



U.S. SMALL BUSINESS ADMINISTRATION
WASHINGTON, DC 20416

OFFICE OF GENERAL COUNSEL

March 2, 2021

Austin R. Evers
Executive Director
American Oversight
1030 15th Street, NW, Suite B255
Washington, DC 20005
FOIA@americanoversight.org

Dear Mr. Evers,

This letter is in response to your Freedom of Information Act (“FOIA”) request No. SBA-2020-001021 in which you requested the following:

All email communications (including emails, email attachments, calendar invitations, and calendar invitation attachments) between or among (1) the government officials listed in Column A and (2) representatives of the external entities listed in Column B, including but not limited to at the email domains provided:

Column A: Government Officials	Column B: External Entities
1. Jovita Carranza, Administrator 2. William Manger, Chief of Staff 3. Emily Threadgill, Director of Scheduling and External Affairs 4. Bill Briggs, Deputy Associate Administrator 5. John Miller, Deputy Associate Administrator 6. James Rivera, Associate Administrator 7. Rafaela Monchek, Associate Administrator 8. Michael Vallante, Associate Administrator 9. Victor Parker, Deputy Associate Administrator 10. Christopher Gray, and anyone else serving as White House Liaison 11. Anyone serving as agency point of contact for the coronavirus task force	1. Trump Organization (trumporg.com, trump.com, triumphotels.com, trumpgolf.com, ijkfamily.com) 2. Continental Materials (continentalmaterials.com) 3. Hallador Energy (halladorenergy.com) 4. Sunrise Coal (sunrisecoal.com) 5. TSR (tsrconsulting.com) 6. Broadwind Energy (bwen.com) 7. Vasomedical (vasomedical.com) 8. DMC Global (dmcglobal.com) 9. Fiesta Restaurant (frgi.com) 10. Quantum (quantum.com) 11. Potbelly (potbelly.com) 12. J. Alexander’s Holdings (jalexandersholdings.com) 13. Shake Shack (shakeshack.com) 14. Ashford Inc. (ashfordinc.com) 15. Provenance Hotels (provenancehotels.com) 16. Zagg (zagg.com) 17. Ramaco Resources (ramacoresources.com) 18. Crawford United

	(crawfordunited.com) 19. Flotek Industries (flotekind.com) 20. MiMedx Group (mimedx.com) 21. Ballard Partners (ballard.com, ballardfl.com) 22. Miller Strategies (millerstrategies.com) 23. Chartwell Strategy (chartwellstrategy.com) 24. Avenue Strategies (avenuestrategies.com) 25. Bailey Strategic Advisors (baileystategicadvisors.com) 26. Holland and Knight (hklaw.com) 27. Turnberry Solutions (turnberrysolutions.com) 28. Brownstein Hyatt (bhfs.com) 29. Cozen O'Connor (cozen.com) 30. Rich Feuer Anderson (rfadc.com) 31. Picard Group (thepicardgroup.com) 32. Liberty Counsel (lc.org) 33. FreedomWorks (freedomworks.org)
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Please provide all responsive records from March 25, 2020, through the date of the search.

SBA is releasing the attached documents that are responsive to your request. Redactions have been made pursuant to FOIA Exemptions 5 and 6. Exemption 5 protects deliberative and pre-decisional materials written as part of the decision-making process in federal agencies. Exemption 6 protects information about individuals in “personnel and medical files and similar files” when the disclosure of such information “would constitute a clearly unwarranted invasion of personal privacy.” The Exemption 6 redacted information consists of personal cell phone numbers, which clearly falls under the protection of FOIA exemption 6.

If you are dissatisfied with the Agency’s decision, you may file an administration appeal within 90 days of the date of this letter to:

Office of Hearings and Appeals
Attention: Oreoluwa Fashola, FOIA Office
409 3rd Avenue, SW – 8th Floor
Washington, D.C. 20416

If you are unable to resolve your FOIA dispute through our FOIA Public Liaison in the Office of Hearings and Appeals, the Office of Government Information Services (“OGIS”), the Federal FOIA Ombudsman’s Office, offers mediation services to help resolve disputes between FOIA requesters and Federal agencies. The contact information for OGIS is:

Office of Government Information Services
National Archives and Records Administration
8601 Adelphi Road-OGIS
College Park, MD 20740-6001

ogis@nara.gov
ogis.archives.gov
202-741-5770
877-684-6448

Sincerely,

/s/ *Eric S. Benderson*

Eric S. Benderson
Chief FOIA Officer
Office of General Counsel
U.S. Small Business Administration

From: [Gray, Christopher S.](#)
To: [Gray, Christopher S.](#)
Bcc: [Kevin Sunday](#); [Kevin Shivers](#); [Luke Bernstein](#); [Jessica Mandel](#); [Julia.Convertini@mail.house.gov](#); [Aaron Cohen](#); [Costa, Timothy](#); [Diehl, Rene L.](#); [Noe Garcia](#); [Willette, Alex R.](#) [EOP/WHO](#); [Strazzella, Michael P.](#); [Rebecca Wolfkiel](#); [Muriel.Garr@suntrust.com](#); [Drew Maloney](#); [Cortez, Mike](#); [Wilson, Michael](#); [Sue Smith](#); [Cody J Carbone](#); [Duncan Campbell](#); [SVernick@foxrothschild.com](#); [Lynette@shaleenergyalliance.org](#); [Ackerman, Emily](#); [Marc E Andersen](#); [Jason Miller](#); ["Schultz, James D."](#); [Roz.Leighton@mail.house.gov](#); [Campbell, Chris](#)
Subject: Important PPP Lending Operations Update - April 29, 2020
Date: Wednesday, April 29, 2020 1:26:00 PM



Please distribute this message throughout your networks.

**Paycheck Protection Program (PPP) Lending Operations Update –
Wednesday, April 29, 2020**

SBA and Treasury value all lenders and their small business customers. To ensure access to the PPP loan program for the smallest lenders and their small business customers, starting at 4 p.m. today EDT through 11:59 p.m. EDT, SBA systems will only accept loans from lending institutions with asset sizes less than \$1 billion dollars.

Please note, lending institutions with asset sizes less than \$1 billion will still be able to submit PPP loans outside of this time frame. Please also note that lenders with asset sizes greater than \$1 billion will be able to submit loans outside of today's 4pm -11:59pm EDT reserved processing time.

This reserved processing time applies today April 29, 2020. SBA and Treasury will evaluate whether to create a similar reserved time again in the future.

SBA and Treasury continue to monitor loan system performance and will continue to provide frequent updates to the lending community.

Christopher S. Gray

Deputy Chief of Staff
U.S. Small Business Administration

From: [Gray, Christopher S.](#)
To: [Gray, Christopher S.](#)
Bcc: [Kevin Sunday](#); [Kevin Shivers](#); [Luke Bernstein](#); [Jessica Mandel](#); [Julia.Convertini@mail.house.gov](#); [Aaron Cohen](#); [Costa, Timothy](#); [Diehl, Rene L.](#); [Noe Garcia](#); [Willette, Alex R.](#) EOP/WHO; [Strazzella, Michael P.](#); [Rebecca Wolfkiel](#); [Muriel.Garr@suntrust.com](#); [Drew Maloney](#); [Cortez, Mike](#); [Wilson, Michael](#); [Sue Smith](#); [Cody J Carbone](#); [Duncan Campbell](#); [SVernick@foxrothschild.com](#); [Lynette@shaleenergyalliance.org](#); [Ackerman, Emily](#); [Marc E Andersen](#); [Jason Miller](#); ["Schultz, James D."](#)
Subject: Important PPP lending operations update - Tuesday, April 28, 2020
Date: Tuesday, April 28, 2020 12:08:00 PM

Please distribute this message throughout your networks.

PPP Lending Operations Update – Tuesday, April 28, 2020

SBA and Treasury value all lenders and their small business customers.

For the benefit of small business customers and their employees, SBA and Treasury are working on ways to optimize the loan processing system.

Starting today, Robotic Processing Automation (RPA), which are robotic systems used by some banks to mimic human data entry, may not be used to submit Paycheck Protection Program loans into SBA's E-Tran loan system.

RPAs burden the processing system and diminish its capabilities. Without RPAs, the loan processing system will be more reliable, accessible, and equitable for all small businesses.

Application Programming Interface (APIs) will still be permitted. If you are a lender who needs assistance converting your submission process to a non-RPA API, contact Sheri McConville. (Sheri.Mcconville@sba.gov)

Christopher S. Gray

Deputy Chief of Staff
U.S. Small Business Administration

From: [Gray, Christopher S.](#)
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Subject: Joint Statement by Administrator Jovita Carranza Secretary and Steven T. Mnuchin on Establishing Dedicated Hours for Small Lender Submissions of PPP Applications
Date: Wednesday, April 29, 2020 5:02:00 PM
Attachments: [image002.png](#)

Please see below.

Christopher S. Gray

Deputy Chief of Staff

U.S. Small Business Administration

NEWS RELEASE

PRESS OFFICE

Release Date: April 29, 2020

Release Number: 20-36

Contact: Press_Office@sba.gov, (202) 205-7036
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Joint Statement by Administrator Jovita Carranza Secretary and Steven T. Mnuchin on Establishing Dedicated Hours for Small Lender Submissions of PPP Applications

WASHINGTON – U.S. Small Business Administration Administrator Jovita Carranza and U.S. Treasury Secretary Steven T. Mnuchin issued the following statement today on the Paycheck Protection Program (PPP) amid continuing efforts to aid small community lenders, their small business customers, and ensure SBA's systems run efficiently:

"In order to ensure special access to the PPP loan program for the smallest lenders and their small business customers, the SBA is only accepting loans from lending institutions with asset sizes less than \$1 billion from 4:00 p.m. EDT until 11:59 p.m. EDT on April 29, 2020. SBA is working to ensure that all eligible small businesses have access to this funding to sustain their businesses and keep their employees on payroll.

"All lending institutions, regardless of size, will still be able to submit PPP loans outside of this timeframe. This reserved processing time currently only applies to April 29, 2020. In addition to ensuring access for the smallest lenders, we expect that providing this reserved processing time

today will enhance the SBA's loan system performance all users who submit loans outside of this time frame."

###

About the U.S. Small Business Administration

The U.S. Small Business Administration makes the American dream of business ownership a reality. As the only go-to resource and voice for small businesses backed by the strength of the federal government, the SBA empowers entrepreneurs and small business owners with the resources and support they need to start, grow or expand their businesses, or recover from a declared disaster. It delivers services through an extensive network of SBA field offices and partnerships with public and private organizations. To learn more, visit www.sba.gov. ☐

From: [Gray, Christopher S.](#)
To: [Gray, Christopher S.](#)
Bcc: [Kevin Sunday](#); [Kevin Shivers](#); [Luke Bernstein](#); [Jessica Mandel](#); [Julia.Convertini@mail.house.gov](#); [Aaron Cohen](#); [Costa, Timothy](#); [Diehl, Rene L.](#); [Noe Garcia](#); [Willette, Alex R.](#) EOP/WHO; [Strazzella, Michael P.](#); [Rebecca Wolfkiel](#); [Muriel.Garr@suntrust.com](#); [Drew Maloney](#); [Cortez, Mike](#); [Wilson, Michael](#); [Sue Smith](#); [Cody J Carbone](#); [Duncan Campbell](#); [SVernick@foxrothschild.com](#); [Ackerman, Emily](#)
Subject: SBA - New Lender Agreement & Info - 4/9/20
Date: Thursday, April 9, 2020 6:13:00 PM

Please see below for additional guidance.

Christopher S. Gray

Deputy Chief of Staff

U.S. Small Business Administration



New Document:

Lender Agreement (Non-Bank and Non-Insured Depository Institution Lenders) view and enroll as a participating SBA Lender to make Paycheck Protection Program financing available to your customers. - [Click here](#)

Important Resources:

Affiliation Rules: [Click Here](#)

Interim Final Rule (IFR) on Affiliation: [Click Here](#)

FAQ on Faith-based Orgs and PPP: [Click Here](#)

Interim Final Rule: [Click Here](#)

Borrower Application: [Click Here](#)

PPP Loan Guaranty Form: [Click Here](#)

FAQ's on PPP (As of April 8, 2020) - [Click Here](#)

New Lender Application For Federally insured depository institutions, federally insured credit unions, and Farm Credit System institutions (other than the Federal Agricultural Mortgage Corporation)

(Submit to delegatedauthority@sba.gov) <https://www.sba.gov/sites/default/files/2020-04/PPP--Agreement-for-New-Lenders-Banks-Credit-Unions-FCS-w-seal-fillable.pdf>

More Info:

E-Tran Pro Tip: When a lender enters a loan into E-tran, **make sure they choose “PPP” from the first drop down menu**. Do NOT choose “7(a)”. If they choose 7(a), they will face restrictions that aren’t relevant to PPP.

Find a lender tool: [Click Here](#)

Lender Assistance Hotline: (833) 572-0502

Information for lenders can always be found at www.sba.gov/paycheckprotection or www.treasury.gov/cares

How to request change to info on sba.gov website: www.sba.gov/support (file a ticket)

-
-

From: [Gray, Christopher S.](#)
To: [Gray, Christopher S.](#)
Bcc: ["Schultz, James D.";](#) Roz.Leighton@mail.house.gov; [Marc E Andersen](#); [Jason Miller](#); [Kareem D. Lanier](#); [Tori Barnes](#)
Subject: SBA Release: Joint Statement by SBA Administrator Jovita Carranza and Treasury Secretary Steven T. Mnuchin on the Resumption of the Paycheck Protection Program
Date: Friday, April 24, 2020 4:39:00 PM
Attachments: [image005.png](#)

Please see below:

Christopher S. Gray

Deputy Chief of Staff
U.S. Small Business Administration

NEWS RELEASE

PRESS OFFICE

Release Date: April 24, 2020

Contact: Press_Office@sba.gov, (202) 205-7036

Release Number: 20-34

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Joint Statement by SBA Administrator Jovita Carranza and Treasury Secretary Steven T. Mnuchin on the Resumption of the Paycheck Protection Program

WASHINGTON – Administrator of the U.S. Small Business Administration Jovita Carranza and U.S. Treasury Secretary Steven T. Mnuchin issued the following statement today on the resumption of the Payroll Protection Program (PPP):

“We are pleased that President Trump has signed into law the Paycheck Protection Program and Health Care Enhancement Act, which provides critical additional funding for American workers and small businesses affected by the coronavirus pandemic. We want to thank Leader McConnell, Leader Schumer, Speaker Pelosi, and Leader McCarthy for working with us on a bipartisan basis to ensure that the Paycheck Protection Program is funded so that small businesses can keep hardworking Americans on the payroll.

“The Small Business Administration will resume accepting PPP loan applications on Monday,

April 27 at 10:30AM EDT from approved lenders on behalf of any eligible borrower. This will ensure that SBA has properly coded the system to account for changes made by the legislation.

“The PPP has supported more than 1.66 million small businesses and protected over 30 million jobs for hardworking Americans. With the additional funds appropriated by Congress, tens of millions of additional workers will benefit from this critical relief.

“We encourage all approved lenders to process loan applications previously submitted by eligible borrowers and disburse funds expeditiously. All eligible borrowers who need these funds should work with an approved lender to apply. Borrowers should carefully review PPP regulations and guidance and the certifications required to obtain a loan.

“The Trump Administration is fully committed to ensuring that America’s workers and small businesses continue to get the resources they need to get through this challenging time.”

For more information on the Paycheck Protection Program, visit: sba.gov/paycheckprotection.

###

About the U.S. Small Business Administration

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From: Scott.Mason@hklaw.com
To: [Briggs, William J.](#)
Subject: 7(a) lender form
Date: Thursday, April 2, 2020 2:29:56 PM

CAUTION - The sender of this message is external to the SBA network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to spam@sba.gov.

Bill –

I know you guys are under numerous waterfalls; hang in there. Checking in to see if there is any way I can get a copy of the application to become a 7(a) lender. Really appreciated. THANKS!

Scott

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

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From: [Jessica Mandel](#)
To: [Briggs, William J.](#)
Subject: Affiliate Rule
Date: Monday, April 6, 2020 5:50:30 PM

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Bill: I hope this finds you well. I know that you released the interim final rule with affiliate rule and guidance of the affiliate rule but was curious if you anticipated there would be additional guidance to the rule? There still seems to be some confusion around the rule and whether it applies to certain companies. Please let me know. Thank you for your help!

Best,
Jessica

Jessica A. Mandel
Principal
Miller Strategies
(303) 588-6551



From: [Briggs, William J.](#)
To: Scott.Mason@hklaw.com
Subject: an answer will be coming shortly on the bank you emailed about.
Date: Friday, April 24, 2020 10:32:00 PM

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration

Cell (202) [REDACTED]
William.Briggs@sba.gov



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From: Scott.Mason@hklaw.com
To: [Briggs, William J.](#)
Subject: Application status/approval
Date: Wednesday, April 8, 2020 10:23:43 AM

CAUTION - The sender of this message is external to the SBA network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to spam@sba.gov.

Bill –

Thanks again for all your help. I am sure your world is a waterfall. Hang in there, and stay healthy.

Checking on a question for a client (bank) that sent in the form to become a lender to the delegatedauthority@sba.gov. Will they get an affirmative approval of some kind in order for them to initiate lending? Do they need to wait for a response from SBA to acknowledge receipt of the Form 3506 in order to start taking PPP loan applications and apply for the endorsement? What's that process?

Also, anything we can do to get the Ops Team to look at our 8(a) contractor (Capitol Bridge; call centers, application processing, etc.) and get them engaged would be great. Happy to take a direct contact and put them in touch.

Thanks,
Scott

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

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From: Scott.Mason@hklaw.com
To: [Briggs, William J.](#)
Subject: Bank approval and moving forward as a PPP lender: CAFS/E-Trans and PIMS issue
Date: Tuesday, April 28, 2020 9:04:32 PM

CAUTION - The sender of this message is external to the SBA network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to spam@sba.gov.

Bill – Hope you all are hanging in there.

Following up on the bank approval we traded notes on Friday, thank you again for your assistance in getting Bank [REDACTED] B.M. thru the approval process. They received their initial approval on Saturday.

Unfortunately, Bank [REDACTED] representatives are getting stymied from submitting loans because according to the CFAS/E-Trans and PIMS processes internally within SBA, Bank [REDACTED] is showing up as having a U.S. subsidiary in Signature Bank. **Signature Bank was sold in 2005** and has no relationship with the approved PPP lending bank, but because SBA/government computers still show a linkage, they are unable to proceed as a PPP lender... can we please get immediate attention from a lending office (or other office?) to recognize and fix this error and allow Bank [REDACTED] B.M. to proceed with lending thru the PPP program? I'm happy to get any of their senior leadership on a call tomorrow with your folks if helpful, but there is obviously a glitch in the system that still links Bank [REDACTED] and Signature, even though the sale was closed over 15 years ago!

Really appreciate your ongoing help. This is a crazy problem, I know, and we're hoping there is an easy fix.

Many thanks,
Scott

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

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From: [Jessica Mandel](#)
To: [Briggs, William J.](#)
Subject: Client Concerns with PPP/Affiliation Rule
Date: Wednesday, April 8, 2020 10:40:22 PM
Attachments: [OVG Letter re SBA \(4-8-20\).pdf](#)
[Please DocuSign TAMC - SBA \(4 8 20\) \(final\)\[\[2\].pdf](#)

CAUTION - The sender of this message is external to the SBA network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to spam@sba.gov.

Bill: I hope this email finds you well. I am writing on behalf of our client the Oakview Group/Azoff Music Company. As representatives of the live entertainment industry, our clients have been devastated by the Coronavirus outbreak and the stay-at-home orders and don't expect their businesses to come back quickly, since it will take time for people to be willing to gather together in large groups after the virus mitigation measures are lifted. They are writing to urge the SBA to modify its affiliation rule to allow companies such as theirs to participate in the PPP loan program and retain as many employees as possible. Specifically, they would prefer the rules be changed to state that an entity has control only when it has the power to appoint the majority of the board or other governing body of an applicant. For the purpose of the PPP only, control should not exist when an investor simply has rights to block decisions.

Attached please finds more in-depth information and let us know if you have any questions. Thank you for your help and attention to this matter.

Best,
Jessica

Jessica A. Mandel
Principal
Miller Strategies
(303) 588-6551



From: [Jessica Mandel](#)
To: [Briggs, William J.](#)
Subject: Cloud expenses under SBA PPP - Amazon Web Services
Date: Thursday, April 23, 2020 9:48:43 AM
Attachments: [BSA SBA PPL Clarification Letter\[3\].pdf](#)
[BSA SBA PPL Clarification\[3\].pdf](#)

CAUTION - The sender of this message is external to the SBA network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to spam@sba.gov.

Bill: I hope this email finds you well. BSA, The Software Alliance, sent over the attached letter and language to White House, Treasury, and SBA to include “digital and cloud services” as an allowable expense under the SBA PPP program in the “payroll” and “rent” categories. Our client, Amazon Web Services is not necessarily opposed to their approach but believe their services are more accurately reflected under “utility” payments. Please see their note below and proposed language. Please let me know if you have any questions, need more information or have any feedback. Thank you for your attention to this matter!

>>

Small and medium sized businesses support their customers by leveraging the use of cloud services to provide jobs and services in their local economies. These cloud services are essential to operating under the current circumstances we are facing with COVID-19. As many small businesses are turning to the SBA PPP for financial relief, we want to ensure their allowable expenses include digital and cloud services which allow them to continue operating, maintain a workforce and serve customers.

In order to further support small businesses, we propose that the SBA PPP program expand the flexibility for allowable expenses through future guidance to include cloud services under the “utility” category.

Proposed Language:

Clarification that “utility payments” includes public utilities such as electricity, gas, water, phone, or internet and also includes other necessary expenses for core business and operational functions, such as security and fire monitoring systems, minimum facility maintenance and repair services, insurance, janitorial, pest and waste management services, tax and accounting services, and technology services, including software, cloud services, remote working tools and systems, and technical support.

Why expanding “utilities” for cloud services as an allowable expenses is the right option for SBA PPP

- It is more logical to use “utilities” for classification of cloud services to best provide broad relief for small businesses. The categories of “payroll” and “rent” are naturally more defined and narrow concepts. In general, federal agencies view essential services like cloud as more of a utility fit and have pointed to this in the past, especially agencies like GSA and DHS.

Why “payroll” isn’t a good option

- A “payroll” classification is too narrow for the broad usage of cloud services. Small businesses

can use cloud and other IT software for payroll but that would not include security software, backing up and storing key company data, running remote work from home workstations and remote training portals.

Why “rent” isn’t a good option

-A “rent” classification has a broader legal and tax significance which can lead to withholding taxes, US sales tax or permanent establishment issues for either the tech provider or its customers.

Best,
Jessica

Jessica A. Mandel
Principal
Miller Strategies
(303) 588-6551



From: [Jessica Mandel](#)
To: [Briggs, William J.](#)
Subject: Comments for the Record on SBA-2020-0015: Ashford Inc.
Date: Thursday, April 9, 2020 4:25:54 PM
Attachments: [SBA Comment Letter\[9\].pdf](#)
[Hotel Industry Recovery \(RevPAR\).pdf](#)

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Bill: Attached please find my client, Ashford Inc.'s comments on SBA-2020-0015 for the record. At this time, there is no way for me to file it on regulations.gov because it hasn't been posted to the Federal Register. If there are additional people that I should send this to, please let me know. Otherwise, we appreciate your help and attention to this matter. Thank you!

Best,
Jessica

Jessica A. Mandel
Principal
Miller Strategies
(303) 588-6551



From: [Ozzie Palomo](#)
To: [Chiokadze, David G.](#); [Gray, Christopher S.](#); [Steve Pfrang](#)
Subject: Connecting you to Steve Pfrang-Rep. LaHood Chief of Staff
Date: Saturday, April 4, 2020 1:29:41 PM

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Chris/David -

By way of email I am connecting you guys with Steve Pfrang, Chief of Staff for Rep. Darin LaHood. Steve is also one of my best friends and an unbelievable resource with a solid network in town.

Steve was hoping to touch base with you on some issues the Congressman is facing in the district. Specifically, several lenders from the district are having issues with the PPP portal. I know it's crazy but figured you all might be able to help guide Steve here.

Thanks in advance.

Ozzie

OJP
m. 202 [REDACTED]

Sent from my iPhone

From: [Briggs, William J.](#)
To: [Jessica Mandel](#); [Seale, Jessica N.](#); [Briggs, William J.](#)
Subject: Conversation with Jessica Mandel, Seale, Jessica N.
Date: Monday, April 13, 2020 2:41:32 PM

Briggs, William J. 2:24 PM:

(b) (5)

From: [Pfister, Zachary S.](#)
To: james.billimoria@sba.gov; [Gibson, Patricia M](#); [Gray, Christopher S.](#); pradeep.belur@sba.gov; [McShane, Kathleen M.](#)
Subject: Credit Union National Association - Join Trades call tomorrow at 2pm
Date: Tuesday, March 31, 2020 9:51:48 PM

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Hello,

I apologize for including multiple points of contact, as I not entirely sure where to direct this request, given how incredibly busy everyone at the SBA is during this time.

I am reaching out on behalf of our client, the **Credit Union National Association (CUNA)**, which represents the nation's 5,700 credit unions and its 115 million members across all 50 states. As you are aware, credit unions have a long and successful history of small business lending throughout the communities they serve. It has come to our attention that there is a **joint financial services trades call with the SBA tomorrow at 2pm**. We would be grateful if CUNA was invited to participate. As of this writing they have not received an invitation. If the invitations were not going out until tomorrow, we understand.

That said, we would very much appreciate an invitation sent to **CUNA's Chief Advocacy Officer, Ryan Donovan**, at rdonovan@cuna.coop.

Thank you, and thank you for all of the terrific work the SBA is doing to help American businesses weather this challenging time.

Zachary S. Pfister

Policy Director

Brownstein Hyatt Farber Schreck, LLP

1155 F Street, NW, Suite 1200

Washington, DC 20004

202.652.2345 tel

cell

ZPfister@BHFS.com

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(303) 223-1300 and delete the message. Thank you.

From: [David Tamasi](#)
To: [Manger, William M.](#)
Subject: Eastern States Hospitality Corporation - PPP Recommendations
Date: Thursday, April 30, 2020 4:22:21 PM
Attachments: [ESHC FINAL.pdf](#)
[ATT00001.htm](#)

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Hi Bill,

Hope you are well. Been a long time since when we worked on Live Oak Bank. We are now working with the Eastern States Hospitality Coalition (ESHC), which represents over 1,000 full service restaurants, hotels, and suppliers from Maine to Florida that employ over 80,000 employees. The Members of our group are local businesses not national chains and are not asking for a bail out.

We appreciate the small business relief provided in the CAREs Act, however, the structure of the law and restrictions in guidance significantly reduce the intended benefits for businesses in the hospitality industry, meaning few will qualify for needed funding. The availability of enhanced Unemployment Insurance benefits makes retaining and rehiring workers prohibitive, rendering PPP loan forgiveness unworkable for meeting other obligations. In addition, the PPP loan forgiveness definition does not cover supply chain obligations or for debt, inventory, supplies, raw materials, insurance, and maintenance, e.g., working capital. As the nation prepares for a staged reopening, existing program guidelines will prohibit a return to anything close to previous levels for an extended period of time. In addition, reopening and mitigation costs associated with reopening were never calculated in the 75/25 cap, making them even less workable now.

We understand you are completely inundated with so many things related to the pandemic but these local businesses are going to become extinct if they can't get relief on the 75/25 cap.

Please let know if there is someone on your team we could connect with to discuss this matter or if you need additional information.

Thank you.

Dave

From: Scott.Mason@hklaw.com
To: [Briggs, William J.](#)
Subject: email adds, and approved lending banks...
Date: Friday, April 24, 2020 10:00:10 PM
Attachments: [NOTARIZE-sec10141BHI2OF2TOBENOTARIZED.pdf](#)
[PPP--Agreement for New Lenders Banks Credit Unions FCS w seal \(1\).pdf](#)

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Bill –

I know you all have been drinking from waterfalls; hang in there. And stay healthy!

Reaching out on a couple things:

1) email list additions for your press releases, etc. Could you please add:

Scott.mason@hklaw.com

eve.otoole@hklaw.com

Travis.Kiyota@EastWestBank.com

Happy to give you any background necessary, but Eve is a partner of mine and Travis is SVP Global Public Affairs for East West Bank (CA), one of the largest minority owned banks in the U.S. THANK YOU.

2) Seeking some level of confirmation for an application by the U.S. branch of a foreign-owned but FDIC insured bank so they may participate in the PPP efforts as a lending entity. I have attached the documents they submitted to the SBA for approval already. The email from the general counsel of the Bank [REDACTED] below explains it well; we would **appreciate ANY insights or confirmation you can give as they would like to participate in the next round of lending, starting Monday.**

Dear Scott-

As we have discussed, the U.S. branch of Bank [REDACTED] B.M., the largest bank in Israel, is licensed in the United States by the New York State Department of Financial Services, and our deposits are insured by the FDIC.

When the SBA first commenced accepting applications from lenders who desired to participate in the Payroll Protection Program we immediately applied (see attached forms.) Our initial application was rejected as someone at the SBA did not realize that a foreign bank could be FDIC insured if it was “grandfathered” under old regulations that were subsequently changed. Nina Levine, the Deputy General Counsel of the SBA, was instrumental in helping us to overcome this misunderstanding.

After the FDIC issue was resolved, we immediately reapplied but the SBA responded with a form email, advising that they were no longer accepting applications from banks as all of the PPP funds were fully utilized. As soon as we heard that Congress was going to allocate additional funds for the program, we immediately sent our application back to the SBA. We never received a response and I have sent an email, every day this week, to 'Delegated Authority' DelegatedAuthority@sba.gov, inquiring as to the status of our application.

Do we need to have a formal response from the SBA to begin processing applications from a bank customer, *or can we just assume that as an FDIC-insured financial institution we are automatically approved. Any assistance or advice that you can provide would be greatly appreciated.*

Really appreciate your help. Keep up the great work. Stay healthy.

Thanks,
Scott

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

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From: [Jessica Mandel](#)
To: [Briggs, William J.](#)
Subject: FL Woman Owned Local Business Issues with Wells Fargo & PPP--Comment Letter
Date: Wednesday, April 15, 2020 3:03:22 PM
Attachments: [Letter to SBA.pdf](#)

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Bill: Attached is a letter from a small business in FL that cannot get Wells Fargo to fund their loan because of technical issues Wells Fargo is having with the PPP. I wanted to raise this to you, as well as send it for official comments on the interim final rule. Please let me know if you have any questions. Thank you in advance for your help!

Best,
Jessica

Jessica A. Mandel
Principal
Miller Strategies
(303) 588-6551



From: [Jessica Mandel](#)
To: [Gray, Christopher S.](#)
Subject: Follow-Up
Date: Friday, March 27, 2020 10:06:09 AM

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Chris: It was great speaking with you this morning. I wanted to make sure you have my contact information and send you the information we discussed.

- When looking at this language for an SBA 7A loan, what constitutes “ability to control?”
 - “When you calculate the size of your business to determine if you are a small business, you must include the annual receipts and the employees of your affiliates. **Affiliation is determined by the ability to control.** When the ability to control exists, even if it is not exercised, affiliation exists.”
- Once the CARES Act is enacted into law, what will change for a 7A loan?
 - In the CARES Act, they waive affiliation rules for restaurants and hotels, does that mean their edibility is based off just the number of employees and the parent company/affiliates size doesn’t matter?
- The association language we discussed: The political consultant and lobbying industry is concerned that it will be excluded from applying for the relief loans available under Section 1102 of the CARES Act because under the 7(a) regulations at 120.110(k) businesses that engage primarily in lobbying and political activity are excluded from eligibility. This seems like a potential First Amendment issue – because if these firms sold widgets instead of politicians or ideas they would be eligible. It appears to prohibit them from eligibility based on the content of their speech. It seems like there is an opening in the law here for the SBA to make clear that lobbying and political consulting firms are eligible. The pending statutory language at Section 1102(a) says “in addition to small business concerns, any business concern, non profit organization,...” is eligible. It seems that the phrase “any business concern” in the statute should be viewed as overriding the regulations for these particular 7(a) loans. There is real concern in the industry that if this isn’t made clear by regulation or guidance from SBA to the lending institutions, that the industry might need to take legal action in order to be eligible.

Let me know if you need more information. Your help with these issues is greatly appreciated, thank you!!

Best,
Jessica

Jessica A. Mandel
Principal
Miller Strategies
(303) 588-6551



From: [Ozzie Palomo](#)
To: [McCracken, Erin S.](#); [Chiokadze, David G.](#)
Cc: [David Tamasi](#)
Subject: From iHeartMedia: SBA-CARES Act-Radio
Date: Friday, April 10, 2020 9:47:53 AM
Attachments: [SBA-CARES Act-Radio.pdf](#)
[ATT00001.htm](#)

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Good morning Erin and David —

I understand you are busy but wanted to reach out to you on behalf of iHeartMedia. My business partner David Tamasi, copied here, works closely with iHeartMedia. We were hoping to put the following concept in front of you and SBA leadership for consideration.

The U.S. Government has a long history of utilizing local radio's massive reach to communicate directly with the public on matters of national urgency. Based on this experience, iHeartMedia and the radio industry believe it is vital that U.S. small businesses be educated about the Paycheck Protection Program and other relevant SBA programs. Ad Council-partnered radio PSAs continue to be a key component of the public education COVID-19 social distancing campaign.

Broadcast radio, which is free to listeners, is unmatched in terms of its national reach. Radio's cost-per-thousand listeners (CPM) is also the most cost-effective mass media platform, with superior results. An SBA-led national broadcast radio public education campaign, similar to **DEA's "National Take Back Day" Campaign**, can reach U.S. small businesses about the CARES ACT's benefits and access program information. iHeart Media, as an example, has the capability to stand up a broadcast spot campaign in a matter of 4 hours (as long as the audio is ready and approved). In many cases, such a national campaign, with wide industry participation could be on the air within 24 hours of its design.

iHeartMedia, Inc., is a leading global media, digital and entertainment company. iHeartMedia, Inc. includes iHeartMedia, which has the largest reach of any broadcaster in America and over a quarter billion listeners each month, is a major digital platform via its iHeartRadio Network and a significant social platform with over 120 million social followers.

Attached is more information. Dave can also answer any questions.

We would welcome the opportunity to discuss this at your earliest convenience.

Thank you,

Ozzie

From: [Briggs, William J.](#)
To: [Franklin, Timalyn E. \(Contractor\)](#)
Cc: [Ledford, Edward](#)
Subject: FW: Bank approval and moving forward as a PPP lender: CAFS/E-Trans and PIMS issue
Date: Thursday, April 30, 2020 3:27:55 PM
Attachments: [image001.png](#)
[\[REDACTED\] Submission of Loan Application # \[REDACTED\].pdf](#)

Would you guys have any insight into this issue?

