22 A. Okay.

23 Q. Do you see those two signatures?

24 A. Yes.

25 Q. Are those your wife's signatures?

1 A. They're somewhat similar, but I can't say that that's her
2 exact signature.

3 Q. Let's talk about these checks.

4 You have never worked as an employee for your wife;
5 correct?

6 A. No, sir.

7 Q. You have never been involved in the hairstyling business;
8 correct?

9 A. Repeat the question.

10 Q. You have never been involved in the hairstyling business
11 for your wife?

12 A. No, sir.

13 Q. And she has never paid you a salary; correct?

14 A. No, sir.

15 Q. And yet, she wrote multiple checks to you with the word
16 "salary" in the memo; correct?

17 A. Yes, she did.

18 Q. And it's your testimony that that was to withdraw cash;
19 correct?

20 A. Yes, it was. So, again, as I testified earlier, one of
21 the things that was explained for me when you get the proceeds
22 from the PPP loan, you need to be accountable for the proceeds
23 that -- how you spent the proceeds. There has to be
24 accountability. So what she's putting in the memo section --
25 it's not illegal to pay yourself salary when you have PPP

1 proceeds.

2 Q. I'm talking about the checks to you, sir, where she
3 wrote --

4 A. She was not paying me.

5 Q. She wasn't paying you?

6 A. No, sir.

7 Q. But she wrote "salary" to you, and you just testified
8 she's never --

9 A. She wrote a check to me for cash.

10 Q. Well, is that what it says, "cash" in the memo?

11 A. Maybe it should have said "cash," but she wrote it and I
12 gave her cash.

13 Q. And she wrote "salary." That was false. Yes?

14 A. No, it was her salary.

15 Q. I'm talking about the checks to you. Let's put it up so
16 there's no confusion here.

17 This is a check to you, sir, signed by Carolyn Wade
18 with the memo "salary." That's false. Yes?

19 A. No, it is not.

20 Q. Was it for salary or -- yes or no?

21 A. What's factual on this check, it's written out to me, and
22 in the memo section it says "salary." Technically, that's all
23 it says. It doesn't say it's for me. It doesn't say it's for
24 her. It says "salary." You asked me for an explanation and I
25 just told you why it says "salary."

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1 Q. Did you just tell me -- did you just tell me that you
2 never received salary from Carolyn Wade?

3 A. No, she never paid me -- I never worked for her.

4 Q. So this memo, "salary," is not accurate; correct?

5 A. It is accurate.

6 Q. It's accurate that it says "salary," but you never
7 received a salary from her. Is that what you're saying?

8 A. It's accurate that the check was written for salary.

9 Q. To you.

10 A. Not to me. It was --

11 Q. Who was it made --

12 MR. MCCRAY: Judge, this is asked and answered.

13 THE COURT: One moment.

14 MR. MCCRAY: Objection. Asked and answered.

15 Objection. Asked and answered.

16 THE COURT: All right. I hear you now. That's
17 correct.

18 BY MR. SNIDER:

19 Q. Who is this check made payable to?

20 A. The check is made payable to me in reference to the funds
21 she received cashwise.

22 Q. And it's your testimony that's true for every one of these
23 checks that's made to you with the word "salary" in the memo?

24 A. Absolutely.

25 Q. So it's your testimony, then, that the only time that

1 Carolyn Wade needed this cash from you was when she received
2 the proceeds of her PPP loan?

3 A. No, I can't testify to that.

4 Q. But she never wrote checks like this ever before receiving
5 the PPP loan proceeds; correct?

6 A. That said salary in it, no.

7 Q. And she never did that again once she had written you a
8 couple of these checks --

9 A. No, because she never had to be accountable for the funds
10 that were being taken out of her account.

11 Q. I'm sorry. Say that again.

12 A. When you receive the PPP proceeds, part of the
13 stipulations is you need to be accountable in case you're
14 audited so that therefore you can show that you spent the
15 proceeds appropriately.

16 Her writing a check out to herself was not
17 inappropriate. It was not illegal. However, she put
18 "salary," and maybe she should have been more descriptive and
19 put Carolyn's salary so then therefore we wouldn't have to ask
20 this question.

21 Q. So she never did it to herself before receiving the
22 proceeds and she never did it again -- correct? -- writing
23 "salary" to herself?

24 A. That, I can't answer to.

25 Q. And she never again wrote checks to you for salary to

1 withdraw cash?

2 A. That, I can't answer to either -- yes, I can. The answer
3 is no to that.

4 Q. The answer is "no"?

5 A. The answer is "no."

6 Q. By the way, this is a joint account that you have with
7 your wife; correct? This is your money together?

8 A. Which account are we referring to?

9 Q. The ones that the checks are drawn from.

10 A. No, sir.

11 Q. This is not a joint account?

12 A. No, sir. This is Carolyn Wade's account.

13 Q. I'm showing you Government Exhibit 305. Do you see that?

14 A. Yes, sir.

15 Q. This is a check to Jersey City Group?

16 A. Yes, sir.

17 Q. You were asked about this on direct examination?

18 A. Yes, sir.

19 Q. And you testified that this was additional money that you
20 were paying the Riveros for a PPP loan?

21 A. Yes, sir.

22 Q. So it wasn't for equipment restoration?

23 A. Well, she was advised to put that in the memo section. So
24 once again, you have to be accountable for the proceeds you
25 got from the PPP loan, and it has to be related to your

1 business.

