UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

United States of America ex rel.
The Tarbell Group, LLC,

Plaintiff

v.

Acoaxet Club Inc.,
Administrators of Special Education Inc.,
The Advertising Club of Greater Boston Inc. dba The Ad Club,
American Civic Association Inc. dba Sons of Italy,
Amherst Golf Club Inc.,
Arlington Chamber of Commerce Inc.,
Bar Association of Norfolk County Inc.,
Benevolent & Protective Order of Elks of the USA—Fall River Lodge No. 118,
Benevolent & Protective Order of Elks of the USA—Haverhill Lodge No. 165,
Benevolent & Protective Order of Elks of the USA—Waltham-Watertown Lodge No. 953,
Berkshire County Board of Realtors Inc.,
Bertocci Memorial Club of Brockton Inc.,
Billerica Lodge No. 2648 Loyal Order of Moose,
Boston Madison Square Garden Club,
Bridgewater Citizens' Club Inc.,
Brockton Country Club Inc.,
Builders and Remodelers Association of Greater Boston Inc.,
Cambridge Chamber of Commerce,
Cape Cod Cranberry Growers' Association,
Club Franco American de Westford Massachusetts,
Clube Desportivo Faialense Inc.,
Cohasse Country Club,
Concord Chamber of Commerce,
Construction Industries of Massachusetts Inc.,
Cottage Park Yacht Club Inc.,
Curve Triangle & Rectangle Institute Inc.,
Dennis Yacht Club Inc.,
Edgewood Club Inc.,

Case no. 1:24-cv-11950-LTS

Ellinwood Country Club Inc.,
Employers Association of the Northeast Inc.,
Everett Chamber of Commerce Inc.,
Fall River Country Club,
The Fay Club,
Forestdale Cemetery Association,
Grand Lodge of Theta Delta Chi Inc.,
Greater Chicopee Chamber of Commerce Inc.,
Greenfield Lodge No. 997 Loyal Order of Moose,
Gremio Lusitano Club Inc.,
Greylock Community Club Inc.,
H. E. Fletcher Social & Athletic Club Inc.,
Hampden County Bar Association Inc.,
Harvard Square Business Association Inc.,
Holyoke Canoe Club Inc.,
International Brotherhood of Electrical Workers Building Corporation,
Irish-American Club Inc. of Woburn,
Italian Naturalization Club Inc. of Taunton,
John Alden Sportsmen's Club Inc.,
Jubilee Yacht Club,
Knights of Columbus dba Cardinal Spellman Council 347,
Lafayette Naturalization Club Inc.,
Lakeville Aerie No. 3944 Fraternal Order of Eagles,
Lenox Chamber of Commerce,
Lexington Golf Club,
Longwood Covered Courts Trust,
Ludlow Country Club Inc.,
Ludlow Fish & Game Club Inc.,
Ludlow Tennis Club Inc.,
Malden Lodge No. 1910 Loyal Order of Moose,
Marblehead Yacht Club Inc.,
Marshfield Country Club,
Massachusetts Association of Accountants Inc.,
Massachusetts Chiefs of Police Association Inc.,
Massachusetts Farm Bureau Federation Inc.,
Massachusetts LGBT Chamber of Commerce,
Massachusetts Laborers' Health & Welfare Fund,
Massachusetts Systems Contractors Association Inc.,
Master, Wardens, and Members of The Grand Lodge of Masons in Massachusetts,

Milton Hoosic Club Inc.,
Minute Man Sportsmans Club Inc.,
Nabnasset Lake Country Club Inc.,
National Board of Trial Advocacy Inc.,
New Bedford Sports Club Inc.,
The New England Affordable Housing Management Association Inc.,
North of Boston Convention & Visitors Bureau Inc.,
The North Shore Chamber of Commerce Inc.,
North Shore Skating Club Inc.,
North Shore Tennis & Squash Club Inc.,
Oak Grove Cemetery Association of Falmouth Inc.,
The Old Colony Yacht Club,
Orleans Yacht Club Inc.,
Outdoor Amusement Business Association Inc.,
Palmer's Cove Yacht Club Inc.,
Pine Grove Cemetery Corporation,
Pleasant Park Yacht Club Inc.,
The Plymouth Area Chamber of Commerce Inc.,
Plymouth Country Club Inc.,
Point Independence Yacht Club Inc.,
Polish American Veterans of Webster Inc.,
The Polish Club Lodge 2058 Inc.,
Portuguese National Club,
Prince Hall Masonic Grand Lodge,
The Proprietors of Forest Hills Cemetery,
Realtor Association of Central Massachusetts,
Rowley Veterans' Association Inc.,
Salem Chamber of Commerce & Civics,
Salem Office of Tourism & Cultural Affairs Inc. dba Destination Salem,
Sandy Bay Yacht Club Inc.,
Singletary Rod & Gun Club Inc.,
Sons of Italy in America—Grand Lodge of Massachusetts,
Sons of Italy in America—Methuen Lodge No. 902,
Sons of Italy in America—Quincy Lodge No. 1295,
Stockbridge Golf Club,
Stoneham Chamber of Commerce Inc.,
Supreme Council of the Royal Arcanum,
Swampscott Yacht Club,