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Scott.Mason@hklaw.com <Scott.Mason@hklaw.com>
Sent: Thursday, April 30, 2020 2:37 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: RE: Bank approval and moving forward as a PPP lender: CAFS/E-Trans and PIMS issue

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Bill – Thanks again. Unfortunately, they are still receiving this error message:

(b) (5)
[REDACTED]

Error [REDACTED] and [REDACTED] are related to the application itself and they can fix, but error [REDACTED] [REDACTED] is apparently something they cannot change. Related document also attached.

Let me know what you think.

Thanks,
Scott

Scott Mason | Holland & Knight
Senior Policy Advisor
Holland & Knight LLP
800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564
Cell [REDACTED]
scott.mason@hklaw.com | www.hklaw.com

From: Briggs, William J. <William.Briggs@sba.gov>
Sent: Thursday, April 30, 2020 8:18 AM
To: Mason, Scott D (WAS - X75330, CLT - X37787) <Scott.Mason@hklaw.com>
Subject: FW: Bank approval and moving forward as a PPP lender: CAFS/E-Trans and PIMS issue

[External email]

The agreement is attached to the "Bank (b) (4) BM" in our database. I noticed that it was missing the "office code". I entered (b) (4)". That should fix the issues.

I don't believe the "(b) (4) Bank" link has any effect.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Scott.Mason@hklaw.com <Scott.Mason@hklaw.com>
Sent: Wednesday, April 29, 2020 12:15 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: RE: Bank approval and moving forward as a PPP lender: CAFS/E-Trans and PIMS issue

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Bill – hope this made some sense. Any thoughts on getting the systems updated so Bank (b) (4) isn't misidentified as Signature bank? Really appreciate guidance. THANKS.

Scott Mason | Holland & Knight
Senior Policy Advisor
Holland & Knight LLP
800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006
Phone 202.469.5330 | Fax 202.955.5564
Cell [REDACTED]
scott.mason@hklaw.com | www.hklaw.com

From: Mason, Scott D (WAS - X75330, CLT - X37787)

Sent: Tuesday, April 28, 2020 9:04 PM

To: Briggs, William J. (William.Briggs@sba.gov) <William.Briggs@sba.gov>

Subject: Bank approval and moving forward as a PPP lender: CAFS/E-Trans and PIMS issue

Importance: High

Bill – Hope you all are hanging in there.

Following up on the bank approval we traded notes on Friday, thank you again for your assistance in getting Bank (b) (4) B.M. thru the approval process. They received their initial approval on Saturday.

Unfortunately, Bank (b) (4) representatives are getting stymied from submitting loans because according to the CFAS/E-Trans and PIMS processes internally within SBA, Bank (b) (4) is showing up as having a U.S. subsidiary in Signature Bank. **Signature Bank was sold in 2005** and has no relationship with the approved PPP lending bank, but because SBA/government computers still show a linkage, they are unable to proceed as a PPP lender... can we please get immediate attention from a lending office (or other office?) to recognize and fix this error and allow Bank (b) (4) B.M. to proceed with lending thru the PPP program? I'm happy to get any of their senior leadership on a call tomorrow with your folks if helpful, but there is obviously a glitch in the system that still links Bank (b) (4) and Signature, even though the sale was closed over 15 years ago!

Really appreciate your ongoing help. This is a crazy problem, I know, and we're hoping there is an easy fix.

Many thanks,
Scott

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell (b) (4)

scott.mason@hklaw.com | www.hklaw.com

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properly received this e-mail as a client, co-counsel or retained expert of H&K, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.

From: [Briggs, William J.](#)
To: Scott.Mason@hklaw.com
Subject: FW: Bank approval and moving forward as a PPP lender: CAFS/E-Trans and PIMS issue
Date: Thursday, April 30, 2020 8:17:00 AM

The agreement is attached to the "Bank [REDACTED] BM" in our database. I noticed that it was missing the "office code". I entered [REDACTED] That should fix the issues.

I don't believe the (b) (4) Bank" link has any effect.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Scott.Mason@hklaw.com <Scott.Mason@hklaw.com>
Sent: Wednesday, April 29, 2020 12:15 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: RE: Bank approval and moving forward as a PPP lender: CAFS/E-Trans and PIMS issue

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Scott Mason | Holland & Knight

Senior Policy Advisor
Holland & Knight LLP
800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006
Phone 202.469.5330 | Fax 202.955.5564
Cell [REDACTED]
scott.mason@hklaw.com | www.hklaw.com

From: Mason, Scott D (WAS - X75330, CLT - X37787)
Sent: Tuesday, April 28, 2020 9:04 PM
To: Briggs, William J. (William.Briggs@sba.gov) <William.Briggs@sba.gov>
Subject: Bank approval and moving forward as a PPP lender: CAFS/E-Trans and PIMS issue
Importance: High

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Scott

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell (b) (4)

scott.mason@hklaw.com | www.hklaw.com

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From: [Briggs, William J.](#)
To: ZPfister@BHFS.com
Subject: FW: Credit Union National Association - Join Trades call tomorrow at 2pm
Date: Wednesday, April 1, 2020 12:59:00 PM

Zach,

Cuna has the info. Thanks.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration

From: Pfister, Zachary S. <ZPfister@BHFS.com>
Sent: Tuesday, March 31, 2020 9:51 PM
To: james.billimoria@sba.gov; Gibson, Patricia M <Patricia.Gibson@sba.gov>; Gray, Christopher S. <Christopher.Gray@sba.gov>; pradeep.belur@sba.gov; McShane, Kathleen M. <Kathleen.McShane@sba.gov>
Subject: Credit Union National Association - Join Trades call tomorrow at 2pm
Importance: High

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Hello,

I apologize for including multiple points of contact, as I not entirely sure where to direct this request, given how incredibly busy everyone at the SBA is during this time.

I am reaching out on behalf of our client, the **Credit Union National Association (CUNA)**, which represents the nation's 5,700 credit unions and its 115 million members across all 50 states. As you are aware, credit unions have a long and successful history of small business lending throughout the communities they serve. It has come to our attention that there is a **joint financial services trades call with the SBA tomorrow at 2pm**. We would be grateful if CUNA was invited to participate. As of this writing they have not received an invitation. If the invitations were not going out until tomorrow, we understand.

That said, we would very much appreciate an invitation sent to **CUNA's Chief Advocacy Officer, Ryan Donovan**, at rdonovan@cuna.coop.

Thank you, and thank you for all of the terrific work the SBA is doing to help American businesses

weather this challenging time.

Zachary S. Pfister

Policy Director

Brownstein Hyatt Farber Schreck, LLP

1155 F Street, NW, Suite 1200

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202.652.2345 tel

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ZPfister@BHFS.com

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From: [Washburn, Mary Morning F.](#)
To: [Billimoria, Jimmy F. \(Jim\)](#); [McCracken, Erin S.](#); [Sutherland, Terrence P.](#)
Cc: [Kelly, Jennifer F.](#)
Subject: FW: From iHeartMedia: SBA-CARES Act-Radio
Date: Friday, April 10, 2020 10:21:18 AM
Attachments: [SBA-CARES Act-Radio.pdf](#)

Good morning everyone — (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

-Morning

M. Morning F. Washburn
Director of Strategic Alliances
Office of Communications and Public Liaison
U.S. Small Business Administration
cell: (202) [REDACTED]
morning.washburn@sba.gov

From: McCracken, Erin S. <Erin.McCracken@sba.gov>
Sent: Friday, April 10, 2020 10:04 AM
To: Ozzie Palomo <opalomo@chartwellstrategy.com>; Billimoria, Jimmy F. (Jim) <jim.billimoria@sba.gov>; Kelly, Jennifer F. <Jennifer.Kelly@sba.gov>; Washburn, Mary Morning F. <MaryMorning.Washburn@sba.gov>
Cc: David Tamasi <dtamasi@chartwellstrategy.com>
Subject: RE: From iHeartMedia: SBA-CARES Act-Radio

Good morning Ozzie, thank you for the email! I've moved our colleague David C. to the bcc and added our communications team to the email. We'll review the information and get back to you soon. Thank you!

From: Ozzie Palomo <opalomo@chartwellstrategy.com>
Sent: Friday, April 10, 2020 9:45 AM
To: McCracken, Erin S. <Erin.McCracken@sba.gov>; Chiokadze, David G. <David.Chiokadze@sba.gov>
Cc: David Tamasi <dtamasi@chartwellstrategy.com>
Subject: From iHeartMedia: SBA-CARES Act-Radio

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Good morning Erin and David —

I understand you are busy but wanted to reach out to you on behalf of iHeartMedia. My business partner David Tamasi, copied here, works closely with iHeartMedia. We were hoping to put the following concept in front of you and SBA leadership for consideration.

The U.S. Government has a long history of utilizing local radio's massive reach to communicate directly with the public on matters of national urgency. Based on this experience, iHeartMedia and the radio industry believe it is vital that U.S. small businesses be educated about the Paycheck Protection Program and other relevant SBA programs. Ad Council-partnered radio PSAs continue to be a key component of the public education COVID-19 social distancing campaign.

Broadcast radio, which is free to listeners, is unmatched in terms of its national reach. Radio's cost-per-thousand listeners (CPM) is also the most cost-effective mass media platform, with superior results. An SBA-led national broadcast radio public education campaign, similar to **DEA's "National Take Back Day" Campaign**, can reach U.S. small businesses about the CARES ACT's benefits and access program information. iHeart Media, as an example, has the capability to stand up a broadcast spot campaign in a matter of 4 hours (as long as the audio is ready and approved). In many cases, such a national campaign, with wide industry participation could be on the air within 24 hours of its design.

iHeartMedia, Inc., is a leading global media, digital and entertainment company. iHeartMedia, Inc. includes iHeartMedia, which has the largest reach of any broadcaster in America and over a quarter billion listeners each month, is a major digital platform via its iHeartRadio Network and a significant social platform with over 120 million social followers.

Attached is more information. Dave can also answer any questions.

We would welcome the opportunity to discuss this at your earliest convenience.

Thank you,

Ozzie

From: Tyler.Williams@treasury.gov
To: john.anderson@rfadc.com; [Manger, William M.](#)
Subject: FW: Technology solution - process small business loans and protect taxpayers
Date: Tuesday, March 31, 2020 10:17:58 PM
Attachments: [ATT00001.htm](#)
[Enigma_SBALoans_033020.pdf](#)
[ATT00002.htm](#)

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John – connecting you with Bill at the SBA to share this note and offer of a demo.

Best,

Tyler

From: John Anderson <john.anderson@rfadc.com>
Sent: Monday, March 30, 2020 11:03 PM
To: Williams, Tyler <Tyler.Williams@treasury.gov>
Subject: Technology solution - process small business loans and protect taxpayers

**** Caution:** External email. Pay attention to suspicious links and attachments. Send suspicious email to suspect@treasury.gov **

Dear Deputy Assistant Secretary Williams:

Attached is a backgrounder but here's the summary - to ensure SBA's loan facilitates are successful the Administration must partner with or encourage private sector participants to utilize precision data and predictive algorithms to efficiently expedite loan application processing and most importantly filter out fraud and protect taxpayers. The government must do its best to make sure loans are going to legitimate businesses.

A data science company leading the way is [Enigma](#) and they can verify business legitimacy through data and technology in seconds. Historically business data is only aggregated by Dun & Bradstreet, Equifax, Lexis, but those firms don't have reliable data on small businesses (<\$5M). Enigma spent years training predictive algorithms on billions of public data points to assess which small businesses would make good B2B bets, suitable for insurance offerings/credit lines etc. That's exactly the solution needed for the SBA loan facility to be a successful response to coronavirus. Bottom-line. The old 7(a) methods of approving/processing loans will not work given the current state of affairs. [Enigma](#), works with major private-sector financial institutions (e.g., Capitol One, Truist) and can quickly and accurately identify

deserving loan applicants. Relying on the most precise available data sets and highly predictive algorithms, Enigma can accurately assess small business risk and growth signals, as well as granular industry activity. The company's ability to quickly screen aid applications is critical to SBA, Treasury or their designated banking partners, which will be overwhelmed with applicants. Enigma will also identify fraudulent claims or those made in bad-faith efforts to access government money. Again, to advance our collective interests we must be sure that the money is used to support businesses that were productive and viable before COVID and that can roar back after the pandemic clears.

I can connect you with Enigma's CEO who would be happy to brief you and demonstrate the technology. We can share credentials with your team or anyone at SBA so that you can test the company's insights - that is, type in the name of any small business and explore the return rate and quality of their assessments. Understand no one has time right now so you can trust that I'm only coming to you with a viable solution.

Thank you. Please let me know who else on your team I should be in touch with or if there is a good time to connect for a demo? Thanks again.

Sincerely,
John

From: [Ozzie Palomo](#)
To: [Gray, Christopher S.](#)
Subject: Fwd: Conference call request - American Camp Association, Christian Camp & Conference Association and Federation for Jewish Camp
Date: Saturday, March 28, 2020 3:50:14 PM

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Chris -

Trying again. Let me know if you get this.

Thanks,

Ozzie

OJP

m. 2020

Sent from my iPhone

Begin forwarded message:

From: Ozzie Palomo <opalomo@chartwellstrategy.com>
Date: March 28, 2020 at 10:04:46 AM EDT
To: "Christopher.Gray@sba.gov" <Christopher.Gray@sba.gov>
Subject: Fwd: Conference call request - American Camp Association, Christian Camp & Conference Association and Federation for Jewish Camp

Chris -

See below. I had the wrong email for you.

Thanks for the consideration here.

Ozzie

OJP

m. 2020

Sent from my iPhone

Begin forwarded message:

From: Ozzie Palomo <opalomo@chartwellstrategy.com>

Date: March 28, 2020 at 9:15:05 AM EDT

To: "David.chiokadze@sba.gov" <David.chiokadze@sba.gov>, "chris.gray@sba.gov" <chris.gray@sba.gov>

Subject: Conference call request - American Camp Association, Christian Camp & Conference Association and Federation for Jewish Camp

Good morning Chris and David -

I hope you are both well. I wanted to reach out hoping you guys might be able to set up a conference call between SBA and representatives from the American Camp Association, the Christian Camp and Conference Association and the Foundation for Jewish Camp.

Collectively, these three associations represent a broad coalition of camps across the US. The American Camp Association alone represents 14,000 camps serving 20 million kids.

By some conservative estimates, camps across the US have a \$24 billion impact on the economy. Camps fall into two categories; small businesses and nonprofits.

As you can imagine, camps have been and will continue to be adversely impacted by the Covid-19 crisis. The hit comes during a time where camps are beginning to ramp up operations for the summer season.

Now that the CARES Act has been signed, camps are looking at SBA for guidance on the 7(a) expansion program. There's also concern how payroll calculations may put camps at a disadvantage as well as some other concerns.

Given the freeze on travel across the country, a conference call with these stakeholders may be the best way to initiate communications with SBA.

Is a conference call something we can arrange? We would structure the call so we maximize everyone's time and set an agenda beforehand.

Please let me know if this would work and certainly happy to provide any additional information.

Thank you both and enjoy the weekend.

Best,

Ozzie

OJP

m. 202- [REDACTED]

Sent from my iPhone

From: [Manger, William M.](#)
To: [Briggs, William J.](#)
Subject: Fwd: Eastern States Hospitality Corporation - PPP Recommendations
Date: Thursday, April 30, 2020 4:48:22 PM
Attachments: [ESHC FINAL.pdf](#)
[ATT00001.htm](#)

FYI

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From: David Tamasi <dtamasi@chartwellstrategy.com>
Sent: Thursday, April 30, 2020 4:19:00 PM
To: Manger, William M. <William.Manger@sba.gov>
Subject: Eastern States Hospitality Corporation - PPP Recommendations

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Hi Bill,

Hope you are well. Been a long time since when we worked on Live Oak Bank. We are now working with the Eastern States Hospitality Coalition (ESHC), which represents over 1,000 full service restaurants, hotels, and suppliers from Maine to Florida that employ over 80,000 employees. The Members of our group are local businesses not national chains and are not asking for a bail out.

We appreciate the small business relief provided in the CAREs Act, however, the structure of the law and restrictions in guidance significantly reduce the intended benefits for businesses in the hospitality industry, meaning few will qualify for needed funding. The availability of enhanced Unemployment Insurance benefits makes retaining and rehiring workers prohibitive, rendering PPP loan forgiveness unworkable for meeting other obligations. In addition, the PPP loan forgiveness definition does not cover supply chain obligations or for debt, inventory, supplies, raw materials, insurance, and maintenance, e.g., working capital. As the nation prepares for a staged reopening, existing program guidelines will prohibit a return to anything close to previous levels for an extended period of time. In addition, reopening and mitigation costs associated with reopening were never calculated in the 75/25 cap, making them even less workable now.

We understand you are completely inundated with so many things related to the pandemic but these local businesses are going to become extinct if they can't get relief on the 75/25 cap.

Please let know if there is someone on your team we could connect with to discuss this matter or if you need additional information.

Thank you.

Dave

From: [Ashley Gunn](#)
To: [Gray, Christopher S.](#)
Subject: Fwd: Region 8 Advocate Position Candidate
Date: Wednesday, April 29, 2020 12:02:42 PM
Attachments: [RCK 2019 resume \(1\).docx](#)

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Chris,
(b) (6) has applied to the office of advocacy. She is a fantastic current Trump appointee at Peace Corps. She is moving to Colorado and is specifically interested in the Region 8. As you can see (b) (6) I. What do you know about this position Bc it has been vacant? (b) (6)
Thank you so much!

Sent from my iPhone

Begin forwarded message:

From: (b) (6) <(b) (6)@gmail.com>
Date: April 27, 2020 at 7:42:57 PM EDT
To: Ashley Gunn <ashley@millerstrategies.com>
Subject: Fwd: FW: Region 8 Advocate Position Candidate

Nancy is the WH Liaison--the position is Region 8 Advocate

Dan, who recommended me, is the Region 8 Administrator

From: Nordberg, Daniel P.
Sent: Wednesday, April 22, 2020 7:25 PM
To: Clark III, Major L. <Major.Clark@sba.gov>
Cc: Knilans, Joseph J. <Joseph.Knilans@sba.gov>; Prall, Nancy E. <Nancy.Prall@sba.gov>
Subject: Region 8 Advocate Position Candidate

Good Evening Major,

I wanted to reach out to inform you that in addition to Regional Administrator, I

will also be serving as the Director for the Office of Rural Affairs. As you and I have discussed in the past, I've been able to absorb many of the responsibilities of the region 8 Advocate position out of necessity, but with my responsibilities growing, and the unprecedented environment we find ourselves, that is going to be a challenge to continue. As such, I would like to bring your attention an extremely qualified candidate that can step in right away and make a huge impact. (b) (5)

[REDACTED]

There are always qualified candidates worthy of these positions but it would be hard to find someone with a more distinguished record of accomplishment. (b) (5) She is someone I have the utmost respect for and I would appreciate your immediate consideration of her candidacy. Small businesses are struggling now more than ever and for this position to be vacant during this time is something we should not allow. Thank you again for your consideration and please don't hesitate to contact me should you have any questions.

Respectfully,

Daniel "Dan" Nordberg

Director, Office of Rural Affairs & Regional Administrator

U.S. Small Business Administration

(303) 844-0505

Cell [REDACTED]

daniel.nordberg@sba.gov



U.S. Small Business
Administration

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--

(b) (6)

) (6)

From: [Briggs, William J.](#)
To: [Jessica Mandel](#); [Kim, Jihoon](#)
Subject: Fwd: SBA Access - First Financial Bank in Winnebago
Date: Thursday, April 9, 2020 1:59:23 PM

Jihoon,

(b) (5)

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From: Hart, Hailey E. EOP/WHO <Hailey.E.Hart@who.eop.gov>
Sent: Thursday, April 9, 2020 1:48:54 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Cc: Russo, Joseph H. EOP/WHO <Joseph.H.Russo@who.eop.gov>
Subject: FW: SBA Access - First Financial Bank in Winnebago

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Please see the below from First Financial Bank in Winnebago – has any new guidance been released about the FDIC authorization number? That seems to be creating confusion for multiple banks.

Thank you,

Hailey Hart
White House Office of Public Liaison
C: 202 [REDACTED]

From: Jim Amundson <jamundson@icbm.org>
Sent: Thursday, April 9, 2020 1:43 PM
To: Hart, Hailey E. EOP/WHO <Hailey.E.Hart@who.eop.gov>
Subject: [EXTERNAL] Fwd: SBA Access

Hi Hailey-

Could you please ask someone to look into this situation? It seems to be especially tough. I thought he was taken care of a couple of days ago.

Jim Amundson
Independent Community
Bankers of Minnesota

651-789-3985 (office)
[REDACTED] (mobile)

Sent from my iPhone

Begin forwarded message:

From: Bill Erickson <bill.erickson@1stbago.com>
Date: April 9, 2020 at 12:24:46 PM CDT
To: Jim Amundson <jamundson@icbm.org>
Subject: SBA Access

I am just wondering about the status of the PPP program. There was quite a bit of talk up until the end of the day on Tuesday. Now everything seems to have gone silent. I am at a dead end on getting access myself. Since a week ago I have received no email response of any type from CLS, no return phone calls, no return contact whatsoever. In calling around to other banks I haven't found anyone in the "no response" category. They at least have received some response and are working to move forward and some are "in". I have checked my spam filters to make sure they are clear, and reviewed the spam logs to see if any of the addresses they have given were caught in the logs since last week. I have had an email exchange with Brian McDonald at SBA both last weekend and on Tuesday where he said he forwarded my inquiry to DC (twice). Yesterday I emailed again with this information but received no response.

So the things I know are:

1. I am on the SBA list of lenders to contact that businesses keep referring to
2. In my files I have a Supplemental Loan Guaranty Agreement dated July 6, 2018, that says my SBA Form 750 is extended for 2 years so it should be active.
3. I have a pile of applications on my desk ready to input.
4. Multiple customers with long term relationships have pulled their applications and gone elsewhere to banks that say they have access.
5. The phone keeps ringing and I feel like I am lying to my customers that we have been promised the access issues will be resolved.

So the actions I have taken have been:

- A week ago Wednesday (April 1) I contacted cfs@sba.gov as their website and phone number advised to get my account access opened
- Emailed CLS again on Friday
- Called their new hotline on Saturday and emailed them as the person instructed
- Emailed again on Monday
- Called the hotline Tuesday morning and a live person took my contact information and location number and said they would forward it to cfs.
- Called the hotline again on Wednesday afternoon, and they took my information again

saying they were surprised I had not received a response yet

I see there is this new "Connect" portal opened up today, but the information seems to indicate you can only do this if you weren't already an approved lender. One bank I talked to (they had at least received an email response from CLS but were still waiting on the next step) had tried that approach and then reached a point where it asked for some authorization number, which it wasn't clear what number that was.

Bill Erickson

First Financial Bank in Winnebago

1 Main St. South, P. O. Box 988

Winnebago, MN 56098

Phone: (507)893-3155

Toll Free: (888)883-9365

Fax: (507)893-4719 NMLS ID # [REDACTED]; Bank ID [REDACTED]

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From: [Manger, William M.](#)
To: [Kucharski, Stephen W.](#)
Subject: Fwd: Technology solution - process small business loans and protect taxpayers
Date: Tuesday, March 31, 2020 10:23:10 PM
Attachments: [ATT00001.htm](#)
[Enigma_SBALoans_033020.pdf](#)
[ATT00002.htm](#)

Steve,

(b) (5)

Bill

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From: Tyler.Williams@treasury.gov <Tyler.Williams@treasury.gov>
Sent: Tuesday, March 31, 2020 10:14:46 PM
To: john.anderson@rfadc.com <john.anderson@rfadc.com>; Manger, William M. <William.Manger@sba.gov>
Subject: FW: Technology solution - process small business loans and protect taxpayers

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John – connecting you with Bill at the SBA to share this note and offer of a demo.

Best,

Tyler

From: John Anderson <john.anderson@rfadc.com>
Sent: Monday, March 30, 2020 11:03 PM
To: Williams, Tyler <Tyler.Williams@treasury.gov>
Subject: Technology solution - process small business loans and protect taxpayers

**** Caution:** External email. Pay attention to suspicious links and attachments. Send suspicious email to suspect@treasury.gov **

Dear Deputy Assistant Secretary Williams:

Attached is a backgrounder but here's the summary - to ensure SBA's loan facilitates are successful the Administration must partner with or encourage private sector participants to utilize precision data and predictive algorithms to efficiently expedite loan application processing and most importantly filter out fraud and protect

taxpayers. The government must do its best to make sure loans are going to legitimate businesses.

A data science company leading the way is [Enigma](#) and they can verify business legitimacy through data and technology in seconds. Historically business data is only aggregated by Dun & Bradstreet, Equifax, Lexis, but those firms don't have reliable data on small businesses (<\$5M). Enigma spent years training predictive algorithms on billions of public data points to assess which small businesses would make good B2B bets, suitable for insurance offerings/credit lines etc. That's exactly the solution needed for the SBA loan facility to be a successful response to coronavirus.

Bottom-line. The old 7(a) methods of approving/processing loans will not work given the current state of affairs. [Enigma](#), works with major private-sector financial institutions (e.g., Capitol One, Truist) and can quickly and accurately identify deserving loan applicants. Relying on the most precise available data sets and highly predictive algorithms, Enigma can accurately assess small business risk and growth signals, as well as granular industry activity. The company's ability to quickly screen aid applications is critical to SBA, Treasury or their designated banking partners, which will be overwhelmed with applicants. Enigma will also identify fraudulent claims or those made in bad-faith efforts to access government money. Again, to advance our collective interests we must be sure that the money is used to support businesses that were productive and viable before COVID and that can roar back after the pandemic clears.

I can connect you with Enigma's CEO who would be happy to brief you and demonstrate the technology. We can share credentials with your team or anyone at SBA so that you can test the company's insights - that is, type in the name of any small business and explore the return rate and quality of their assessments.

Understand no one has time right now so you can trust that I'm only coming to you with a viable solution.

Thank you. Please let me know who else on your team I should be in touch with or if there is a good time to connect for a demo? Thanks again.

Sincerely,
John

From: [Briggs, William J.](#)
To: [Briggs, William J. \(William.Briggs@sba.gov\)](#)
Bcc: [Greg Baer](#); [jnussle@cuna.coop](#); [rdonovan@cuna.coop](#); [Steve Keen](#); [Ann Kossachev](#); [kkelly@nationalbankers.org](#); [Jeannine Jacokes](#); [Van Hoose, Todd](#); [Shipp, Jeff](#); [James Ballentine](#); [Sam Whitfield](#) ([swhitfield@consumerbankers.com](#)); [twilkinson@naggl.org](#); [Richard Hunt](#); [Daniel Martini](#) ([dmartini@aba.com](#)); [rnichols@aba.com](#); [jbutler@naggl.org](#); [Carrie Hunt](#); [Jarrod Loadholt](#); [Brian Blake](#); [Pataki, Tim A. EOP/WHO](#); [Nat Hoopes](#); [Scott Talbott](#); [Scott Stewart](#); [Rob Saliterman](#); [bworth@franklinsquaregroup.com](#); [pfreeman@fsvector.com](#); [Clarine Nardi Riddle](#); [pdisselkoen@paypal.com](#); [Scott.Mason@hklaw.com](#); [Phil Anderson](#); [jkelley@electran.org](#); [Kaley Schafer](#); [Robert Flock](#); [Bill Himpler](#); [RJ Karney](#); [David Pommerehn](#)
Subject: fyi on numbers
Date: Friday, April 3, 2020 11:44:00 AM

<https://twitter.com/sbajovita>

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration

Cell (202) [REDACTED]
William.Briggs@sba.gov



[Home Page](#) | [Twitter](#) | [Instagram](#) | [Facebook](#) | [YouTube](#) | [LinkedIn](#) | [Email Alerts](#)

From: [Briggs, William J.](#)
Bcc: [Scott.mason@hklaw.com](#); [eve.otoole@hklaw.com](#); [Travis.Kiyota@EastWestBank.com](#); [Hector@barretoinc.com](#); [Alex Avers \(aayers@hardinet.org\)](#); [Alex Strong](#); [Anthony Diaz \(anthony.diaz@nist.gov\)](#); [Ashley Homes \(ahorner@sbko.bank\)](#); [Ashley Wittorf \(AWittorf@AdvaMed.org\)](#); [Billy Johnson \(BJohnson@isri.org\)](#); [Branson Lexi \(JGanzert@USChamber.com\)](#); [Callie Hoyt \(choyt@nmma.org\)](#); [Cecia Winslow \(cwinslow@afsamail.org\)](#); [Chissy Buteas \(cbuteas@njbri.org\)](#); [Chris Andersen \(chris.andersen@dutkogr.com\)](#); [Chris Burroughs](#); [Chris Cylke \(ccylke@americangaming.org\)](#); [Chris Schultz \(cschultz@ci-lake.com\)](#); [Chris Smith](#); [Christine Banning \(ChristineBanning@weareparking.org\)](#); [Craig Nett](#); [Dana Barbieri \(DBarbieri@csbs.org\)](#); [Danielle Beck \(dbeck@beef.org\)](#); [David Brown \(David.brown@bennetttdc.com\)](#); [David Hickey](#); [David Thompson](#); [Dennis Potter](#); [Don Childears \(Don@coloradobankers.org\)](#); [Eleni Kalish \(ekalisch@rccl.com\)](#); [Eric Streenststra \(eric@votehemp.com\)](#); [Henry Hogan \(hhogan@mdnonprofits.org\)](#); [James Slotnicj \(james.slotnick@sunlife.com\)](#); [Jared Ihrig](#); [Jeff Finkle](#); [Jeffrey Shapiro \(Jeffrey.Shapiro <jshapiro@pmj-dc.com>\)](#); [John Chwat \(johnchwat@mckeongrp.com\)](#); [Jon Gold \(goldj@nrf.com\)](#); [Jonathan Eisen \(jeisen@ifdaonline.com\)](#); [Josh Ulman \(josh@ulmanpolicy.com\)](#); [Julie Strandlie \(strandlie@techservicealliance.org\)](#); [Katelyn Harris](#); [Kelli Burke](#); [Ken Presley \(kpresley@uma.org\)](#); [Kristina Weger \(kweger@aha.org\)](#); [Lauren McCormick](#); [Leah Dempsey \(dempsey@acinternational.org\)](#); [Leslie Fox](#); [Lisa Veith \(LisaPVeith@maximus.com\)](#); [Lizzy Simmons \(Simmons@nrf.com\)](#); [Lucida Cobbs](#); [Marc Saluk \(msaluk@co.hunterdon.nj.us\)](#); [Maria Sanderson \(MSanderson@GuidePost-Strategy.com\)](#); [Mark Leahy \(mleahy@mdna.com\)](#); [Matt Ginley \(matt@apcllc.net\)](#); [Matthew Lapinski \(mlapinski@crshq.com\)](#); [Meagan McCanna \(meagan.mccanna@airbnb.com\)](#); [Michael Lamm \(MLamm@corpadvisorysolutions.com\)](#); [Michael Schuttloffel \(michael@capenet.org\)](#); [Mike Aquaro \(maquaro@rmahq.org\)](#); [Mike Leonard](#); [Naisha Jackson \(njackson@finhealthnetwork.org\)](#); [Nancy Hammer \(Nancy.Hammer@shrm.org\)](#); [Nick Austin \(naustinesq@gmail.com\)](#); [Ozzie Palomo \(opalomo@chartwellstrategy.com\)](#); [Patricia Hall \(patricia.ward@androsysinc.com\)](#); [Paul Miller](#); [Peter Comstock](#); [Ralph Pulver \(RPULVER@travelers.com\)](#); [Rashid G. Hallaway](#); [Reed Linsk](#); [Reese Goldsmith \(rgoldsmith@bhfs.com>\)](#); [RJ Carney \(ronaldrk@fb.org\)](#); [Russell Wasson \(Russell.Wasson@nreca.coop\)](#); [schelton@beststrategies.com](#); [Seth Pearman \(seth.pearman@fsst.org\)](#); [Shannon Meade \(smeade@restaurant.org\)](#); [Stephen Hoar \(shoar@wh2cpas.com\)](#); [Stephen Aaron \(saaron@mercuryllc.com\)](#); [Tori Barnes](#); [Tracy Taylor](#); [Travis Johnson](#)
Subject: fyi
Date: Monday, April 27, 2020 5:28:00 PM

As of 3:30 pm EDT today, SBA has processed more than 100,000 PPP loans by more than 4,000 lenders.

Unprecedented demand is slowing E-Tran response times. Currently, there are double the number of users accessing the system compared to any day during the initial round of PPP. SBA is actively working to ensure system security and integrity while loan processing continues.

SBA is working around the clock to help all U.S. small businesses during these challenging times.