2 Q. So is this for equipment restoration or not?

3 A. I wouldn't know.

4 Q. Well, you just testified that it was for paying the wage
5 to do your PPP loan. So that's not equipment restoration;
6 correct?

7 A. What you asked me, sir, was, "Was this check made to
8 Jersey City Group?" I said, "Yes." You said, "In the memo
9 she put equipment restoration." Then you turned around and
10 you asked me, "Was it for equipment restoration?" No, it
11 wasn't. It was paid to them.

12 Q. So it's false?

13 A. Correct.

14 Q. That's another false memo; correct?

15 A. Right.

16 Q. This is Government Exhibit 307, page 1. Do you see that?

17 A. Yes, sir.

18 Q. This is another check to Jersey City Group that -- this
19 one you wrote; correct?

20 A. Yes, sir.

21 Q. And this one is from an account ending in 7309. Yes?

22 A. Yes, sir.

23 Q. And that's Tracy Wade and Carolyn Wade. Yes?

24 A. Yes, sir.

25 Q. And this one is for funeral home repair?

1 A. Funeral home repair.

2 Q. So is that accurate?

3 A. Somewhat.

4 Q. Somewhat?

5 A. Yes.

6 Q. Well, you testified yesterday to Mr. McCray that this was
7 a payment that you were making to Mr. Rivero for his help with
8 the loan?

9 A. The money was paid for that -- for the PPP loan; however,
10 when I put in the memo section funeral home repair, I was
11 instructed to do that by Eduardo Rivero.

12 Q. And that's not true, is it?

13 A. No. Eduardo said, "Because I've done stuff around your
14 funeral home, me and my brother, just put 'funeral home
15 repair' in it, so therefore it would be associated with your
16 business."

17 Q. So you knew that wasn't true?

18 A. Some of it was.

19 Q. Some of it was.

20 If the money was going to Mr. Rivero, as you
21 testified, to pay for their role in this PPP application, then
22 it wasn't for funeral home repair; correct?

23 A. Some of it was. Again, I said I never knew the criteria
24 or what went with the PPP, so I never knew it was illegal to
25 pay him.

1 Q. And these checks that you wrote upon receipt of the PPP
2 money to Wade Funeral Home for payroll, you never wrote checks
3 like this from your own personal account before; correct?

4 A. Because the PPP money was in my personal account.

5 Q. Right.

6 It didn't go into your business account?

7 A. It should have.

8 Q. But you were the one that put in the personal account
9 number?

10 A. I can't really say I did that.

11 Q. You can't really say?

12 A. No, sir.

13 Q. Do you remember the data showing that that's what you did?

14 A. The data showed logins from a Verizon account. The only
15 data that you showed came from 166 was the initial point of
16 when I went in there.

17 Q. You don't remember me showing you yesterday the exhibit
18 that showed the transaction -- the funding instructions, and I
19 think your testimony was that it was auto-populated -- right?

20 A. You showed me initially when I logged in, and there was a
21 million other transactions underneath mine.

22 Q. Do you remember looking at the one that said "funding
23 instructions"?

24 A. That was one of them, I think. I can't recall.

25 Q. I think your testimony was that Womply had auto-populated

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1 your account. Did Womply have your account information?

2 A. I didn't say that, sir.

3 Q. You didn't say auto-populate?

4 A. I didn't say Womply auto-populated my account.

5 Q. But you were putting it into the Womply website. Yes?

6 A. I think you might be referring to when I said my computer
7 may have auto-populated because if you do it -- when you have
8 your own desktop and -- your computer automatically sometimes
9 stores information.

10 Q. So that's your testimony that Womply automatically put
11 in --

12 A. I never said Womply automatically did anything.

13 Q. Mr. Wade, this PPP loan application for Tracy Wade, that
14 was not for Wade Funeral Home; correct?

15 A. No, but it should have been.

16 Q. And you actually did, though, apply for a separate PPP
17 loan for Wade Funeral Home; correct?

18 A. Can you tell me the loan you're referring to?

19 Q. Sure.

20 May 6, 2021, an application was submitted for a PPP
21 loan to Wade Funeral Home seeking a PPP loan of --

22 MR. MCCRAY: Objection, Judge. May we go sidebar,
23 please?

24 THE COURT: Is there an objection?

25 MR. MCCRAY: Yes.

1 THE COURT: What is the objection?

2 MR. MCCRAY: Judge, this --

3 THE COURT: A legal objection.

4 MR. MCCRAY: The Court has ruled on this previously,
5 and I think counsel is seeking to go into something that the
6 Court is not supposed to -- I'm trying not to make a
7 speaking --

8 THE COURT: Sidebar.

9 (The following proceedings were held sidebar:)

10 THE COURT: What is the objection?

11 MR. WILCOX: It appears that he was --

12 THE COURT: Wait a minute. Who --

13 MR. MCCRAY: Judge, Mr. Wilcox brought to my
14 attention that apparently what he's seeking to go into -- what
15 the Government is seeking to go into now violates what the
16 Court has talked about, the 404(b) information regarding the
17 other loan.

18 THE COURT: I'm not sure what we're talking about,
19 frankly. So what is the --

20 MR. SNIDER: The witness is now testifying -- I'm
21 sorry. The defendant is now testifying -- the defendant is
22 subject to cross-examination, and I can ask him. But whether
23 he is aware of another PPP loan for his funeral home goes
24 directly to his credibility.