Tennis and Racquet Club,
Town River Yacht Club,
Volunteer Yacht Club,
Wampatuck Country Club of Canton Inc.,
Wayland Swimming and Tennis Club Inc.,
Wequaquet Lake Yacht Club,
West Dennis Yacht Club Inc.,
West End Beagle Club Inc. of Gardner,
Whitinsville Golf Club,
Winthrop Golf Club,
Winthrop Yacht Club Inc.,
Wood Products Manufacturers Association,
Worcester County Memorial Park Inc.,
Young Men's Club of Hadley Inc., and
Unknown John or Jane Does,

Defendants

FIRST AMENDED COMPLAINT

Nature of the Case

1. Relator The Tarbell Group, LLC, brings this action for itself and the United States under the False Claims Act, 31 U.S.C. §§ 3729-3733, to recover funds illegally obtained by the defendants under federal COVID-19 relief laws.

Jurisdiction and Venue

2. The Court has jurisdiction of, and is the appropriate venue for, this matter because it arises under a federal law, because the United States is a plaintiff, and because in this judicial district each defendant can be found, resides, transacts business in, or committed an act proscribed by the False Claims Act. 28 U.S.C. §§ 1331, 1345, and 31 U.S.C. § 3732(a).

Parties—Relator

3. Relator The Tarbell Group, LLC, is a limited liability company located in and organized under the laws of the Commonwealth of Virginia.

Parties—501(c)(2) Defendant

4. Defendant International Brotherhood of Electrical Workers Building Corporation is an entity exempt from taxation under section 501(c)(2) of the Internal Revenue Code, 26 U.S.C. § 501(c)(2) ("Tax-Exempt 501(c)(2) Organization"). On the loan application(s) at issue herein, this defendant gave its address as 256 Freeport Street, Dorchester, MA.

Parties—501(c)(5) Defendants

5. Defendant Cape Cod Cranberry Growers' Association is an entity exempt from taxation under section 501(c)(5) of the Internal Revenue Code, 26 U.S.C. § 501(c)(5) ("Tax-Exempt 501(c)(5) Organization"). On the loan application(s) at issue herein, this defendant gave its address as 265 South Meadow Road, Unit 2D, Plymouth, MA.

6. Defendant Massachusetts Farm Bureau Federation Inc. is a Tax-Exempt 501(c)(5) Organization. On the loan application(s) at issue herein, this defendant gave its address as 249 Lakeside Avenue, Marlborough, MA.

Parties—501(c)(6) Defendants

7. Defendant Administrators of Special Education Inc. is an entity exempt from taxation under section 501(c)(6) of the Internal Revenue Code, 26 U.S.C. § 501(c)(6) ("Tax-Exempt 501(c)(6) Organization"). On the loan application(s) at issue herein, this defendant gave its address as 3 Allied Drive, Suite 303, Dedham, MA.

8. Defendant The Advertising Club of Greater Boston Inc. dba The Ad Club is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 22 Batterymarch Street, Boston, MA.

9. Defendant Arlington Chamber of Commerce Inc. is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 611 Massachusetts Avenue, Arlington, MA.

10. Defendant Bar Association of Norfolk County Inc. is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 420 Washington Street, Suite 304, Braintree, MA.

11. Defendant Berkshire County Board of Realtors Inc is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 99 West Street, Suite 200, Pittsfield, MA.

12. Defendant Builders and Remodelers Association of Greater Boston Inc. is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 45 Dan Road, Canton, MA.

13. Defendant Cambridge Chamber of Commerce is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 1 Kendall Square, Suite 6-105, Cambridge, MA.

14. Defendant Concord Chamber of Commerce is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 35 Beharrell Street, Concord, MA.

15. Defendant Construction Industries of Massachusetts Inc. is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 1500 Boston Providence Turnpike, Suite 14, Norwood, MA.

16. Defendant Curve Triangle & Rectangle Institute Inc. is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 101 Federal Street, Suite 1900, Boston, MA.

17. Defendant Employers Association of the Northeast Inc. is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 67 Hunt Street, Suite 111, P.O. Box 1070, Agawam, MA.

18. Defendant Everett Chamber of Commerce Inc. is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 467 Broadway, Everett, MA.