From: [Briggs, William J.](#)
Bcc: [Scott.mason@hklaw.com](#); [eve.otoole@hklaw.com](#); [Travis.Kiyota@EastWestBank.com](#); [Hector@barretoinc.com](#); [Alex Avers \(aayers@hardinet.org\)](#); [Alex Strong](#); [Anthony Diaz \(anthony.diaz@nist.gov\)](#); [Ashley Homes \(ahorner@sbko.bank\)](#); [Ashley Wittorf \(AWittorf@AdvaMed.org\)](#); [Billy Johnson \(BJohnson@isri.org\)](#); [Branson Lexi \(JGanzert@USChamber.com\)](#); [Callie Hoyt \(choyt@nmma.org\)](#); [Cecia Winslow \(cwinslow@afsamail.org\)](#); [Chissy Buteas \(cbuteas@njbri.org\)](#); [Chris Andersen \(chris.andersen@dutkogr.com\)](#); [Chris Burroughs](#); [Chris Cylke \(ccylke@americangaming.org\)](#); [Chris Schultz \(cschultz@ci-lake.com\)](#); [Chris Smith](#); [Christine Banning \(ChristineBanning@weareparking.org\)](#); [Craig Nett](#); [Dana Barbieri \(DBarbieri@csbs.org\)](#); [Danielle Beck \(dbeck@beef.org\)](#); [David Brown \(David.brown@bennetttdc.com\)](#); [David Hickey](#); [David Thompson](#); [Dennis Potter](#); [Don Childears \(Don@coloradobankers.org\)](#); [Eleni Kalish \(ekalisch@rccl.com\)](#); [Eric Streenststra \(eric@votehemp.com\)](#); [Henry Hogan \(hhogan@mdnonprofits.org\)](#); [James Slotnicj \(james.slotnick@sunlife.com\)](#); [Jared Ihrig](#); [Jeff Finkle](#); [Jeffrey Shapiro \(Jeffrey.Shapiro <jshapiro@pmj-dc.com>\)](#); [John Chwat \(johnchwat@mckongrp.com\)](#); [Jon Gold \(goldj@nrf.com\)](#); [Jonathan Eisen \(jeisen@ifdaonline.com\)](#); [Josh Ulman \(josh@ulmanpolicy.com\)](#); [Julie Strandlie \(strandlie@techservicealliance.org\)](#); [Katelyn Harris](#); [Kelli Burke](#); [Ken Presley \(kpresley@uma.org\)](#); [Kristina Weger \(kweger@aha.org\)](#); [Lauren McCormick](#); [Leah Dempsey \(dempsey@acinternational.org\)](#); [Leslie Fox](#); [Lisa Veith \(LisaPVeith@maximus.com\)](#); [Lizzy Simmons \(Simmons@nrf.com\)](#); [Lucida Cobbs](#); [Marc Saluk \(msaluk@co.hunterdon.nj.us\)](#); [Maria Sanderson \(MSanderson@GuidePost-Strategy.com\)](#); [Mark Leahy \(mleahy@mdna.com\)](#); [Matt Ginley \(matt@apcllc.net\)](#); [Matthew Lapinski \(mlapinski@crshq.com\)](#); [Meagan McCanna \(meagan.mccanna@airbnb.com\)](#); [Michael Lamm \(MLamm@corpadvisorysolutions.com\)](#); [Michael Schuttloffel \(michael@capenet.org\)](#); [Mike Aquaro \(maquaro@rmahq.org\)](#); [Mike Leonard](#); [Naisha Jackson \(njackson@finhealthnetwork.org\)](#); [Nancy Hammer \(Nancy.Hammer@shrm.org\)](#); [Nick Austin \(naustinesq@gmail.com\)](#); [Ozzie Palomo \(opalomo@chartwellstrategy.com\)](#); [Patricia Hall \(patricia.ward@androsysinc.com\)](#); [Paul Miller](#); [Peter Comstock](#); [Ralph Pulver \(RPULVER@travelers.com\)](#); [Rashid G. Hallaway](#); [Reed Linsk](#); [Reese Goldsmith \(rgoldsmith@bhfs.com>\)](#); [RJ Carney \(ronaldrk@fb.org\)](#); [Russell Wasson \(Russell.Wasson@nreca.coop\)](#); [schelton@beststrategies.com](#); [Seth Pearman \(seth.pearman@fsst.org\)](#); [Shannon Meade \(smeade@restaurant.org\)](#); [Stephen Hoar \(shoar@wh2cpas.com\)](#); [Stephen Aaron \(saaron@mercuryllc.com\)](#); [Tori Barnes](#); [Tracy Taylor](#); [Travis Johnson](#)
Subject: fyi
Date: Monday, April 27, 2020 5:28:00 PM

As of 3:30 pm EDT today, SBA has processed more than 100,000 PPP loans by more than 4,000 lenders.

Unprecedented demand is slowing E-Tran response times. Currently, there are double the number of users accessing the system compared to any day during the initial round of PPP. SBA is actively working to ensure system security and integrity while loan processing continues.

SBA is working around the clock to help all U.S. small businesses during these challenging times.

From: Scott.Mason@hklaw.com
To: [Billimoria, Jimmy F. \(Jim\)](#)
Subject: hey
Date: Wednesday, March 25, 2020 8:02:29 PM

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JB – Hope you are well, safe, and most importantly healthy! SBA about to get busy...best suggestions on getting clients questions answered...or wait til they come in and contact that office? Thanks in advance!!!

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

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From: [Ozzie Palomo](#)
To: [Gray, Christopher S.](#); [Chiokadze, David G.](#)
Cc: [David Tamasi](#)
Subject: iHeartMedia: SBA-CARES Act-Radio effort
Date: Monday, April 6, 2020 8:41:01 PM
Attachments: [SBA-CARES Act-Radio.pdf](#)
[ATT00001.htm](#)

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Chris and David -

I understand you are busy but wanted to reach out to you on behalf of iHeartMedia. My business partner David Tamasi, copied here, works closely with iHeartMedia. We were hoping to put the following concept in front of you and SBA leadership for consideration.

The U.S. Government has a long history of utilizing local radio's massive reach to communicate directly with the public on matters of national urgency. Based on this experience, iHeartMedia and the radio industry believe it is vital that U.S. small businesses be educated about the Paycheck Protection Program and other relevant SBA programs. Ad Council-partnered radio PSAs continue to be a key component of the public education COVID-19 social distancing campaign.

Broadcast radio, which is free to listeners, is unmatched in terms of its national reach. Radio's cost-per-thousand listeners (CPM) is also the most cost-effective mass media platform, with superior results. An SBA-led national broadcast radio public education campaign, similar to **DEA's "National Take Back Day" Campaign**, can reach U.S. small businesses about the CARES ACT's benefits and access program information. iHeart Media, as an example, has the capability to stand up a broadcast spot campaign in a matter of 4 hours (as long as the audio is ready and approved). In many cases, such a national campaign, with wide industry participation could be on the air within 24 hours of its design.

iHeartMedia, Inc., is a leading global media, digital and entertainment company. iHeartMedia, Inc. includes iHeartMedia, which has the largest reach of any broadcaster in America and over a quarter billion listeners each month, is a major digital platform via its iHeartRadio Network and a significant social platform with over 120 million social followers.

Attached is more information. Dave can also answer any questions.

We would welcome the opportunity to discuss this at your earliest convenience.

Thank you,

Ozzie

From: [Briggs, William J.](#)
To: [Briggs, William J. \(William.Briggs@sba.gov\)](#)
Bcc: [John Stanford](#); [Raymond, Joshua H.](#); [Alex Ayers \(aayers@hardinet.org\)](#); [Alex Strong](#); [Anthony Diaz \(anthony.diaz@nist.gov\)](#); [Ashley Homes \(ahorner@sbko.bank\)](#); [Ashley Wittorf \(AWittorf@AdvaMed.org\)](#); [Billy Johnson \(BJohnson@isri.org\)](#); [Branson Lexi \(JGanzert@USChamber.com\)](#); [Callie Hoyt \(choyt@nmma.org\)](#); [Cecia Winslow \(cwinslow@afsamail.org\)](#); [Chissy Buteas \(cbuteas@njbri.org\)](#); [Chris Andersen \(chris.andersen@dutkogr.com\)](#); [Chris Burroughs](#); [Chris Cylke \(ccylke@americangaming.org\)](#); [Chris Schultz \(cschultz@cj-lake.com\)](#); [Chris Smith](#); [Christine Banning \(ChristineBanning@weareparking.org\)](#); [Craig Nett](#); [Dana Barbieri \(DBarbieri@csbs.org\)](#); [Danielle Beck \(dbeck@beef.org\)](#); [David Brown \(David.brown@bennettcdc.com\)](#); [David Hickey](#); [David Thompson](#); [Dennis Potter](#); [Don Childears \(Don@coloradobankers.org\)](#); [Eleni Kalish \(ekalisch@rccl.com\)](#); [Eric Streenststra \(eric@votehemp.com\)](#); [Henry Hogan \(hhogan@mdnonprofits.org\)](#); [James Slotnick \(james.slotnick@sunlife.com\)](#); [Jared Thrig](#); [Jeff Finkle](#); [Jeffrey Shapiro \(Jeffrey Shapiro <jshapiro@pmj-dc.com>\)](#); [John Chwat \(johnchwat@mckeongrp.com\)](#); [Jon Gold \(goldj@nrf.com\)](#); [Jonathan Eisen \(jeisen@ifdaonline.com\)](#); [Josh Ulman \(josh@ulmanpolicy.com\)](#); [Julie Strandlie \(strandlie@techservicealliance.org\)](#); [Katelyn Harris](#); [Kelli Burke](#); [Ken Presley \(kpresley@uma.org\)](#); [Kristina Weger \(kweger@aha.org\)](#); [Lauren McCormick](#); [Leah Dempsey \(dempsey@acinternational.org\)](#); [Leslie Fox](#); [Lisa Veith \(LisaPVeith@maximus.com\)](#); [Lizzy Simmons \(Simmons@nrf.com\)](#); [Lucida Cobbs](#); [Marc Saluk \(msaluk@co.hunterdon.nj.us\)](#); [Maria Sanderson \(MSanderson@GuidePost-Strategy.com\)](#); [Mark Leahy \(mleahy@mdna.com\)](#); [Matt Ginley \(matt@apcllc.net\)](#); [Matthew Lapinski \(mlapinski@crshq.com\)](#); [Meagan McCanna \(meagan.mccanna@airbnb.com\)](#); [Michael Lamm \(MLamm@corpadvisorysolutions.com\)](#); [Michael Schuttloffel \(michael@capenet.org\)](#); [Mike Aquaro \(maquaro@rmahq.org\)](#); [Mike Leonard](#); [Naisha Jackson \(njackson@finhealthnetwork.org\)](#); [Nancy Hammer \(Nancy.Hammer@shrm.org\)](#); [Nick Austin \(naustinesq@gmail.com\)](#); [Ozzie Palomo \(opalomo@chartwellstrategy.com\)](#); [Patricia Hall \(patricia.ward@androsysinc.com\)](#); [Paul Miller](#); [Peter Comstock](#); [Ralph Pulver \(RPULVER@travelers.com\)](#); [Rashid G. Hallaway](#); [Reed Linsk](#); [Reese Goldsmith \(rgoldsmith@bhfs.com>\)](#); [RJ Carney \(ronaldk@fb.org\)](#); [Russell Wasson \(Russell.Wasson@nreca.coop\)](#); [schelton@beststrategies.com](#); [Seth Pearman \(seth.pearman@fsst.org\)](#); [Shannon Meade \(smeade@restaurant.org\)](#); [Stephen Hoar \(shoar@wh2cpas.com\)](#); [Stephen A Aaron \(saaron@mercuryllc.com\)](#); [Tori Barnes](#); [Tracy Taylor](#); [Travis Johnson](#)
Subject: Important PPP Lending Operations Update - April 29, 2020
Date: Wednesday, April 29, 2020 1:19:00 PM

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Paycheck Protection Program (PPP) Lending Operations Update – Wednesday, April 29, 2020

SBA and Treasury value all lenders and their small business customers.

To ensure access to the PPP loan program for the smallest lenders and their small business customers, starting at 4 p.m. today EDT through 11:59 p.m. EDT, SBA systems will only accept loans from lending institutions with asset sizes less than \$1 billion dollars.

Please note, lending institutions with asset sizes less than \$1 billion will still be able to submit PPP loans outside of this time frame. Please also note that lenders with asset sizes greater than \$1 billion will be able to submit loans outside of today's 4pm -11:59pm EDT reserved processing time.

This reserved processing time applies today April 29, 2020. SBA and Treasury will evaluate whether to create a similar reserved time again in the future.

SBA and Treasury continue to monitor loan system performance and will continue to provide frequent updates to the lending community.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration



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Bcc: [Ali Gormley](#); [Ayrianne Parks](#); [Barbara Benham](#); [Blanchard, Laricke](#); [Brennan Hart](#); [Brian Crawford](#); [Buck, Leon](#); [Caleb Jones](#); [Carolina Martinez](#); [Cerami, Michael](#); [Charles Crain](#); [Chiling Tong <ctong@nationalace.org>](#); [Chirag](#); [Chris Bliley](#); [Chris Burgoyne](#); [Chris Walker](#); [Covington, Lee](#); [Darren Littell](#); [David Stewart \(david.stewart@squirepb.com\)](#); [Denton, Neal](#); [Ed Elfmann](#); [Eric Dell](#); [Faith Bautista](#); [Gideon Lett](#); [Graham, Michael A.](#); [Greenhaus, Doug](#); [Gregg Haifley](#); [Guy](#); [Hughes, Spencer](#); [Jason Paul Dore](#); [Jay Pacious](#); [Jeffrey Regan](#); [Jessica Mandel](#); [Jill Hoffman](#); [Jody Milanese](#); [John Basselini](#); [John Hiller](#); [John Sanford \(jp@prismgroup.global\)](#); [Jonathan Lovitz](#); [Jordan Heiliczer](#); [Kati Siconolfi](#); [Katie Vlietstra \(NASE\)](#); [Kerrie Rushton](#); [Kitty Loyd](#); [kkerrigan@sbecouncil.org](#); [Laura Haines](#); [Lauren Crawford Shaver](#); [Maria Luisa Boyce \(mariaboyce@ups.com\)](#); [Mark McCallum](#); [Mark Szymanski](#); [Matt Curtis](#); [Maura Morton](#); [Michelle B. Christian \(Michelle.Christian@sba.gov\)](#); [Michelle Lieber](#); [Nathan Conrad](#); [Newton, Martha E - ILAB](#); [Nicholas Zupancic](#); [Nick Owens](#); [Phil Anderson](#); [rboerstling@nam.org](#); [Rhett Buttle](#); [Rob Chamberlin](#); [Robert James, II](#); [sbeall@franchise.org](#); [Steve Denis](#); [Susan Nester](#); [Tom Sullivan](#); [Valerie Jaffee](#); [VRMA - Holcomb, Greg](#); [Walling, Laura](#); [Woolf, Steven](#); [Zach Martin](#)
Subject: Important PPP lending operations update - Tuesday, April 28, 2020
Date: Tuesday, April 28, 2020 12:06:00 PM

Please distribute this message throughout your networks.

PPP Lending Operations Update – Tuesday, April 28, 2020

SBA and Treasury value all lenders and their small business customers.

For the benefit of small business customers and their employees, SBA and Treasury are working on ways to optimize the loan processing system.

Starting today, Robotic Processing Automation (RPA), which are robotic systems used by some banks to mimic human data entry, may not be used to submit Paycheck Protection Program loans into SBA's E-Tran loan system.

RPAs burden the processing system and diminish its capabilities. Without RPAs, the loan processing system will be more reliable, accessible, and equitable for all small businesses.

Application Programming Interface (APIs) will still be permitted. If you are a lender who needs assistance converting your submission process to a non-RPA API, contact Sheri McConville. (Sheri.Mcconville@sba.gov)

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration



U.S. Small Business
Administration

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Subject: Joint Statement by Administrator Jovita Carranza Secretary and Steven T. Mnuchin on Establishing Dedicated Hours for Small Lender Submissions of PPP Applications
Date: Wednesday, April 29, 2020 4:43:00 PM
Attachments: [image003.png](#)

NEWS RELEASE

PRESS OFFICE

Release Date: April 29, 2020
Release Number: 20-36

Contact: Press_Office@sba.gov, (202) 205-7036
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Joint Statement by Administrator Jovita Carranza Secretary and Steven T. Mnuchin on Establishing Dedicated Hours for Small Lender Submissions of PPP Applications

WASHINGTON – U.S. Small Business Administration Administrator Jovita Carranza and U.S. Treasury Secretary Steven T. Mnuchin issued the following statement today on the Paycheck Protection Program (PPP) amid continuing efforts to aid small community lenders, their small business customers, and ensure SBA's systems run efficiently:

"In order to ensure special access to the PPP loan program for the smallest lenders and their small business customers, the SBA is only accepting loans from lending institutions with asset sizes less than \$1 billion from 4:00 p.m. EDT until 11:59 p.m. EDT on April 29, 2020. SBA is working to ensure that all eligible small businesses have access to this funding to sustain their businesses and keep their employees on payroll.

“All lending institutions, regardless of size, will still be able to submit PPP loans outside of this timeframe. This reserved processing time currently only applies to April 29, 2020. In addition to ensuring access for the smallest lenders, we expect that providing this reserved processing time today will enhance the SBA’s loan system performance all users who submit loans outside of this time frame.”

###

About the U.S. Small Business Administration

The U.S. Small Business Administration makes the American dream of business ownership a reality. As the only go-to resource and voice for small businesses backed by the strength of the federal government, the SBA empowers entrepreneurs and small business owners with the resources and support they need to start, grow or expand their businesses, or recover from a declared disaster. It delivers services through an extensive network of SBA field offices and partnerships with public and private organizations. To learn more, visit www.sba.gov. ☐

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Subject: Joint Statement by SBA Administrator Jovita Carranza and Treasury Secretary Steven T. Mnuchin on the Resumption of the Paycheck Protection Program
Date: Friday, April 24, 2020 3:50:00 PM
Attachments: [image004.png](#)

NEWS RELEASE

PRESS OFFICE

Release Date: April 24, 2020

Contact: Press_Office@sba.gov, (202) 205-7036

Release Number: 20-34

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Joint Statement by SBA Administrator Jovita Carranza and Treasury Secretary Steven T. Mnuchin on the Resumption of the Paycheck Protection Program

WASHINGTON – Administrator of the U.S. Small Business Administration Jovita Carranza and U.S. Treasury Secretary Steven T. Mnuchin issued the following statement today on the resumption of the Payroll Protection Program (PPP):

“We are pleased that President Trump has signed into law the Paycheck Protection Program and Health Care Enhancement Act, which provides critical additional funding for American

workers and small businesses affected by the coronavirus pandemic. We want to thank Leader McConnell, Leader Schumer, Speaker Pelosi, and Leader McCarthy for working with us on a bipartisan basis to ensure that the Paycheck Protection Program is funded so that small businesses can keep hardworking Americans on the payroll.

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“We encourage all approved lenders to process loan applications previously submitted by eligible borrowers and disburse funds expeditiously. All eligible borrowers who need these funds should work with an approved lender to apply. Borrowers should carefully review PPP regulations and guidance and the certifications required to obtain a loan.

“The Trump Administration is fully committed to ensuring that America’s workers and small businesses continue to get the resources they need to get through this challenging time.”

For more information on the Paycheck Protection Program, visit: sba.gov/paycheckprotection.

###

About the U.S. Small Business Administration

The U.S. Small Business Administration makes the American dream of business ownership a reality. As the only go-to resource and voice for small businesses backed by the strength of the federal government, the SBA empowers entrepreneurs and small business owners with the resources and support they need to start, grow or expand their businesses, or recover from a declared disaster. It delivers services through an extensive network of SBA field offices and partnerships with public and private organizations. To learn more, visit www.sba.gov.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration

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U.S. Small Business
Administration

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From: [Briggs, William J.](#)
To: [Briggs, William J. \(William.Briggs@sba.gov\)](#)
Bcc: [Alex Avers \(aavers@hardinet.org\)](#); [Alex Strong](#); [Andrew Shore](#); [Anthony Diaz \(anthony.diaz@nist.gov\)](#); [Ashley Homes \(ahorner@sbko.bank\)](#); [Ashley Wittorf \(AWittorf@AdvaMed.org\)](#); [Billy Johnson \(BJohnson@isri.org\)](#); [Branson Lexi \(JGanzert@USChamber.com\)](#); [Callie Hoyt \(choyt@nmma.org\)](#); [Cecia Winslow \(cwinslow@afsamail.org\)](#); [Chissy Buteas \(cbuteas@njbri.org\)](#); [Chris Andersen \(chris.andersen@dutkogr.com\)](#); [Chris Burroughs](#); [Chris Cylke \(ccylke@americangaming.org\)](#); [Chris Schultz \(cschultz@cj-lake.com\)](#); [Chris Smith](#); [Christine Banning \(ChristineBanning@weareparking.org\)](#); [Craig Nett](#); [Dana Barbieri \(DBarbieri@csbs.org\)](#); [Danielle Beck \(dbeck@beef.org\)](#); [David Brown \(David.brown@bennettcd.com\)](#); [David Hickey](#); [David Thompson](#); [Delynn Shattuck \(Delynn.Shattuck.300228258@p2a.co\)](#); [Dena Sher \(sher@au.org\)](#); [Dennis Potter](#); [Don Childears \(Don@coloradobankers.org\)](#); [Eleni Kalish \(ekalisch@rccl.com\)](#); [Eric Streenststra \(eric@votehemp.com\)](#); [Henry Hogan \(hhogan@mdnonprofits.org\)](#); [James Slotnick \(james.slotnick@sunlife.com\)](#); [Jared Ihrig](#); [Jared Williams J. D. \(jwilliams@teetimedcoalition.org\)](#); [Jason Torchinsky \(jtorchinsky@hvtj.law\)](#); [Jeff Finkle](#); [Jeffrey Shapiro \(Jeffrey.Shapiro <jshapiro@pmj-dc.com>\)](#); [John Chwat \(johnchwat@mckongrp.com\)](#); [John Moore \(jmoore@backstopsolutions.com\)](#); [Jon Gold \(goldj@nrf.com\)](#); [Jonathan Eisen \(jeisen@ifdaonline.com\)](#); [Jonathan Thompson \(jthompson@sheriffs.org\)](#); [Josh Ulman \(josh@ulmanpolicy.com\)](#); [Joshua Habursky \(joshua@premiumcigars.org\)](#); [Julie Strandlie \(strandlie@techservicealliance.org\)](#); [Kaitlyn Martin \(KMMartin@cozen.com\)](#); [Katelyn Harris](#); [Kelli Burke](#); [Ken Presley \(kpresley@uma.org\)](#); [Kristina Weger \(kweger@aha.org\)](#); [Kurt Imhof \(Kurt Imhof <kimhof@lifesciencespa.org>\)](#); [Larry Allen \(lallen@nypex.com\)](#); [Lauren McCormick](#); [Leah Dempsey \(dempsey@acinternational.org\)](#); [Leslie Fox](#); [Lisa Veith \(LisaPVeith@maximus.com\)](#); [Lizzy Simmons \(Simmons@nrf.com\)](#); [Lucida Cobbs](#); [Marc Saluk \(msaluk@co.hunterdon.nj.us\)](#); [Maria Sanderson \(MSanderson@GuidePost-Strategy.com\)](#); [Mark Leahy \(mleahy@mdna.com\)](#); [Mark Steiner](#); [Matt Ginley \(matt@apcllc.net\)](#); [Matthew Lapinski \(mlapinski@crshq.com\)](#); [Meagan McCanna \(meagan.mccanna@airbnb.com\)](#); [Michael Lamm \(MLamm@corpadvisorystolutions.com\)](#); [Michael Schuttloffel \(michael@capenet.org\)](#); [Mike Aquaro \(maquaro@rmahq.org\)](#); [Mike Leonard](#); [Naisha Jackson \(njackson@finhealthnetwork.org\)](#); [Nancy Hammer \(Nancy.Hammer@shrm.org\)](#); [Nick Austin \(naustinesq@gmail.com\)](#); [Ozzie Palomo \(opalomo@chartwellstrategy.com\)](#); [Patricia Hall \(patricia.ward@androsysinc.com\)](#); [Paul Miller](#); [Peter Comstock](#); [Peter Gordon](#); [Ralph Pulver \(RPULVER@travelers.com\)](#); [Rashid G. Hallaway](#); [Reed Linsk](#); [Reese Goldsmith \(rgoldsmith@bhfs.com>\)](#); [RJ Carney \(ronaldk@fb.org\)](#); [Russell Wasson \(Russell.Wasson@nreca.coop\)](#); [Ryan Hunter \(rhunt@callout.us\)](#); [schelton@beststrategies.com](#); [Seth Pearman \(seth.pearman@fsst.org\)](#); [Shannon Meade \(smeade@restaurant.org\)](#); [Stephen Hoar \(shoar@wh2cpas.com\)](#); [Stephen Aaron \(saaron@mercuryllc.com\)](#); [Tori Barnes](#); [Tracy Taylor](#); [Warren Tyron \(wtyron@Capitalcounsel.com\)](#); [Zeke Flores](#)
Subject: Joint Statement by SBA Administrator Jovita Carranza and Treasury Secretary Steven T. Mnuchin on the Resumption of the Paycheck Protection Program
Date: Friday, April 24, 2020 3:50:00 PM
Attachments: [image004.png](#)

NEWS RELEASE

PRESS OFFICE

Release Date: April 24, 2020

Contact: Press_Office@sba.gov, (202) 205-7036

Release Number: 20-34

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Joint Statement by SBA Administrator Jovita Carranza and Treasury Secretary Steven T. Mnuchin on the Resumption of the Paycheck Protection Program

WASHINGTON – Administrator of the U.S. Small Business Administration Jovita Carranza and U.S. Treasury Secretary Steven T. Mnuchin issued the following statement today on the resumption of the Payroll Protection Program (PPP):

“We are pleased that President Trump has signed into law the Paycheck Protection Program and Health Care Enhancement Act, which provides critical additional funding for American

workers and small businesses affected by the coronavirus pandemic. We want to thank Leader McConnell, Leader Schumer, Speaker Pelosi, and Leader McCarthy for working with us on a bipartisan basis to ensure that the Paycheck Protection Program is funded so that small businesses can keep hardworking Americans on the payroll.

“The Small Business Administration will resume accepting PPP loan applications on Monday, April 27 at 10:30AM EDT from approved lenders on behalf of any eligible borrower. This will ensure that SBA has properly coded the system to account for changes made by the legislation.

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For more information on the Paycheck Protection Program, visit: sba.gov/paycheckprotection.

###

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From: [Chiokadze, David G.](#)
To: [Ozzie Palomo](#)
Subject: Lender List
Date: Thursday, April 23, 2020 4:24:00 PM
Attachments: [image001.png](#)

Per our conversation,

https://www.sba.gov/sites/default/files/2020-04/Lenders%20participating%20in%20PPP%20by%20State_As%20of%2004%2023%2020.pdf

David Chiokadze

Senior Advisor

Office of the Administrator

(202) [REDACTED] (C)



From: [Goldsmith, Reese E.](#)
To: [Manger, William M.](#)
Subject: Letter to Administrator re: NAICS 72 Clarification
Date: Tuesday, April 21, 2020 6:03:53 PM
Attachments: [SBA Letter 042120.pdf](#)

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Good evening Mr. Manger,

I hope this email finds you well. I'm a former SBA Office of Advocacy employee and I am now in private practice. I represent a number of clients with stakeholder interests in the PPP program.

Please find attached a letter to Administrator Carranza from Rosemary Becchi in our office on behalf of one of our hotel clients. This letter has also been transmitted to the White House by our client. The letter will also be submitted as a comment to the Interim Final Rules.

FYI, I also have some additional letters requesting for guidance on PPP loan forgiveness. I will forward those when finalized. We believe there will be additional guidance forthcoming. If you have any insight timing for that, it would be greatly appreciated.

Please let me know if you have any questions or if you need additional information.

I'm available by cell at [REDACTED] anytime.

Best,
Reese

Reese E. Goldsmith

Associate/Policy Advisor

Brownstein Hyatt Farber Schreck, LLP

1155 F Street N.W., Suite 1200

Washington, DC 20004

[REDACTED] cell

rgoldsmith@bhfs.com

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From: [Jessica Mandel](#)
To: [Gray, Christopher S.](#)
Subject: Loan Origination Question
Date: Monday, March 30, 2020 9:21:08 AM

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Chris: Hope you had a great weekend. Quick question, on the paycheck protection program, for originating these loans, is it just being down by banks or are there opportunities for others to originate?:

“Paycheck Protection Program” – **\$349bn for small business covered loan program** (another \$17bn for existing SBA loans and \$10bn for additional emergency grants)

Overseen by the Small Business Administration (fully guaranteed); **loans originated by banks**

Eligibility: businesses <500 employees

Individual loan size: 2.5x average monthly payroll cost (calculated from Jan. 1 – Feb. 29, 2020); capped at \$10mm

Debt will be forgiven (amount of which will be prorated by share of employees a business retains (or re-hires) through 6/30/20) if used for payroll / rent / utility / other necessities

Rate on loan will be capped at 4%; with maximum tenor of 10 years

Lender fees: 5% for loans <\$350K, 3% for loans \$350K-2mm, 1% for loans >\$2mm

0% risk-weighting if loans held on bank balance sheets

Jessica A. Mandel
Principal
Miller Strategies
(303) 588-6551



From: Scott.Mason@hklaw.com
To: [Briggs, William J.](#)
Cc: travis.kiyota@eastwestbank.com
Subject: Loan originator: East West Bank
Date: Tuesday, March 31, 2020 9:23:27 AM

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Bill –

Thank you for all your ongoing help re: some of the loan programs established by the CARES Act and their status. Everyone is anxious to learn more, and we really appreciate all the work you and the SBA team are undertaking to help secure the U.S. economy. Really appreciated.

One of those organizations interested in partnering with the SBA is East West Bank, the largest minority-operated bank in the U.S., headquartered in Los Angeles with branches in seven states serving both consumer and commercial interests. They are poised to become a leading originator of loans among Minority Depository Institutions.

For convenience, I've cc'ed Travis Kiyota, Senior Vice President of Global Policy and Public Affairs, who will likely follow up with specific questions regarding the new SBA Paycheck Protection loan program, and other CARES support opportunities, etc. Travis is also available as a resource to you all to answer any questions you may have on process, etc.

Thanks again for all your help.

Scott

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

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scott.mason@hklaw.com | www.hklaw.com

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From: [John Anderson](#)
To: [McCracken, Erin S.](#)
Subject: Melissa Shuffield Recommended we connect
Date: Monday, March 30, 2020 10:30:09 PM
Attachments: [ATT00001.htm](#)
[Enigma_SBALoans_033020.pdf](#)
[ATT00002.htm](#)

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Hi Erin,

Melissa encourage me to connect. I worked for Sen. Crapo and my colleague Jared Sawyer worked with Jovita at UST. By way of background, attached is a deck but here's the summary - to ensure SBA's loan facilitates are successful the Administration must partner with or encourage private sector participants to utilize precision data and predictive algorithms to efficiently expedite loan application processing and most importantly filter out fraud and protect taxpayers. The government must do its best to make sure loans are going to legitimate businesses.

A data science company leading the way is [Enigma](#) and they can verify business legitimacy through data and technology in seconds. Historically business data is only aggregated by Dun & Bradstreet, Equifax, Lexis, but those firms don't have reliable data on small businesses (<\$5M). Enigma spent years training predictive algorithms on billions of public data points to assess which small businesses would make good B2B bets, suitable for insurance offerings/credit lines etc. That's exactly the solution needed for the SBA loan facility to be a successful response to coronavirus.

Bottom-line. The old 7(a) methods of approving/processing loans will not work given the current state of affairs. [Enigma](#), works with major private-sector financial institutions (e.g., Capitol One, Truist) and can quickly and accurately identify deserving loan applicants. Relying on the most precise available data sets and highly predictive algorithms, Enigma can accurately assess small business risk and growth signals, as well as granular industry activity. The company's ability to quickly screen aid applications is critical to SBA, Treasury or their designated banking partners, which will be overwhelmed with applicants. Enigma will also identify fraudulent claims or those made in bad-faith efforts to access government money. Again, to advance our collective interests we must be sure that the money is used to support businesses that were productive and viable before COVID and that can roar back after the pandemic clears.

I can connect you with Enigma's CEO who would be happy to brief you and demonstrate the technology. We can share credentials with your team or anyone at SBA so that you can test the company's insights - that is, type in the name of any small business and explore the return rate and quality of their assessments.

Understand no one has time right now so you can trust that I'm only coming to you

with a viable solution.

Thank you. We greatly appreciate SBA's efforts and encourage you to consider innovative solutions to get the economy going again. Please let me know who else I should be in touch with?

Sincerely,

John

From: [Briggs, William J.](#)
Bcc: [Ali Gormley](#); [Ayrianne Parks](#); [Barbara Benham](#); [Blanchard, Laricke](#); [Brant Imperatore](#); [Brennan Hart](#); [Brian Blake](#); [Brian Crawford](#); [Caleb Jones](#); [Carolina Martinez](#); [Charles Crain](#); [Chiling Tong](#) <ctong@nationalace.org>; [Chirag](#); [Chris Bliley](#); [Chris Burgoyne](#); [Chris Walker](#); [Connie Evans](#); [Covington, Lee](#); [Dafina Williams](#); [Daniel Martini](#) (dmartini@aba.com); [Darren Littell](#); [David Stewart](#) (david.stewart@squirepb.com); [Denton, Neal](#); [Ed Elfmann](#); [Eric Dell](#); [Faith Bautista](#); [Gideon Lett](#); [Graham, Michael A.](#); [Greenhaus, Doug](#); [Greg Baer](#); [Gregg Haifley](#); [Guy](#); [Hughes, Spencer](#); [Jarrod Loadholt](#); [Jason Paul Dore](#); [Jay Pacious](#); jbutler@naggl.org; [Jeffrey Regan](#); [Jessica Mandel](#); [Jill Hoffman](#); [Jody Milanese](#); [John Hiller](#); [John Stanford](#); [Jonathan Lovitz](#); [Jordan Heiliczer](#); [Kaley Schafer](#); [Kalyn Stephens](#); [Kati Siconolfi](#); [Katie Vlietstra](#) (NASE); [Kerrie Rushton](#); [Kitty Loyd](#); kkelly@nationalbankers.org; kkerrigan@sbecouncil.org; [Kristen Granchelli](#); [Laura Haines](#); [Lauren Crawford Shaver](#); [Maggie Ference](#); [Maria Luisa Boyce](#) (mariaboyce@ups.com); [Mark McCallum](#); [Mark Szymanski](#); [Matt Curtis](#); [Maura Morton](#); [Michelle B. Christian](#) (Michelle.Christian@sba.gov); [Michelle Lieber](#); [NADCO president](#); [Nat Hoopes](#); [Nathan Conrad](#); [Newton, Martha E](#) - ILAB; [Nicholas Zupancic](#); [Nick Owens](#); [Phil Anderson](#); rboerstling@nam.org; [Rhett Buttle](#); [Rhonda Pointon](#) <RPointon@nadco.org>; [Rob Chamberlin](#); [Robert Flock](#); [Robert James, II](#); sbeall@franchise.org; [Scott Stewart](#); [Scott Talbott](#); [Steve Denis](#); [Steve Keen](#); [Susan Nester](#); [Tom Sullivan](#); twilkinson@naggl.org; [Valerie Jaffee](#); [VRMA - Holcomb, Greg](#); [Walling, Laura](#); [Zach Martin](#)
Subject: New FAQ's and info
Date: Tuesday, April 7, 2020 12:46:00 PM
Attachments: [Paycheck-Protection-Program-Frequently-Asked-Questions - April 6 2020.pdf](#)

New document:

See attached

Previous docs:

Affiliation Rules: <https://www.sba.gov/sites/default/files/2020-04/Affiliation%20rules%20overview%20%28for%20public%29%20v2.pdf>

Interim Final Rule (IFR) on affiliation: https://www.sba.gov/sites/default/files/2020-04/SBA%20IFR%20_1.pdf

FAQ on Faith-based Orgs and PPP: <https://www.sba.gov/sites/default/files/2020-04/SBA%20Faith-Based%20FAQ%20Final.pdf>

Interim Final Rule: https://www.sba.gov/sites/default/files/2020-04/PPP--IFRN%20FINAL_0.pdf

Borrower Application: <https://www.sba.gov/sites/default/files/2020-04/PPP%20Borrower%20Application%20Form.pdf>

PPP Loan Guaranty Form: https://www.sba.gov/sites/default/files/2020-04/PPP%20Lender%20Application%20Form_0.pdf

New Lender Application For Federally insured depository institutions, federally insured credit unions, and Farm Credit System institutions (other than the Federal Agricultural Mortgage Corporation) (Submit to delegatedauthority@sba.gov) <https://www.sba.gov/sites/default/files/2020-04/PPP--Agreement-for-New-Lenders-Banks-Credit-Unions-FCS-w-seal-fillable.pdf>

More Info:

E-Tran Pro Tip: When a lender enters a loan intro E-tran, **make sure they choose "PPP" from the**

first drop down menu. Do NOT choose “7(a)”. If they choose 7(a), they will face restrictions that aren’t relevant to PPP.