25 THE COURT: Is this the same issue that I -- is this

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1 the loan that I ruled on --

2 MR. SNIDER: That was before he testified.

3 THE COURT: I'm asking you --

4 MR. SNIDER: Yes.

5 THE COURT: -- is that the --

6 MR. SNIDER: One of them. There's two loans. Yes.

7 THE COURT: I can't keep up with all the loans. I'm
8 sorry. Tell me what loan you're questioning him about.

9 MR. SNIDER: A PPP loan for Wade Funeral Home -- I'm
10 sorry. Let me be more specific. An application -- an
11 application for a PPP loan for Wade Funeral Home that was
12 approved for \$701,873. It was submitted on May 6, 2021.
13 Tracy Wade is listed as the point of contact. It has all the
14 information for Wade Funeral Home, including the EIN and his
15 personal information.

16 THE COURT: This document is what? This is a -- what
17 is the document?

18 MR. SNIDER: What do you mean?

19 THE COURT: What is this? What is the document?
20 Because there's a lot of the information --

21 MR. SNIDER: It's a printout -- it was produced to
22 us -- it's a business record from SmartBiz is what it is.

23 THE COURT: And the question is what? What is the
24 question?

25 MR. SNIDER: I asked him -- I said, "With respect to

1 this PPP loan that we've been talking about, this wasn't the
2 only loan that you applied for." And he said, "Well, can you
3 be more specific? Can you give me some information about it?"
4 So I'm giving him some information about it. This is a
5 perfectly legitimate inquiry.

6 THE COURT: Don't tell me what's perfectly
7 legitimate, Counsel.

8 MR. SNIDER: Sorry.

9 THE COURT: All right. Why is it that he can't ask
10 him about other loans as a witness? It's not -- I mean, he's
11 not asking it as 404(b) evidence, that he's offering it in his
12 case in chief against your client. He's asking, "Have you
13 ever had any other loans?"

14 MR. MCCRAY: If he's not going to go into anything
15 more specific than asking that question, then we don't object
16 but --

17 THE COURT: So if he says, "Have you had any other
18 loans," and Mr. Wade says, "Yes, there was another loan" --

19 MR. MCCRAY: Well, Judge, it actually doesn't seem
20 relevant to the issues of this case. It doesn't seem like it
21 tends to prove or disprove any material issue that's --

22 THE COURT: Why is it not relevant? The subject is
23 PPP loans, and he's asked, "Did you have any other loans?"
24 And the witness responds -- I guess you expect him to say,
25 "Yes, I have other PPP loans. They were legitimate loans.

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1 They were" -- I don't know. I don't know where it leads to.
2 But the subject is PPP loans and knowledge of whether this is
3 fraudulent. Did you have another PPP loan?

4 MR. MCCRAY: Well, Judge, the Court previously ruled
5 on this --

6 THE COURT: I ruled on it in a different context.

7 MR. MCCRAY: Judge, I understand. But what I'm
8 getting ready to say, if you allow me to say it, if he could
9 ask the questions outside the presence of the jury so that my
10 client doesn't say anything that would be violative of the
11 previous ruling --

12 THE COURT: I don't understand. The previous ruling
13 doesn't have anything to do with this particular issue. He's
14 on the stand now subject to cross-examination. My ruling
15 dealt with his case in chief and presenting 404(b) evidence.
16 And then lawyers decide, you know, the defendant has a prior
17 conviction or not. You can't put that in the case in chief,
18 but if the defendant takes the stand, you can ask him about
19 the prior conviction.

20 So now he's asking him about his knowledge of other
21 PPP loans since the subject of the examination is PPP loans.

22 MR. MCCRAY: Just let me confer with counsel for a
23 second, please.

24 Judge, we've stated our position.

25 THE COURT: All right. Now, I do have one question.

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1 There was a receipt that had \$700,000 on it.

2 MR. SNIDER: That's in evidence. That's in evidence,
3 Government Exhibit 2002.

4 THE COURT: Is that this loan?

5 MR. SNIDER: Yes.

6 THE COURT: Well, it's -- this is the same loan.

7 MR. SNIDER: Yeah. It's already in evidence, that
8 piece of information is.

9 THE COURT: Remember, there is a receipt or something
10 that --

11 MR. MCCRAY: There was a --

12 THE COURT: -- Ms. Granados gave to the husband. Is
13 that it?

14 MR. MCCRAY: No, it wasn't given to the husband.
15 That was sent from a Ms. Concepcion to Ms. Rivero.
16 Ms. Concepcion, I believe, was counsel or something for
17 Ms. Rivero.

18 THE COURT: Yes.

19 MR. MCCRAY: But there was no testimony that Mr. Wade
20 had requested that from that particular document.

21 THE COURT: So the loan you're asking about doesn't
22 relate to that --

23 MR. SNIDER: Of course it does. That's exactly what
24 I'm asking him about.

25 MR. MCCRAY: What I'm saying is the email that's in

1 evidence was not --

2 THE COURT: Was an attachment.

3 MR. MCCRAY: Yeah. That was not sent to Mr. Wade.

4 Mr. Wade did not request that. The testimony from

5 Ms. Granados is "I believe my husband asked him."

6 THE COURT: I understand, but I'm just asking if that
7 document represents the same inquiry.

8 MR. SNIDER: Yes.

9 THE COURT: That's all I'm asking.

10 MR. MCCRAY: I believe it does.

11 THE COURT: All right.

12 MR. SNIDER: Is the objection overruled?

13 THE COURT: It is.

14 MR. SNIDER: Thank you.

15 (The following proceedings were held in open court:)

16 THE COURT: The objection is overruled.

17 BY MR. SNIDER:

18 Q. Mr. Wade, I was asking you about another application for
19 another PPP loan made on behalf of Wade Funeral Home.

20 A. I don't recall any loan being referred to as a PPP loan
21 for Wade Funeral Home.

22 Q. Are you saying that you are not aware of any other PPP
23 loan for Wade Funeral Home -- not yourself but for Wade
24 Funeral Home?