19. Defendant Greater Chicopee Chamber of Commerce Inc. is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 48 Center Street, Chicopee, MA.

20. Defendant Hampden County Bar Association Inc. is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 50 State Street, Springfield, MA.

21. Defendant Harvard Square Business Association Inc. is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 18 Brattle Square, Cambridge, MA.

22. Defendant Lenox Chamber of Commerce is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 4 Housatonic Street, Lenox, MA.

23. Defendant Massachusetts Association of Accountants Inc. is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 607 North Avenue, D16-4, Wakefield, MA.

24. Defendant Massachusetts Chiefs of Police Association Inc. is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 353 Providence Road, South Grafton, MA.

25. Defendant Massachusetts LGBT Chamber of Commerce is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 50 Milk Street, 16th Floor, Boston, MA.

26. Defendant Massachusetts Systems Contractors Association Inc. is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 1 Merchant Street, Suite 112, Sharon, MA.

27. Defendant National Board of Trial Advocacy Inc. is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 850 Franklin Street, Suite 8, Wrentham, MA.

28. Defendant The New England Affordable Housing Management Association Inc. is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 400 Washington Street, Suite 202, Braintree, MA.

29. Defendant North of Boston Convention & Visitors Bureau Inc. is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 195 South Bound Exit 60, Salisbury, MA.

30. Defendant The North Shore Chamber of Commerce Inc. is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 5 Cherry Hill Drive, Danvers, MA.

31. Defendant Outdoor Amusement Business Association Inc. is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 1305 Memorial Avenue, Suite 2, West Springfield, MA.

32. Defendant The Plymouth Area Chamber of Commerce Inc. is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 134 Court Street, Plymouth, MA.

33. Defendant Realtor Association of Central Massachusetts is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 492 Washington Street, Auburn, MA.

34. Defendant Salem Chamber of Commerce & Civics is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 265 Essex Street, Suite 101, Salem, MA.

35. Defendant Salem Office of Tourism & Cultural Affairs Inc. dba Destination Salem is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 81 Washington Street, Suite 204, Salem, MA.

36. Defendant Stoneham Chamber of Commerce Inc. is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 335 Main Street, Suite 202, Stoneham, MA.

37. Defendant Wood Products Manufacturers Association is a Tax-Exempt 501(c)(6) Organization. On the loan application(s) at issue herein, this defendant gave its address as 14 East Broadway, Gardner, MA.

Parties—501(c)(7) Defendants

38. Defendant Acoaxet Club Inc. is an entity exempt from taxation under section 501(c)(7) of the Internal Revenue Code, 26 U.S.C. § 501(c)(7) ("Tax-Exempt 501(c)(7)

Organization"). It is also a private club or business which limits the number of its memberships for reasons other than capacity (a "Private Club"). Under Defendant's membership process, a prospective member must be sponsored by a current full member and must satisfy a home-ownership and residency requirement tied to membership boundaries drawn around Westport Harbor and neighboring streets in Little Compton and Adamsville, Rhode Island. On the loan application(s) at issue herein, this defendant gave its address as 152 Howland Road, Westport, MA.

39. Defendant Amherst Golf Club Inc. is a Tax-Exempt 501(c)(7) Organization. On the loan application(s) at issue herein, this defendant gave its address as 365 South Pleasant Street, Amherst, MA.

40. Defendant Bertocci Memorial Club of Brockton Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. On information and belief, Defendant limits the number of its memberships for reasons other than capacity: it operates as a dues-paying fraternal social club whose dining and recreational facilities are reserved to its membership. On the loan application(s) at issue herein, this defendant gave its address as 594 Montello Street, Brockton, MA.

41. Defendant Boston Madison Square Garden Club is a Tax-Exempt 501(c)(7) Organization and Private Club. Under Defendant's membership process, an applicant must be sponsored by two current members, each of whom must submit a separate letter of recommendation, and membership is limited to a select community of sports and entertainment enthusiasts. On the loan application(s) at issue herein, this defendant gave its address as 180 Canal Street, Suite 302, Boston, MA.

42. Defendant Bridgewater Citizens' Club Inc. is a Tax-Exempt 501(c)(7) Organization. On the loan application(s) at issue herein, this defendant gave its address as 60 Hale Street, Bridgewater, MA.

43. Defendant Brockton Country Club Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. On information and belief, Defendant limits the number of its memberships for reasons other than capacity: it operates a private golf course at which play is limited to members and their guests across several membership categories. On the loan application(s) at issue herein, this defendant gave its address as 265 Samuel Avenue, Brockton, MA.