Find a lender tool: <https://www.sba.gov/paycheckprotection/find>

Lender Assistance Hotline: (833) 572-0502

Information for lenders can always be found at www.sba.gov/paycheckprotection or www.treasury.gov/cares

How to request change to info on sba.gov website: www.sba.gov/support (file a ticket)

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration



Home Page | www.sba.gov/paycheckprotection

From: [Briggs, William J.](#)
To: [Briggs, William J. \(William.Briggs@sba.gov\)](#)
Bcc: [Alex Avers \(aavers@hardinet.org\)](#); [Alex Strong](#); [Andrew Shore](#); [Anthony Diaz \(anthony.diaz@nist.gov\)](#); [Ashley Homes \(ahorner@sbko.bank\)](#); [Ashley Wittorf \(AWittorf@AdvaMed.org\)](#); [Billy Johnson \(BJohnson@isri.org\)](#); [Branson Lexi \(JGanzert@USChamber.com\)](#); [Callie Hoyt \(choyt@nmma.org\)](#); [Cecia Winslow \(cwinslow@afsamail.org\)](#); [Chissy Buteas \(cbuteas@njbri.org\)](#); [Chris Andersen \(chris.andersen@dutkogr.com\)](#); [Chris Burroughs](#); [Chris Cylke \(ccylke@americangaming.org\)](#); [Chris Schultz \(cschultz@cj-lake.com\)](#); [Chris Smith](#); [Christine Banning \(ChristineBanning@weareparking.org\)](#); [Craig Nett](#); [Dana Barbieri \(DBarbieri@csbs.org\)](#); [Danielle Beck \(dbeck@beef.org\)](#); [David Brown \(David.brown@bennetttdc.com\)](#); [David Hickey](#); [David Thompson](#); [Delynn Shattuck \(Delynn.Shattuck.300228258@p2a.co\)](#); [Dena Sher \(sher@au.org\)](#); [Dennis Potter](#); [Don Childears \(Don@coloradobankers.org\)](#); [Eleni Kalish \(ekalisch@rccl.com\)](#); [Eric Streenststra \(eric@votehemp.com\)](#); [Henry Hogan \(hhogan@mdnonprofits.org\)](#); [James Slotnicj \(james.slotnick@sunlife.com\)](#); [Jared Ihrig](#); [Jared Williams J. D. \(jwilliams@teetimedcoalition.org\)](#); [Jason Torchinsky \(jtorchinsky@hvtj.law\)](#); [Jeff Finkle](#); [Jeffrey Shapiro \(Jeffrey.Shapiro <jshapiro@pmj-dc.com>\)](#); [John Chwat \(johnchwat@mckeongrp.com\)](#); [John Moore \(jmoore@backstopsolutions.com\)](#); [Jon Gold \(goldj@nrf.com\)](#); [Jonathan Eisen \(jeisen@ifdaonline.com\)](#); [Jonathan Thompson \(jthompson@sheriffs.org\)](#); [Josh Ulman \(josh@ulmanpolicy.com\)](#); [Joshua Habursky \(joshua@premiumcigars.org\)](#); [Julie Strandlie \(strandlie@techservicealliance.org\)](#); [Kaitlyn Martin \(KMMartin@cozen.com\)](#); [Katelyn Harris](#); [Kelli Burke](#); [Ken Presley \(kpresley@uma.org\)](#); [Kristina Weger \(kweger@aha.org\)](#); [Kurt Imhof \(Kurt Imhof <kimhof@lifesciencespa.org>\)](#); [Larry Allen \(lallen@nypex.com\)](#); [Lauren McCormick](#); [Leah Dempsey \(dempsey@acinternational.org\)](#); [Leslie Fox](#); [Lisa Veith \(LisaPVeith@maximus.com\)](#); [Lizzy Simmons \(Simmons@nrf.com\)](#); [Lucida Cobbs](#); [Marc Saluk \(msaluk@co.hunterdon.nj.us\)](#); [Maria Sanderson \(MSanderson@GuidePost-Strategy.com\)](#); [Mark Leahy \(mleahy@mdna.com\)](#); [Mark Steiner](#); [Matt Ginley \(matt@apcllc.net\)](#); [Matthew Lapinski \(mlapinski@crshq.com\)](#); [Meagan McCanna \(meagan.mccanna@airbnb.com\)](#); [Michael Lamm \(MLamm@corpadvisorystolutions.com\)](#); [Michael Schuttloffel \(michael@capenet.org\)](#); [Mike Aquaro \(maquaro@rmahq.org\)](#); [Mike Leonard](#); [Naisha Jackson \(njackson@finhealthnetwork.org\)](#); [Nancy Hammer \(Nancy.Hammer@shrm.org\)](#); [Nick Austin \(naustinesq@gmail.com\)](#); [Ozzie Palomo \(opalomo@chartwellstrategy.com\)](#); [Patricia Hall \(patricia.ward@androsysinc.com\)](#); [Paul Miller](#); [Peter Comstock](#); [Peter Gordon](#); [Ralph Pulver \(RPULVER@travelers.com\)](#); [Rashid G. Hallaway](#); [Reed Linsk](#); [Reese Goldsmith \(rgoldsmith@bhfs.com>\)](#); [RJ Carney \(ronaldek@fb.org\)](#); [Russell Wasson \(Russell.Wasson@nreca.coop\)](#); [Ryan Hunter \(rhunt@callout.us\)](#); [schelton@beststrategies.com](#); [Seth Pearman \(seth.pearman@fsst.org\)](#); [Shannon Meade \(smeade@restaurant.org\)](#); [Stephen Hoar \(shoar@wh2cpas.com\)](#); [Stephen Aaron \(saaron@mercuryllc.com\)](#); [Tori Barnes](#); [Tracy Taylor](#); [Warren Tyron \(wtyron@Capitalcounsel.com\)](#); [Zeke Flores](#)
Subject: New PPP documents
Date: Wednesday, April 8, 2020 10:09:00 PM
Attachments: [PPP--Agreement-for-New-Lenders-Non-Bank-Non-Insured-Depository-Institution-Lenders-w-seal-fillable_0 \(1\).pdf](#)



U.S. Small Business
Administration

New Documents:

[New Lender Application Form](#) (Non-Bank and Non-Insured Depository Institution Lenders) See attached PDF.

Note: Lenders in the categories requiring the new form should submit the form by [emailing NFLapplicationforPPP@sba.gov](mailto:NFLapplicationforPPP@sba.gov).

Federally insured banks, credit unions, and farm credits should continue submitting new lender applications to DelegatedAuthority@sba.gov.

Additional questions were added [to the FAQ document](#). (Questions 19 & 20)

Misc. Info:

Find a lender tool: <https://www.sba.gov/paycheckprotection/find>

Information for lenders can always be found at www.sba.gov/paycheckprotection and www.treasury.gov/cares

Previous docs:

Affiliation Rules: <https://www.sba.gov/sites/default/files/2020-04/Affiliation%20rules%20overview%20%28for%20public%29%20v2.pdf>

Interim Final Rule (IFR) on affiliation: https://www.sba.gov/sites/default/files/2020-04/SBA%20IFR%20_1.pdf

FAQ on Faith-based Orgs and PPP: <https://www.sba.gov/sites/default/files/2020-04/SBA%20Faith-Based%20FAQ%20Final.pdf>

Interim Final Rule: https://www.sba.gov/sites/default/files/2020-04/PPP--IFRN%20FINAL_0.pdf

Borrower Application: <https://www.sba.gov/sites/default/files/2020-04/PPP%20Borrower%20Application%20Form.pdf>

PPP Loan Guaranty Form: https://www.sba.gov/sites/default/files/2020-04/PPP%20Lender%20Application%20Form_0.pdf

New Lender Application For Federally insured depository institutions, federally insured credit unions, and Farm Credit System institutions (other than the Federal Agricultural Mortgage Corporation) (Submit to delegatedauthority@sba.gov) <https://www.sba.gov/sites/default/files/2020-04/PPP--Agreement-for-New-Lenders-Banks-Credit-Unions-FCS-w-seal-fillable.pdf>

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Subject: New PPP Documents
Date: Tuesday, April 14, 2020 5:39:00 PM

SBA and Treasury have posted new documents to their respective PPP websites. Information for lenders can always be found at www.sba.gov/paycheckprotection and www.treasury.gov/cares.

New Documents:

The [Interim Final Rule](#) announcing Additional Eligibility Criteria and Requirements for Certain Pledges of Loans for the Paycheck Protection Program. This information is being posted in advance of publication in the Federal Register. The official version will appear in the Federal Register. [Click here](#) to download.

Through April 13, 2020, the SBA has guaranteed 1,035,086 loans under the Paycheck Protection Program. For more information on loan activity, [click here](#).

Misc. Info:

Lender Assistance Hotline: (833) 572-0502

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Subject: New PPP FAQs released
Date: Friday, April 24, 2020 5:43:00 PM

Additional FAQs regarding the Paycheck Protection Program: (Questions 31-35)

- [Frequently Asked Questions for Lenders and Borrowers for the Paycheck Protection Program](#)

For more information and updates, visit and [SBA.gov/PaycheckProtection](https://www.sba.gov/PaycheckProtection) and [Treasury.gov/CARES](https://www.treasury.gov/CARES)

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Subject: New PPP FAQs released
Date: Friday, April 24, 2020 5:43:00 PM

Additional FAQs regarding the Paycheck Protection Program: (Questions 31-35)

- [Frequently Asked Questions for Lenders and Borrowers for the Paycheck Protection Program](#)

For more information and updates, visit and [SBA.gov/PaycheckProtection](#) and [Treasury.gov/CARES](#)

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Subject: New PPP materials
Date: Friday, April 24, 2020 12:22:00 PM

Additional guidance regarding the Paycheck Protection Program:

- [Interim Final Rule on Requirements for Promissory Notes, Authorizations, Affiliation, and Eligibility](#)

For more information and updates, visit and [SBA.gov/PaycheckProtection](#) and [Treasury.gov/CARES](#)

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Subject: New PPP materials 4-28-20
Date: Tuesday, April 28, 2020 10:47:00 PM

SBA and Treasury have released additional guidance regarding the Paycheck Protection Program:

- [Joint Statement by Secretary Steven T. Mnuchin and Administrator Jovita Carranza on the Review Procedure for Paycheck Protection Program Loans](#)
- [Interim Final Rule on Seasonal Employees](#)
- [Interim Final Rule on Disbursements](#)
- [Frequently Asked Questions \(Question 37\)](#)
- [How to calculate PPP loan amounts](#)

For more information and updates, visit [SBA.gov/PaycheckProtection](#) and [Treasury.gov/CARES](#)

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From: [John Anderson](#)
To: [McCracken, Erin S.](#)
Subject: per my email - Here's how to get a small business loan under the \$350 billion coronavirus aid bill - The Washington Post
Date: Monday, March 30, 2020 11:24:26 PM

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Enigma quoted in the WP:

“However, Hicham Oudghiri, chief executive of a small business-focused data analytics and fraud detection company called Enigma Technologies, said it would be difficult for most banks to meet that target without substantially increasing the risk of fraud. Most small businesses will take days just gathering the documents they need to apply, he said.

“Even the most sophisticated banks will have a hard time short cutting their processes to get money out the door this fast,” Oudghiri.”

<https://www.washingtonpost.com/business/2020/03/30/heres-how-get-small-business-loan-under-349-billion-coronavirus-aid-bill/>

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Subject: PPP Lender Guidance now up
Date: Thursday, April 2, 2020 6:45:00 PM
Attachments: [IFRN FINAL.pdf](#)

www.sba.gov/paycheckprotection

The Interim Final Rule announcing the Paycheck Protection Program information is being posted in advance of publication in the Federal Register. The official version will appear in the Federal Register.

This will be posted publicly on the website at www.sba.gov/paycheckprotection along with other relevant documentation.

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From: [Briggs, William J.](#)
Bcc: [Alex Ayers \(aayers@hardinet.org\)](#); [Alex Strong](#); [Andrew Shore](#); [Anthony Diaz \(anthony.diaz@nist.gov\)](#); [Ashley Homes \(ahorner@sbko.bank\)](#); [Ashley Wittorf \(AWittorf@AdvaMed.org\)](#); [Billy Johnson \(BJohnson@isri.org\)](#); [Branson Lexi \(JGanzert@USChamber.com\)](#); [Callie Hoyt \(choyt@nmma.org\)](#); [Cecia Winslow \(cwinslow@afsamail.org\)](#); [Chissy Buteas \(cbuteas@njbri.org\)](#); [Chris Andersen \(chris.andersen@dutkogr.com\)](#); [Chris Burroughs](#); [Chris Cylke \(ccylke@americangaming.org\)](#); [Chris Schultz \(cschultz@cj-lake.com\)](#); [Chris Smith](#); [Christine Banning \(ChristineBanning@weareparking.org\)](#); [Craig Nett](#); [Dana Barbieri \(DBarbieri@csbs.org\)](#); [Danielle Beck \(dbeck@beef.org\)](#); [David Brown \(David.brown@bennettddc.com\)](#); [David Hickey](#); [David Thompson](#); [Delynn Shattuck \(Delynn.Shattuck.300228258@p2a.co\)](#); [Dena Sher \(sher@au.org\)](#); [Dennis Potter](#); [Don Childears \(Don@coloradobankers.org\)](#); [Eleni Kalish \(ekalisch@rccl.com\)](#); [Eric Streenststra \(eric@votehemp.com\)](#); [Henry Hogan \(hhogan@mdnonprofits.org\)](#); [James Slotnick \(james.slotnick@sunlife.com\)](#); [Jared Ihrig](#); [Jared Williams J. D. \(jwilliams@teetimecoalition.org\)](#); [Jason Torchinsky \(jtorchinsky@hvit.law\)](#); [Jeff Finkle](#); [Jeffrey Shapiro \(Jeffrey.Shapiro.<jshapiro@pmj-dc.com>\)](#); [John Chwat \(johnchwat@mckeongrp.com\)](#); [John Moore \(jmoore@backstopsolutions.com\)](#); [Jon Gold \(goldj@nrf.com\)](#); [Jonathan Eisen \(jeisen@ifdaonline.com\)](#); [Jonathan Thompson \(jthompson@sheriffs.org\)](#); [Josh Ulman \(josh@ulmanpolicy.com\)](#); [Joshua Habursky \(joshua@premiumcigars.org\)](#); [Julie Strandlie \(strandlie@techservicealliance.org\)](#); [Kaitlyn Martin \(KMMartin@cozen.com\)](#); [Katelyn Harris](#); [Kelli Burke](#); [Ken Presley \(kpresley@uma.org\)](#); [Kristina Weger \(kweger@aha.org\)](#); [Kurt Imhof \(Kurt Imhof <kimhof@lifesciencespa.org>\)](#); [Larry Allen \(lallen@nypex.com\)](#); [Lauren McCormick](#); [Leah Dempsey \(dempsey@acinternational.org\)](#); [Leslie Fox](#); [Lisa Veith \(LisaPVeith@maximus.com\)](#); [Lizzy Simmons \(Simmons@nrf.com\)](#); [Lucida Cobbs](#); [Marc Saluk \(msaluk@co.hunterdon.nj.us\)](#); [Maria Sanderson \(MSanderson@GuidePost-Strategy.com\)](#); [Mark Leahy \(mleahy@mdna.com\)](#); [Mark Steiner](#); [Matt Ginley \(matt@apcllc.net\)](#); [Matthew Lapinski \(mlapinski@crshq.com\)](#); [Meagan McCanna \(meagan.mccanna@airbnb.com\)](#); [Michael Lamm \(MLamm@corpadvisorystolutions.com\)](#); [Michael Schuttloffel \(michael@capenet.org\)](#); [Mike Aquaro \(maquaro@rmahq.org\)](#); [Mike Leonard](#); [Naisha Jackson \(njackson@finhealthnetwork.org\)](#); [Nancy Hammer \(Nancy.Hammer@shrm.org\)](#); [Nick Austin \(naustinesq@gmail.com\)](#); [Ozzie Palomo \(opalomo@chartwellstrategy.com\)](#); [Patricia Hall \(patricia.ward@androsysinc.com\)](#); [Paul Miller](#); [Peter Comstock](#); [Peter Gordon](#); [Ralph Pulver \(RPULVER@travelers.com\)](#); [Rashid G. Hallaway](#); [Reed Linsk](#); [Reese Goldsmith \(rgoldsmith@bhfs.com>\)](#); [RJ Carney \(ronaldk@fb.org\)](#); [Russell Wasson \(Russell.Wasson@nreca.coop\)](#); [Ryan Hunter \(rhunt@callout.us\)](#); [schelton@beststrategies.com](#); [Seth Pearman \(seth.pearman@fsst.org\)](#); [Shannon Meade \(smeade@restaurant.org\)](#); [Stephen Hoar \(shoar@wh2cpas.com\)](#); [Stephen Aaron \(saaron@mercuryllc.com\)](#); [Tori Barnes](#); [Tracy Taylor](#); [Travis Johnson](#); [Warren Tyron \(wtyron@Capitalcounsel.com\)](#); [Zeke Flores](#)
Subject: PPP loan data posted
Date: Friday, April 17, 2020 1:49:00 PM

<https://www.sba.gov/sites/default/files/2020-04/PPP%20Deck%20copy.pdf>

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration

Cell (202) 412-7016
William.Briggs@sba.gov



U.S. Small Business
Administration

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From: [Briggs, William J.](#)
Bcc: [Alex Ayers \(aayers@hardinet.org\)](#); [Alex Strong](#); [Andrew Shore](#); [Anthony Diaz \(anthony.diaz@nist.gov\)](#); [Ashley Homes \(ahorner@sbko.bank\)](#); [Ashley Wittorf \(AWittorf@AdvaMed.org\)](#); [Billy Johnson \(BJohnson@isri.org\)](#); [Branson Lexi \(JGanzert@USChamber.com\)](#); [Callie Hoyt \(choyt@nmma.org\)](#); [Cecia Winslow \(cwinslow@afsamail.org\)](#); [Chissy Buteas \(cbuteas@njbri.org\)](#); [Chris Andersen \(chris.andersen@dutkogr.com\)](#); [Chris Burroughs](#); [Chris Cylke \(ccylke@americangaming.org\)](#); [Chris Schultz \(cschultz@cj-lake.com\)](#); [Chris Smith](#); [Christine Banning \(ChristineBanning@weareparking.org\)](#); [Craig Nett](#); [Dana Barbieri \(DBarbieri@csbs.org\)](#); [Danielle Beck \(dbeck@beef.org\)](#); [David Brown \(David.brown@bennettddc.com\)](#); [David Hickey](#); [David Thompson](#); [Delynn Shattuck \(Delynn.Shattuck.300228258@p2a.co\)](#); [Dena Sher \(sher@au.org\)](#); [Dennis Potter](#); [Don Childears \(Don@coloradobankers.org\)](#); [Eleni Kalish \(ekalisch@rccl.com\)](#); [Eric Streenststra \(eric@votehemp.com\)](#); [Henry Hogan \(hhogan@mdnonprofits.org\)](#); [James Slotnick \(james.slotnick@sunlife.com\)](#); [Jared Ihrig](#); [Jared Williams J. D. \(jwilliams@teetimecoalition.org\)](#); [Jason Torchinsky \(jtorchinsky@hvit.law\)](#); [Jeff Finkle](#); [Jeffrey Shapiro \(Jeffrey.Shapiro <jshapiro@pmj-dc.com>\)](#); [John Chwat \(johnchwat@mckeongrp.com\)](#); [John Moore \(jmoore@backstopsolutions.com\)](#); [Jon Gold \(goldj@nrf.com\)](#); [Jonathan Eisen \(jeisen@ifdaonline.com\)](#); [Jonathan Thompson \(jthompson@sheriffs.org\)](#); [Josh Ulman \(josh@ulmanpolicy.com\)](#); [Joshua Habursky \(joshua@premiumcigars.org\)](#); [Julie Strandlie \(strandlie@techservicealliance.org\)](#); [Kaitlyn Martin \(KMMartin@cozen.com\)](#); [Katelyn Harris](#); [Kelli Burke](#); [Ken Presley \(kpresley@uma.org\)](#); [Kristina Weger \(kweger@aha.org\)](#); [Kurt Imhof \(Kurt Imhof <kimhof@lifesciencespa.org>\)](#); [Larry Allen \(lallen@nypex.com\)](#); [Lauren McCormick](#); [Leah Dempsey \(dempsey@acinternational.org\)](#); [Leslie Fox](#); [Lisa Veith \(LisaPVeith@maximus.com\)](#); [Lizzy Simmons \(Simmons@nrf.com\)](#); [Lucida Cobbs](#); [Marc Saluk \(msaluk@co.hunterdon.nj.us\)](#); [Maria Sanderson \(MSanderson@GuidePost-Strategy.com\)](#); [Mark Leahy \(mleahy@mdna.com\)](#); [Mark Steiner](#); [Matt Ginley \(matt@apcllc.net\)](#); [Matthew Lapinski \(mlapinski@crshq.com\)](#); [Meagan McCanna \(meagan.mccanna@airbnb.com\)](#); [Michael Lamm \(MLamm@corpadvisorystolutions.com\)](#); [Michael Schuttloffel \(michael@capenet.org\)](#); [Mike Aquaro \(maquaro@rmahq.org\)](#); [Mike Leonard](#); [Naisha Jackson \(njackson@finhealthnetwork.org\)](#); [Nancy Hammer \(Nancy.Hammer@shrm.org\)](#); [Nick Austin \(naustinesq@gmail.com\)](#); [Ozzie Palomo \(opalomo@chartwellstrategy.com\)](#); [Patricia Hall \(patricia.ward@androsysinc.com\)](#); [Paul Miller](#); [Peter Comstock](#); [Peter Gordon](#); [Ralph Pulver \(RPULVER@travelers.com\)](#); [Rashid G. Hallaway](#); [Reed Linsk](#); [Reese Goldsmith \(rgoldsmith@bhfs.com>\)](#); [RJ Carney \(ronaldk@fb.org\)](#); [Russell Wasson \(Russell.Wasson@nreca.coop\)](#); [Ryan Hunter \(rhunt@callout.us\)](#); [schelton@beststrategies.com](#); [Seth Pearman \(seth.pearman@fsst.org\)](#); [Shannon Meade \(smeade@restaurant.org\)](#); [Stephen Hoar \(shoar@wh2cpas.com\)](#); [Stephen Aaron \(saaron@mercuryllc.com\)](#); [Tori Barnes](#); [Tracy Taylor](#); [Travis Johnson](#); [Warren Tyron \(wtyron@Capitalcounsel.com\)](#); [Zeke Flores](#)
Subject: PPP loan data posted
Date: Friday, April 17, 2020 1:49:00 PM

<https://www.sba.gov/sites/default/files/2020-04/PPP%20Deck%20copy.pdf>

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration

Cell (202) 412-7016
William.Briggs@sba.gov



U.S. Small Business
Administration

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From: [Briggs, William J.](#)
To: Scott.Mason@hklaw.com
Subject: RE: 7(a) lender form
Date: Thursday, April 2, 2020 3:12:00 PM

It hasn't come out yet. As soon as I have it you will

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Scott.Mason@hklaw.com <Scott.Mason@hklaw.com>
Sent: Thursday, April 2, 2020 2:28 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: 7(a) lender form

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Bill –

I know you guys are under numerous waterfalls; hang in there. Checking in to see if there is any way I can get a copy of the application to become a 7(a) lender. Really appreciated. THANKS!

Scott

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

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confidentiality.

From: [Jessica Mandel](#)
To: [Briggs, William J.](#)
Subject: Re: Affiliate Rule
Date: Monday, April 6, 2020 6:14:44 PM

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Great, thanks! I really appreciate it. Do you think it will be this week?

Jessica A. Mandel
Principal
Miller Strategies
m: [REDACTED]

From: Briggs, William J. <William.Briggs@sba.gov>
Sent: Monday, April 6, 2020 4:50:58 PM
To: Jessica Mandel <jessica@millerstrategies.com>
Subject: RE: Affiliate Rule

Yes. more guidance is coming.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Jessica Mandel <jessica@millerstrategies.com>
Sent: Monday, April 6, 2020 5:50 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: Affiliate Rule

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Bill: I hope this finds you well. I know that you released the interim final rule with affiliate rule and guidance of the affiliate rule but was curious if you anticipated there would be additional guidance to the rule? There still seems to be some confusion around the rule and whether it applies to certain companies. Please let me know. Thank you for your help!

Best,
Jessica

Jessica A. Mandel
Principal
Miller Strategies



From: [Briggs, William J.](#)
To: [Jessica Mandel](#)
Subject: RE: Affiliate Rule
Date: Monday, April 6, 2020 6:19:00 PM

Will try to. Treasury.gov/cares and www.sba.gov/paycheckprotection are the go-to

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Jessica Mandel <jessica@millerstrategies.com>
Sent: Monday, April 6, 2020 6:18 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: Re: Affiliate Rule

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Ok, no problem. If you could flag it to me when it's released I would really appreciate it!

Jessica A. Mandel
Principal
Miller Strategies
m: [REDACTED]

From: Briggs, William J. <William.Briggs@sba.gov>
Sent: Monday, April 6, 2020 5:16:24 PM
To: Jessica Mandel <jessica@millerstrategies.com>
Subject: RE: Affiliate Rule

Can't commit to a timeframe.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Jessica Mandel <jessica@millerstrategies.com>
Sent: Monday, April 6, 2020 6:15 PM
To: Briggs, William J. <William.Briggs@sba.gov>

Subject: Re: Affiliate Rule

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Great, thanks! I really appreciate it. Do you think it will be this week?

Jessica A. Mandel
Principal
Miller Strategies
m [REDACTED]

From: Briggs, William J. <William.Briggs@sba.gov>
Sent: Monday, April 6, 2020 4:50:58 PM
To: Jessica Mandel <jessica@millerstrategies.com>
Subject: RE: Affiliate Rule

Yes. more guidance is coming.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Jessica Mandel <jessica@millerstrategies.com>
Sent: Monday, April 6, 2020 5:50 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: Affiliate Rule

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Bill: I hope this finds you well. I know that you released the interim final rule with affiliate rule and guidance of the affiliate rule but was curious if you anticipated there would be additional guidance to the rule? There still seems to be some confusion around the rule and whether it applies to certain companies. Please let me know. Thank you for your help!

Best,
Jessica

Jessica A. Mandel
Principal

Miller Strategies



From: [Jessica Mandel](#)
To: [Briggs, William J.](#)
Subject: Re: Affiliate Rule
Date: Monday, April 6, 2020 6:18:04 PM

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Ok, no problem. If you could flag it to me when it's released I would really appreciate it!

Jessica A. Mandel
Principal
Miller Strategies
m: [REDACTED]

From: Briggs, William J. <William.Briggs@sba.gov>
Sent: Monday, April 6, 2020 5:16:24 PM
To: Jessica Mandel <jessica@millerstrategies.com>
Subject: RE: Affiliate Rule

Can't commit to a timeframe.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Jessica Mandel <jessica@millerstrategies.com>
Sent: Monday, April 6, 2020 6:15 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: Re: Affiliate Rule

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Great, thanks! I really appreciate it. Do you think it will be this week?

Jessica A. Mandel
Principal
Miller Strategies
m: [REDACTED]

From: Briggs, William J. <William.Briggs@sba.gov>

Sent: Monday, April 6, 2020 4:50:58 PM
To: Jessica Mandel <jessica@millerstrategies.com>
Subject: RE: Affiliate Rule

Yes. more guidance is coming.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Jessica Mandel <jessica@millerstrategies.com>
Sent: Monday, April 6, 2020 5:50 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: Affiliate Rule

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Bill: I hope this finds you well. I know that you released the interim final rule with affiliate rule and guidance of the affiliate rule but was curious if you anticipated there would be additional guidance to the rule? There still seems to be some confusion around the rule and whether it applies to certain companies. Please let me know. Thank you for your help!

Best,
Jessica

Jessica A. Mandel
Principal
Miller Strategies
[REDACTED]



From: Scott.Mason@hikmah.com
To: E.gas.William.1
Subject: Re: an anime will be co
Date: Saturday, April 25, 2020

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Apprec. & THANK YOU!!!

Scott D. Mason
Sr. Policy Advisor

Sent from my Phone

On Apr 2 2020 at 10:36 PM Mason, Scott D (WAS - X75330 CLT - X37787) <Scott.Mason@hhklaw.com> wrote:

You're the best! If you/they need any addl information let me know. Thanks!!!

Scott D. Mason

Scott D. Mason
Sr. Policy Advisor
C [REDACTED]

Sent from my Phone

On Apr 2 2020 at 10:32 PM Briggs, Will am J. <Will.am.Briggs@sta.go> wrote:

[Ex-ernal email]

B Il Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration

Cell (202) [REDACTED]

Cell (202 [REDACTED])
Will am Briggs@sbu.go <<mailto:Willam.Briggs@sbu.go>>
<image001.png>

[illegible]

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Subject Re: an answer will be coming shortly on the bank you emailed about

You're the best! If you/ they need any addl information let me know. Thanks!!!

Sr. Policy Advisor
C [REDACTED]

On Apr 2, 2020 at

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Age Group	Percentage
18-29	85%
30-49	80%
50-69	75%
70+	70%

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From: Bill_ggs_William.J
To: Scott.Mason@bhkline.com
Subject: RE: an answer will be co
Date: Satu, day, Apr 12, 2020

Good stuff

B I I Briggs
Deputy Associate Administrator Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

-- --Original Message-----

From: Scott Mason@bklaw.com <Scott.Mason@bklaw.com>

To: Briggs William J. <William.Briggs@sba.go>
Subject: Re: an answer wi l be coming shortly on the bank you emailed about.

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Appro 64. THANK YOU!!!

Scott D. Mason

C [REDACTED]

Sent from my Phone

On Apr 2, 2020, at 10:36 PM, Mason, Scott D (WAS - X75330; CLT - X37787) <Scott.Mason@thklaw.com> wrote:

You're the best! If you/they need any addl information let me know. Thanks!!!

Scott D. Mason

C [REDACTED]

On Apr 2, 2020, at 10:32 PM, Briggs, William J. <Willam.Briggs@sba.gov> wrote:

Deputy Associate Administrator, Office of Capital Access U.S. Small Business Administration

Cell C02 XXXXXXXXXX

Will am Briggs@isa.go <<mailto:Willam.Briggs@isa.go>>
<image001.jpg>

[illegible]

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From: Scott.Mason@hklaw.com
To: [Briggs, William J.](#)
Subject: RE: Application status/approval
Date: Thursday, April 9, 2020 11:15:15 AM

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Bill – just checking on this. Thanks. Will bank receive confirmation of their approval to initiate lending?

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

From: Mason, Scott D (WAS - X75330, CLT - X37787)
Sent: Wednesday, April 08, 2020 10:23 AM
To: Briggs, William J. (William.Briggs@sba.gov) <William.Briggs@sba.gov>
Subject: Application status/approval

Bill –

Thanks again for all your help. I am sure your world is a waterfall. Hang in there, and stay healthy.

Checking on a question for a client (bank) that sent in the form to become a lender to the delegatedauthority@sba.gov. Will they get an affirmative approval of some kind in order for them to initiate lending? Do they need to wait for a response from SBA to acknowledge receipt of the Form 3506 in order to start taking PPP loan applications and apply for the endorsement? What's that process?

Also, anything we can do to get the Ops Team to look at our 8(a) contractor (Capitol Bridge; call centers, application processing, etc.) and get them engaged would be great. Happy to take a direct contact and put them in touch.

Thanks,
Scott

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

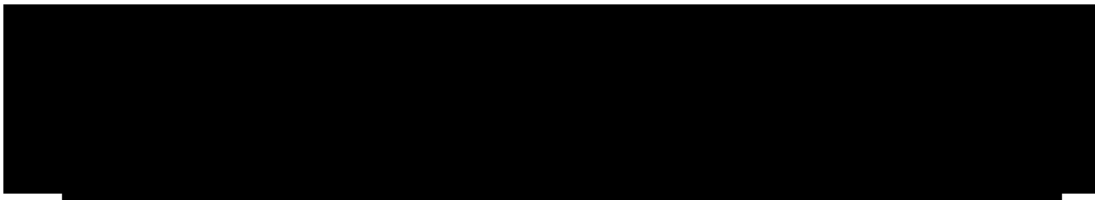
scott.mason@hklaw.com | www.hklaw.com

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From: Scott.Mason@hklaw.com
To: [Briggs, William J.](#)
Subject: RE: Bank approval and moving forward as a PPP lender: CAFS/E-Trans and PIMS issue
Date: Thursday, April 30, 2020 2:38:57 PM
Attachments: [image001.png](#)
[REDACTED] [Submission of Loan Application #15737840.pdf](#)

CAUTION - The sender of this message is external to the SBA network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to spam@sba.gov.

Bill – Thanks again. Unfortunately, they are still receiving this error message:



Error 0002 and 0003 are related to the application itself and they can fix, but error 0001 [REDACTED] is apparently something they cannot change. Related document also attached.

Let me know what you think.

Thanks,
Scott

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

From: Briggs, William J. <William.Briggs@sba.gov>
Sent: Thursday, April 30, 2020 8:18 AM
To: Mason, Scott D (WAS - X75330, CLT - X37787) <Scott.Mason@hklaw.com>
Subject: FW: Bank approval and moving forward as a PPP lender: CAFS/E-Trans and PIMS issue

[External email]

The agreement is attached to the “Bank [REDACTED] BM” in our database. I noticed that it was missing the “office code”. I entered [REDACTED] That should fix the issues.

I don't believe the "Signature Bank" link has any effect.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Scott.Mason@hklaw.com <Scott.Mason@hklaw.com>
Sent: Wednesday, April 29, 2020 12:15 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: RE: Bank approval and moving forward as a PPP lender: CAFS/E-Trans and PIMS issue

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Bill – hope this made some sense. Any thoughts on getting the systems updated so Bank [REDACTED] isn't misidentified as Signature bank? Really appreciate guidance. THANKS.

Scott Mason | Holland & Knight

Senior Policy Advisor
Holland & Knight LLP
800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006
Phone 202.469.5330 | Fax 202.955.5564
Cell [REDACTED]
scott.mason@hklaw.com | www.hklaw.com

From: Mason, Scott D (WAS - X75330, CLT - X37787)
Sent: Tuesday, April 28, 2020 9:04 PM
To: Briggs, William J. (William.Briggs@sba.gov) <William.Briggs@sba.gov>
Subject: Bank approval and moving forward as a PPP lender: CAFS/E-Trans and PIMS issue
Importance: High

Bill – Hope you all are hanging in there.

Following up on the bank approval we traded notes on Friday, thank you again for your assistance in getting Bank [REDACTED] B.M. thru the approval process. They received their initial approval on Saturday.

