[redacted]

C. <u>The Corporation and Mr. Crowther had sufficient funds to cover the expense of the boat.</u>

General accounting principles also wholly contradict the government's theory of specifically earmarked funds for utilization during the PPP time period. Money is fungible and the assets of a corporation, whether contained in one bank account or hundreds of bank accounts, are all corporate funds under the same umbrella, with the same owner. For general accounting purposes, all of the funds are recorded in the books and ledgers of the Company and are utilized to generate financial statements, profit and loss statements, and account receivables. Moreover, there is nothing in the Cares Act about opening a separate bank account, segregating the proceeds from a PPP Loan or the commingling of funds with other business funds or working capital.

When the wire was sent to Sara Bay Marina, Target Roofing had ample funds in its operating account for the expense. Below is a chart of the funds available to the Company as of that date:

Name of account	Owner of account	Account Number	Company Funds Available on 4/24	Company Funds w/out use of "PPP Account" [2]
Operating account	**Target Roofing**	[redacted]	$131,768.58	$2,468.58
LOC [redacted]	**Target Roofing**	[redacted]	$600,000.00	$ 500,000.00
Petty Cash	**Target Roofing**	Office Safe - On Books	$59,702.30	$59,702.30
Chase rewards	**Target Roofing**	[redacted]	$110,357.00	$110,357.00
Petty Cash	**Casey Crowther**	Office Safe	$400,000.00	$400,000.00

[2] Funds transferred from the PPP Account were subtracted here to illustrate the availability of funds other than those from the proceeds of the loan that were deposited into the PPP Account.

TOTAL AVAILABLE FUNDS	Target & Crowther	NOT "PPP" FUNDS	$1,301,827.88	$1,072,527.88

In addition to the available funds, a review of the contracts provided in the document production shows that the Company had a pipeline of jobs that would generate consistent revenue, approximately $750,000 to $1,000,000 as a rolling average at any given time during the time period in question. Although the revenue stream had been lower than it had been in prior months due to the pandemic, there was still a steady and known stream of income. Thus, the whole of the Company operated with sufficient money, had a healthy pipeline of projects and was paying its bills and payroll on time. The bank would view these financials in their totality to determine the Company's available cash flow.

[redacted]

[redacted]

[redacted]

[redacted]

[redacted] [redacted]