25 A. A PPP loan?

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1 Q. Yes.

2 A. No, sir. No loan that I know to be referred to as a PPP
3 loan for Wade Funeral Home.

4 Q. Are you aware of another loan for Wade Funeral Home?

5 MR. WILCOX: Asked and answered.

6 THE COURT: Another loan is the question? Overruled.

7 THE WITNESS: Can you be specific, please, sir?

8 BY MR. SNIDER:

9 Q. You are not aware of a PPP loan application for Wade
10 Funeral Home submitted on May 6, 2021, seeking a PPP loan of
11 \$701,873?

12 A. No, sir.

13 Q. So if a PPP loan application was submitted on behalf of
14 Wade Funeral Home, that's not something you had anything to do
15 with?

16 A. No, sir.

17 Q. Mr. Wade, was Wade Funeral Home founded in 2011?

18 A. Somewhere in there, yes.

19 Q. Was it founded in order to offer affordable funeral
20 service for those less fortunate in our community who do not
21 have the means for such expenses?

22 A. It wasn't -- I don't recall those words, but -- I don't
23 know where you're getting that from.

24 Q. That wasn't the purpose for which you started Wade Funeral
25 Home?

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1 A. I am not sure where you're getting that from, so...

2 Q. Did Wade Funeral Home ever have \$3 million in annual
3 payroll?

4 MR. MCCRAY: Objection as to relevance.

5 THE COURT: May I see -- come sidebar.

6 (The following proceedings were held sidebar:)

7 THE COURT: What is the \$3 million about?

8 MR. SNIDER: A PPP loan application that was
9 submitted on behalf of Wade Funeral Home that represents --
10 that had \$3,368,990 in payroll.

11 THE COURT: Well, what's --

12 MR. SNIDER: I'm asking if he ever did.

13 THE COURT: Well, based on his answer, you probably
14 should ask him is he familiar with this document. You're
15 publishing the contents of this document. Show him the
16 document and ask him if he recognizes it. And if he says no,
17 you go to your next question.

18 MR. SNIDER: Well -- okay.

19 (The following proceedings were held in open court:)

20 MR. SNIDER: May I approach the witness, Your Honor?

21 THE COURT: Yes, sir.

22 BY MR. SNIDER:

23 Q. Mr. Wade, I'm handing you what has been marked for
24 identification as Government Exhibit 167. Do you see that?

25 A. Yes, I see this.

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1 Q. My question for you is did Wade Funeral Home ever have
2 \$3,368,909.56 in payroll?

3 MR. MCCRAY: Objection to the form. That's not the
4 question that was supposed to be asked from sidebar.

5 THE COURT: Ask the question -- show him the form.

6 MR. SNIDER: He has it.

7 THE COURT: Are you familiar with the exhibit?

8 THE WITNESS: No, sir. I've never seen this form.
9 Never seen this number ever in my life.

10 THE COURT: The next question, please.

11 BY MR. SNIDER:

12 Q. I'm showing you what is marked for identification as
13 Government Exhibit 168. Have you ever seen that before?

14 A. Never seen this form before. I'm not familiar with this.

15 Q. Okay. Showing you what is identified as Government
16 Exhibit 169. Have you ever seen that before?

17 A. I'm not familiar with this document. Who prepared this?

18 Q. Showing you what is marked for identification as
19 Government Exhibit 170. Have you ever seen that before?

20 A. I've never seen this document before. Is there other
21 documents attached to it?

22 Q. I'll take that back.

23 A. Okay.

24 Q. Mr. Wade, do you know what your payroll was for Wade
25 Funeral Home in 2020?

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1 A. Not offhand.

2 Q. Can you give an approximation?

3 A. No, I don't want to approximate, sir.

4 Q. Did you ever have payroll of \$3 million?

5 A. I had laborers --

6 MR. WILCOX: Objection, Your Honor.

7 THE COURT: What's the objection? The basis?

8 MR. WILCOX: Relevancy.

9 THE COURT: Overruled.

10 BY MR. SNIDER:

11 Q. Did Wade Funeral Home ever have payroll of \$3 million?

12 A. Payroll of \$3 million?

13 Q. Yes.

14 A. I've never ever stated that, sir.

15 Q. Listen to the question --

16 A. The answer is no.

17 Q. Did Wade Funeral Home ever have 45 employees?

18 A. 45? No.

19 Q. Mr. Wade, who would know the EIN for Wade Funeral Home?

20 A. Anybody that logs on Sunbiz, sir.

21 Q. Oh, it's available on Sunbiz, the EIN?

22 A. Yes, it is, sir.

23 Q. Who would know your cell phone number?

24 A. Everybody that I've ever dealt with in my life as far as
25 business goes, personal. Everybody knows my number.

1 Q. Who would know the bank account for Wade Funeral Home, the
2 account number and routing number?

3 A. Myself, my secretaries, and Haydee Granados and Eduardo
4 Rivero, with the exception of Realtors I've dealt with and
5 mortgage brokers and loan/lease companies, et cetera,
6 et cetera.