Unfortunately, Bank [REDACTED] representatives are getting stymied from submitting loans

because according to the CFAS/E-Trans and PIMS processes internally within SBA, Bank [REDACTED] is showing up as having a U.S. subsidiary in Signature Bank. Signature Bank was sold in 2005 and has no relationship with the approved PPP lending bank, but because SBA/government computers still show a linkage, they are unable to proceed as a PPP lender... can we please get immediate attention from a lending office (or other office?) to recognize and fix this error and allow Bank [REDACTED] B.M. to proceed with lending thru the PPP program? I'm happy to get any of their senior leadership on a call tomorrow with your folks if helpful, but there is obviously a glitch in the system that still links Bank [REDACTED] and Signature, even though the sale was closed over 15 years ago!

Really appreciate your ongoing help. This is a crazy problem, I know, and we're hoping there is an easy fix.

Many thanks,
Scott

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

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From: Scott.Mason@hklaw.com
To: [Briggs, William J.](#)
Subject: RE: Bank approval and moving forward as a PPP lender: CAFS/E-Trans and PIMS issue
Date: Wednesday, April 29, 2020 12:15:41 PM

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Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

From: Mason, Scott D (WAS - X75330, CLT - X37787)
Sent: Tuesday, April 28, 2020 9:04 PM
To: Briggs, William J. (William.Briggs@sba.gov) <William.Briggs@sba.gov>
Subject: Bank approval and moving forward as a PPP lender: CAFS/E-Trans and PIMS issue
Importance: High

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Really appreciate your ongoing help. This is a crazy problem, I know, and we're hoping there is an easy fix.

Many thanks,
Scott

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

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From: [Briggs, William J.](#)
To: Scott.Mason@hklaw.com
Subject: RE: Bank approval and moving forward as a PPP lender: CAFS/E-Trans and PIMS issue
Date: Thursday, April 30, 2020 7:26:00 AM

Will look into this.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Scott.Mason@hklaw.com <Scott.Mason@hklaw.com>
Sent: Wednesday, April 29, 2020 12:15 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: RE: Bank approval and moving forward as a PPP lender: CAFS/E-Trans and PIMS issue

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Bill – hope this made some sense. Any thoughts on getting the systems updated so Bank [REDACTED] isn't misidentified as Signature bank? Really appreciate guidance. THANKS.

Scott Mason | Holland & Knight

Senior Policy Advisor
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800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006
Phone 202.469.5330 | Fax 202.955.5564
Cell [REDACTED]
scott.mason@hklaw.com | www.hklaw.com

From: Mason, Scott D (WAS - X75330, CLT - X37787)
Sent: Tuesday, April 28, 2020 9:04 PM
To: Briggs, William J. (William.Briggs@sba.gov) <William.Briggs@sba.gov>
Subject: Bank approval and moving forward as a PPP lender: CAFS/E-Trans and PIMS issue
Importance: High

Bill – Hope you all are hanging in there.

Following up on the bank approval we traded notes on Friday, thank you again for your assistance in getting Bank [REDACTED] B.M. thru the approval process. They received their initial

approval on Saturday.

Unfortunately, Bank [REDACTED] representatives are getting stymied from submitting loans because according to the CFAS/E-Trans and PIMS processes internally within SBA, Bank [REDACTED] is showing up as having a U.S. subsidiary in Signature Bank. **Signature Bank was sold in 2005** and has no relationship with the approved PPP lending bank, but because SBA/government computers still show a linkage, they are unable to proceed as a PPP lender... can we please get immediate attention from a lending office (or other office?) to recognize and fix this error and allow Bank [REDACTED] B.M. to proceed with lending thru the PPP program? I'm happy to get any of their senior leadership on a call tomorrow with your folks if helpful, but there is obviously a glitch in the system that still links Bank [REDACTED] and Signature, even though the sale was closed over 15 years ago!

Really appreciate your ongoing help. This is a crazy problem, I know, and we're hoping there is an easy fix.

Many thanks,
Scott

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

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From: Scott.Mason@hklaw.com
To: [Briggs, William J.](#)
Subject: Re: Bank approval and moving forward as a PPP lender: CAFS/E-Trans and PIMS issue
Date: Thursday, April 30, 2020 8:25:55 AM

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Thanks!! They'll try ASAP this morning.

Scott D. Mason
Sr. Policy Advisor
C) [REDACTED]

Sent from my iPhone

On Apr 30, 2020, at 8:17 AM, Briggs, William J. <William.Briggs@sba.gov> wrote:

The agreement is attached to the "Bank [REDACTED] BM" in our database. I noticed that it was missing the "office code". I entered [REDACTED]". That should fix the issues.

I don't believe the "Signature Bank" link has any effect.

NOTE: This e-mail is from a law firm, Holland & Knight LLP ("H&K"), and is intended solely for the use of the individual(s) to whom it is addressed. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you are not an existing client of H&K, do not construe anything in this e-mail to make you a client unless it contains a specific statement to that effect and do not disclose anything to H&K in reply that you expect it to hold in confidence. If you properly received this e-mail as a client, co-counsel or retained expert of H&K, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.

From: [Pfister, Zachary S.](#)
To: [Briggs, William J.](#)
Cc: [Delegated Authority; cls](#)
Subject: RE: CoBank, ACB CARES Act Section 1109 Lender Agreement - still need Lender Location IDs
Date: Monday, April 6, 2020 10:51:50 AM
Attachments: [image001.png](#)
[image002.png](#)
[FINAL EXECUTED PPP Lender Agreement 04042020.pdf](#)

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Bill,

I wanted to give you an update on this inquiry regarding CoBank.

Please see the update from CoBank. It seems SBA is saying that all the Farm Credit System banks are now authorized as lenders, but the problem remains that as of this morning, **they have yet to receive their Lender Location IDs**. So they can't get into ETRANS without those, and accordingly, can't lend until they do. These institutions are literally waiting to click approve for lending to their customers, but they need these IDs assigned before they can. I'm adding the other respective email addresses to this chain, so we are all on the same page. CoBank is the largest bank in the Farm Credit System, but to their understanding none of the other banks and associations in the system have received their IDs either. Any insight you can provide on this is appreciated as they are at a standstill until this occurs. Thanks again.

Zach

Zachary S. Pfister

Policy Director

Brownstein Hyatt Farber Schreck, LLP

1155 F Street, NW, Suite 1200

Washington, DC 20004

202.652.2345 tel

cell

ZPfister@BHFS.com

From: Cavey, Brian [<mailto:BCavey@cobank.com>]

Sent: Sunday, April 05, 2020 8:54 PM

To: Pfister, Zachary S.

Subject: FW: CoBank SBA Application

Zach,

Sorry to bother you. After your efforts Friday, I got an email from Delegated authority@ SBA EARLY Saturday morning, indicating that the application we sent in was wrong and that a final app had been put out Friday afternoon.

So Saturday morning we put that in (seen in attachment).

This afternoon Todd Van Hoose of our trade association the Farm Credit Council sent a note saying the SBA had provided all Farm Credit Institutions access to their portal ETRANS. I will share that note in a separate email.

As of a call at 4:00 PM this afternoon it does not occur that has allowed any of the associations full access. That MAY have changed in the last 4 hours, but we have not heard that. I know that is not the case for CoBank.

Our guys are not sure what else they need to do to get a Lender Location ID so they can get an Authorizing Officer so they can start taking applications.

Our customers are panicking and we would like to help ease their concerns.

Thanks for your help so far, and let me know if anything, other than the email from Todd which will follow would be helpful on this.

Thanks.

Brian

From: Challenger, Brett <bchallenger@cobank.com>

Sent: Sunday, April 05, 2020 7:14 PM

To: cls@sba.gov

Cc: Clayton, Christian <CCLayton@cobank.com>; Cavey, Brian <BCavey@cobank.com>; Jacob, Andrew <AJacob@cobank.com>

Subject: CoBank SBA Application

To Whom it May Concern -

I am inquiring about the status of Cobank, ACB's application (attached for your reference) submitted by Senior Vice President & Managing Counsel, Christian J. Clayton. Please note that CoBank is a member of the Farm Credit System.

-

We are waiting for authorization and Headquarters Location ID in order to establish an Authorized Officer account. I will be the Authorizing Officer for CoBank. Please advise.

Thank you.

Brett A. Challenger

Senior Vice President

Regional Agribusiness Banking Group

CoBank, ACB

6340 S. Fiddlers Green Circle

Greenwood Village, CO 80111

(303) 740-4137 (office)
[REDACTED] (cell)
(303) 796-1523 (fax)
bchallenger@cobank.com

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CoBank, 6340 S. Fiddlers Green Circle, Greenwood Village, CO 80111 www.cobank.com

Zachary S. Pfister

Policy Director

Brownstein Hyatt Farber Schreck, LLP

1155 F Street, NW, Suite 1200

Washington, DC 20004

202.652.2345 tel

[REDACTED] cell

ZPfister@BHFS.com

From: Pfister, Zachary S.

Sent: Friday, April 03, 2020 3:26 PM

To: 'Briggs, William J.'

Subject: RE: CoBank, ACB CARES Act Section 1109 Lender Agreement

Thank you, Bill. I appreciate anything you can do or find out.

Zachary S. Pfister

Policy Director

Brownstein Hyatt Farber Schreck, LLP

1155 F Street, NW, Suite 1200

Washington, DC 20004

202.652.2345 tel

[REDACTED] cell

ZPfister@BHFS.com

From: Briggs, William J. [mailto:William.Briggs@sba.gov]

Sent: Friday, April 03, 2020 3:18 PM

To: Pfister, Zachary S.

Subject: RE: CoBank, ACB CARES Act Section 1109 Lender Agreement

Received.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Pfister, Zachary S. <ZPfister@BHFS.com>
Sent: Friday, April 3, 2020 3:14 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: RE: CoBank, ACB CARES Act Section 1109 Lender Agreement
Importance: High

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Bill,

Sorry to bother you again. We have another client, CoBank, who is a \$[REDACTED] farm credit bank that is the largest in the Farm Credit System. They are ready to lend in the SBA program the moment their application is approved. They have submitted all the requisite forms as attached and per below. They are inquiring as to how quickly new large lenders will be approved, and whether that is on a same-day or close to same-day basis. Or are we talking weeks?

Appreciate any insight, feedback, or direction you or someone on your team can offer.

Best regards,

Zach Pfister

Zachary S. Pfister

Policy Director

Brownstein Hyatt Farber Schreck, LLP

1155 F Street, NW, Suite 1200

Washington, DC 20004

202.652.2345 tel

[REDACTED] cell

ZPfister@BHFS.com

From: Cavey, Brian [<mailto:BCavey@cobank.com>]
Sent: Friday, April 03, 2020 10:56 AM
To: Pfister, Zachary S.
Subject: FW:CoBank, ACB CARES Act Section 1109 Lender Agreement

Our Counsel has submitted the attached application materials but has not heard back from the SBA.

It should be noted that we submitted last night and then had to resubmit today with the revised document. The final submission is attached.

As you know the CARES Act authorized Farm Credit institutions like CoBank to provide these loans, but we are not previous SBA lenders so this is new. We have spent a lot of time trying to get ready to serve our customers.

We are looking forward to getting approval and our Lender Location ID as soon as possible. While 95% of our employees, most based in CoBank Center are working from home, we can help make this product successful for our customers if we can get the Lender Location ID.

Please advise if you require any additional information from CoBank, contacting me at bcavey@cobank.com or 202-870-2674 or our Counsel whose info can be found below. Thanks!

Brian

Brian Cavey
Senior Vice President
Government Affairs
bcavey@cobank.com
202-650-5862 desk
202- cell



Christian J. Clayton | Senior Vice President and Managing Counsel



6340 S. Fiddlers Green Circle | Greenwood Village, CO 80111
Office: (303) 740-4364 | Cell:
cclayton@cobank.com | www.cobank.com

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Zachary S. Pfister

Policy Director

Brownstein Hyatt Farber Schreck, LLP

1155 F Street, NW, Suite 1200

Washington, DC 20004

202.652.2345 tel

cell

ZPfister@BHFS.com

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From: [Pfister, Zachary S.](#)
To: [Briggs, William J.](#)
Subject: RE: CoBank, ACB CARES Act Section 1109 Lender Agreement
Date: Friday, April 3, 2020 3:26:30 PM
Attachments: [image001.png](#)
[image002.png](#)

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Thank you, Bill. I appreciate anything you can do or find out.

Zachary S. Pfister

Policy Director

Brownstein Hyatt Farber Schreck, LLP

1155 F Street, NW, Suite 1200

Washington, DC 20004

202.652.2345 tel

[REDACTED] cell

ZPfister@BHFS.com

From: Briggs, William J. [mailto:William.Briggs@sba.gov]
Sent: Friday, April 03, 2020 3:18 PM
To: Pfister, Zachary S.
Subject: RE: CoBank, ACB CARES Act Section 1109 Lender Agreement

Received.

Bill Briggs

Deputy Associate Administrator, Office of Capital Access

U.S. Small Business Administration

(202) [REDACTED] mobile

From: Pfister, Zachary S. <ZPfister@BHFS.com>
Sent: Friday, April 3, 2020 3:14 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: RE: CoBank, ACB CARES Act Section 1109 Lender Agreement
Importance: High

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Best regards,

Zach Pfister

Zachary S. Pfister

Policy Director

Brownstein Hyatt Farber Schreck, LLP

1155 F Street, NW, Suite 1200

Washington, DC 20004

202.652.2345 tel

[REDACTED] cell

ZPfister@BHFS.com

From: Cavey, Brian [<mailto:BCavey@cobank.com>]

Sent: Friday, April 03, 2020 10:56 AM

To: Pfister, Zachary S.

Subject: FW:CoBank, ACB CARES Act Section 1109 Lender Agreement

Our Counsel has submitted the attached application materials but has not heard back from the SBA. It should be noted that we submitted last night and then had to resubmit today with the revised document. The final submission is attached.

As you know the CARES Act authorized Farm Credit institutions like CoBank to provide these loans, but we are not previous SBA lenders so this is new. We have spent a lot of time trying to get ready to serve our customers.

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Brian

Brian Cavey

Senior Vice President

Government Affairs
bcavey@cobank.com
202-650-5862 desk
[REDACTED] cell



Christian J. Clayton | Senior Vice President and Managing Counsel



6340 S. Fiddlers Green Circle | Greenwood Village, CO 80111
Office: (303) 740-4364 | Cell: [REDACTED]
cclayton@cobank.com | www.cobank.com

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CoBank, 6340 S. Fiddlers Green Circle, Greenwood Village, CO 80111 www.cobank.com

Zachary S. Pfister

Policy Director
Brownstein Hyatt Farber Schreck, LLP
1155 F Street, NW, Suite 1200
Washington, DC 20004
202.652.2345 tel
[REDACTED] cell
ZPfister@BHFS.com

From: Pfister, Zachary S.
Sent: Wednesday, April 01, 2020 10:02 AM
To: Briggs, William J.
Subject: Re: Credit Union National Association - Join Trades call tomorrow at 2pm

Thank you Bill. And thank you for your service and the great work you are all doing.

Zach Pfister
Policy Director
Brownstein Hyatt Farber Schreck
202.652.2345 (tel)
[REDACTED] (c)

On Apr 1, 2020, at 12:59 PM, Briggs, William J. <William.Briggs@sba.gov> wrote:

Zach,

Cuna has the info. Thanks.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration

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From: [Pfister, Zachary S.](#)
To: [Briggs, William J.](#)
Subject: RE: CoBank, ACB CARES Act Section 1109 Lender Agreement
Date: Friday, April 3, 2020 3:17:17 PM
Attachments: [image001.png](#)
[image002.png](#)
[SBA PPP Lender Application \(UPDATED FINAL\).pdf](#)
[Incumbency Certificate - Clayton.pdf](#)

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Bill,

Sorry to bother you again. We have another client, CoBank, who is a \$[REDACTED] farm credit bank that is the largest in the Farm Credit System. They are ready to lend in the SBA program the moment their application is approved. They have submitted all the requisite forms as attached and per below. They are inquiring as to how quickly new large lenders will be approved, and whether that is on a same-day or close to same-day basis. Or are we talking weeks?

Appreciate any insight, feedback, or direction you or someone on your team can offer.

Best regards,

Zach Pfister

Zachary S. Pfister

Policy Director

Brownstein Hyatt Farber Schreck, LLP

1155 F Street, NW, Suite 1200

Washington, DC 20004

202.652.2345 tel

[REDACTED] cell

ZPfister@BHFS.com

From: Cavey, Brian [<mailto:BCavey@cobank.com>]

Sent: Friday, April 03, 2020 10:56 AM

To: Pfister, Zachary S.

Subject: FW:CoBank, ACB CARES Act Section 1109 Lender Agreement

Our Counsel has submitted the attached application materials but has not heard back from the SBA. It should be noted that we submitted last night and then had to resubmit today with the revised document. The final submission is attached.

As you know the CARES Act authorized Farm Credit institutions like CoBank to provide these loans, but we are not previous SBA lenders so this is new. We have spent a lot of time trying to get ready to serve our customers.

We are looking forward to getting approval and our Lender Location ID as soon as possible. While 95% of our employees, most based in CoBank Center are working from home, we can help make this product successful for our customers if we can get the Lender Location ID.

Please advise if you require any additional information from CoBank, contacting me at bcavey@cobank.com or 202-870-2674 or our Counsel whose info can be found below. Thanks!

Brian

Brian Cavey
Senior Vice President
Government Affairs
bcavey@cobank.com
202-650-5862 desk
[REDACTED] cell



Christian J. Clayton | Senior Vice President and Managing Counsel



6340 S. Fiddlers Green Circle | Greenwood Village, CO 80111
Office: (303) 740-4364 | Cell: [REDACTED]
cclayton@cobank.com | www.cobank.com

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CoBank, 6340 S. Fiddlers Green Circle, Greenwood Village, CO 80111 www.cobank.com

Zachary S. Pfister

Policy Director

Brownstein Hyatt Farber Schreck, LLP

1155 F Street, NW, Suite 1200

Washington, DC 20004

202.652.2345 tel

[REDACTED] cell

ZPfister@BHFS.com

From: Pfister, Zachary S.
Sent: Wednesday, April 01, 2020 10:02 AM
To: Briggs, William J.
Subject: Re: Credit Union National Association - Join Trades call tomorrow at 2pm

Thank you Bill. And thank you for your service and the great work you are all doing.

Zach Pfister
Policy Director
Brownstein Hyatt Farber Schreck
202.652.2345 (tel)
[REDACTED] (c)

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From: [Briggs, William J.](#)
To: [Pfister, Zachary S.](#)
Subject: RE: CoBank, ACB CARES Act Section 1109 Lender Agreement
Date: Friday, April 3, 2020 3:18:00 PM
Attachments: [image001.png](#)
[image002.png](#)

Received.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Pfister, Zachary S. <ZPfister@BHFS.com>
Sent: Friday, April 3, 2020 3:14 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: RE: CoBank, ACB CARES Act Section 1109 Lender Agreement
Importance: High

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Zachary S. Pfister

Policy Director

Brownstein Hyatt Farber Schreck, LLP

1155 F Street, NW, Suite 1200

Washington, DC 20004

202.652.2345 tel

[REDACTED] cell

ZPfister@BHFS.com

From: Cavey, Brian [<mailto:BCavey@cobank.com>]
Sent: Friday, April 03, 2020 10:56 AM
To: Pfister, Zachary S.
Subject: FW:CoBank, ACB CARES Act Section 1109 Lender Agreement

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Brian

Brian Cavey
Senior Vice President
Government Affairs
bcavey@cobank.com
202-650-5862 desk
[REDACTED] cell



Christian J. Clayton | Senior Vice President and Managing Counsel



6340 S. Fiddlers Green Circle | Greenwood Village, CO 80111
Office: (303) 740-4364 | Cell: [REDACTED]
cclayton@cobank.com | www.cobank.com

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CoBank, 6340 S. Fiddlers Green Circle, Greenwood Village, CO 80111 www.cobank.com

Zachary S. Pfister

Policy Director

Brownstein Hyatt Farber Schreck, LLP

1155 F Street, NW, Suite 1200

Washington, DC 20004

202.652.2345 tel

[REDACTED] cell

ZPfister@BHFS.com

From: Pfister, Zachary S.

Sent: Wednesday, April 01, 2020 10:02 AM

To: Briggs, William J.

Subject: Re: Credit Union National Association - Join Trades call tomorrow at 2pm

Thank you Bill. And thank you for your service and the great work you are all doing.

Zach Pfister

Policy Director

Brownstein Hyatt Farber Schreck

202.652.2345 (tel)

[REDACTED] (c)

On Apr 1, 2020, at 12:59 PM, Briggs, William J. <William.Briggs@sba.gov> wrote:

Zach,

Cuna has the info. Thanks.

Bill Briggs

Deputy Associate Administrator, Office of Capital Access

U.S. Small Business Administration

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From: [Briggs, William J.](#)
To: [Jessica Mandel](#)
Cc: [PPP-IFR](#)
Subject: RE: Comments for the Record on SBA-2020-0015: Ashford Inc.
Date: Thursday, April 9, 2020 4:32:56 PM

Comments on SBA-2020-0015 to appropriate inbox on this email are being submitted.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
[REDACTED] mobile

From: Jessica Mandel <jessica@millerstrategies.com>
Sent: Thursday, April 9, 2020 4:24 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: Comments for the Record on SBA-2020-0015: Ashford Inc.
Importance: High

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Bill: Attached please find my client, Ashford Inc.'s comments on SBA-2020-0015 for the record. At this time, there is no way for me to file it on regulations.gov because it hasn't been posted to the Federal Register. If there are additional people that I should send this to, please let me know. Otherwise, we appreciate your help and attention to this matter. Thank you!

Best,
Jessica

Jessica A. Mandel
Principal
Miller Strategies
(303) 588-6551



From: [Jessica Mandel](#)
To: [Briggs, William J.](#)
Subject: Re: Comments for the Record on SBA-2020-0015: Ashford Inc.
Date: Thursday, April 9, 2020 4:34:58 PM

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Very much appreciated! Also, wanted to make sure you saw

Jessica A. Mandel
Miller Strategies
(303) 588-6551

From: "Briggs, William J." <William.Briggs@sba.gov>
Date: Thursday, April 9, 2020 at 3:32 PM
To: Jessica Mandel <jessica@millerstrategies.com>
Cc: PPP-IFR <PPP-IFR@sba.gov>
Subject: RE: Comments for the Record on SBA-2020-0015: Ashford Inc.

Comments on SBA-2020-0015 to appropriate inbox on this email are being submitted.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
[REDACTED] mobile

From: Jessica Mandel <jessica@millerstrategies.com>
Sent: Thursday, April 9, 2020 4:24 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: Comments for the Record on SBA-2020-0015: Ashford Inc.
Importance: High

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Bill: Attached please find my client, Ashford Inc.'s comments on SBA-2020-0015 for the record. At this time, there is no way for me to file it on regulations.gov because it hasn't been posted to the Federal Register. If there are additional people that I should send this to, please let me know. Otherwise, we appreciate your help and attention to this matter. Thank you!

Best,

Jessica

Jessica A. Mandel

Principal

Miller Strategies

(303) 588-6551



From: [Chiokadze, David G.](#)
To: [Ozzie Palomo](#); [Gray, Christopher S.](#); [Steve Pfrang](#)
Subject: RE: Connecting you to Steve Pfrang-Rep. LaHood Chief of Staff
Date: Saturday, April 4, 2020 2:13:12 PM

Steve,

Great chatting just now. Thanks for flagging that issue.

David Chiokadze
Senior Advisor
Office of the Administrator
(202) 340 8908 (C)

-----Original Message-----

From: Ozzie Palomo <opalomo@chartwellstrategy.com>
Sent: Saturday, April 4, 2020 1:29 PM
To: Chiokadze, David G. <David.Chiokadze@sba.gov>; Gray, Christopher S. <Christopher.Gray@sba.gov>; Steve Pfrang <Steve.Pfrang@mail.house.gov>
Subject: Connecting you to Steve Pfrang-Rep. LaHood Chief of Staff

CAUTION - The sender of this message is external to the SBA network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to spam@sba.gov.

Chris/David -

By way of email I am connecting you guys with Steve Pfrang, Chief of Staff for Rep. Darin LaHood. Steve is also one of my best friends and an unbelievable resource with a solid network in town.

Steve was hoping to touch base with you on some issues the Congressman is facing in the district. Specifically, several lenders from the district are having issues with the PPP portal. I know it's crazy but figured you all might be able to help guide Steve here.

Thanks in advance.

Ozzie

OJP
m. 202

Sent from my iPhone

From: [Pfister, Zachary S.](#)
To: [Briggs, William J.](#)
Subject: Re: Credit Union National Association - Join Trades call tomorrow at 2pm
Date: Wednesday, April 1, 2020 1:02:45 PM

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Thank you Bill. And thank you for your service and the great work you are all doing.

Zach Pfister
Policy Director
Brownstein Hyatt Farber Schreck
202.652.2345 (tel)
[REDACTED] (c)

On Apr 1, 2020, at 12:59 PM, Briggs, William J. <William.Briggs@sba.gov> wrote:

Zach,

Cuna has the info. Thanks.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration

From: Pfister, Zachary S. <ZPfister@BHFS.com>
Sent: Tuesday, March 31, 2020 9:51 PM
To: james.billimoria@sba.gov; Gibson, Patricia M <Patricia.Gibson@sba.gov>; Gray, Christopher S. <Christopher.Gray@sba.gov>; pradeep.belur@sba.gov; McShane, Kathleen M. <Kathleen.McShane@sba.gov>
Subject: Credit Union National Association - Join Trades call tomorrow at 2pm
Importance: High

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Hello,

I apologize for including multiple points of contact, as I not entirely sure where to direct this request, given how incredibly busy everyone at the SBA is during this time.

I am reaching out on behalf of our client, the **Credit Union National Association (CUNA)**, which represents the nation's 5,700 credit unions and its 115 million members across all 50 states. As you are aware, credit unions have a long and successful history of small business lending throughout the communities they serve. It has come to our attention that there is a **joint financial services trades call with the SBA tomorrow at 2pm**. We would be grateful if CUNA was invited to participate. As of this writing they have not received an invitation. If the invitations were not going out until tomorrow, we understand.

That said, we would very much appreciate an invitation sent to **CUNA's Chief Advocacy Officer, Ryan Donovan**, at rdonovan@cuna.coop.

Thank you, and thank you for all of the terrific work the SBA is doing to help American businesses weather this challenging time.

Zachary S. Pfister

Policy Director

Brownstein Hyatt Farber Schreck, LLP

1155 F Street, NW, Suite 1200

Washington, DC 20004

202.652.2345 tel

cell

ZPfister@BHFS.com

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From: Scott.Mason@hklaw.com
To: [Briggs, William J.](#)
Subject: RE: email adds, and approved lending banks...
Date: Friday, April 24, 2020 10:09:59 PM

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Many thanks!!

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

From: Briggs, William J. <William.Briggs@sba.gov>
Sent: Friday, April 24, 2020 10:03 PM
To: Mason, Scott D (WAS - X75330, CLT - X37787) <Scott.Mason@hklaw.com>
Subject: RE: email adds, and approved lending banks...

[External email]

I can add you all to the distribution list.

Also, they need SBA approval before doing loans. I have forwarded to the right folks for review.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Scott.Mason@hklaw.com <Scott.Mason@hklaw.com>
Sent: Friday, April 24, 2020 9:58 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: email adds, and approved lending banks...
Importance: High

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spam@sba.gov.

Bill –

I know you all have been drinking from waterfalls; hang in there. And stay healthy!

Reaching out on a couple things:

1) email list additions for your press releases, etc. Could you please add:

Scott.mason@hklaw.com

eve.otoole@hklaw.com

Travis.Kiyota@EastWestBank.com

Happy to give you any background necessary, but Eve is a partner of mine and Travis is SVP Global Public Affairs for East West Bank (CA), one of the largest minority owned banks in the U.S. THANK YOU.

2) Seeking some level of confirmation for an application by the U.S. branch of a foreign-owned but FDIC insured bank so they may participate in the PPP efforts as a lending entity. I have attached the documents they submitted to the SBA for approval already. The email from the general counsel of the Bank [REDACTED] below explains it well; we would **appreciate ANY insights or confirmation you can give as they would like to participate in the next round of lending, starting Monday**.

Dear Scott-

As we have discussed, the U.S. branch of Bank [REDACTED] B.M., the largest bank in Israel, is licensed in the United States by the New York State Department of Financial Services, and our deposits are insured by the FDIC.

When the SBA first commenced accepting applications from lenders who desired to participate in the Payroll Protection Program we immediately applied (see attached forms.) Our initial application was rejected as someone at the SBA did not realize that a foreign bank could be FDIC insured if it was “grandfathered” under old regulations that were subsequently changed. Nina Levine, the Deputy General Counsel of the SBA, was instrumental in helping us to overcome this misunderstanding.

After the FDIC issue was resolved, we immediately reapplied but the SBA responded with a form email, advising that they were no longer accepting applications from banks as all of the PPP funds were fully utilized. As soon as we heard that Congress was going to allocate additional funds for the program, we immediately sent our application back to the SBA. We never received a response and I have sent an email, every day this week, to 'Delegated Authority' DelegatedAuthority@sba.gov, inquiring as to the status of our application.

Do we need to have a formal response from the SBA to begin processing applications from a bank customer, or can we just assume that as an FDIC-insured financial institution we are automatically approved. Any assistance or advice that you can provide would be greatly appreciated.

Really appreciate your help. Keep up the great work. Stay healthy.

Thanks,
Scott

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

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From: [Briggs, William J.](#)
To: Scott.Mason@hklaw.com
Subject: RE: email adds, and approved lending banks...
Date: Friday, April 24, 2020 10:02:00 PM

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Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

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Importance: High

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Scott.mason@hklaw.com

eve.otoole@hklaw.com

Travis.Kiyota@EastWestBank.com

Happy to give you any background necessary, but Eve is a partner of mine and Travis is SVP Global Public Affairs for East West Bank (CA), one of the largest minority owned banks in the U.S. THANK YOU.

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Do we need to have a formal response from the SBA to begin processing applications from a bank customer. *or can we just assume that as an FDIC-insured financial institution we are automatically approved. Any assistance or advice that you can provide would be greatly appreciated.*

Really appreciate your help. Keep up the great work. Stay healthy.

Thanks,
Scott

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

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From: [Briggs, William J.](#)
To: [Jessica Mandel](#)
Subject: RE: FL Woman Owned Local Business Issues with Wells Fargo & PPP--Comment Letter
Date: Friday, April 17, 2020 1:16:00 AM

Comment received.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Jessica Mandel <jessica@millerstrategies.com>
Sent: Wednesday, April 15, 2020 3:01 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: FL Woman Owned Local Business Issues with Wells Fargo & PPP--Comment Letter

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Bill: Attached is a letter from a small business in FL that cannot get Wells Fargo to fund their loan because of technical issues Wells Fargo is having with the PPP. I wanted to raise this to you, as well as send it for official comments on the interim final rule. Please let me know if you have any questions. Thank you in advance for your help!

Best,
Jessica

Jessica A. Mandel
Principal
Miller Strategies
[REDACTED]



From: [Jessica Mandel](#)
To: [Gray, Christopher S.](#)
Subject: Re: Follow-Up
Date: Friday, March 27, 2020 11:26:25 AM

CAUTION - The sender of this message is external to the SBA network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to spam@sba.gov.

One more question: What if a company doesn't have an existing relationship with a lender for an 7A loan?

Jessica A. Mandel
Miller Strategies
(303) 588-6551

From: Jessica Mandel <jessica@millerstrategies.com>
Date: Friday, March 27, 2020 at 9:03 AM
To: "christopher.gray@sba.gov" <christopher.gray@sba.gov>
Subject: Follow-Up

Chris: It was great speaking with you this morning. I wanted to make sure you have my contact information and send you the information we discussed.

- When looking at this language for an SBA 7A loan, what constitutes “ability to control?”
 - “When you calculate the size of your business to determine if you are a small business, you must include the annual receipts and the employees of your affiliates. **Affiliation is determined by the ability to control.** When the ability to control exists, even if it is not exercised, affiliation exists.”
- Once the CARES Act is enacted into law, what will change for a 7A loan?
 - In the CARES Act, they waive affiliation rules for restaurants and hotels, does that mean their edibility is based off just the number of employees and the parent company/affiliates size doesn't matter?
- The association language we discussed: The political consultant and lobbying industry is concerned that it will be excluded from applying for the relief loans available under Section 1102 of the CARES Act because under the 7(a) regulations at 120.110(k) businesses that engage primarily in lobbying and political activity are excluded from eligibility. This seems like a potential First Amendment issue – because if these firms sold widgets instead of politicians or ideas they would be eligible. It appears to prohibit them from eligibility based on the content of their speech. It seems like there is an opening in the law here for the SBA to make clear that lobbying and political consulting firms are eligible. The pending statutory language at Section 1102(a) says “in addition to

small business concerns, any business concern, non profit organization,...” is eligible. It seems that the phrase “any business concern” in the statute should be viewed as overriding the regulations for these particular 7(a) loans. There is real concern in the industry that if this isn’t made clear by regulation or guidance from SBA to the lending institutions, that the industry might need to take legal action in order to be eligible.

Let me know if you need more information. Your help with these issues is greatly appreciated, thank you!!

Best,
Jessica

Jessica A. Mandel
Principal
Miller Strategies



From: [Billimoria, Jimmy F. \(Jim\)](#)
To: [Washburn, Mary Morning F.](#); [McCracken, Erin S.](#); [Sutherland, Terrence P.](#)
Cc: [Kelly, Jennifer F.](#)
Subject: RE: From iHeartMedia: SBA-CARES Act-Radio
Date: Friday, April 10, 2020 10:22:04 AM

I thought as much. [REDACTED].

From: Washburn, Mary Morning F. <MaryMorning.Washburn@sba.gov>
Sent: Friday, April 10, 2020 10:21 AM
To: Billimoria, Jimmy F. (Jim) <jim.billimoria@sba.gov>; McCracken, Erin S. <Erin.McCracken@sba.gov>; Sutherland, Terrence P. <terrence.sutherland@sba.gov>
Cc: Kelly, Jennifer F. <Jennifer.Kelly@sba.gov>
Subject: FW: From iHeartMedia: SBA-CARES Act-Radio

Good morning everyone – When you get a chance, please see my previous email [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] Please tell me if you have any questions.