44. Defendant Club Franco American de Westford Massachusetts is a Tax-Exempt 501(c)(7) Organization. On the loan application(s) at issue herein, this defendant gave its address as 55 West Prescott Street, Westford, MA.

45. Defendant Clube Desportivo Faialense Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. Defendant admits new members only through personal referral by an existing member, without open enrollment, and its membership is drawn from the Azorean-Portuguese community of East Cambridge. On the loan application(s) at issue herein, this defendant gave its address as 1121 Cambridge Street, Cambridge, MA.

46. Defendant Cohasse Country Club is a Tax-Exempt 501(c)(7) Organization and Private Club. On information and belief, Defendant limits the number of its memberships for reasons other than capacity: it is governed by a Board of Governors, charges an initiation fee, and admits new members only through a written application. On the loan application(s) at issue herein, this defendant gave its address as 393 Eastford Road, Southbridge, MA.

47. Defendant Cottage Park Yacht Club Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. Under Defendant's membership process, an applicant must obtain two member

sponsors who each submit a written declaration recommending the applicant, sit for an interview with the Membership Committee, and undergo a background check before the Board of Directors elects the applicant to membership. On the loan application(s) at issue herein, this defendant gave its address as 1 Bakers Square, Winthrop, MA.

48. Defendant Dennis Yacht Club Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. On information and belief, Defendant limits the number of its memberships for reasons other than capacity: it is a seasonal private club whose sailing, tennis, and beach facilities are reserved to its membership. On the loan application(s) at issue herein, this defendant gave its address as P.O. Box 556, 4 Harbor Road, East Dennis, MA.

49. Defendant Edgewood Club Inc. is a Tax-Exempt 501(c)(7) Organization. On the loan application(s) at issue herein, this defendant gave its address as 266 Pleasant Street, Raynham, MA.

50. Defendant Ellinwood Country Club Inc. is a Tax-Exempt 501(c)(7) Organization. On the loan application(s) at issue herein, this defendant gave its address as 1928 Pleasant Street, Athol, MA.

51. Defendant Fall River Country Club is a Tax-Exempt 501(c)(7) Organization and Private Club. Under Defendant's membership process, an applicant must name two sponsors on a written application, be verified by the Membership Committee, and be elected at a meeting of the Board of Directors before admission, and its memberships are divided into fixed categories by age and voting status. On the loan application(s) at issue herein, this defendant gave its address as 4232 North Main Street, Fall River, MA.

52. Defendant The Fay Club is a Tax-Exempt 501(c)(7) Organization and Private Club. Under Defendant's membership process, an applicant must name two current-member

sponsors on the written application, which is received by the Club Secretary and must be approved by the Board of Directors before admission. On the loan application(s) at issue herein, this defendant gave its address as 658 Main Street, Fitchburg, MA.

53. Defendant Grand Lodge of Theta Delta Chi Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. Defendant is the governing corporation of a collegiate fraternity whose chartered chapters admit members only by initiation, and membership is restricted to men enrolled as undergraduates at institutions at which Defendant has chartered a chapter. On the loan application(s) at issue herein, this defendant gave its address as 214 Lewis Wharf, Boston, MA.

54. Defendant Gremio Lusitano Club Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. On information and belief, Defendant limits the number of its memberships for reasons other than capacity: it is a dues-supported social club founded to promote Portuguese civic, cultural, and recreational life, and its membership is drawn from the Portuguese community of Ludlow. On the loan application(s) at issue herein, this defendant gave its address as 385 Winsor Street, Ludlow, MA.

55. Defendant Greylock Community Club Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. On information and belief, Defendant limits the number of its memberships for reasons other than capacity: it operates as a dues-based membership club whose bar and pavilion are reserved to its membership. On the loan application(s) at issue herein, this defendant gave its address as 548 State Road, North Adams, MA.

56. Defendant H. E. Fletcher Social & Athletic Club Inc. is a Tax-Exempt 501(c)(7) Organization. On the loan application(s) at issue herein, this defendant gave its address as 11 Brookside Road, Westford, MA.

57. Defendant Holyoke Canoe Club Inc. is a Tax-Exempt 501(c)(7) Organization. On the loan application(s) at issue herein, this defendant gave its address as 33 Old Ferry Road, Holyoke, MA.

58. Defendant Irish-American Club Inc. of Woburn is a Tax-Exempt 501(c)(7) Organization and Private Club. On information and belief, Defendant limits the number of its memberships for reasons other than capacity: it is a recreational and social membership club organized around Irish-American heritage. On the loan application(s) at issue herein, this defendant gave its address as 147 Main Street, Woburn, MA.