7 Q. I'm publishing for you what is in evidence as Government
8 Exhibit 2002. Do you see 2002 on your screen, sir?

9 A. Yes, sir.

10 Q. This is an email; correct?

11 A. It's an email from an Odalys Concepcion, and it's to
12 Haydee Granados.

13 Q. And what's the subject?

14 A. The subject says Wade Funeral Home.

15 Q. What's the date?

16 A. May 6, 2021.

17 Q. I'm on page 2, which is an attachment to that email. Do
18 you see that?

19 A. I see it.

20 Q. When does it say this application was started?

21 A. This application says it was started on May 6, 2021.

22 Q. And what is the estimated loan amount?

23 A. The loan amount on this document says \$701,873.

24 May I see that document again, please, Mr. Snider?

25 Q. We're moving on, sir.

1 Mr. Wade, are you familiar with another loan program
2 that was offered during the pandemic from the SBA called the
3 Economic Injury Disaster Loan?

4 A. I never knew a loan was called that until you brought it
5 to my attention.

6 Q. So you never knew that?

7 MR. MCCRAY: May we object and go sidebar, please?

8 THE COURT: Come sidebar.

9 (The following proceedings were held sidebar:)

10 MR. WILCOX: The same objection, Your Honor. We
11 believe he's trying to lay a foundation to talk about the EIDL
12 loan, which you had previously excluded when they attempted to
13 introduce it under Rule 404(b).

14 THE COURT: What's that? I'm listening.

15 MR. WILCOX: Do you understand? You've already
16 excluded this when the Government tried to introduce --

17 THE COURT: All right. On which loan is this?

18 MR. WILCOX: It's an EIDL loan.

19 THE COURT: What's the amount? I'm trying to
20 identify from what you all had told me before. What was the
21 amount of this EIDL loan?

22 MR. WILCOX: He actually received an EID loan -- he
23 actually received an EIDL loan for -- I believe it was
24 \$80,000. But what the Government wanted to show was that
25 prior to receiving the EIDL loan for \$80,000, he put on the

1 application that -- there's an application that states that
2 the gross income was, like, \$400 million, and there's a second
3 application that states the gross income was \$300 million.
4 And we had a hearing on this where this was subject to the
5 Court allowing the 404(b). I believe the Court had since
6 ruled that that evidence is excluded -- that you denied the
7 Government's motion to admit this evidence pursuant to 404(b).
8 Now he seems to be laying a foundation to introduce this
9 evidence.

10 THE COURT: I'm still not sure of where we are now.

11 MR. WILCOX: What are you not sure about, Judge?

12 THE COURT: I'm not sure which loan this is that I
13 ruled on.

14 MR. SNIDER: Judge, we're in the same posture that we
15 were five minutes ago. I'm not seeking to -- I'm asking a
16 line of inquiry on cross-examination about another application
17 that he submitted and that --

18 THE COURT: You're saying he submitted. Is this a
19 document that's in evidence?

20 MR. SNIDER: No. No.

21 THE COURT: Have you asked him if he submitted this
22 loan?

23 MR. SNIDER: I was about to. That's what I'm doing.

24 THE COURT: And tell me about the loan, please.

25 MR. SNIDER: There is a loan application that was

1 submitted to the SBA, an EIDL loan, which is another form of
2 pandemic relief, representing that Wade Funeral Home had
3 \$465 million in gross revenue and 175 million in expenses, and
4 then there's -- and then subsequent to that submitted an
5 identical loan that represented 300-some-odd [sic] million in
6 expenses --

7 THE COURT: Is this a loan that Ms. Rivero was --

8 MR. SNIDER: No. Judge, this has nothing -- I'm not
9 going into this for 404(b). This is impeachment.

10 THE COURT: You are going to show him the document, I
11 assume.

12 MR. SNIDER: Of course. I was starting to begin my
13 inquiry about whether he knows about this other loan. He's
14 going to say he did.

15 THE COURT: He's going to say he did?

16 MR. SNIDER: Yes, unless he's lying, because counsel
17 just represented that he got the loan.

18 MR. WILCOX: Yes, he did get an EIDL loan, but I
19 don't understand how him receiving an EIDL loan is relevant to
20 any issue in this case.

21 THE COURT: What's EIDL?

22 MR. WILCOX: E-I-D-L, Economic Injury Disaster Loan.
23 We had some pleadings on it, Judge. We've addressed this in
24 pleadings.

25 THE COURT: I understand that, but I really don't

1 know what you're talking about.

2 MR. SNIDER: He's referring to a 404(b) argument
3 that's not relevant for this posture.

4 MR. WILCOX: I'm referring to a 404(b) argument
5 because the Government has filed a motion seeking to introduce
6 this evidence as 404(b).

7 MR. SNIDER: I'm not --

8 THE COURT: One moment, please.

9 You filed a motion seeking to introduce it as 404(b).

10 MR. WILCOX: Yes.

11 THE COURT: We're not in that posture now.

12 MR. WILCOX: I understand. Agreed. Why is it
13 relevant? Why is the EIDL relevant -- and the fact that he
14 applied for an EIDL and received an EIDL relevant in this
15 case?

16 MR. SNIDER: It's relevant, Judge. The heart of this
17 case is false statements to the SBA. This is an application
18 saying that Wade Funeral Home had \$465 million in gross
19 revenue.