-Morning

M. Morning F. Washburn
Director of Strategic Alliances
Office of Communications and Public Liaison
U.S. Small Business Administration
cell: (202) [REDACTED]
morning.washburn@sba.gov

From: McCracken, Erin S. <Erin.McCracken@sba.gov>
Sent: Friday, April 10, 2020 10:04 AM
To: Ozzie Palomo <opalomo@chartwellstrategy.com>; Billimoria, Jimmy F. (Jim) <jim.billimoria@sba.gov>; Kelly, Jennifer F. <Jennifer.Kelly@sba.gov>; Washburn, Mary Morning F. <MaryMorning.Washburn@sba.gov>
Cc: David Tamasi <dtamasi@chartwellstrategy.com>
Subject: RE: From iHeartMedia: SBA-CARES Act-Radio

Good morning Ozzie, thank you for the email! I've moved our colleague David C. to the bcc and added our communications team to the email. We'll review the information and get back to you soon. Thank you!

From: Ozzie Palomo <opalomo@chartwellstrategy.com>
Sent: Friday, April 10, 2020 9:45 AM
To: McCracken, Erin S. <Erin.McCracken@sba.gov>; Chiokadze, David G. <David.Chiokadze@sba.gov>
Cc: David Tamasi <dtamasi@chartwellstrategy.com>

Subject: From iHeartMedia: SBA-CARES Act-Radio

CAUTION - The sender of this message is external to the SBA network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to spam@sba.gov.

Good morning Erin and David —

I understand you are busy but wanted to reach out to you on behalf of iHeartMedia. My business partner David Tamasi, copied here, works closely with iHeartMedia. We were hoping to put the following concept in front of you and SBA leadership for consideration.

The U.S. Government has a long history of utilizing local radio's massive reach to communicate directly with the public on matters of national urgency. Based on this experience, iHeartMedia and the radio industry believe it is vital that U.S. small businesses be educated about the Paycheck Protection Program and other relevant SBA programs. Ad Council-partnered radio PSAs continue to be a key component of the public education COVID-19 social distancing campaign.

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iHeartMedia, Inc., is a leading global media, digital and entertainment company. iHeartMedia, Inc. includes iHeartMedia, which has the largest reach of any broadcaster in America and over a quarter billion listeners each month, is a major digital platform via its iHeartRadio Network and a significant social platform with over 120 million social followers.

Attached is more information. Dave can also answer any questions.

We would welcome the opportunity to discuss this at your earliest convenience.

Thank you,

Ozzie

From: [Ozzie Palomo](#)
To: [McCracken, Erin S.](#)
Cc: [Billimoria, Jimmy F. \(Jim\)](#); [Kelly, Jennifer E.](#); [Washburn, Mary Morning F.](#); [David Tamasi](#)
Subject: Re: From iHeartMedia: SBA-CARES Act-Radio
Date: Friday, April 10, 2020 10:13:34 AM

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Thank you Erin and team. If Dave or I can answer any questions let us know. I know the team at iHeartMedia is eager to be a resource here.

Thank you again and enjoy the upcoming weekend.

Ozzie

OJP

m. [REDACTED]

Sent from my iPhone

On Apr 10, 2020, at 10:03 AM, McCracken, Erin S. <Erin.McCracken@sba.gov> wrote:

Good morning Ozzie, thank you for the email! I've moved our colleague David C. to the bcc and added our communications team to the email. We'll review the information and get back to you soon. Thank you!

From: Ozzie Palomo <opalomo@chartwellstrategy.com>
Sent: Friday, April 10, 2020 9:45 AM
To: McCracken, Erin S. <Erin.McCracken@sba.gov>; Chiokadze, David G. <David.Chiokadze@sba.gov>
Cc: David Tamasi <dtamasi@chartwellstrategy.com>
Subject: From iHeartMedia: SBA-CARES Act-Radio

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Attached is more information. Dave can also answer any questions.

We would welcome the opportunity to discuss this at your earliest convenience.

Thank you,

Ozzie

<SBA-CARES Act-Radio.pdf>

From: [McCracken, Erin S.](#)
To: [Ozzie Palomo](#); [Billimoria, Jimmy F. \(Jim\)](#); [Kelly, Jennifer F.](#); [Washburn, Mary Morning F.](#)
Cc: [David Tamasi](#)
Subject: RE: From iHeartMedia: SBA-CARES Act-Radio
Date: Friday, April 10, 2020 10:03:35 AM
Attachments: [SBA-CARES Act-Radio.pdf](#)

Good morning Ozzie, thank you for the email! I've moved our colleague David C. to the bcc and added our communications team to the email. We'll review the information and get back to you soon. Thank you!

From: Ozzie Palomo <opalomo@chartwellstrategy.com>
Sent: Friday, April 10, 2020 9:45 AM
To: McCracken, Erin S. <Erin.McCracken@sba.gov>; Chiokadze, David G. <David.Chiokadze@sba.gov>
Cc: David Tamasi <dtamasi@chartwellstrategy.com>
Subject: From iHeartMedia: SBA-CARES Act-Radio

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Thank you,

Ozzie

From: [Washburn, Mary Morning F.](#)
To: [Billimoria, Jimmy F. \(Jim\)](#); [McCracken, Erin S.](#); [Sutherland, Terrence P.](#)
Cc: [Kelly, Jennifer F.](#)
Subject: RE: From iHeartMedia: SBA-CARES Act-Radio
Date: Friday, April 10, 2020 10:33:42 AM

Great! I will reach back out to them and loop you in when needed.

Regards,
Morning

M. Morning F. Washburn
Director of Strategic Alliances
Office of Communications and Public Liaison
U.S. Small Business Administration
cell: (202) [REDACTED]
morning.washburn@sba.gov

From: Billimoria, Jimmy F. (Jim) <jim.billimoria@sba.gov>
Sent: Friday, April 10, 2020 10:22 AM
To: Washburn, Mary Morning F. <MaryMorning.Washburn@sba.gov>; McCracken, Erin S. <Erin.McCracken@sba.gov>; Sutherland, Terrence P. <terrence.sutherland@sba.gov>
Cc: Kelly, Jennifer F. <Jennifer.Kelly@sba.gov>
Subject: RE: From iHeartMedia: SBA-CARES Act-Radio

I thought as much. [REDACTED].

From: Washburn, Mary Morning F. <MaryMorning.Washburn@sba.gov>
Sent: Friday, April 10, 2020 10:21 AM
To: Billimoria, Jimmy F. (Jim) <jim.billimoria@sba.gov>; McCracken, Erin S. <Erin.McCracken@sba.gov>; Sutherland, Terrence P. <terrence.sutherland@sba.gov>
Cc: Kelly, Jennifer F. <Jennifer.Kelly@sba.gov>
Subject: FW: From iHeartMedia: SBA-CARES Act-Radio

Good morning everyone – [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Please tell me if you have any questions.

-Morning

M. Morning F. Washburn
Director of Strategic Alliances
Office of Communications and Public Liaison
U.S. Small Business Administration
cell: (202) [REDACTED]
morning.washburn@sba.gov

From: McCracken, Erin S. <Erin.McCracken@sba.gov>
Sent: Friday, April 10, 2020 10:04 AM
To: Ozzie Palomo <opalomo@chartwellstrategy.com>; Billimoria, Jimmy F. (Jim) <jim.billimoria@sba.gov>; Kelly, Jennifer F. <Jennifer.Kelly@sba.gov>; Washburn, Mary Morning F. <MaryMorning.Washburn@sba.gov>
Cc: David Tamasi <dtamasi@chartwellstrategy.com>
Subject: RE: From iHeartMedia: SBA-CARES Act-Radio

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Cc: David Tamasi <dtamasi@chartwellstrategy.com>
Subject: From iHeartMedia: SBA-CARES Act-Radio

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Attached is more information. Dave can also answer any questions.

We would welcome the opportunity to discuss this at your earliest convenience.

Thank you,

Ozzie

From: [David Tamasi](#)
To: [McCracken, Erin S.](#)
Cc: [Ozzie Palomo](#); [Billimoria, Jimmy F. \(Jim\)](#); [Kelly, Jennifer F.](#); [Washburn, Mary Morning F.](#)
Subject: Re: From iHeartMedia: SBA-CARES Act-Radio
Date: Monday, April 13, 2020 8:35:58 AM

CAUTION - The sender of this message is external to the SBA network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to spam@sba.gov.

Hi Erin,

Good morning. Following up on Ozzie's note below to see if you all had any further discussions regarding note below or would like any additional information.

We would be happy to arrange a call with folks at iHeart if you thought that would be helpful.

Thank you.

Dave

David Tamasi
Chartwell Strategy Group
202 487-3851

On Apr 10, 2020, at 10:03 AM, McCracken, Erin S. <Erin.McCracken@sba.gov> wrote:

Good morning Ozzie, thank you for the email! I've moved our colleague David C. to the bcc and added our communications team to the email. We'll review the information and get back to you soon. Thank you!

From: Ozzie Palomo <opalomo@chartwellstrategy.com>
Sent: Friday, April 10, 2020 9:45 AM
To: McCracken, Erin S. <Erin.McCracken@sba.gov>; Chiokadze, David G. <David.Chiokadze@sba.gov>
Cc: David Tamasi <dtamasi@chartwellstrategy.com>
Subject: From iHeartMedia: SBA-CARES Act-Radio

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Thank you,

Ozzie

<SBA-CARES Act-Radio.pdf>

From: Scott.Mason@hklaw.com
To: [Billimoria, Jimmy F. \(Jim\)](#)
Cc: [Briggs, William J.](#)
Subject: RE: hey
Date: Wednesday, March 25, 2020 8:17:09 PM

CAUTION - The sender of this message is external to the SBA network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to spam@sba.gov.

JB – Thanks.

Nick – Will reach out Thursday. Thanks in advance.

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

From: Billimoria, Jimmy F. (Jim) <jim.billimoria@sba.gov>
Sent: Wednesday, March 25, 2020 8:04 PM
To: Mason, Scott D (WAS - X75330, CLT - X37787) <Scott.Mason@hklaw.com>
Cc: Briggs, William J. <William.Briggs@sba.gov>
Subject: RE: hey

[External email]

Bill Briggs is likely your best go-to.

From: Scott.Mason@hklaw.com <Scott.Mason@hklaw.com>
Sent: Wednesday, March 25, 2020 8:02 PM
To: Billimoria, Jimmy F. (Jim) <jim.billimoria@sba.gov>
Subject: hey

CAUTION - The sender of this message is external to the SBA network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to spam@sba.gov.

JB – Hope you are well, safe, and most importantly healthy! SBA about to get busy...best suggestions on getting clients questions answered...or wait til they come in and contact that office? Thanks in advance!!!

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

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From: [Billimoria, Jimmy F. \(Jim\)](#)
To: Scott.Mason@hklaw.com
Cc: [Briggs, William J.](#)
Subject: RE: hey
Date: Wednesday, March 25, 2020 8:04:00 PM

Bill Briggs is likely your best go-to.

From: Scott.Mason@hklaw.com <Scott.Mason@hklaw.com>
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To: Billimoria, Jimmy F. (Jim) <jim.billimoria@sba.gov>
Subject: hey

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JB – Hope you are well, safe, and most importantly healthy! SBA about to get busy...best suggestions on getting clients questions answered...or wait til they come in and contact that office? Thanks in advance!!!

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Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cel [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

NOTE: This e-mail is from a law firm, Holland & Knight LLP ("H&K"), and is intended solely for the use of the individual(s) to whom it is addressed. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you are not an existing client of H&K, do not construe anything in this e-mail to make you a client unless it contains a specific statement to that effect and do not disclose anything to H&K in reply that you expect it to hold in confidence. If you properly received this e-mail as a client, co-counsel or retained expert of H&K, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.

From: [Ozzie Palomo](#)
To: [Gray, Christopher S.](#); [Chiokadze, David G.](#)
Cc: [David Tamasi](#)
Subject: Re: iHeartMedia: SBA-CARES Act-Radio effort
Date: Thursday, April 9, 2020 7:54:57 AM

CAUTION - The sender of this message is external to the SBA network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to spam@sba.gov.

Good morning gents —

I know things are super busy over at SBA so apologies in advance. But the team at iHeartMedia is eager to discuss this effort with appropriate staff.

Any recommendations or thoughts on how best to proceed?

Thank you very much,

Ozzie

OJP

m. [REDACTED]

Sent from my iPhone

On Apr 6, 2020, at 8:38 PM, Ozzie Palomo <opalomo@chartwellstrategy.com> wrote:

Chris and David -

I understand you are busy but wanted to reach out to you on behalf of iHeartMedia. My business partner David Tamasi, copied here, works closely with iHeartMedia. We were hoping to put the following concept in front of you and SBA leadership for consideration.

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We would welcome the opportunity to discuss this at your earliest convenience.

Thank you,

Ozzie

<SBA-CARES Act-Radio.pdf>

OJP

m. [REDACTED]

Sent from my iPhone

From: [Briggs, William J.](#)
To: [Norton, Travis J.](#)
Subject: Re: Loan forgiveness
Date: Tuesday, April 28, 2020 3:21:06 PM

Please have your client email Sanjay.gupta@sba.gov our CTO

Get [Outlook for iOS](#)

From: Norton, Travis J. <tnorton@bhfs.com>
Sent: Tuesday, April 28, 2020 3:20:03 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: Loan forgiveness

CAUTION - The sender of this message is external to the SBA network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to spam@sba.gov.

Bill can you tell me who is in charge of PPP forgiveness? Have a client with technology that can expedite review; they'd like to be in touch with whomever is in charge. Is that you? Thank you for any direction you can give.

Travis

Travis Norton
Brownstein Hyatt Farber Schreck LLP
tnorton@bhfs.com

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From: [Gray, Christopher S.](#)
To: [Jessica Mandel](#)
Subject: RE: Loan Origination Question
Date: Monday, March 30, 2020 10:13:00 AM

Hi Jessica - Treasury is leading this and will be issuing guidance shortly.

From: Jessica Mandel <jessica@millerstrategies.com>
Sent: Monday, March 30, 2020 9:21 AM
To: Gray, Christopher S. <Christopher.Gray@sba.gov>
Subject: Loan Origination Question

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Chris: Hope you had a great weekend. Quick question, on the paycheck protection program, for originating these loans, is it just being down by banks or are there opportunities for others to originate?:

“Paycheck Protection Program” – **\$349bn for small business covered loan program** (another \$17bn for existing SBA loans and \$10bn for additional emergency grants)
Overseen by the Small Business Administration (fully guaranteed); **loans originated by banks**
Eligibility: businesses <500 employees
Individual loan size: 2.5x average monthly payroll cost (calculated from Jan. 1 – Feb. 29, 2020); capped at \$10mm
Debt will be forgiven (amount of which will be prorated by share of employees a business retains (or re-hires) through 6/30/20) if used for payroll / rent / utility / other necessities
Rate on loan will be capped at 4%; with maximum tenor of 10 years
Lender fees: 5% for loans <\$350K, 3% for loans \$350K-2mm, 1% for loans >\$2mm
0% risk-weighting if loans held on bank balance sheets

Jessica A. Mandel
Principal
Miller Strategies



From: [Jessica Mandel](#)
To: [Gray, Christopher S.](#)
Subject: Re: Loan Origination Question
Date: Monday, March 30, 2020 11:48:05 AM

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Thanks Chris. I will reach out to Treasury to try and get some clarity. Any idea when SBA will be issuing guidance?

Jessica A. Mandel
Miller Strategies
[REDACTED]

From: Chris Gray <Christopher.Gray@sba.gov>
Date: Monday, March 30, 2020 at 9:13 AM
To: Jessica Mandel <jessica@millerstrategies.com>
Subject: RE: Loan Origination Question

Hi Jessica - Treasury is leading this and will be issuing guidance shortly.

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0% risk-weighting if loans held on bank balance sheets

Jessica A. Mandel

Principal

Miller Strategies



From: [Briggs, William J.](#)
To: [Travis Kiyota](#)
Cc: Scott.Mason@hklaw.com
Subject: RE: Loan originator: East West Bank
Date: Tuesday, March 31, 2020 12:43:00 PM

Thank you Travis, we need strong SBA lenders like you right now! More details soon.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Travis Kiyota <Travis.Kiyota@EastWestBank.com>
Sent: Tuesday, March 31, 2020 12:31 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Cc: Scott.Mason@hklaw.com
Subject: Re: Loan originator: East West Bank

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Mr. Briggs:

Thank you for your leadership and service to our country. As you may know, East West Bank has a sound history of administering SBA loans and we stand ready to work with the agency to administer the critical CARES Act loans. As Scott mentions, please view us as a resource.

Thanks again,
Travis

Travis Kiyota
Senior Vice President, Head of Global Policy and Public Affairs
East West Bank
(415) [REDACTED] mobile

On Mar 31, 2020, at 6:26 AM, Briggs, William J. <William.Briggs@sba.gov> wrote:

Thank you Scott and Travis,

We will be sharing more guidance and information shortly. The minority-owned banks have been in frequent touch and have clearly expressed their desire to participate in this effort.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Scott.Mason@hklaw.com <Scott.Mason@hklaw.com>
Sent: Tuesday, March 31, 2020 9:22 AM
To: Briggs, William J. <William.Briggs@sba.gov>
Cc: travis.kiyota@eastwestbank.com
Subject: Loan originator: East West Bank

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Bill –

Thank you for all your ongoing help re: some of the loan programs established by the CARES Act and their status. Everyone is anxious to learn more, and we really appreciate all the work you and the SBA team are undertaking to help secure the U.S. economy. Really appreciated.

One of those organizations interested in partnering with the SBA is East West Bank, the largest minority-operated bank in the U.S., headquartered in Los Angeles with branches in seven states serving both consumer and commercial interests. They are poised to become a leading originator of loans among Minority Depository Institutions.

For convenience, I've cc'ed Travis Kiyota, Senior Vice President of Global Policy and Public Affairs, who will likely follow up with specific questions regarding the new SBA Paycheck Protection loan program, and other CARES support opportunities, etc. Travis is also available as a resource to you all to answer any questions you may have on process, etc.

Thanks again for all your help.

Scott

Scott Mason | Holland & Knight
Senior Policy Advisor

Holland & Knight LLP
800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006
Phone 202.469.5330 | Fax 202.955.5564
Cell [REDACTED]
scott.mason@hklaw.com | www.hklaw.com

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From: [Travis Kiyota](#)
To: [Briggs, William J.](#)
Cc: Scott.Mason@hklaw.com
Subject: Re: Loan originator: East West Bank
Date: Tuesday, March 31, 2020 12:31:37 PM

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East West Bank
[REDACTED] mobile

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U.S. Small Business Administration
(202) [REDACTED] mobile

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Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

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From: [Briggs, William J.](#)
To: Scott.Mason@hklaw.com
Cc: travis.kiyota@eastwestbank.com
Bcc: Brian.Morgenstern@treasury.gov
Subject: RE: Loan originator: East West Bank
Date: Tuesday, March 31, 2020 9:26:00 AM

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From: Tyler.Williams@treasury.gov
To: mark.vanderweide@frb.gov; tnorton@bhfs.com; Briggs, William J.; Bimal.Patel@treasury.gov; joe.carapiet@frb.gov; brian.phillips@frb.gov
Subject: RE: PPPLF
Date: Thursday, April 16, 2020 9:06:31 AM

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Thanks, Travis. I too will share with the team.

Tyler

From: Mark Van Der Weide <mark.vanderweide@frb.gov>
Date: April 15, 2020 at 8:30:24 PM EDT
To: Norton, Travis J. <tnorton@bhfs.com>, william.briggs@sba.gov <william.briggs@sba.gov>, Patel, Bimal <Bimal.Patel@treasury.gov>, Joe Carapiet <joe.carapiet@frb.gov>, Brian Phillips <brian.phillips@frb.gov>, Williams, Tyler <Tyler.Williams@treasury.gov>
Subject: RE: PPPLF

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Thanks, Travis. Team PPPLF will review.

Mark

From: Norton, Travis J. <tnorton@bhfs.com>
Sent: Wednesday, April 15, 2020 8:03 PM
To: william.briggs@sba.gov; Bimal.Patel@treasury.gov; Mark Van Der Weide <mark.vanderweide@frb.gov>; Joe Carapiet <joe.carapiet@frb.gov>; Brian Phillips <brian.phillips@frb.gov>; Tyler.Williams@treasury.gov
Subject: PPPLF

Gentlemen, first, thank you for your public service, I know you're busy, I'll keep it brief. I'm writing with a proposal I would request you consider as it will help the PPP:

There is a cash velocity problem in the PPP, which is why the Board has set up the PPPLF. The Facility will help PPP lenders who have, for various reasons, balance

sheet capacity issues (small lender with thin-balance sheet; larger bank with leverage concerns). SBA is working to approve new PPP lenders, including nonbanks, which the Board will likely eventually qualify for the PPPLF.

There are, however, a handful of nonbank PPP lenders who were SBA-approved 7(a) lenders well before the PPP ever existed. Some of them are SBA “preferred” lenders, which means the SBA guarantee attaches when the lender approves the loan without further SBA intermediation. This is earned and is evidence of the quality of these lenders’ underwriting and servicing abilities.

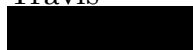
Proposal: The PPPLF is currently constructed to accept only originating DI PPP loans. I know additional program rules are coming for nonbanks, but these may be a week or two away. What I would like you to consider is allowing “any SBA 7(a) lender as of [pre-PPP reference date, call it March 22]” to access the PPPLF in the near term. I represent a company called CIM, one of these lenders. CIM’s PPP collateral, like their 7(a) collateral, is the highest quality the Board will find—never lost a guarantee, servicing is mature, etc. It is actually better collateral than DIs that are not preferred lenders will pledge the day the PPPLF opens.

I’m hoping this might be something you could be interested in during the day or two. Allowing this change would have the benefits of (i) facilitating liquidity to a finite set of trusted nonbank PPP lenders, thus enabling them to *fund* more PPP loans; and (ii) giving the Board data as to the participation of nonbanks in the PPPLF on something of a trial/pilot program basis. CIM would sign the additional paperwork FRB Chicago would require.

Thank you for considering. The sooner the better as there are tens of millions (and more behind it) of dollars of PPP money that can get out the door tomorrow if the confidence of a liquidity facility were provided.

Thank you. Thank you for listening, and for your public service.

Travis



Travis J. Norton

Of Counsel

Brownstein Hyatt Farber Schreck, LLP

1155 F Street N.W., Suite 1200

Washington, DC 20004

202.872.5287 tel

tnorton@bhfs.com

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From: [Mark Van Der Weide](#)
To: [Norton, Travis J.](#); [Briggs, William J.](#); Bimal.Patel@treasury.gov; [Joe Carapiet](#); [Brian Phillips](#); Tyler.Williams@treasury.gov
Subject: RE: PPPLF
Date: Wednesday, April 15, 2020 8:30:31 PM

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To: william.briggs@sba.gov; Bimal.Patel@treasury.gov; Mark Van Der Weide <mark.vanderweide@frb.gov>; Joe Carapiet <joe.carapiet@frb.gov>; Brian Phillips <brian.phillips@frb.gov>; Tyler.Williams@treasury.gov
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Thank you. Thank you for listening, and for your public service.

Travis



Travis J. Norton

Of Counsel

Brownstein Hyatt Farber Schreck, LLP

1155 F Street N.W., Suite 1200

Washington, DC 20004

202.872.5287 tel

tnorton@bhfs.com

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From: [Jessica Mandel](#)
To: [Briggs, William J.](#)
Subject: Re: Question re: SBA's Paycheck Protection Program
Date: Monday, March 30, 2020 12:20:49 PM

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Hi Bill! I dropped the others out of respect for email management during this crazy time. If you think someone else that you're working with on this issue should be brought back in let me know. We are trying to get clarity on how Treasury and SBA are working together on Paycheck Protection Program and who is originating the loans (i.e. just banks or non-banks able to), if SBA is exploring other financial institutions to be SBA approved and how the mechanics are working. Happy to talk on the phone if that is easier.

I have other SBA related questions that I was asking Chris Gray (see below) but maybe you can help with that as well:

- When looking at this language for an SBA 7A loan, what constitutes "ability to control?"
 - "When you calculate the size of your business to determine if you are a small business, you must include the annual receipts and the employees of your affiliates. **Affiliation is determined by the ability to control.** When the ability to control exists, even if it is not exercised, affiliation exists."
- Once the CARES Act is enacted into law, what will change for a 7A loan?
 - In the CARES Act, they waive affiliation rules for restaurants and hotels, does that mean their ability is based off just the number of employees and the parent company/affiliates size doesn't matter?
- The association language: The political consultant and lobbying industry is concerned that it will be excluded from applying for the relief loans available under Section 1102 of the CARES Act because under the 7(a) regulations at 120.110(k) businesses that engage primarily in lobbying and political activity are excluded from eligibility. This seems like a potential First Amendment issue – because if these firms sold widgets instead of politicians or ideas they would be eligible. It appears to prohibit them from eligibility based on the content of their speech. It seems like there is an opening in the law here for the SBA to make clear that lobbying and political consulting firms are eligible. The pending statutory language at Section 1102(a) says "in addition to small business concerns, any business concern, non profit organization,..." is eligible. It seems that the phrase "any business concern" in the statute should be viewed as overriding the regulations for these particular 7(a) loans. There is real concern in the industry that if this isn't made clear by regulation or guidance from SBA to

the lending institutions, that the industry might need to take legal action in order to be eligible.

- What if a company doesn't have an existing relationship with a lender for an 7A loan?

Jessica A. Mandel
Miller Strategies



From: "Brady.Howell@treasury.gov" <Brady.Howell@treasury.gov>
Date: Monday, March 30, 2020 at 10:54 AM
To: Jessica Mandel <jessica@millerstrategies.com>, "Lauren.Nunnally@treasury.gov" <Lauren.Nunnally@treasury.gov>
Cc: "Brian.Morgenstern@treasury.gov" <Brian.Morgenstern@treasury.gov>, "William.Briggs@sba.gov" <William.Briggs@sba.gov>, "Zachary.Isakowitz@treasury.gov" <Zachary.Isakowitz@treasury.gov>, "Allie.Hoover@treasury.gov" <Allie.Hoover@treasury.gov>
Subject: Re: Question re: SBA's Paycheck Protection Program

Thanks Jessica. Looping you in with Brian from Treasury and Bill from SBA who are lead on these kind of requests.

From: Jessica Mandel <jessica@millerstrategies.com>
Date: March 30, 2020 at 11:47:04 AM EDT
To: Nunnally, Lauren <Lauren.Nunnally@treasury.gov>, Howell, Joseph <Brady.Howell@treasury.gov>
Subject: Question re: SBA's Paycheck Protection Program

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Lauren and Brady: Hope you both are staying well during this crazy time. We are trying to get some clarity on the Paycheck Protection Program run by SBA. We know that this program is being run out of the SBA but when we speak to SBA specially about the mechanics of the program and originating these loans, if it just being done by banks or are there opportunities for others to originate, they say that Treasury is leading this effort and will be issuing guidance shortly. I am just trying to get clarity

on this because as you can imagine, we have quite a few clients that both need to access this program and some that can help originate loans. Any guidance or assistance would be very helpful. I am happy to talk over the phone too. My mobile is [REDACTED]. Thank you in advance!

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Best,
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Principal
Miller Strategies
[REDACTED]



From: Brady.Howell@treasury.gov
To: jessica@millerstrategies.com; Lauren.Nunnally@treasury.gov
Cc: Brian.Morgenstern@treasury.gov; [Briggs, William J.](#); Zachary.Isakowitz@treasury.gov; Allie.Hoover@treasury.gov
Subject: Re: Question re: SBA's Paycheck Protection Program
Date: Monday, March 30, 2020 11:55:07 AM

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Subject: Question re: SBA's Paycheck Protection Program

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Lauren and Brady: Hope you both are staying well during this crazy time. We are trying to get some clarity on the Paycheck Protection Program run by SBA. We know that this program is being run out of the SBA but when we speak to SBA specially about the mechanics of the program and originating these loans, if it just being done by banks or are there opportunities for others to originate, they say that Treasury is leading this effort and will be issuing guidance shortly. I am just trying to get clarity on this because as you can imagine, we have quite a few clients that both need to access this program and some that can help originate loans. Any guidance or assistance would be very helpful. I am happy to talk over the phone too. My mobile is [REDACTED]. Thank you in advance!

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Lender fees: 5% for loans <\$350K, 3% for loans \$350K-2mm, 1% for loans >\$2mm
0% risk-weighting if loans held on bank balance sheets

Best,
Jessica

Jessica A. Mandel
Principal
Miller Strategies



From: [Jessica Mandel](#)
To: [Briggs, William J.](#)
Cc: [McShane, Kathleen M.](#)
Subject: Re: Question re: SBA's Paycheck Protection Program
Date: Monday, March 30, 2020 12:47:25 PM

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Thank you!

Jessica A. Mandel
Miller Strategies
[REDACTED]

From: "Briggs, William J." <William.Briggs@sba.gov>
Date: Monday, March 30, 2020 at 11:44 AM
To: Jessica Mandel <jessica@millerstrategies.com>
Cc: "McShane, Kathleen M." <Kathleen.McShane@sba.gov>
Subject: RE: Question re: SBA's Paycheck Protection Program

You are on the list to receive info. But honestly, sba.gov will be the best resource.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Jessica Mandel <jessica@millerstrategies.com>
Sent: Monday, March 30, 2020 12:43 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: Re: Question re: SBA's Paycheck Protection Program

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Bill: Thank you. If you were to guess, would you say today or mid-week? Will you send that to me as soon as it's out? Also, I might have follow-up questions post-guidance, can I email you at that time? Thank you for being helpful, I know how underwater you are right now!

Jessica A. Mandel
Miller Strategies

[REDACTED]

From: "Briggs, William J." <William.Briggs@sba.gov>
Date: Monday, March 30, 2020 at 11:31 AM
To: Jessica Mandel <jessica@millerstrategies.com>
Subject: RE: Question re: SBA's Paycheck Protection Program

We will have guidance shortly.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Jessica Mandel <jessica@millerstrategies.com>
Sent: Monday, March 30, 2020 12:20 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: Re: Question re: SBA's Paycheck Protection Program

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- When looking at this language for an SBA 7A loan, what constitutes "ability to control?"
 - "When you calculate the size of your business to determine if you are a small business, you must include the annual receipts and the employees of your affiliates. **Affiliation is determined by the ability to control.** When the ability to control exists, even if it is not exercised, affiliation exists."
- Once the CARES Act is enacted into law, what will change for a 7A loan?
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company/affiliates size doesn't matter?

- The association language: The political consultant and lobbying industry is concerned that it will be excluded from applying for the relief loans available under Section 1102 of the CARES Act because under the 7(a) regulations at 120.110(k) businesses that engage primarily in lobbying and political activity are excluded from eligibility. This seems like a potential First Amendment issue – because if these firms sold widgets instead of politicians or ideas they would be eligible. It appears to prohibit them from eligibility based on the content of their speech. It seems like there is an opening in the law here for the SBA to make clear that lobbying and political consulting firms are eligible. The pending statutory language at Section 1102(a) says “in addition to small business concerns, any business concern, non profit organization,...” is eligible. It seems that the phrase “any business concern” in the statute should be viewed as overriding the regulations for these particular 7(a) loans. There is real concern in the industry that if this isn't made clear by regulation or guidance from SBA to the lending institutions, that the industry might need to take legal action in order to be eligible.
- What if a company doesn't have an existing relationship with a lender for an 7A loan?

Jessica A. Mandel
Miller Strategies
[REDACTED]

From: "Brady.Howell@treasury.gov" <Brady.Howell@treasury.gov>

Date: Monday, March 30, 2020 at 10:54 AM

To: Jessica Mandel <jessica@millerstrategies.com>, "Lauren.Nunnally@treasury.gov" <Lauren.Nunnally@treasury.gov>

Cc: "Brian.Morgenstern@treasury.gov" <Brian.Morgenstern@treasury.gov>, "William.Briggs@sba.gov" <William.Briggs@sba.gov>, "Zachary.Isakowitz@treasury.gov" <Zachary.Isakowitz@treasury.gov>, "Allie.Hoover@treasury.gov" <Allie.Hoover@treasury.gov>

Subject: Re: Question re: SBA's Paycheck Protection Program

Thanks Jessica. Looping you in with Brian from Treasury and Bill from SBA who are lead on these kind of requests.

From: Jessica Mandel <jessica@millerstrategies.com>

Date: March 30, 2020 at 11:47:04 AM EDT

To: Nunnally, Lauren <Lauren.Nunnally@treasury.gov>, Howell, Joseph
<Brady.Howell@treasury.gov>

Subject: Question re: SBA's Paycheck Protection Program

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Lauren and Brady: Hope you both are staying well during this crazy time. We are trying to get some clarity on the Paycheck Protection Program run by SBA. We know that this program is being run out of the SBA but when we speak to SBA specially about the mechanics of the program and originating these loans, if it just being done by banks or are there opportunities for others to originate, they say that Treasury is leading this effort and will be issuing guidance shortly. I am just trying to get clarity on this because as you can imagine, we have quite a few clients that both need to access this program and some that can help originate loans. Any guidance or assistance would be very helpful. I am happy to talk over the phone too. My mobile is [REDACTED]. Thank you in advance!

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0% risk-weighting if loans held on bank balance sheets

Best,
Jessica

Jessica A. Mandel
Principal
Miller Strategies
[REDACTED]



From: [Jessica Mandel](#)
To: [Briggs, William J.](#)
Subject: Re: Question re: SBA's Paycheck Protection Program
Date: Monday, March 30, 2020 12:43:19 PM

CAUTION - The sender of this message is external to the SBA network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to spam@sba.gov.

Bill: Thank you. If you were to guess, would you say today or mid-week? Will you send that to me as soon as it's out? Also, I might have follow-up questions post-guidance, can I email you at that time? Thank you for being helpful, I know how underwater you are right now!