59. Defendant Italian Naturalization Club Inc. of Taunton is a Tax-Exempt 501(c)(7) Organization and Private Club. On information and belief, Defendant limits the number of its memberships for reasons other than capacity: it is a members-only social club organized around Italian ancestry that does not admit the general public. On the loan application(s) at issue herein, this defendant gave its address as 46 Wales Street, Taunton, MA.

60. Defendant John Alden Sportsmen's Club Inc. is a Tax-Exempt 501(c)(7) Organization. On the loan application(s) at issue herein, this defendant gave its address as 16 Minuteman Lane, Plymouth, MA.

61. Defendant Jubilee Yacht Club is a Tax-Exempt 501(c)(7) Organization and Private Club. Under Defendant's membership process, an applicant must submit a completed application to the membership committee for review and approval before being admitted, and Defendant does not admit the general public. On the loan application(s) at issue herein, this defendant gave its address as 127 Water Street, Beverly, MA.

62. Defendant Lafayette Naturalization Club Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. On information and belief, Defendant limits the number of its

memberships for reasons other than capacity: only members are permitted to enter its premises, and it was organized as a heritage-based association of French-Canadian immigrants. On the loan application(s) at issue herein, this defendant gave its address as 11 High Street, Amesbury, MA.

63. Defendant Lexington Golf Club is a Tax-Exempt 501(c)(7) Organization and Private Club. Under Defendant's membership process, an applicant may join only from a general wait list that opens periodically, each application must be sponsored by two regular members not otherwise sponsoring another applicant, and Defendant selects among pooled applicants by lottery rather than admitting all applicants. On the loan application(s) at issue herein, this defendant gave its address as 55 Hill Street, Lexington, MA.

64. Defendant Longwood Covered Courts Trust is a Tax-Exempt 501(c)(7) Organization. On the loan application(s) at issue herein, this defendant gave its address as 28 Middlesex Road, Chestnut Hill, MA.

65. Defendant Ludlow Country Club Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. Defendant is a private facility at which play is limited to members and invitees. On the loan application(s) at issue herein, this defendant gave its address as 1 Tony Lema Drive, Ludlow, MA.

66. Defendant Ludlow Fish & Game Club Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. On information and belief, Defendant limits the number of its memberships for reasons other than capacity: it is a dues-paying sporting club offering tiered family, individual, senior, and junior memberships and requiring range-officer certification and license verification before use of its shooting facilities. On the loan application(s) at issue herein, this defendant gave its address as 200 Sportsmen's Road, Ludlow, MA.

67. Defendant Ludlow Tennis Club Inc. is a Tax-Exempt 501(c)(7) Organization. On the loan application(s) at issue herein, this defendant gave its address as 40 Carmelinas Circle, Ludlow, MA.

68. Defendant Marblehead Yacht Club Inc. is a Tax-Exempt 501(c)(7) Organization. On the loan application(s) at issue herein, this defendant gave its address as 4 Cliff Street, Marblehead, MA.

69. Defendant Marshfield Country Club is a Tax-Exempt 501(c)(7) Organization and Private Club. Defendant is a private country club whose memberships are extended by invitation only, and play is limited to members and their accompanied guests. On the loan application(s) at issue herein, this defendant gave its address as 515 Moraine Street, Marshfield, MA.

70. Defendant Milton Hoosic Club Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. Under Defendant's membership process, an application may be submitted only at the request of a sponsoring eligible member, defined as a person who has been a full member for at least two years, and play at Defendant's facility is limited to members. On the loan application(s) at issue herein, this defendant gave its address as 70 Greenlodge Street, Canton, MA.

71. Defendant Minute Man Sportsmans Club Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. Under Defendant's membership process, an applicant must obtain recommendations from three members in good standing or be interviewed by the membership committee before admission, and must pay a one-time initiation fee in addition to annual dues. On the loan application(s) at issue herein, this defendant gave its address as 56 R Francis Wyman Road, Burlington, MA.

72. Defendant Nabnasset Lake Country Club Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. Defendant extends memberships by invitation only, and its memberships are allotted by fixed age-based categories including unrestricted, senior, student, and junior tiers rather than by open admission. On the loan application(s) at issue herein, this defendant gave its address as 47 Oak Hill Road, Westford, MA.

73. Defendant New Bedford Sports Club Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. On information and belief, Defendant limits the number of its memberships for reasons other than capacity: it is a social and recreational club supported by membership fees whose facilities are reserved to its membership. On the loan application(s) at issue herein, this defendant gave its address as 1790 Acushnet Avenue, New Bedford, MA.

74. Defendant North Shore Skating Club Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. Under Defendant's membership process, a prospective member must complete a written application and be in good standing with U.S. Figure Skating, after which the application is presented to Defendant's Board of Directors for discretionary approval. On the loan application(s) at issue herein, this defendant gave its address as 51 Symonds Way, Reading, MA.

