

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

ERIC GREATHOUSE, et al.,

Plaintiffs,

v.

CAPITAL PLUS FINANCIAL, LLC, et al.,

Defendants.

Case No. 4:21-cv-01243-BRW

Declaration of Eric Greathouse

I, Eric Greathouse, hereby declare as follows:

1. My name is Eric Greathouse, and I am above the age of 21 and competent in all respects to submit this Declaration.
2. I live in Russellville, Arkansas, and have lived there at all times relevant to this matter. I understand the Defendants Capital Plus Financial, LLC (CPF) and Crossroads Systems, Inc. are challenging jurisdiction of this Court, but I brought this litigation here and believe it should be adjudicated here, where I reside. I also understand that defendants have pointed out that I used to live in Texas, but that was years ago and, to me, irrelevant given that my home for years has been Russellville, Arkansas.
3. I am a sole proprietor of an insurance inspection business in Russellville, Arkansas, and have been in this business in the Russellville, Arkansas area at all times relevant to this matter.
4. Due to the pandemic, I was unable to provide these services with the same frequency and, as a result, lost significant income.

5. I learned about the PPP from watching the news. The news described a low interest forgivable loan offered to small business which I was operating. I always employed one or two people to help me with my business. I also produced all of my applicable IRS tax documents to help show I own my own business.

6. On or about April 8, 2021, I applied for a PPP loan with CPF as part of my business in Russellville, Arkansas.

7. I completed all required paperwork to apply for my PPP loan for my business in Russellville, Arkansas.

8. I submitted all requested documentation and information to CPF from Russellville, Arkansas.

9. On or about April 9, 2021, the SBA approved my PPP loan application in the amount of \$15,665.00.

10. I intended to use my PPP loan to support my Arkansas business.

11. The loan proceeds were to be deposited into my bank account at Evolve Bank & Trust in Arkansas.

12. On April 18, 2021, CPF sent me a PPP promissory note (the "Note") and accompanying documents to sign in Russellville, Arkansas. A copy of my Note and accompanying documents are attached to the Amended Complaint as Exhibit A.

13. CPF also sent me in Russellville, Arkansas additional forms to be signed by CPF and me. A complete copy of those complete documents is also attached to the Amended Complaint as Exhibit A.

14. On April 18, 2021, I completed, signed, and returned the Note and the accompanying loan documents to CPF from Russellville, Arkansas, in order to obtain the PPP loan.

15. On April 18, 2021, I received an email from CPF in Russellville, Arkansas, notifying me that my loan was approved and would be funded.

16. Despite properly and timely completing, signing and submitting the Note and the accompanying loan documents, I never received the proceeds of my SBA-approved PPP loan.

17. I sent emails and made numerous telephone calls from Russellville, Arkansas to CPF to try to get funded.

18. To date, I have never received any PPP loan proceeds.

19. As a result of CPF's failure to fund my SBA-approved PPP loan, I was deprived of funds that would have directly assisted in the operation of my business in Russellville, Arkansas.

20. I am also aware of others who have also complained that they were SBA-approved for PPP loans but, just like me, did not get funded by CPF. That is why I have sued individually to get my loan funded, and also to help represent a class of other SBA-approved borrowers that CPF failed to fund.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 18th day of May, 2022.


Eric Greathouse