20 THE COURT: Did he get the loan?

21 MR. SNIDER: Yes.

22 MR. WILCOX: He got the loan, but what happened was
23 is that -- there's a little gap here. SBA wrote back to him
24 and said, "Wait a minute. You've got to show us some proof
25 that you've got \$400 million in assets -- I mean gross

1 receipts." He sent his legitimate tax return showing that he
2 made about, I believe, \$200,000. That tax return is in
3 evidence. And based on that, they gave him a loan for
4 \$80,000. Do you follow me?

5 THE COURT: Yes.

6 MR. WILCOX: But I don't --

7 THE COURT: So what is the -- I guess your position
8 is that this loan is a mistake. He submitted the correct
9 information and everything's fine.

10 MR. SNIDER: That's a question for the jury.

11 THE COURT: That's not a question for the jury.

12 Has the loan been recouped? Has the Government
13 attempted to retrieve the loan --

14 MR. WILCOX: No. No.

15 THE COURT: -- or it's a legitimate loan?

16 MR. WILCOX: Yes.

17 THE COURT: And you want to ask about this loan?

18 MR. SNIDER: Judge, this goes -- I'm offering -- this
19 goes to credibility. There were two applications submitted,
20 each of which represented that Wade Funeral Home had hundreds
21 of millions of dollars. I can ask him about the veracity of
22 that. It goes to his credibility.

23 THE COURT: Now I'm getting into another trial.

24 That's what troubles me, because you're going to ask these
25 questions and now they're going to say, "Oh, gee. It was a

1 mistake. He got a legitimate loan and" -- am I ever going to
2 finish this case?

3 MR. SNIDER: Judge, this is just a few questions
4 about this and then I'm done.

5 THE COURT: A few questions about it.

6 MR. SNIDER: Yes.

7 THE COURT: So when he said -- he got the loan --

8 MR. SNIDER: This goes to his --

9 THE COURT: Wait a minute.

10 What did the SBA say about these numbers? They
11 questioned him?

12 MR. SNIDER: Yes.

13 THE COURT: And his response was what?

14 MR. SNIDER: He didn't -- he couldn't support them.

15 THE COURT: I'm sorry?

16 MR. SNIDER: He could not support them.

17 THE COURT: I said what was his response --

18 MR. SNIDER: He gave them his tax returns.

19 THE COURT: Okay. And they said, "Oh, we made a
20 mistake" --

21 MR. SNIDER: They reduced the loan in half. It shows
22 his intent, Judge, to get loans he's not entitled to. That is
23 a relevant issue in the case. It goes to his credibility.

24 THE COURT: Well, that's his position, and your
25 position is he got the loan and no one ever investigated it.

1 MR. WILCOX: And to go into this -- and we will say
2 stay away from it because it's prejudicial. It's a confusion
3 of the issues, Judge, under 403.

4 THE COURT: I don't think it's that confusing.
5 I'm going to allow a few questions.

6 Are we going to get through with this anytime today?

7 MR. SNIDER: Yes.

8 THE COURT: What time today?

9 MR. SNIDER: I don't know how long their redirect is.

10 THE COURT: No, don't worry about the redirect. I'm
11 asking you. What time are you finishing?

12 MR. SNIDER: I think I've got 15 minutes.

13 THE COURT: You're on the clock.

14 MR. SNIDER: Very well.

15 MR. MCCRAY: Judge, can we establish the two
16 questions?

17 THE COURT: I'm not going to go into that, Counsel.

18 (The following proceedings were held in open court:)

19 BY MR. SNIDER:

20 Q. Mr. Wade, you applied for an EIDL loan, E-I-D-L, from the
21 SBA for Wade Funeral Home; correct?

22 A. I did not know it to be called that. I know it to be an
23 SBA loan until you told me that's what it was.

24 Q. So you applied for an SBA loan for Wade Funeral Home that
25 was not a PPP loan; correct?

1 A. I was unaware that was considered a PPP loan --

2 Q. No, that was not. I'm talking about a different --

3 Did you apply for a loan from the SBA that you
4 believed was an SBA loan?

5 A. Yes, sir.

6 Q. And you did that in approximately 2020; correct?

7 A. I'm not sure. If you have the document and you show me, I
8 can verify that's the year.

9 Q. And in that application, you were asked by the SBA to put
10 in the gross revenue for Wade Funeral Home for the year
11 preceding 2020; correct?

12 A. I assume, if that's a part of the application process.

13 Q. Okay. And in that response, you put \$465 million;
14 correct?

15 A. What?

16 Q. In your response to that question, what is the gross
17 revenue for the 12 months prior to January 31, 2020, you put
18 \$465 million?

19 A. Sir, my tax documents -- I've never even been shown to
20 make 500,000 to a million dollars.

21 Q. Listen to the question. I'm not talking about your tax
22 documents.

23 In the application to the SBA for this other loan
24 that you just said you applied for, when you were asked to put
25 in the gross revenues for the 12-month period before

1 January 31, 2020, you entered \$465 million?

2 A. I don't recall that. Can you show me the document? Or
3 was that phone recorded?

4 MR. SNIDER: May I approach, Your Honor?

5 THE COURT: Yes, sir.

6 BY MR. SNIDER:

7 Q. Sir, I'm handing you what has been marked for
8 identification as Government's 900. Okay? And on the left
9 side, each side is numbered. Go to line 15, please.

10 A. Can you make this bigger? Because I'm having trouble
11 seeing it. Can you publish it and I will try to follow along.