75. Defendant North Shore Tennis & Squash Club Inc. is a Tax-Exempt 501(c)(7) Organization. On the loan application(s) at issue herein, this defendant gave its address as 98 Swampscott Road, Salem, MA.

76. Defendant The Old Colony Yacht Club is a Tax-Exempt 501(c)(7) Organization and Private Club. Defendant does not solicit membership from outside its existing membership, and a prospective member must be brought into the club by an existing member and obtain two

sponsors before being considered for admission. On the loan application(s) at issue herein, this defendant gave its address as 235 Victory Road, Dorchester, MA.

77. Defendant Orleans Yacht Club Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. Each of Defendant's five voting membership categories, defined by age brackets, is capped at a maximum number of members independent of the capacity of its facilities, and its non-voting racing associate membership requires sponsorship by two current members in good standing and approval by the Commodore. On the loan application(s) at issue herein, this defendant gave its address as 39 Cove Road, Orleans, MA.

78. Defendant Palmer's Cove Yacht Club Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. Defendant admits new members only during an annual window running from February through June, with applications due by May 1 to be considered in that year, and, on information and belief, selects among applicants on criteria unrelated to the capacity of its facilities. On the loan application(s) at issue herein, this defendant gave its address as 74 Leavitt Street, Salem, MA.

79. Defendant Pleasant Park Yacht Club Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. On information and belief, Defendant limits the number of its memberships for reasons other than capacity: a prospective member must submit a completed application with supporting documentation for review and is admitted only upon approval. On the loan application(s) at issue herein, this defendant gave its address as 562 Pleasant Street, Winthrop, MA.

80. Defendant Plymouth Country Club Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. Defendant is a member-governed club that restricts associate membership to working professionals between the ages of 23 and 40 and legacy junior membership to children

of a current member, categories unrelated to the capacity of its course. On the loan application(s) at issue herein, this defendant gave its address as 221 Warren Avenue, Plymouth, MA.

81. Defendant Point Independence Yacht Club Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. Under Defendant's membership process, an applicant must be sponsored by two members in good standing for at least one year, obtain letters of recommendation from both sponsors, undergo review by an admissions committee, and submit to a criminal offender record information check. On the loan application(s) at issue herein, this defendant gave its address as 15 Independence Lane, Onset, MA.

82. Defendant Polish American Veterans of Webster Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. On information and belief, Defendant limits the number of its memberships for reasons other than capacity: it is a Polish-American veterans organization whose membership is limited to honorably discharged veterans of Polish descent. On the loan application(s) at issue herein, this defendant gave its address as 30 Ray Street, Webster, MA.

83. Defendant Portuguese National Club is a Tax-Exempt 501(c)(7) Organization and Private Club. Membership in Defendant is restricted to applicants at least 16 years of age who are of Portuguese descent, born in or immigrated to America, or connected by blood or marriage to persons of Portuguese descent, and each application must be signed by two member sponsors and approved by the directors and by a vote of the membership, with a separate social category for applicants not of Portuguese descent. On the loan application(s) at issue herein, this defendant gave its address as 21 Railroad Avenue, Stoughton, MA.

84. Defendant Rowley Veterans' Association Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. On information and belief, Defendant limits the number of its memberships for reasons other than capacity: it is a veterans association whose membership is

limited to veterans and their affiliates rather than to the general public. On the loan application(s) at issue herein, this defendant gave its address as 19 Bradford Street, Rowley, MA.

85. Defendant Sandy Bay Yacht Club Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. Under Defendant's membership process, an applicant obtains an application from a member of the Membership Committee who vouches for the applicant, the completed application is posted at the clubhouse for one week, and the Membership Committee then acts upon the application and elects new members. On the loan application(s) at issue herein, this defendant gave its address as 5 T-Wharf Road, Rockport, MA.

86. Defendant Singletary Rod & Gun Club Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. Under Defendant's membership process, an applicant must be sponsored by a current member in good standing and must pay an initiation fee in addition to annual dues, and Defendant maintains separate senior and life member categories tied to age and years of consecutive membership. On the loan application(s) at issue herein, this defendant gave its address as 300 Sutton Avenue, Oxford, MA.

87. Defendant Stockbridge Golf Club is a Tax-Exempt 501(c)(7) Organization and Private Club. Under Defendant's membership process, an applicant must submit references from two current members, the application is reviewed by a Membership Committee and then by the Board of Governors for approval, and each accepted member must pay a non-refundable initiation fee. Defendant is not open to the public. On the loan application(s) at issue herein, this defendant gave its address as 3 Cherry Street, Stockbridge, MA.