Jessica A. Mandel
Miller Strategies
[REDACTED]

From: "Briggs, William J." <William.Briggs@sba.gov>
Date: Monday, March 30, 2020 at 11:31 AM
To: Jessica Mandel <jessica@millerstrategies.com>
Subject: RE: Question re: SBA's Paycheck Protection Program

We will have guidance shortly.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Jessica Mandel <jessica@millerstrategies.com>
Sent: Monday, March 30, 2020 12:20 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: Re: Question re: SBA's Paycheck Protection Program

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Jessica A. Mandel
Miller Strategies
[REDACTED]

From: "Brady.Howell@treasury.gov" <Brady.Howell@treasury.gov>

Date: Monday, March 30, 2020 at 10:54 AM

To: Jessica Mandel <jessica@millerstrategies.com>, "Lauren.Nunnally@treasury.gov"

<Lauren.Nunnally@treasury.gov>

Cc: "Brian.Morgenstern@treasury.gov" <Brian.Morgenstern@treasury.gov>, "William.Briggs@sba.gov" <William.Briggs@sba.gov>, "Zachary.Isakowitz@treasury.gov" <Zachary.Isakowitz@treasury.gov>, "Allie.Hoover@treasury.gov" <Allie.Hoover@treasury.gov>

Subject: Re: Question re: SBA's Paycheck Protection Program

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From: Jessica Mandel <jessica@millerstrategies.com>

Date: March 30, 2020 at 11:47:04 AM EDT

To: Nunnally, Lauren <Lauren.Nunnally@treasury.gov>, Howell, Joseph <Brady.Howell@treasury.gov>

Subject: Question re: SBA's Paycheck Protection Program

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Principal
Miller Strategies



From: [Briggs, William J.](#)
To: [Jessica Mandel](#)
Cc: [McShane, Kathleen M.](#)
Subject: RE: Question re: SBA's Paycheck Protection Program
Date: Monday, March 30, 2020 12:44:26 PM

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Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Jessica Mandel <jessica@millerstrategies.com>
Sent: Monday, March 30, 2020 12:43 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Subject: Re: Question re: SBA's Paycheck Protection Program

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Miller Strategies
[REDACTED]

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[REDACTED] mobile

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Jessica A. Mandel
Miller Strategies
[REDACTED]

From: "Brady.Howell@treasury.gov" <Brady.Howell@treasury.gov>
Date: Monday, March 30, 2020 at 10:54 AM
To: Jessica Mandel <jessica@millerstrategies.com>, "Lauren.Nunnally@treasury.gov" <Lauren.Nunnally@treasury.gov>
Cc: "Brian.Morgenstern@treasury.gov" <Brian.Morgenstern@treasury.gov>, "William.Briggs@sba.gov" <William.Briggs@sba.gov>, "Zachary.Isakowitz@treasury.gov" <Zachary.Isakowitz@treasury.gov>, "Allie.Hoover@treasury.gov" <Allie.Hoover@treasury.gov>
Subject: Re: Question re: SBA's Paycheck Protection Program

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From: Jessica Mandel <jessica@millerstrategies.com>
Date: March 30, 2020 at 11:47:04 AM EDT
To: Nunnally, Lauren <Lauren.Nunnally@treasury.gov>, Howell, Joseph <Brady.Howell@treasury.gov>
Subject: Question re: SBA's Paycheck Protection Program

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Best,
Jessica

Jessica A. Mandel
Principal
Miller Strategies
[REDACTED]



From: [Briggs, William J.](#)
To: Scott.Mason@hklaw.com; [Billimoria, Jimmy F. \(Jim\)](#)
Subject: RE: SBA - minority programs
Date: Monday, March 30, 2020 10:01:45 AM

SBA will provide guidance on this issue shortly.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Scott.Mason@hklaw.com <Scott.Mason@hklaw.com>
Sent: Monday, March 30, 2020 10:01 AM
To: Billimoria, Jimmy F. (Jim) <jim.billimoria@sba.gov>
Cc: Briggs, William J. <William.Briggs@sba.gov>
Subject: SBA - minority programs

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Jim/Bill – Who/where in SBA would be best to guide a minority owned bank to best serve their customers to initiate loan discussions for clients, etc.? Thanks for insights/guidance.

Scott

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

From: Billimoria, Jimmy F. (Jim) <jim.billimoria@sba.gov>
Sent: Wednesday, March 25, 2020 8:04 PM
To: Mason, Scott D (WAS - X75330, CLT - X37787) <Scott.Mason@hklaw.com>
Cc: Briggs, William J. <William.Briggs@sba.gov>
Subject: RE: hey

[External email]

Bill Briggs is likely your best go-to.

From: Scott.Mason@hklaw.com <Scott.Mason@hklaw.com>

Sent: Wednesday, March 25, 2020 8:02 PM

To: Billimoria, Jimmy F. (Jim) <jim.billimoria@sba.gov>

Subject: hey

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JB – Hope you are well, safe, and most importantly healthy! SBA about to get busy...best suggestions on getting clients questions answered...or wait til they come in and contact that office? Thanks in advance!!!

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

NOTE: This e-mail is from a law firm, Holland & Knight LLP ("H&K"), and is intended solely for the use of the individual(s) to whom it is addressed. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you are not an existing client of H&K, do not construe anything in this e-mail to make you a client unless it contains a specific statement to that effect and do not disclose anything to H&K in reply that you expect it to hold in confidence. If you properly received this e-mail as a client, co-counsel or retained expert of H&K, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.

From: [Briggs, William J.](#)
To: Scott.Mason@hklaw.com
Subject: RE: SBA Call to Action - Contractors
Date: Tuesday, March 31, 2020 9:24:00 AM

Passed on to contracting teams.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Scott.Mason@hklaw.com <Scott.Mason@hklaw.com>
Sent: Tuesday, March 31, 2020 9:18 AM
To: Briggs, William J. <William.Briggs@sba.gov>
Cc: Billimoria, Jimmy F. (Jim) <jim.billimoria@sba.gov>
Subject: RE: SBA Call to Action - Contractors

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Apologies. Meant to include attachment for Ops review. Thanks.

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

From: Briggs, William J. <William.Briggs@sba.gov>
Sent: Monday, March 30, 2020 12:20 PM
To: Mason, Scott D (WAS - X75330, CLT - X37787) <Scott.Mason@hklaw.com>
Cc: Billimoria, Jimmy F. (Jim) <jim.billimoria@sba.gov>
Subject: RE: SBA Call to Action - Contractors

[External email]

Thank you Scott. I will forward to our Ops team.

Bill Briggs

Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Scott.Mason@hklaw.com <Scott.Mason@hklaw.com>
Sent: Monday, March 30, 2020 12:12 PM
To: Briggs, William J. <William.Briggs@sba.gov>
Cc: Billimoria, Jimmy F. (Jim) <jim.billimoria@sba.gov>
Subject: SBA Call to Action - Contractors

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Bill –

On another matter regarding the SBA, wanted to let you know that we have a client well positioned to assist the SBA with the upcoming needs you will have as a result of the CARES Act and multiple SBA loan programs, etc., you're faced with managing to stabilize the U.S. economy. **Capitol Bridge** is an existing, certified SBA 8(a) provider, able to provide immediate assistance to the SBA. They currently manage contracts at HHS/CMS, and support states with prime contractors in contact center support. Capitol Bridge currently provides surge support and rapid response implementations of the below to federal customers and has significant past performance across these areas to demonstrate their success:

- Call Center Operations
- Program Management Support
- Program Evaluation / Quality Assurance
- Acquisition / Grants Support
- Cloud – IaaS, PaaS, SaaS

Based in northern Virginia, they support call center operations around the country including Texas, Kansas, California and Maryland. Along with their partners, Capitol Bridge has existent capacity for growth and can initiate SBA assistance quickly.

Any guidance/recommendations welcomed.

Thanks,
Scott

Scott Mason | Holland & Knight
Senior Policy Advisor
Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

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From: Scott.Mason@hklaw.com
To: [Briggs, William J.](#)
Cc: [Billimoria, Jimmy F. \(Jim\)](#)
Subject: RE: SBA Call to Action - Contractors
Date: Tuesday, April 7, 2020 3:20:47 PM
Attachments: [SBA 8a Mar 2020.pdf](#)

CAUTION - The sender of this message is external to the SBA network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to spam@sba.gov.

Bill – Thank you all for all your assistance to date; hope you all are hanging in there.

Just a quick note to let you know that our folks at Capitol Bridge have not yet heard from the Ops Team, but stand ready to immediately support the SBA mission and need for contract processing, call centers, etc. With another potentially \$250 billion coming your way, it's obvious a busy time for all but they stand ready to assist in making your processes easier.

Really appreciated.

Thanks,
Scott

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

From: Briggs, William J. <William.Briggs@sba.gov>
Sent: Monday, March 30, 2020 12:20 PM
To: Mason, Scott D (WAS - X75330, CLT - X37787) <Scott.Mason@hklaw.com>
Cc: Billimoria, Jimmy F. (Jim) <jim.billimoria@sba.gov>
Subject: RE: SBA Call to Action - Contractors

[External email]

Thank you Scott. I will forward to our Ops team.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration
(202) [REDACTED] mobile

From: Scott.Mason@hklaw.com <Scott.Mason@hklaw.com>

Sent: Monday, March 30, 2020 12:12 PM

To: Briggs, William J. <William.Briggs@sba.gov>

Cc: Billimoria, Jimmy F. (Jim) <jim.billimoria@sba.gov>

Subject: SBA Call to Action - Contractors

CAUTION - The sender of this message is external to the SBA network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to spam@sba.gov.

Bill –

On another matter regarding the SBA, wanted to let you know that we have a client well positioned to assist the SBA with the upcoming needs you will have as a result of the CARES Act and multiple SBA loan programs, etc., you're faced with managing to stabilize the U.S. economy. **Capitol Bridge** is an existing, certified SBA 8(a) provider, able to provide immediate assistance to the SBA. They currently manage contracts at HHS/CMS, and support states with prime contractors in contact center support. Capitol Bridge currently provides surge support and rapid response implementations of the below to federal customers and has significant past performance across these areas to demonstrate their success:

- Call Center Operations
- Program Management Support
- Program Evaluation / Quality Assurance
- Acquisition / Grants Support
- Cloud – IaaS, PaaS, SaaS

Based in northern Virginia, they support call center operations around the country including Texas, Kansas, California and Maryland. Along with their partners, Capitol Bridge has existent capacity for growth and can initiate SBA assistance quickly.

Any guidance/recommendations welcomed.

Thanks,
Scott

Scott Mason | Holland & Knight

Senior Policy Advisor

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800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

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To: [Briggs, William J.](#)
Cc: [Billimoria, Jimmy F. \(Jim\)](#)
Subject: RE: SBA Call to Action - Contractors
Date: Tuesday, March 31, 2020 9:21:53 AM
Attachments: [SBA 8a Mar 2020.pdf](#)

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Apologies. Meant to include attachment for Ops review. Thanks.

Scott Mason | Holland & Knight

Senior Policy Advisor

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From: [Manger, William M.](#)
To: [Kucharski, Stephen W.](#)
Subject: RE: Technology solution - process small business loans and protect taxpayers
Date: Wednesday, April 1, 2020 9:20:00 AM

[REDACTED]

From: Kucharski, Stephen W. <Stephen.Kucharski@sba.gov>
Sent: Tuesday, March 31, 2020 10:47 PM
To: Manger, William M. <William.Manger@sba.gov>
Subject: RE: Technology solution - process small business loans and protect taxpayers

[REDACTED]

From: Manger, William M. <William.Manger@sba.gov>
Sent: Tuesday, March 31, 2020 10:23 PM
To: Kucharski, Stephen W. <Stephen.Kucharski@sba.gov>
Subject: Fwd: Technology solution - process small business loans and protect taxpayers

Steve,

[REDACTED]
Bill

Get [Outlook for iOS](#)

From: Tyler.Williams@treasury.gov <Tyler.Williams@treasury.gov>
Sent: Tuesday, March 31, 2020 10:14:46 PM
To: john.anderson@rfadc.com <john.anderson@rfadc.com>; Manger, William M. <William.Manger@sba.gov>
Subject: FW: Technology solution - process small business loans and protect taxpayers

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John – connecting you with Bill at the SBA to share this note and offer of a demo.

Best,

Tyler

From: John Anderson <john.anderson@rfadc.com>
Sent: Monday, March 30, 2020 11:03 PM
To: Williams, Tyler <Tyler.Williams@treasury.gov>
Subject: Technology solution - process small business loans and protect taxpayers

**** Caution:** External email. Pay attention to suspicious links and attachments. Send suspicious email to suspect@treasury.gov **

Dear Deputy Assistant Secretary Williams:

Attached is a backgrounder but here's the summary - to ensure SBA's loan facilitates are successful the Administration must partner with or encourage private sector participants to utilize precision data and predictive algorithms to efficiently expedite loan application processing and most importantly filter out fraud and protect taxpayers. The government must do its best to make sure loans are going to legitimate businesses.

A data science company leading the way is [Enigma](#) and they can verify business legitimacy through data and technology in seconds. Historically business data is only aggregated by Dun & Bradstreet, Equifax, Lexis, but those firms don't have reliable data on small businesses (<\$5M). Enigma spent years training predictive algorithms on billions of public data points to assess which small businesses would make good B2B bets, suitable for insurance offerings/credit lines etc. That's exactly the solution needed for the SBA loan facility to be a successful response to coronavirus.

Bottom-line. The old 7(a) methods of approving/processing loans will not work given the current state of affairs. [Enigma](#), works with major private-sector financial institutions (e.g., Capitol One, Truist) and can quickly and accurately identify deserving loan applicants. Relying on the most precise available data sets and highly predictive algorithms, Enigma can accurately assess small business risk and growth signals, as well as granular industry activity. The company's ability to quickly screen aid applications is critical to SBA, Treasury or their designated banking partners, which will be overwhelmed with applicants. Enigma will also identify fraudulent claims or those made in bad-faith efforts to access government money. Again, to advance our collective interests we must be sure that the money is used to support businesses that were productive and viable before COVID and that can roar back after the pandemic clears.

I can connect you with Enigma's CEO who would be happy to brief you and demonstrate the technology. We can share credentials with your team or anyone at SBA so that you can test the company's insights - that is, type in the name of any small business and explore the return rate and quality of their assessments.

Understand no one has time right now so you can trust that I'm only coming to you with a viable solution.

Thank you. Please let me know who else on your team I should be in touch with or if there is a good time to connect for a demo? Thanks again.

Sincerely,
John

Subject: PARTNER [REDACTED], WE NEED TO HAVE OUR ACCOUNT UNLOCKED TO RETRIEVE NEW PASSWORD
Importance: High

Hello, I have a username, but need a password. We have not logged into CAFS in many, many years, if ever at all.
When I select Forgot Password, it emails me a temporary password.
when I use that temporary password an error message shows up on screen that "Your Account is Suspended"
Please advise!

Chad A. McGroarty
Vice President
United Savings Bank
35 E. Baltimore Pike
Media, PA 19063
610-627-0100
[REDACTED] cell

----- Original Message -----

Received: 11:14 PM EDT, 04/04/2020

From: DONOTREPLY@sba.gov

To: cmcgroarty@unitedsavingsbank.com

Subject: Your CLS Security profile has been Updated

Dear Charles McGroarty

Your SBA CAFS Security profile has been successfully updated.

A determination on your request to access the following CAFS Web Systems with the role permissions you requested are provided below:

Lender's Security POC - Review/Approve Lender's CLS account request. access has been granted.

The system you have request access to is a Federal computer system and is the property of the United States Government. It is for authorized use only.
Unauthorized use of SBA CAFS Web systems or use that exceeds the users authorized access privileges is prohibited and may constitute a violation of

18 U.S.C. - 1030 or other Federal laws and regulations and may result in criminal, civil, and/or administrative action.

This determination DOES NOT constitute 'Participation In' or 'Approval Of' any Web Application Forms/Transactions that you will submit to OCA via the web applications that you have been granted access to.

Thank You,

SBA CAFS Security CLS Staff

----- Original Message -----

Received: 05:40 PM EDT, 04/01/2020

From: DONOTREPLY@sba.gov

To: cmcgroarty@unitedsavingsbank.com

Subject: New account request verification

Dear Charles McGroarty,

Your account has been created in the SBA's Capital Access Login System (CLS) at <https://www.sba.gov/cls>.

Please click on the link below to verify your email address:

Verify Your Email

Verification must be completed within two hours of submitting or the account will be removed.

For additional help please contact your Program Office representative at the U.S. Small Business Administration.

ATTENTION: This email message originates outside of the USB email system, use caution.

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From G ay, Ch istophe S. Ch istophe .G ay@sba.gov>
Sent Wednesday, Ap il 8, 2020 4 22 PM
To Chad McG oa ty cmcg oa ty@unitedsav ngsbank.com>
Cc Schultz, James D. JDSchultz@cozen.com
Subject RE: United Sav ngs Bank Pa tne #7692 Locat on ID# 80228

Ok. I will reconnect with some folks here.

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I was speaking with a Mike Lawrence who was extremely helpful and informative, but was not able to do anything at that time. He emailed me his contacts and said he was hopeful I would hear back from him or someone else later this afternoon, that was at 12:30. His info:

U.S. Small Business Administration

To: cmcgrosarty@unitedsavingsbank.com

Jeff D commented

For assistance accessing CAFS you can reach out to SBA's Lender Customer Service Line at 1-833-572-0502.

Hi Chad - These two resources might be able to help you unlock faster. Give these a try asap and let me know your progress. If this doesn't fix it quickly we will try o her approach

How to request change to info on sba.gov website: www.sba.gov/support (file a ticket)

U.S. Small Business Administration

-----Original Message-----

Cc: idschultz@cozen.com

Importance: High

Hello Chris

As you asked, I have pasted below a string of email communications I have received since the start of this process last Wednesday (beginning bottom to top), ending with a string of emails today with an from Harris

We, the bank, thank you for all that you can do to expedite this process, but truly hundreds of small business owners thank you too!

Please let me know if there is anything else you need from me. Any updates or further information you can provide tomorrow should be extremely helpful.

1998

W 37 30% 7 8

VICE PRESIDENT

United Savings Bank

35 E. Baltimore P.

Media, PA 190

610-627-0100

cell

----- Original Message -----

Received: 10:21 AM EDT, 04/07/2020

From: "Harris, Izora" <izora.harris@sba.gov>

Tools: ale@sha.com / Co-Chad McGroarty: cmcgroarty@unitedservicesgroup.com

Subject: DE BARTNER #7603 WE NEED TO HAVE OUR ACCOUNT LINE LOCKED TO RETRIEVE NEW B4RSH/ORD

C. D. 93 - D-1, 4 - 1, 1 - A - 1, 1

BANKS. The Banker's account was suspended after he

Please contact bank to take suspension off, thank you.

Original Message

For more: [Cheryl McGuinness at \[Cheryl.McGuinness@oxford-journals.com\]\(mailto:Cheryl.McGuinness@oxford-journals.com\)](mailto:Cheryl.McGuinness@oxford-journals.com)

Sent: Tuesday, April 7, 2020 8:36 AM

Max Hübner, huebner.max@uni-erlangen.de

10. HUBBIS, IZONA ~ IZONA.HUBBIS@POLY.UMD.EDU

I did!

That is this email. I could even just sent it to them. Is this wrong?

-----Original Message-----

From: Harris, Izora [<mailto:izora.harris@sba.gov>]
Sent: Tuesday, April 07, 2020 9:33 AM
To: Chad McGroarty <cmcgroarty@unitedsavingsbank.com>
Subject: RE: PARTNER #7692 - WE NEED TO HAVE OUR ACCOUNT UNLOCKED TO RETRIEVE NEW PASSWORD
Contact cls@sba.gov, so they can take the suspension off.

-----Original Message-----

From: Chad McGroarty <cmcgroarty@unitedsavingsbank.com>
Sent: Sunday, April 5, 2020 11:18 AM
To: cls <cls@sba.gov>
Cc: Harris, Izora <izora.harris@sba.gov>
Subject: PARTNER #7692 - WE NEED TO HAVE OUR ACCOUNT UNLOCKED TO RETRIEVE NEW PASSWORD
Importance: High

Hello, I have a username, but need a password. We have not logged into CAFS in many, many years, if ever at all.
When I select Forgot Password, it emails me a temporary password.
when I use that temporary password an error message shows up on screen that "Your Account is Suspended"
Please advise!

Chad A. McGroarty
Vice President
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Media, PA 19063
610-627-0100
[REDACTED] cell

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Importance: High

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From: [Gray, Christopher S.](#)
To: [Chad McGroarty](#)
Subject: RE: United Savings Bank: Partner #7692 Locat on ID# 80228
Date: Wednesday, April 8, 2020 2:09:00 PM

Hi Chad - These two resources might be able to help you unlock faster. Give these a try asap and let me know your progress. If this doesn't fix it quickly we will try other approach.

Lender Assistance Hotline: (833) 572-0502

How to request change to info on sba.gov website: www.sba.gov/support (file a ticket)

Christopher S. Gray
Deputy Chief of Staff
U.S. Small Business Administration
O: (202) 205-6335 | C: (202) [REDACTED]

-----Original Message-----

From: Chad McGroarty <cmcgrouty@unitedsavingsbank.com>
Sent: Tuesday, April 7, 2020 9:30 PM
To: Gray, Christopher S. <Christopher.Gray@sba.gov>
Cc: jdschultz@cozen.com
Subject: United Savings Bank: Partner #7692 Location ID# 80228
Importance: High

CAUTION - The sender of this message is external to the SBA network. Please use care when clicking on links and responding with sensitive information. Send suspicious email o spam@sba.gov.

Hello Chris,

Thanks for jumping on the call tonight. As I explained I need to have my account UNSUSPENDED and receive a temporary or working password so that I can access CAFS/ETRAN.

As you asked, I have posted below a string of email communications I have received since the start of this process last Wednesday (beginning bottom to top), ending with a string of emails today with an Izora Harris.

In addition to the above I have spent a total of 5 hours and 45 minutes over 2 days in a queue on the 833.572.0502 help number, both calls ended in the service operator taking my information down and saying they would put in the request.

We, the bank, thank you for all that you can do to expedite this process, but truly hundreds of small business owners thank you too!

Please let me know if there is anything else you need from me. Any updates or further information you can provide tomorrow would be extremely helpful.

Thank you,

Chad A. McGroarty
Vice President
United Savings Bank
35 E. Baltimore Pike
Media, PA 19063
610-627-0100

[REDACTED] cell
<https://getlink.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.unitedsavingsbank.com%2F&data=02%7C01%7Cchristopher.gray%40sba.gov%7Cbd66f93b41e74e7f02008d7db5c67ac%7C3c89fd8a7f684667aa1541eb2208961%7C1%7C0%7C637219062227966799&data=thcuSIBvjchKrt2aDq0rbf6bBgER26OpF0P%2F588Q%3D&reserved=0>

----- Original Message -----

Received: 10:21 AM EDT, 04/07/2020
From: "Harris, Izora" <izora.harris@sba.gov>
To: chs <chs@sba.gov>; Cc: Chad McGroarty <cmcgrouty@unitedsavingsbank.com>
Subject: RE: PARTNER #7692 - WE NEED TO HAVE OUR ACCOUNT UNLOCKED TO RETRIEVE NEW PASSWORD

CAFS: The Banker's account was suspended after the password was reset.
Please contact bank to take suspension off; thank you.

Mr. McGroarty by copy of his message I am forwarding your issue to chs@sba.gov. Also we have a team in Herndon helping out with the issues so you should hear back soon.

-----Original Message-----

From: Chad McGroarty <cmcgrouty@unitedsavingsbank.com>
Sent: Tuesday, April 7, 2020 8:36 AM
To: Harris, Izora <izora.harris@sba.gov>
Subject: RE: PARTNER #7692 - WE NEED TO HAVE OUR ACCOUNT UNLOCKED TO RETRIEVE NEW PASSWORD

I did!

That is this email! I cc'd you but sent it to them--is this wrong?

-----Original Message-----

From: Harris, Izora [mailto:izora.harris@sba.gov]
Sent: Tuesday, April 07, 2020 9:33 AM
To: Chad McGroarty <cmcgrouty@unitedsavingsbank.com>
Subject: RE: PARTNER #7692 - WE NEED TO HAVE OUR ACCOUNT UNLOCKED TO RETRIEVE NEW PASSWORD

Contact chs@sba.gov so they can take the suspension off.

-----Original Message-----

From: Chad McGroarty <cmcgrouty@unitedsavingsbank.com>
Sent: Sunday, April 5, 2020 11:18 AM
To: chs <chs@sba.gov>
Cc: Harris, Izora <izora.harris@sba.gov>
Subject: PARTNER #7692 - WE NEED TO HAVE OUR ACCOUNT UNLOCKED TO RETRIEVE NEW PASSWORD
Importance: High

Hello, I have a username, but need a password. We have not logged into CAFS in many, many years, if ever at all.

When I select Forgot Password, it emails me a temporary password.

When I use that temporary password an error message shows up on screen that "Your Account is Suspended"

Please advise!

Chad A. McGroarty
Vice President
United Savings Bank
35 E. Baltimore Pike
Media, PA 19063
610-627-0100

[REDACTED] cell

----- Original Message -----

Received: 11:14 PM EDT, 04/04/2020
From: DONOTREPLY@sba.gov
To: cmcgrouty@unitedsavingsbank.com
Subject: Your CLS Security profile has been Updated

Dear Charles McGroarty

Your SBA CAFS Security profile has been successfully updated.

A determination on your request to access the following CAFS Web Systems with the role permissions you requested are provided below:

Lender's Security POC - Review/Approve Lender's CLS account request, access has been granted.

The system you have request access to is a Federal computer system and is the property of the United States Government. It is for authorized use only. Unauthorized use of SBA CAFS Web systems or use that exceeds the users authorized access privileges is prohibited and may constitute a violation of 18 U.S.C. - 1030 or other Federal laws and regulations and may result in criminal, civil, and/or administrative action.

This determination DOES NOT constitute 'Participation In' or 'Approval Of' any Web Application Forms/Transactions that you will submit to OCA via the web applications that you have been granted access to.

Thank You,
SBA CAFS Security CLS Staff

----- Original Message -----

Received: 05:40 PM EDT, 04/01/2020
From: DONOTREPLY@sba.gov
To: cmcgrouty@unitedsavingsbank.com
Subject: New account request verification

Dear Charles McGroarty,
Your account has been created in the SBA's Capital Access Login System (CLS) at <https://caweb.sba.gov/cls>.

Please click on the link below to verify your email address:
Verify Your Email

Verification must be completed within two hours of submitting or the account will be removed.
For additional help please contact your Program Office representative at the U.S. Small Business Administration.

ATTENTION: This email message originates outside of the USB email system, use caution.

From: [Jessica Mandel](#)
To: [Gray, Christopher S.](#)
Subject: Re-Hire Question
Date: Wednesday, April 1, 2020 4:45:34 PM

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We are trying to get some clarity on a point of eligibility, when looking at the SBA loans (Title I), it would really help us if **furloughed** employees count toward the total of FTEs (full-time employees) during the covered period (which is the 8-week period after loan origination). This would help hotels maximize loan forgiveness. These folks are still our employees, and they are still receiving some healthcare benefits. Is that what you are addressing with this language below or is this when they lay employees off and re-hire them before June 30th? Am I reading this wrong?

Re-hires

The amount of loan forgiveness is not reduced if:

- Between February 15, 2020 and 30 days after enactment of CARES, there is a reduction of full-time employees compared to February 15, 2020, and the reduction is eliminated by June 30, 2020
- Between February 15, 2020 and 30 days after enactment of CARES, there is a reduction in salary or wages of 1 or more employees compared to February 15, 2020, and the reduction is eliminated by June 30, 2020

Jessica A. Mandel
Principal
Miller Strategies



From: Scott.Mason@hklaw.com
To: [Billimoria, Jimmy F. \(Jim\)](#)
Cc: [Briggs, William J.](#)
Subject: SBA - minority programs
Date: Monday, March 30, 2020 10:01:00 AM

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Jim/Bill – Who/where in SBA would be best to guide a minority owned bank to best serve their customers to initiate loan discussions for clients, etc.? Thanks for insights/guidance.

Scott

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

From: Billimoria, Jimmy F. (Jim) <jim.billimoria@sba.gov>
Sent: Wednesday, March 25, 2020 8:04 PM
To: Mason, Scott D (WAS - X75330, CLT - X37787) <Scott.Mason@hklaw.com>
Cc: Briggs, William J. <William.Briggs@sba.gov>
Subject: RE: hey

[External email]

Bill Briggs is likely your best go-to.

From: Scott.Mason@hklaw.com <Scott.Mason@hklaw.com>
Sent: Wednesday, March 25, 2020 8:02 PM
To: Billimoria, Jimmy F. (Jim) <jim.billimoria@sba.gov>
Subject: hey

CAUTION - The sender of this message is external to the SBA network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to spam@sba.gov.

JB – Hope you are well, safe, and most importantly healthy! SBA about to get busy...best suggestions on getting clients questions answered...or wait til they come in and contact that office? Thanks in advance!!!

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

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From: [Gray, Christopher S.](#)
To: [Gray, Christopher S.](#)
Bcc: [Kevin Sunday](#); [Kevin Shivers](#); [Luke Bernstein](#); [Jessica Mandel](#); [Julia.Convertini@mail.house.gov](#); [Aaron Cohen](#); [Costa, Timothy](#); [Diehl, Rene L.](#); [Noe Garcia](#); [Willette, Alex R.](#) EOP/WHO; [Strazzella, Michael P.](#); [Rebecca Wolfkiel](#); [Muriel.Garr@suntrust.com](#); [Pilkerton, Christopher M.](#) EOP/WHO; [Drew Maloney](#); [Cortez, Mike](#); [Wilson, Michael](#); [Sue Smith](#); [Cody J Carbone](#); [Duncan Campbell](#); [SVernick@foxrothschild.com](#)
Subject: SBA - New FAQ's & Info - 4/8/20
Date: Wednesday, April 8, 2020 4:05:00 PM

Please see below for additional updated guidance and resources.

Christopher S. Gray

Deputy Chief of Staff
U.S. Small Business Administration

New Document:

FAQ's on PPP (As of April 8, 2020) - [Click Here](#)

Important Resources:

Affiliation Rules: [Click Here](#)

Interim Final Rule (IFR) on Affiliation: [Click Here](#)

FAQ on Faith-based Orgs and PPP: [Click Here](#)

Interim Final Rule: [Click Here](#)

Borrower Application: [Click Here](#)

PPP Loan Guaranty Form: [Click Here](#)

New Lender Application For Federally insured depository institutions, federally insured credit unions, and Farm Credit System institutions (other than the Federal Agricultural Mortgage Corporation)

(Submit to delegatedauthority@sba.gov) <https://www.sba.gov/sites/default/files/2020-04/PPP--Agreement-for-New-Lenders-Banks-Credit-Unions-FCS-w-seal-fillable.pdf>

More Info:

E-Tran Pro Tip: When a lender enters a loan into E-tran, **make sure they choose “PPP” from the first drop down menu**. Do NOT choose “7(a)”. If they choose 7(a), they will face restrictions that aren’t relevant to PPP.

Find a lender tool: [Click Here](#)

Lender Assistance Hotline: (833) 572-0502

Information for lenders can always be found at www.sba.gov/paycheckprotection or www.treasury.gov/cares

How to request change to info on sba.gov website: www.sba.gov/support (file a ticket)

-
-

From: [Gray, Christopher S.](#)
To: [Gray, Christopher S.](#)
Bcc: [Kevin Sunday](#); [Kevin Shivers](#); [Luke Bernstein](#); [Jessica Mandel](#); [Julia.Convertini@mail.house.gov](#); [Aaron Cohen](#); [Costa, Timothy](#); [Diehl, Rene L.](#); [Noe Garcia](#); [Willette, Alex R.](#) EOP/WHO; [Strazzella, Michael P.](#); [Rebecca Wolfkiel](#); [Muriel.Garr@suntrust.com](#); [Pilkerton, Christopher M.](#) EOP/WHO; [Drew Maloney](#); [Cortez, Mike](#); [Wilson, Michael](#); [Sue Smith](#); [Cody J Carbone](#); [Duncan Campbell](#)
Subject: SBA - New FAQ's & Info
Date: Tuesday, April 7, 2020 5:09:00 PM
Attachments: [Paycheck-Protection-Program-Frequently-Asked-Questions - April 6 2020.pdf](#)

Please see below for additional guidance and resources.

Christopher S. Gray
Deputy Chief of Staff
U.S. Small Business Administration

New document:

FAQ's on PPP - See attached

Important Resources:

Affiliation Rules: [Click Here](#)

Interim Final Rule (IFR) on affiliation: [Click Here](#)

FAQ on Faith-based Orgs and PPP: [Click Here](#)

Interim Final Rule: [Click Here](#)

Borrower Application: [Click Here](#)

PPP Loan Guaranty Form: [Click Here](#)

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(Submit to delegatedauthority@sba.gov) <https://www.sba.gov/sites/default/files/2020-04/PPP--Agreement-for-New-Lenders-Banks-Credit-Unions-FCS-w-seal-fillable.pdf>

More Info:

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From: [Gray, Christopher S.](#)
To: [Gray, Christopher S.](#)
Bcc: [Kevin Sunday](#); [Kevin Shivers](#); [Luke Bernstein](#); [Jessica Mandel](#); [Julia.Convertini@mail.house.gov](#); [Aaron Cohen](#); [Costa, Timothy](#); [Diehl, Rene L.](#); [Noe Garcia](#); [Willette, Alex R.](#) EOP/WHO; [Strazzella, Michael P.](#); [Rebecca Wolfkiel](#); [Muriel.Garr@suntrust.com](#); [Pilkerton, Christopher M.](#) EOP/WHO; [Drew Maloney](#); [Cortez, Mike](#); [Wilson, Michael](#); [Sue Smith](#); [Cody J Carbone](#); [Duncan Campbell](#); [SVernick@foxrothschild.com](#); [Lynette@shaleenergyalliance.org](#); [Ackerman, Emily](#)
Subject: SBA - New Info - 4/14/20
Date: Tuesday, April 14, 2020 6:25:00 PM

Through April 13, 2020, the [SBA has guaranteed 1,035,086 loans](#) under the Paycheck Protection Program.

For more information on loan activity, [click here](#).

Christopher S. Gray

Deputy Chief of Staff
U.S. Small Business Administration

New Document:

The [Interim Final Rule](#) announcing Additional Eligibility Criteria and Requirements for Certain Pledges of Loans for the Paycheck Protection Program.

This information is being posted in advance of publication in the Federal Register. The official version will appear in the Federal Register. [Click here](#) to download.

Important Resources:

Affiliation Rules: [Click Here](#)

Interim Final Rule (IFR) on Affiliation: [Click Here](#)

FAQ on Faith-based Orgs and PPP: [Click Here](#)

Interim Final Rule: [Click Here](#)

Borrower Application: [Click Here](#)

PPP Loan Guaranty Form: [Click Here](#)

FAQ's on PPP (As of April 8, 2020) - [Click Here](#)

New Lender Application For Federally insured depository institutions, federally insured credit

unions, and Farm Credit System institutions (other than the Federal Agricultural Mortgage Corporation)

(Submit to delegatedauthority@sba.gov) <https://www.sba.gov/sites/default/files/2020-04/PPP--Agreement-for-New-Lenders-Banks-Credit-Unions-FCS-w-seal-fillable.pdf>

More Info:

E-Tran Pro Tip: When a lender enters a loan intro E-tran, **make sure they choose “PPP” from the first drop down menu**. Do NOT choose “7(a)”. If they choose 7(a), they will face restrictions that aren’t relevant to PPP.

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Lender Assistance Hotline: (833) 572-0502

Information for lenders can always be found at www.sba.gov/paycheckprotection or www.treasury.gov/cares

How to request change to info on sba.gov website: www.sba.gov/support (file a ticket)

-
-

From: Scott.Mason@hklaw.com
To: [Briggs, William J.](#)
Cc: [Billimoria, Jimmy F. \(Jim\)](#)
Subject: SBA Call to Action - Contractors
Date: Monday, March 30, 2020 12:12:41 PM

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Bill –

On another matter regarding the SBA, wanted to let you know that we have a client well positioned to assist the SBA with the upcoming needs you will have as a result of the CARES Act and multiple SBA loan programs, etc., you're faced with managing to stabilize the U.S. economy. **Capitol Bridge** is an existing, certified SBA 8(a) provider, able to provide immediate assistance to the SBA. They currently manage contracts at HHS/CMS, and support states with prime contractors in contact center support. Capitol Bridge currently provides surge support and rapid response implementations of the below to federal customers and has significant past performance across these areas to demonstrate their success:

- Call Center Operations
- Program Management Support
- Program Evaluation / Quality Assurance
- Acquisition / Grants Support
- Cloud – IaaS, PaaS, SaaS

Based in northern Virginia, they support call center operations around the country including Texas, Kansas, California and Maryland. Along with their partners, Capitol Bridge has existent capacity for growth and can initiate SBA assistance quickly.