12 Q. Okay. Sure.

13 If you can't read it, I'll be happy to do that. I'm
14 just going to turn it on your screen.

15 A. Okay. Do that, then.

16 Q. Okay. No problem.

17 Can we please publish only for the witness and
18 defense counsel and the Government's table what's identified
19 as 900? Okay. It's not going to publish to the jury?

20 THE COURTROOM DEPUTY: No.

21 BY MR. SNIDER:

22 Q. So, sir, I'm going to -- do you see 900 on your screen --
23 what's identified as Government 900?

24 A. Okay.

25 Q. Do you see line 15?

1 A. Okay. And for what year is this?

2 Q. Do you see line 15?

3 A. I can see it.

4 Q. Does this refresh your recollection that in answer to the
5 question by the SBA for gross revenues for the 12-month period
6 prior to January 31, 2020, there was an entry of \$465 million?

7 A. Clearly that has to be a typo because I've never claimed
8 that.

9 Q. Okay. So you're saying that's a typo?

10 A. Sir, the accurate documents for this particular loan have
11 been submitted. This loan is current and there's no issues
12 with this loan.

13 Q. Just answer the question.

14 Is this a typo? Is that what you're saying?

15 A. Absolutely.

16 Q. And below that you were asked how much the Wade Funeral
17 Home had in cost of goods sold, which are expenses; correct?
18 Cost of goods sold are expenses --

19 A. Yes, sir.

20 Q. -- for the same period, the year before January 31,
21 2020 --

22 A. Okay.

23 Q. -- and you entered 175 million?

24 A. That's what it's saying here. But, sir, clearly, I have a
25 full-time job. I ran a full-time business. I am a full-time

1 dad and a husband. The difference between a hundred thousand
2 and millions is zeroes. Clearly that's a typo.

3 Q. So that's your testimony; this is a typo. 465 million in
4 revenue was a typo and 175 million was a typo?

5 A. Yes, sir.

6 Q. I'm going to publish for you Government Exhibit --

7 A. If I had that kind of money, why would I need any loan?

8 Q. 906. Do you see 906 on your screen?

9 A. Yes, sir.

10 Q. Okay. Do you see line 14?

11 A. Yes, sir.

12 Q. And this is a separate application for an SBA loan with
13 different information than the one we just looked at; correct?

14 A. The discrepancy is zeros.

15 Q. And what does it say that you put in for when asked the
16 question gross revenues for the 12 months prior to the date of
17 the disaster?

18 A. That's an inaccurate typing.

19 Q. Does it say 350 million?

20 A. Yes, it does.

21 Q. And line 15 for the cost of goods sold, did you put in 250
22 million?

23 A. The discrepancy is zeros, sir.

24 Q. So it's two different sets of typos in two different
25 applications. Is that what you're saying?

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1 A. All my correct tax documents are supporting what we
2 initially put, and the phone conversations were recorded.

3 Q. And you asked the SBA for the status of this loan;
4 correct?

5 A. Absolutely.

6 Q. And you called them multiple times asking for the status?

7 A. It was phone-recorded conversations.

8 Q. Okay. And you never --

9 A. Nothing fraudulent was discussed or brought up. That loan
10 was funded. It was never put under investigation, and it is
11 current as of this day.

12 Q. So you asked the SBA for the status of the loan where you
13 had represented that Wade Funeral Home had 465 million in
14 revenues and 350 million in expenses?

15 A. Never. Never. Never. At some point in time -- you
16 clearly see that was corrected.

17 Q. So just to summarize, Mr. Wade. You sought from the
18 SBA --

19 THE COURT: Are these questions you've already asked?

20 MR. SNIDER: I'm just summarizing what we --

21 THE COURT: No, don't summarize. Are these questions
22 that you've asked --

23 MR. SNIDER: No.

24 THE COURT: -- and have been answered?

25 MR. SNIDER: No.

1 THE COURT: If they haven't been asked and haven't
2 been answered, proceed.

3 BY MR. SNIDER:

4 Q. In all the documents that we've looked at today and
5 yesterday for the PPP loan for yourself, you never saw any
6 false information; is that right?

7 A. Yes, I did.

8 Q. You saw false information?

9 A. Yes, I did.

10 Q. When you were applying?

11 A. I saw false information on the documents you showed me
12 yesterday.

13 Q. And it's your testimony you didn't see that when you
14 were -- in all the opportunities when you were logging in, you
15 never saw it?

16 A. Well, in light of some of the information I received last
17 night, I know it to be false. You said that myself and my
18 wife were the only Verizon carriers that had access to the
19 Verizon towers, which that is not true. Eduardo Rivero's
20 phone number is 5338, which is a Verizon account, which is
21 under the name of Haydee Granados.

22 Q. Mr. Wade, you applied or were involved with the
23 applications for five different types of loans during the
24 pandemic?

25 A. No, I wasn't.

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1 Q. Your loan for yourself; correct?

2 A. Yes, sir.

3 Q. The loan for your wife?

4 A. Yes, sir.

5 Q. Two applications for EIDL loans that we just looked at?

6 A. I don't know them to be EIDL loans. They're SBA loans.

7 Q. Two other SBA loans?

8 A. One SBA loan.

9 Q. And the one that we looked at before for Wade Funeral
10 Home, that one you know nothing about. Is that your
11 testimony?