88. Defendant Swampscott Yacht Club is a Tax-Exempt 501(c)(7) Organization and Private Club. On information and belief, Defendant limits the number of its memberships for reasons other than capacity: it is a private club offering distinct membership categories whose

facilities are reserved to its membership. On the loan application(s) at issue herein, this defendant gave its address as 425 Humphrey Street, Swampscott, MA.

89. Defendant Tennis and Racquet Club is a Tax-Exempt 501(c)(7) Organization and Private Club. Under Defendant's membership process, an applicant must obtain two letters of support from current members within one month of applying, sit for an interview with the Membership Committee, be posted on the clubhouse bulletin board, and be approved by the Board of Governors, and applicants are billed an initiation fee upon submitting an application. On the loan application(s) at issue herein, this defendant gave its address as 939 Boylston Street, Boston, MA.

90. Defendant Town River Yacht Club is a Tax-Exempt 501(c)(7) Organization and Private Club. Under Defendant's membership process, an applicant must be sponsored by a current member, and the application is reviewed by a membership committee before admission. On the loan application(s) at issue herein, this defendant gave its address as 60 Mound Street, Quincy, MA.

91. Defendant Volunteer Yacht Club is a Tax-Exempt 501(c)(7) Organization and Private Club. On information and belief, Defendant limits the number of its memberships for reasons other than capacity: it is a member-owned social and recreational yacht club whose facilities are reserved to its membership. On the loan application(s) at issue herein, this defendant gave its address as 68 Lynnway, Lynn, MA.

92. Defendant Wampatuck Country Club of Canton Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. Under Defendant's membership process, an applicant must obtain two sponsors who are members personally acquainted with the applicant and who have belonged to Defendant for at least one year, and a limited number of memberships are reserved

for children of non-members under the age of 19. On the loan application(s) at issue herein, this defendant gave its address as 99 Pleasant Garden Road, P.O. Box 56, Canton, MA.

93. Defendant Wayland Swimming and Tennis Club Inc. is a Tax-Exempt 501(c)(7) Organization. On the loan application(s) at issue herein, this defendant gave its address as 228 Glezen Lane, Wayland, MA.

94. Defendant Wequaquet Lake Yacht Club is a Tax-Exempt 501(c)(7) Organization and Private Club. Defendant's constitution caps membership at 110 families, and under Defendant's membership process an applicant must be sponsored by a current member in good standing and must complete a probationary first year before the Membership Committee and the Board of Directors determine whether to extend permanent membership. On the loan application(s) at issue herein, this defendant gave its address as 57 Yacht Club Drive, Centerville, MA.

95. Defendant West Dennis Yacht Club Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. On information and belief, Defendant limits the number of its memberships for reasons other than capacity: it is a member-owned club offering tiered memberships whose facilities are reserved to its membership. On the loan application(s) at issue herein, this defendant gave its address as 259 Loring Avenue, West Dennis, MA.

96. Defendant West End Beagle Club Inc. of Gardner is a Tax-Exempt 501(c)(7) Organization and Private Club. On information and belief, Defendant limits the number of its memberships for reasons other than capacity: it is a sportsman's club organized around beagle-hound breeding, hunting, and fishing activities for its members. On the loan application(s) at issue herein, this defendant gave its address as 110 Clark Street, Gardner, MA.

97. Defendant Whitinsville Golf Club is a Tax-Exempt 501(c)(7) Organization and Private Club. Defendant is a member-owned club, access to whose course requires being a member, playing with a member, or being recommended by a member, and Defendant charges a non-refundable fee to join its membership waiting list. On the loan application(s) at issue herein, this defendant gave its address as 179 Fletcher Street, Whitinsville, MA.

98. Defendant Winthrop Golf Club is a Tax-Exempt 501(c)(7) Organization. On the loan application(s) at issue herein, this defendant gave its address as 453 Main Street, Winthrop, MA.

99. Defendant Winthrop Yacht Club Inc. is a Tax-Exempt 501(c)(7) Organization and Private Club. Under Defendant's membership process, an applicant for regular membership must be sponsored by two current regular members, an applicant for associate membership must be sponsored by one regular member and one associate member, and each category requires payment of a one-time initiation fee. On the loan application(s) at issue herein, this defendant gave its address as 649 Shirley Street, Winthrop, MA.

100. Defendant Young Men's Club of Hadley Inc. is a Tax-Exempt 501(c)(7) Organization. On the loan application(s) at issue herein, this defendant gave its address as 138 East Street, Hadley, MA.