Any guidance/recommendations welcomed.

Thanks,
Scott

Scott Mason | Holland & Knight

Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

Cell [REDACTED]

scott.mason@hklaw.com | www.hklaw.com

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From: Scott.Mason@hklaw.com
To: [Carson, Barbara E.](#)
Subject: SBA Contracting
Date: Monday, April 13, 2020 11:04:19 AM
Attachments: [SBA 8a Mar 2020.pdf](#)

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Barbara –

I hope you had a great Easter weekend, and you and family are all safe and healthy. Crazy times. I apologize for the e-outreach, but I worked with Robb Wong – whom I met on Transition Team (I did campaign and PETT) -- on a few things while he was there and thought I'd reach out to you since his departure.

I'm working with a client that is well positioned to assist the SBA with the ongoing needs you probably have as a result of the CARES Act and multiple SBA loan programs, etc., you're faced with managing to stabilize the U.S. economy. **Capitol Bridge** is an existing, certified SBA 8(a) provider, able to provide immediate assistance to the SBA. They currently manage contracts at HHS/CMS, and support states with prime contractors in contact center support. Capitol Bridge currently provides surge support and rapid response implementations of the below to federal customers and has significant past performance across these areas to demonstrate their success:

- Call Center Operations
- Program Management Support
- Program Evaluation / Quality Assurance
- Acquisition / Grants Support
- Cloud – IaaS, PaaS, SaaS

Based in northern Virginia, they support call center operations around the country including Texas, Kansas, California and Maryland. Along with their partners, Capitol Bridge has existent capacity for growth and can initiate SBA assistance quickly.

I'd be happy to connect you electronically, or by whatever means you prefer for an introduction with their CEO/senior leadership to discuss their possible engagement. Thank you in advance for your consideration; I look forward to hearing from you. Stay healthy!

Thanks,
Scott

Scott Mason | Holland & Knight
Senior Policy Advisor

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, District of Columbia 20006

Phone 202.469.5330 | Fax 202.955.5564

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From: [Briggs, William J.](#)
To: [Briggs, William J. \(William.Briggs@sba.gov\)](#)
Bcc: [Peele, Nancy](#); [Alex Ayers \(aayers@hardinet.org\)](#); [Alex Strong](#); [Andrew Shore](#); [Anthony Diaz \(anthony.diaz@nist.gov\)](#); [Ashley Homes \(ahorner@sbko.bank\)](#); [Ashley Wittorf \(AWittorf@AdvaMed.org\)](#); [Billy Johnson \(BJohnson@isri.org\)](#); [Branson Lexi \(JGanzert@USChamber.com\)](#); [Callie Hoyt \(choyt@nmma.org\)](#); [Cecia Winslow \(cwinslow@afsamail.org\)](#); [Chissy Buteas \(cbuteas@njbri.org\)](#); [Chris Andersen \(chris.andersen@dutkogr.com\)](#); [Chris Burroughs](#); [Chris Cylke \(ccylke@americangaming.org\)](#); [Chris Schultz \(cschultz@cj-lake.com\)](#); [Chris Smith](#); [Christine Banning \(ChristineBanning@weareparking.org\)](#); [Craig Nett](#); [Dana Barbieri \(DBarbieri@csbs.org\)](#); [Danielle Beck \(dbeck@beef.org\)](#); [David Brown \(David.brown@bennettcd.com\)](#); [David Hickey](#); [David Thompson](#); [Delynn Shattuck \(Delynn.Shattuck.300228258@p2a.co\)](#); [Dena Sher \(sher@au.org\)](#); [Dennis Potter](#); [Don Childears \(Don@coloradobankers.org\)](#); [Eleni Kalish \(ekalisch@rccl.com\)](#); [Eric Streeststra \(eric@votehemp.com\)](#); [Henry Hogan \(hhogan@mdnonprofits.org\)](#); [James Slotnick \(james.slotnick@sunlife.com\)](#); [Jared Ihrig](#); [Jared Williams J. D. \(jwilliams@teetimedcoalition.org\)](#); [Jason Torchinsky \(jtorchinsky@hvjt.law\)](#); [Jeff Finkle](#); [Jeffrey Shapiro \(Jeffrey Shapiro <jshapiro@pmj-dc.com>\)](#); [John Chwat \(johnchwat@mckongrp.com\)](#); [John Moore \(jmoore@backstopsolutions.com\)](#); [Jon Gold \(goldj@nrf.com\)](#); [Jonathan Eisen \(jeisen@ifdaonline.com\)](#); [Jonathan Thompson \(jthompson@sheriffs.org\)](#); [Josh Ulman \(josh@ulmanpolicy.com\)](#); [Joshua Habursky \(joshua@premiumcigars.org\)](#); [Julie Strandlie \(strandlie@techservicealliance.org\)](#); [Kaitlyn Martin \(KMMartin@cozen.com\)](#); [Katelyn Harris](#); [Kelli Burke](#); [Ken Presley \(kpresley@uma.org\)](#); [Kristina Weger \(kweger@aha.org\)](#); [Kurt Imhof \(Kurt Imhof <kimhof@lifesciencespa.org>\)](#); [Larry Allen \(lallen@nypex.com\)](#); [Lauren McCormick](#); [Leah Dempsey \(dempsey@acinternational.org\)](#); [Leslie Fox](#); [Lisa Veith \(LisaPVeith@maximus.com\)](#); [Lizzy Simmons \(Simmons@nrf.com\)](#); [Lucida Cobbs](#); [Marc Saluk \(msaluk@co.hunterdon.nj.us\)](#); [Maria Sanderson \(MSanderson@GuidePost-Strategy.com\)](#); [Mark Leahy \(mleahy@mdna.com\)](#); [Mark Steiner](#); [Matt Ginley \(matt@apcllc.net\)](#); [Matthew Lapinski \(mlapinski@crshq.com\)](#); [Meagan McCanna \(meagan.mccanna@airbnb.com\)](#); [Michael Lamm \(MLamm@corpadvisorystolutions.com\)](#); [Michael Schuttloffel \(michael@capenet.org\)](#); [Mike Aquaro \(maquaro@rmahq.org\)](#); [Mike Leonard](#); [Naisha Jackson \(njackson@finhealthnetwork.org\)](#); [Nancy Hammer \(Nancy.Hammer@shrm.org\)](#); [Nick Austin \(naustinesq@gmail.com\)](#); [Ozzie Palomo \(opalomo@chartwellstrategy.com\)](#); [Patricia Hall \(patricia.ward@androsysinc.com\)](#); [Paul Miller](#); [Peter Comstock](#); [Peter Gordon](#); [Ralph Pulver \(RPULVER@travelers.com\)](#); [Rashid G. Hallaway](#); [Reed Linsk](#); [Reese Goldsmith \(rgoldsmith@bhfs.com>\)](#); [RJ Carney \(ronalddk@fb.org\)](#); [Russell Wasson \(Russell.Wasson@nreca.coop\)](#); [Ryan Hunter \(rhunt@callout.us\)](#); [schelton@beststrategies.com](#); [Seth Pearman \(seth.pearman@fsst.org\)](#); [Shannon Meade \(smeade@restaurant.org\)](#); [Stephen Hoar \(shoar@wh2cpas.com\)](#); [Stephen A Aaron \(saaron@mercuryllc.com\)](#); [Tori Barnes](#); [Tracy Taylor](#); [Travis Johnson](#); [Warren Tyron \(wtyron@Capitalcounsel.com\)](#); [Zeke Flores](#)
Subject: SBA Loan Systems Are Now Accepting PPP Loan Applications
Date: Monday, April 27, 2020 10:30:00 AM

Please distribute this message throughout your networks.

SBA Loan Systems Are Now Accepting PPP Loan Applications

SBA and Treasury are pleased to announce that SBA is now accepting and processing Paycheck Protection Program loan applications.

The PPP lender assistance hotline is (833) 572-0502

Program guidance and related information can be found at www.sba.gov/paycheckprotection or www.treasury.gov/cares

SBA and Treasury value all lenders and their small business customers, and will continue to provide updates to the PPP lending community as loan processing resumes this week.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration

Cell (202) [REDACTED]

William.Briggs@sba.gov



U.S. Small Business
Administration

[Home Page](#) | [Twitter](#) | [Instagram](#) | [Facebook](#) | [YouTube](#) | [LinkedIn](#) | [Email Alerts](#)

From: [Briggs, William J.](#)
To: [Briggs, William J. \(William.Briggs@sba.gov\)](#)
Bcc: [Ali Gormley](#); [Ayrianne Parks](#); [Barbara Benham](#); [Blanchard, Laricke](#); [Brennan Hart](#); [Brian Crawford](#); [Buck, Leon](#); [Caleb Jones](#); [Carolina Martinez](#); [Cerami, Michael](#); [Charles Crain](#); [Chiling Tong <ctong@nationalace.org>](#); [Chirag](#); [Chris Bliley](#); [Chris Burgoyne](#); [Chris Walker](#); [Covington, Lee](#); [Darren Littell](#); [David Stewart \(david.stewart@squirepb.com\)](#); [Denton, Neal](#); [Ed Elfmann](#); [Eric Dell](#); [Faith Bautista](#); [Gideon Lett](#); [Graham, Michael A.](#); [Greenhaus, Doug](#); [Gregg Haifley](#); [Guy](#); [Hughes, Spencer](#); [Jason Paul Dore](#); [Jay Pacious](#); [Jeffrey Regan](#); [Jessica Mandel](#); [Jill Hoffman](#); [Jody Milanese](#); [John Basselini](#); [John Hiller](#); [Jonathan Lovitz](#); [Jordan Heiliczer](#); [Kati Siconolfi](#); [Katie Vlietstra \(NASE\)](#); [Kerrie Rushton](#); [Kitty Loyd](#); [kkerrigan@sbecouncil.org](#); [Laura Haines](#); [Lauren Crawford Shaver](#); [Maria Luisa Boyce \(mariaboyce@ups.com\)](#); [Mark McCallum](#); [Mark Szymanski](#); [Matt Curtis](#); [Maura Morton](#); [Michelle B. Christian \(Michelle.Christian@sba.gov\)](#); [Michelle Lieber](#); [Nathan Conrad](#); [Newton, Martha E - ILAB](#); [Nicholas Zupancic](#); [Nick Owens](#); [Phil Anderson](#); [rboerstling@nam.org](#); [Rhett Buttle](#); [Rob Chamberlin](#); [Robert James, II](#); [sbeall@franchise.org](#); [Steve Denis](#); [Susan Nester](#); [Tom Sullivan](#); [Valerie Jaffee](#); [VRMA - Holcomb, Greg](#); [Walling, Laura](#); [Woolf, Steven](#); [Zach Martin](#); [Scott.mason@hklaw.com](#); [eve.otoole@hklaw.com](#); [Travis.Kiyota@EastWestBank.com](#)
Subject: SBA Loan Systems Are Now Accepting PPP Loan Applications
Date: Monday, April 27, 2020 10:30:00 AM

Please distribute this message throughout your networks.

SBA Loan Systems Are Now Accepting PPP Loan Applications

SBA and Treasury are pleased to announce that SBA is now accepting and processing Paycheck Protection Program loan applications.

The PPP lender assistance hotline is (833) 572-0502

Program guidance and related information can be found at www.sba.gov/paycheckprotection or www.treasury.gov/cares

SBA and Treasury value all lenders and their small business customers, and will continue to provide updates to the PPP lending community as loan processing resumes this week.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration

Cell (202) [REDACTED]
William.Briggs@sba.gov



U.S. Small Business
Administration

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From: [Gray, Christopher S.](#)
To: ["Schultz, James D."](#)
Subject: SBA PPP Info
Date: Monday, April 20, 2020 8:00:00 PM

Christopher S. Gray

Deputy Chief of Staff
U.S. Small Business Administration

New Document:

The [Interim Final Rule](#) announcing Additional Eligibility Criteria and Requirements for Certain Pledges of Loans for the Paycheck Protection Program.

This information is being posted in advance of publication in the Federal Register. The official version will appear in the Federal Register. [Click here](#) to download.

Important Resources:

Affiliation Rules: [Click Here](#)

Interim Final Rule (IFR) on Affiliation: [Click Here](#)

FAQ on Faith-based Orgs and PPP: [Click Here](#)

Interim Final Rule: [Click Here](#)

Borrower Application: [Click Here](#)

PPP Loan Guaranty Form: [Click Here](#)

FAQ's on PPP (As of April 8, 2020) - [Click Here](#)

New Lender Application For Federally insured depository institutions, federally insured credit unions, and Farm Credit System institutions (other than the Federal Agricultural Mortgage Corporation)

(Submit to delegatedauthority@sba.gov) <https://www.sba.gov/sites/default/files/2020-04/PPP--Agreement-for-New-Lenders-Banks-Credit-Unions-FCS-w-seal-fillable.pdf>

More Info:

E-Tran Pro Tip: When a lender enters a loan into E-tran, **make sure they choose “PPP” from the first drop down menu**. Do NOT choose “7(a)”. If they choose 7(a), they will face restrictions that aren’t relevant to PPP.

Find a lender tool: [Click Here](#).

Lender Assistance Hotline: (833) 572-0502

Information for lenders can always be found at www.sba.gov/paycheckprotection or www.treasury.gov/cares

How to request change to info on sba.gov website: www.sba.gov/support (file a ticket)

-

-

From: [Gray, Christopher S.](#)
To: [Gray, Christopher S.](#)
Bcc: [Kevin Sunday](#); [Kevin Shivers](#); [Luke Bernstein](#); [Jessica Mandel](#); [Julia.Convertini@mail.house.gov](#); [Aaron Cohen](#); [Costa, Timothy](#); [Diehl, Rene L.](#); [Noe Garcia](#); [Willette, Alex R.](#) EOP/WHO; [Strazzella, Michael P.](#); [Rebecca Wolfkiel](#); [Muriel.Garr@suntrust.com](#); [Drew Maloney](#); [Cortez, Mike](#); [Wilson, Michael](#); [Sue Smith](#); [Cody J Carbone](#); [Duncan Campbell](#); [SVernick@foxrothschild.com](#); [Lynette@shaleenergyalliance.org](#); [Ackerman, Emily](#)
Subject: SBA Release: Joint Statement by SBA Administrator Jovita Carranza and Treasury Secretary Steven T. Mnuchin on the Resumption of the Paycheck Protection Program
Date: Friday, April 24, 2020 3:50:00 PM
Attachments: [image005.png](#)

Please see below:

Christopher S. Gray

Deputy Chief of Staff
U.S. Small Business Administration

NEWS RELEASE

PRESS OFFICE

Release Date: April 24, 2020

Contact: Press_Office@sba.gov, (202) 205-7036

Release Number: 20-34

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Joint Statement by SBA Administrator Jovita Carranza and Treasury Secretary Steven T. Mnuchin on the Resumption of the Paycheck Protection Program

WASHINGTON – Administrator of the U.S. Small Business Administration Jovita Carranza and U.S. Treasury Secretary Steven T. Mnuchin issued the following statement today on the resumption of the Payroll Protection Program (PPP):

“We are pleased that President Trump has signed into law the Paycheck Protection Program and Health Care Enhancement Act, which provides critical additional funding for American workers and small businesses affected by the coronavirus pandemic. We want to thank Leader McConnell, Leader Schumer, Speaker Pelosi, and Leader McCarthy for working with us on a bipartisan basis to ensure that the Paycheck Protection Program is funded so that small businesses can keep hardworking Americans on the payroll.

“The Small Business Administration will resume accepting PPP loan applications on Monday, April 27 at 10:30AM EDT from approved lenders on behalf of any eligible borrower. This will ensure that SBA has properly coded the system to account for changes made by the legislation.

“The PPP has supported more than 1.66 million small businesses and protected over 30 million jobs for hardworking Americans. With the additional funds appropriated by Congress, tens of millions of additional workers will benefit from this critical relief.

“We encourage all approved lenders to process loan applications previously submitted by eligible borrowers and disburse funds expeditiously. All eligible borrowers who need these funds should work with an approved lender to apply. Borrowers should carefully review PPP regulations and guidance and the certifications required to obtain a loan.

“The Trump Administration is fully committed to ensuring that America’s workers and small businesses continue to get the resources they need to get through this challenging time.”

For more information on the Paycheck Protection Program, visit: sba.gov/paycheckprotection.

###

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Bcc: [Kevin Sunday](#); [Kevin Shivers](#); [Luke Bernstein](#); [Jessica Mandel](#); [Julia.Convertini@mail.house.gov](#); [Aaron Cohen](#); [Costa, Timothy](#); [Diehl, Rene L.](#); [Noe Garcia](#); [Willette, Alex R.](#) EOP/WHO; [Strazzella, Michael P.](#); [Rebecca Wolfkiel](#); [Muriel.Garr@suntrust.com](#); [Drew Maloney](#); [Cortez, Mike](#); [Wilson, Michael](#); [Sue Smith](#); [Cody J Carbone](#); [Duncan Campbell](#); [SVernick@foxrothschild.com](#); [Lynette@shaleenergyalliance.org](#); [Ackerman, Emily](#); [Marc E Andersen](#); [Jason Miller](#); ["Schultz, James D."](#); [Roz.Leighton@mail.house.gov](#); [Campbell, Chris](#)
Subject: SBA Release: Joint Statement by Secretary Steven T. Mnuchin and Administrator Jovita Carranza on the Review Procedure for Paycheck Protection Program Loans
Date: Tuesday, April 28, 2020 7:43:00 PM
Attachments: [image005.png](#)

Please see below.

Christopher S. Gray

Deputy Chief of Staff

U.S. Small Business Administration

NEWS RELEASE

PRESS OFFICE

Release Date: April 28, 2020

Contact: Press_Office@sba.gov, (202) 205-7036

Release Number: 20-35

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Joint Statement by Secretary Steven T. Mnuchin and Administrator Jovita Carranza on the Review Procedure for Paycheck Protection Program Loans

WASHINGTON – U.S. Treasury Secretary Steven T. Mnuchin and U.S. Small Business Administrator Jovita Carranza issued the following statement today on the Paycheck Protection Program (PPP):

“The Paycheck Protection Program is providing critical support to millions of small businesses and tens of millions of hardworking Americans.

“We have noted the large number of companies that have appropriately reevaluated their need for PPP loans and promptly repaid loan funds in response to SBA guidance reminding all borrowers of an important certification required to obtain a PPP loan. To further ensure PPP loans are limited to eligible borrowers, the SBA has decided, in consultation with the

Department of the Treasury, that it will review all loans in excess of \$2 million, in addition to other loans as appropriate, following the lender's submission of the borrower's loan forgiveness application. Regulatory guidance implementing this procedure will be forthcoming.

"We remain fully committed to ensuring that America's workers and small businesses get the resources they need to get through this challenging time."

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Subject: SBA Release: Joint Statement by Secretary Steven T. Mnuchin and Administrator Jovita Carranza on the Review Procedure for Paycheck Protection Program Loans
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Bcc: [Kevin Sunday](#); [Kevin Shivers](#); [Luke Bernstein](#); [Jessica Mandel](#); [Julia.Convertini@mail.house.gov](#); [Aaron Cohen](#); [Costa, Timothy](#); [Diehl, Rene L.](#); [Noe Garcia](#); [Willette, Alex R.](#) EOP/WHO; [Strazzella, Michael P.](#); [Rebecca Wolfkiel](#); [Muriel.Garr@suntrust.com](#); [Pilkerton, Christopher M.](#) EOP/WHO; [Drew Maloney](#); [Cortez, Mike](#); [Wilson, Michael](#); [Sue Smith](#); [Cody J Carbone](#); [Duncan Campbell](#)
Subject: SBA Release: SBA Clarifies Eligibility of Faith-Based Organizations to Participate in Paycheck Protection and Economic Injury Disaster Loan Programs
Date: Saturday, April 4, 2020 3:04:00 PM
Attachments: [image005.png](#)

Administrator Carranza has issued guidance on Faith-Based Organizations eligibility to participate in the Paycheck Protection Program (PPP) and the Economic Injury Disaster Loan (EIDL) program.

CG

Christopher S. Gray

Deputy Chief of Staff
U.S. Small Business Administration

NEWS RELEASE

PRESS OFFICE

Release Date: April 4, 2020

Release Number: 20-31

Contact: Press_Office@sba.gov, (202) 205-7036

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SBA Clarifies Eligibility of Faith-Based Organizations to Participate in Paycheck Protection and Economic Injury Disaster Loan Programs

WASHINGTON – SBA Administrator [Jovita Carranza](#) today announced that SBA [issued guidance](#) clarifying that all faith-based organizations impacted by Coronavirus (COVID-19) are eligible to participate in the Paycheck Protection Program and the Economic Injury Disaster Loan program, without restrictions based on their religious identity or activities, to the extent they meet the eligibility criteria outlined in the CARES Act that was passed by Congress, signed into law by President Trump, and implemented by the Paycheck Protection Act Interim Final Rule.

“Following the passage of the emergency economic relief assistance, the Administration and Congress acted to ensure that small businesses and non-profits alike have access to critical funds to keep their workers paid and employed,” said Carranza. “Faith-based organizations have always provided critical social services for people in need, and SBA will make clear that these organizations may access this emergency capital.”

The Paycheck Protection Program is designed to keep small business workers employed and provide small businesses with capital through the nation’s banks and other lending institutions, with support from the SBA. The Paycheck Protection Program’s maximum loan amount is \$10 million with a fixed 1% interest rate and maturity of two years. SBA will forgive the portion of loan proceeds used for payroll costs and other designated operating expenses for up to eight weeks provided at least 75% of loan proceeds are used for payroll costs.

The Economic Injury Disaster Loan program provides qualifying small businesses and non-profits with working capital up to \$2 million with low interest rates and terms extending up to 30 years.

“While every American is being affected by COVID-19, the impact of this pandemic is particularly hurting our schools and places of worship, and disproportionately impacting the underrepresented communities, the sick, the elderly and the lower income,” added Carranza. “It’s vitally important that organizations focused on delivering critical social services and meeting community needs remain viable, particularly during this economically challenging time.”

###

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From: [Gray, Christopher S.](#)
To: [Gray, Christopher S.](#)
Bcc: [lbernstein@orrstown.com](#); [Jessica Mandel](#); [Drew Maloney](#); [jdzhultz@cozen.com](#); [Strazzella, Michael P.](#); [Mike.Turzai@gmail.com](#); [Cortez, Mike](#); [Becky Corby](#); [Rebecca Wolfkiel](#); [Tori Barnes](#); [Hannigan, Megan](#); [Wilson, Michael](#)
Subject: SBA Release: With \$349 Billion in Emergency Small Business Capital Cleared, SBA and Treasury Begin Unprecedented Public-Private Mobilization Effort to Distribute Funds
Date: Tuesday, March 31, 2020 4:29:00 PM
Attachments: [image003.png](#)

Please see below.

CG

Christopher S. Gray

Deputy Chief of Staff

U.S. Small Business Administration

NEWS RELEASE

PRESS OFFICE

Release Date: March 31, 2020

Contact: Press_Office@sba.gov, (202) 205-7036

Release Number: 20-29

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With \$349 Billion in Emergency Small Business Capital Cleared, SBA and Treasury Begin Unprecedented Public-Private Mobilization Effort to Distribute Funds

WASHINGTON – Following President Trump’s signing of the historic Coronavirus Aid, Relief, and Economic Security (CARES) Act, SBA Administrator [Jovita Carranza](#) and Treasury Secretary [Steven T. Mnuchin](#) today announced that the SBA and Treasury Department have initiated a robust mobilization effort of banks and other lending institutions to provide small businesses with the capital they need.

The CARES Act establishes a new \$349 billion Paycheck Protection Program. The Program will provide much-needed relief to millions of small businesses so they can sustain their

businesses and keep their workers employed.

“This unprecedented public-private partnership is going to assist small businesses with accessing capital quickly. Our goal is to position lenders as the single point-of-contact for small businesses – the application, loan processing, and disbursement of funds will all be administered at the community level,” said Administrator Carranza. “Speed is the operative word; applications for the emergency capital can begin as early as this week, with lenders using their own systems and processes to make these loans. We remain committed to supporting our nation’s more than 30 million small businesses and their employees, so that they can continue to be the fuel for our nation’s economic engine.”

“This legislation provides small business job retention loans to provide eight weeks of payroll and certain overhead to keep workers employed,” said Secretary Mnuchin. “Treasury and the Small Business Administration expect to have this program up and running by April 3rd so that businesses can go to a participating SBA 7(a) lender, bank, or credit union, apply for a loan, and be approved on the same day. The loans will be forgiven as long as the funds are used to keep employees on the payroll and for certain other expenses.”

The new loan program will help small businesses with their payroll and other business operating expenses. It will provide critical capital to businesses without collateral requirements, personal guarantees, or SBA fees – all with a 100% guarantee from SBA. All loan payments will be deferred for six months. Most importantly, the SBA will forgive the portion of the loan proceeds that are used to cover the first eight weeks of payroll costs, rent, utilities, and mortgage interest.

The Paycheck Protection Program is specifically designed to help small businesses keep their workforce employed. Visit [SBA.gov/Coronavirus](https://www.sba.gov/coronavirus) for more information on the Paycheck Protection Program.

- The new loan program will be available retroactive from Feb. 15, 2020, so employers can rehire their recently laid-off employees through June 30, 2020.

Loan Terms & Conditions

- Eligible businesses: All businesses, including non-profits, Veterans organizations, Tribal concerns, sole proprietorships, self-employed individuals, and independent contractors, with 500 or fewer employees, or no greater than the number of employees set by the SBA as the size standard for certain industries
- Maximum loan amount up to \$10 million
- Loan forgiveness if proceeds used for payroll costs and other designated business operating expenses in the 8 weeks following the date of loan origination (due to likely high subscription, it is anticipated that not more than 25% of the forgiven amount may be for non-payroll costs)
- All loans under this program will have the following identical features:

- Interest rate of 0.5%
- Maturity of 2 years
- First payment deferred for six months
- 100% guarantee by SBA
- No collateral
- No personal guarantees
- No borrower or lender fees payable to SBA

SBA's announcement comes on the heels of a series of steps taken by the Agency since the President's Emergency Declaration to expeditiously provide capital to financially distressed businesses affected by the Coronavirus (COVID-19) pandemic. Since March 17, SBA has taken the following steps:

- [Declared all states and territories eligible for Economic Injury Disaster Loan assistance](#)
- 1-year deferment on Economic Injury Disaster Loans provided due to COVID-19
- [Automatic deferment of previous disaster loans for homeowners and businesses through 2020](#)
- Waiver of garnishments through 2020

Visit [SBA.gov/Coronavirus](https://www.sba.gov/coronavirus) for more information on SBA's assistance to small businesses.

###

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To: [Gray, Christopher S.](#)
Bcc: [lbernstein@orrstown.com](#); [Jessica Mandel](#); [Drew Maloney](#); [jdzhultz@cozen.com](#); [Strazzella, Michael P.](#); [Mike.Turzai@gmail.com](#); [Cortez, Mike](#); [Becky Corby](#); [Rebecca Wolfkiel](#); [Tori Barnes](#); [Hannigan, Megan](#); [Wilson, Michael](#)
Subject: SBA Release: With \$349 Billion in Emergency Small Business Capital Cleared, SBA and Treasury Begin Unprecedented Public-Private Mobilization Effort to Distribute Funds
Date: Tuesday, March 31, 2020 4:29:00 PM
Attachments: [image003.png](#)

Please see below.

CG

Christopher S. Gray

Deputy Chief of Staff

U.S. Small Business Administration

NEWS RELEASE

PRESS OFFICE

Release Date: March 31, 2020

Contact: Press_Office@sba.gov, (202) 205-7036

Release Number: 20-29

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To: jdschultz@cozen.com
Subject: SBA Release: With \$349 Billion in Emergency Small Business Capital Cleared, SBA and Treasury Begin Unprecedented Public-Private Mobilization Effort to Distribute Funds
Date: Tuesday, March 31, 2020 5:36:00 PM
Attachments: [image003.png](#)

Please see below.
CG

Christopher S. Gray

Deputy Chief of Staff
U.S. Small Business Administration

NEWS RELEASE

PRESS OFFICE

Release Date: March 31, 2020

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“This legislation provides small business job retention loans to provide eight weeks of payroll and certain overhead to keep workers employed,” said Secretary Mnuchin. “Treasury and the Small Business Administration expect to have this program up and running by April 3rd so that businesses can go to a participating SBA 7(a) lender, bank, or credit union, apply for a loan, and be approved on the same day. The loans will be forgiven as long as the funds are used to keep employees on the payroll and for certain other expenses.”

The new loan program will help small businesses with their payroll and other business operating expenses. It will provide critical capital to businesses without collateral requirements, personal guarantees, or SBA fees – all with a 100% guarantee from SBA. All loan payments will be deferred for six months. Most importantly, the SBA will forgive the portion of the loan proceeds that are used to cover the first eight weeks of payroll costs, rent, utilities, and mortgage interest.

The Paycheck Protection Program is specifically designed to help small businesses keep their workforce employed. Visit [SBA.gov/Coronavirus](https://www.sba.gov/coronavirus) for more information on the Paycheck Protection Program.

- The new loan program will be available retroactive from Feb. 15, 2020, so employers can rehire their recently laid-off employees through June 30, 2020.

Loan Terms & Conditions

- Eligible businesses: All businesses, including non-profits, Veterans organizations, Tribal concerns, sole proprietorships, self-employed individuals, and independent contractors, with 500 or fewer employees, or no greater than the number of employees set by the SBA as the size standard for certain industries
- Maximum loan amount up to \$10 million
- Loan forgiveness if proceeds used for payroll costs and other designated business operating expenses in the 8 weeks following the date of loan origination (due to likely high subscription, it is anticipated that not more than 25% of the forgiven amount may be for non-payroll costs)
- All loans under this program will have the following identical features:
 - Interest rate of 0.5%

- Maturity of 2 years
- First payment deferred for six months
- 100% guarantee by SBA
- No collateral
- No personal guarantees
- No borrower or lender fees payable to SBA

SBA's announcement comes on the heels of a series of steps taken by the Agency since the President's Emergency Declaration to expeditiously provide capital to financially distressed businesses affected by the Coronavirus (COVID-19) pandemic. Since March 17, SBA has taken the following steps:

- [Declared all states and territories eligible for Economic Injury Disaster Loan assistance](#)
- 1-year deferment on Economic Injury Disaster Loans provided due to COVID-19
- [Automatic deferment of previous disaster loans for homeowners and businesses through 2020](#)
- Waiver of garnishments through 2020

Visit [SBA.gov/Coronavirus](https://www.sba.gov/coronavirus) for more information on SBA's assistance to small businesses.

###

From: [John Anderson](#)
To: [Manger, William M.](#)
Subject: Technology solution - process small business loans and protect taxpayers
Date: Thursday, April 2, 2020 12:19:00 PM
Attachments: [ATT00001.htm](#)
[Enigma_SBALoans_033020.pdf](#)
[ATT00002.htm](#)

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Bill,

By way of background, Treasury encouraged me to contact you with a potential solution to getting the loan facilities working ASAP. Attached is a deck but here's the summary - to ensure SBA's loan facilities are successful the Administration must partner with or encourage private sector participants to utilize precision data and predictive algorithms to efficiently expedite loan application processing and most importantly filter out fraud and protect taxpayers.

A data science company leading the way is [Enigma](#) and they can verify business legitimacy through data and technology in seconds. Historically business data is only aggregated by Dun & Bradstreet, Equifax, Lexis, but those firms don't have reliable data on small businesses (<\$5M). Enigma spent years training predictive algorithms on billions of public data points to assess which small businesses would make good B2B bets, suitable for insurance offerings/credit lines etc. That's exactly the solution needed for the SBA loan facility to be a successful response to coronavirus.

Bottom-line. The old methods of approving/processing loans will not work given the current state of affairs. [Enigma](#), works with major private-sector financial institutions (e.g., Capitol One, Truist) and can quickly and accurately identify deserving loan applicants. Relying on the most precise available data sets and highly predictive algorithms, Enigma can accurately assess small business risk and growth signals, as well as granular industry activity. The company's ability to quickly screen aid applications is critical to SBA, Treasury or their designated banking partners, which will be overwhelmed with applicants. Enigma will also identify fraudulent claims or those made in bad-faith efforts to access government money. Again, to advance our collective interests we must be sure that the money is used to support businesses that were productive and viable before COVID and that can roar back after the pandemic clears.

I can connect you with Enigma's CEO who would be happy to brief you and demonstrate the technology. We can share credentials with your Capital Access team or anyone at SBA so that you can test the company's insights - that is, type in the name of any small business and explore the return rate and quality of their assessments.

Understand no one has time right now so you can trust that I'm only coming to you

with a viable solution.

Thank you. Please let me know who else on your team I should be in touch with or if there is a good time to connect for a demo? Thanks again.

Sincerely,

John

From: Scott.Mason@hklaw.com
To: [Briggs, William J.](#)
Subject: Thanks...
Date: Monday, April 27, 2020 8:36:12 AM

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Bill – As you all start up the PPP again, good luck. Thanks again for adding us to email distribution lists, and assistance with Bank [REDACTED] approvals. Have a great week. Hang in there. Stay healthy!

Scott

Scott Mason | Holland & Knight

Senior Policy Advisor

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To: [Briggs, William J.](#)
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Subject: Update on Paycheck Protection Program (PPP)
Date: Wednesday, April 15, 2020 8:42:00 PM

Update on Paycheck Protection Program (PPP)

In the near future, SBA expects the amount of processed PPP loan volume to reach the maximum amount authorized and appropriated by Congress. Once the authorization limit is reached, SBA will not be able to accept any new loan applications for the Paycheck Protection Program.

This will mean that lenders will no longer be able to load PPP applications into the Capital Access Financial System (CAFS or E-Tran) [the Lender Gateway]. SBA is unable to maintain a queue for PPP applications. Further, PPP loan amounts may not be adjusted by lenders within the CAFS system.

Additionally, once the authorization limit is reached, SBA will no longer be able to accept new lender applications to become PPP lenders.

SBA is reaching out to the lending community to make them aware of this eventuality so that they may prepare and inform their small business customers of the situation.

SBA will continue to inform its lending partners of new updates should Congress authorize additional funds.

Bill Briggs
Deputy Associate Administrator, Office of Capital Access
U.S. Small Business Administration

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