

From: Joseph Cavallo [REDACTED]
Sent: Tuesday, April 21, 2020 10:32 AM
To: Comments
Subject: [EXTERNAL MESSAGE] RIN 3064-AF49

Good Morning,

I applied for the PPP through my local bank of First National Bank of Pennsylvania on the first day allowed, I am a 1099 that started my work at the end of October 2019. The first rules of this program stated if you were a 1099 that started late in 2019 that you could use the first 2 months of 2020 to prove your income. I supplied pay sheets from my work that matched with all direct deposit bank statements from Jan -March 2020 (we basically shut down 1st wk Mar) which has my payers name on them. This is absolute in determining my actual income, as other federal agencies like Social Security use these to determine eligibility and entitlement of benefits. It's not as though I could fake these from Jan 1st as if I knew the covid was on its way-plus my bank sends them directly to the SBA. I also offered them my quarterly local tax payment minus expenses that was paid before application to help prove income.

My local LO helping me said the SBA will only approve me for about \$2k because they are looking at my 1099 from last year and dividing by 12. (about \$13000). Also in any sales there is a ramp up time that you do not receive pay until work is installed and funded, 6-8 weeks, thus the true income beginning Jan 2020. This determination is no way how the PPP is meant to misconstrue income and should NOT be final. I lost 2 months of work already and those 2 months are notoriously more profitable months than any. My first 2 months from Jan 6 to Feb 29 I have bank statements for roughly \$27k income so a poor determination of \$2k is unjust, especially when large institutions with \$40 billion endowments are receiving \$8 million they do not need.

I realize this program was thrown at lenders and the language has been changing daily, so this is why I am asking for some better ruling that will help people like myself protect their paychecks. We are going to be slow in the sales industry for months to come-we need to be treated fairly within the program while it exists.

Could I receive some information on how to move the SBA in giving a true determination, I forwarded this same info to SBA but they have said ONLY the Schedule C will be used. The following language is from the "Final Interim Rule" on their website, which still implies a deviation from the 2019 Schedule C only in circumstances:

SBA will issue additional guidance for those individuals with self-employment income who: (i) were not in operation in 2019 but who were in operation on February 15, 2020, and (ii) will file a Form 1040 Schedule C for 2020.

**Thank You,
Joseph C.**