12 A. So I don't know who that gentleman is. I don't know what
13 that reference is. I never seen that before.

14 MR. SNIDER: I have no further questions, Your Honor.

15 REDIRECT EXAMINATION

16 BY MR. MCCRAY:

17 Q. Mr. Wade, you testified that you logged into the Womply
18 portal multiple times. Can you explain why?

19 A. The times that I logged into the portal was because I was
20 prompted to either by a text that came from Womply or because
21 I got a phone call from Eduardo Rivero.

22 Q. And when you logged in, what were you doing?

23 A. I know I had to log in initially. I can't recall, as I
24 keep stating, what we initially had to put in as far as to
25 start it up, but I do know that I did the portal pictures for

1 a fact.

2 Q. Okay. And did you have to redo the portal pictures a
3 certain number of times?

4 A. Multiple times.

5 Q. And when you redid the pictures, did that require you to
6 log in each time?

7 A. Each time is considered a login or a -- as Mr. Snider
8 said, a transaction or something to that nature. I'm not sure
9 exactly what he used.

10 Q. Now, when you logged in those times, did the PPP
11 application appear?

12 A. It never appears. It just prompts you to go with your
13 next action.

14 Q. And when you logged in, did the Schedule C appear?

15 A. No, sir.

16 Q. Now, do you remember -- I believe Mr. Snider asked you
17 about you putting your personal banking information -- no, the
18 business account having been -- I'm sorry -- the business
19 check from PPP going into your personal account. Do you
20 remember that?

21 A. Yes. Yes, sir.

22 Q. At the time in which that occurred, had you prepared and
23 submitted to Eduardo or his wife your business check?

24 A. Yes, sir.

25 Q. Did that check have your account number on it?

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1 A. Yes, it did.

2 Q. Did it have the business name on it?

3 A. Yes, sir.

4 Q. And the name of your bank?

5 A. Yes, sir.

6 Q. And at that time, had either one of the two, the husband
7 or wife, made representations that they would take care of the
8 rest of the application?

9 A. Yes, sir.

10 Q. So when that information was placed into the Womply portal
11 by you, I believe, regarding the business check, Mr. Eduardo
12 Rivero and his wife, they had your banking information
13 already; is that correct?

14 A. Yes. Yes, they did.

15 Q. Okay. Now --

16 A. They had personal and business banking information.

17 Q. And how did they get that information?

18 A. We sent it to them.

19 Q. The forgiveness loan, you saw the spelling of your name on
20 it. How was that spelled?

21 A. It said "Trace."

22 Q. How is your name spelled?

23 A. T-R-A-C-Y.

24 Q. Do you use "Trace" as a nickname?

25 A. Never.

1 Q. Do you ever write the name "Trace" when you're signing any
2 kind of documents?

3 A. No. I spell my name the same every time.

4 Q. Now, did you write "Trace" onto the document that was
5 presented that had Trace on it?

6 A. No, sir.

7 Q. Did you prepare that document, the forgiveness document?

8 A. No, sir.

9 Q. And I believe you testified that Ms. Granados Rivero --
10 did she have access to the Womply portal?

11 A. Yes, she did.

12 Q. Did you ever apply for a \$700,000 loan?

13 A. I never heard of it until this case took place.

14 Q. Were you ever approached by Granados about taking out a
15 loan?

16 A. Eduardo approached me about getting a loan for about
17 \$700,000.

18 Q. Did you apply for that loan?

19 A. No, sir.

20 Q. Now, with respect to the EIDL loan that you just ended up
21 testifying to, did you submit your proper tax returns to the
22 SBA to get that loan?

23 A. Yes, I did.

24 Q. And how much was the loan you received?

25 A. \$80,000.

1 Q. And that was based upon your proper tax returns?

2 A. Yes, sir.

3 Q. Okay. I'm going to publish 207. Okay. This is 207. I
4 believe you testified previously about this. This is for
5 2019?

6 A. Yes, it is.

7 Q. What does it show your income for the business to be?

8 A. \$345,359.

9 Q. And when you presented this to the bank, what happened as
10 a result?

11 A. Everything was approved.

12 Q. And with respect to the figure that counsel brought up,
13 \$400 million, have you ever dreamed of making that amount of
14 money?

15 A. Until I hit the Lotto, yes.

16 Q. Did you represent to the authorities that that's how much
17 money you made?

18 A. No, sir. That would be foolish.

19 Q. And was it brought to your attention that this was in the
20 paperwork?

21 A. During this trial proceeding, yes.

22 Q. Okay. And you submitted the 2019 1120-S to the SBA?

23 A. Yes, I did.

24 Q. Now, you looked at the spreadsheet that was prepared by
25 the Government in this case. When you logged in, do those

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1 documents say exactly what you were doing when it was logged
2 in?

3 A. No, it doesn't. And I asked Mr. Snider repeatedly "Can
4 you please show me all of the actions that I did every time I
5 logged in" and he didn't show me.

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

7 Judge, I have no further questions.

8 THE COURT: You may step down, sir.

9 MR. MCCRAY: We rest, Judge. The defense rests.

10 * * * * *

11
12 CERTIFICATE OF REPORTER

13 I certify that the foregoing is a correct
14 transcription of the record of proceedings in the
above-entitled matter prepared from my stenotype notes.

15 DATE: 16th of January, 2025 /s/Lance W. Steinbeisser
16 Lance W. Steinbeisser,
17 FCRR, RPR, FPR-C
18 Official Court Reporter
United States District Court
Southern District of Florida
19 Miami, Florida
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