Parties—501(c)(8) Defendants

101. Defendant American Civic Association Inc. dba Sons of Italy is an entity exempt from taxation under section 501(c)(8) of the Internal Revenue Code, 26 U.S.C. § 501(c)(8) ("Tax-Exempt 501(c)(8) Organization") and Private Club. Under the uniform rules governing membership in Defendant, admission as a voting member is restricted to persons of Italian birth or descent and their spouses, applicants not of Italian descent may hold only a separate social membership with reduced or no voting privileges, and every applicant must be certified eligible

and recommended by a sponsoring member. On the loan application(s) at issue herein, this defendant gave its address as 117 Swanton Street, Winchester, MA.

102. Defendant Benevolent & Protective Order of Elks of the USA—Fall River Lodge No. 118 is a Tax-Exempt 501(c)(8) Organization and Private Club. Under the uniform rules governing membership in Defendant, every applicant must be an American citizen at least 21 years of age who believes in God and is of good character, must be sponsored by a member in good standing and vouched for by two additional member references, must submit to an interview and investigation by Defendant's investigating committee, and is admitted only upon a favorable vote of Defendant's membership. On the loan application(s) at issue herein, this defendant gave its address as 4500 North Main Street, Fall River, MA.

103. Defendant Benevolent & Protective Order of Elks of the USA—Haverhill Lodge No. 165 is a Tax-Exempt 501(c)(8) Organization and Private Club. Under the uniform rules governing membership in Defendant, every applicant must be an American citizen at least 21 years of age who believes in God and is of good character, must be sponsored by a member in good standing and vouched for by two additional member references, must submit to an interview and investigation by Defendant's investigating committee, and is admitted only upon a favorable vote of Defendant's membership. On the loan application(s) at issue herein, this defendant gave its address as 24 Summer Street, Haverhill, MA.

104. Defendant Benevolent & Protective Order of Elks of the USA—Waltham-Watertown Lodge No. 953 is a Tax-Exempt 501(c)(8) Organization and Private Club. Under the uniform rules governing membership in Defendant, every applicant must be an American citizen at least 21 years of age who believes in God and is of good character, must be sponsored by a member in good standing and vouched for by two additional member references, must submit to

an interview and investigation by Defendant's investigating committee, and is admitted only upon a favorable vote of Defendant's membership. On the loan application(s) at issue herein, this defendant gave its address as 101 School Street, Waltham, MA.

105. Defendant Billerica Lodge No. 2648 Loyal Order of Moose is a Tax-Exempt 501(c)(8) Organization and Private Club. Under the uniform rules governing membership in Defendant, every applicant must be sponsored by an existing member, must be at least 21 years of age, must profess a belief in a Supreme Being, and must be of good moral character, and his membership is conditioned upon the approval of Defendant's application review committee and a favorable vote of Defendant's membership. On the loan application(s) at issue herein, this defendant gave its address as 104 Boston Road, North Billerica, MA.

106. Defendant Greenfield Lodge No. 997 Loyal Order of Moose is a Tax-Exempt 501(c)(8) Organization and Private Club. Under the uniform rules governing membership in Defendant, every applicant must be sponsored by an existing member, must be at least 21 years of age, must profess a belief in a Supreme Being, and must be of good moral character, and his membership is conditioned upon the approval of Defendant's application review committee and a favorable vote of Defendant's membership. On the loan application(s) at issue herein, this defendant gave its address as 20 School Street, Greenfield, MA.

107. Defendant Knights of Columbus dba Cardinal Spellman Council 347 is a Tax-Exempt 501(c)(8) Organization and Private Club. Under the uniform rules governing membership in Defendant, membership is limited to practical Catholic men at least 18 years of age who accept the teaching authority of the Catholic Church on matters of faith and morals and remain in good standing in the Church, and admission requires a member's proposal and a

favorable vote of Defendant's membership. On the loan application(s) at issue herein, this defendant gave its address as 1195 Bedford Street, Whitman, MA.

108. Defendant Lakeville Aerie No. 3944 Fraternal Order of Eagles is a Tax-Exempt 501(c)(8) Organization and Private Club. Under the uniform rules governing membership in Defendant, every applicant must be a person of good moral character who believes in a Supreme Being, must be proposed by two existing members, must be interviewed by Defendant's membership committee, and is admitted only upon a favorable vote of Defendant's membership. On the loan application(s) at issue herein, this defendant gave its address as 217 County Street, Lakeville, MA.

109. Defendant Malden Lodge No. 1910 Loyal Order of Moose is a Tax-Exempt 501(c)(8) Organization and Private Club. Under the uniform rules governing membership in Defendant, every applicant must be sponsored by an existing member, must be at least 21 years of age, must profess a belief in a Supreme Being, and must be of good moral character, and his membership is conditioned upon the approval of Defendant's application review committee and a favorable vote of Defendant's membership. On the loan application(s) at issue herein, this defendant gave its address as 562 Broadway, Malden, MA.

110. Defendant The Polish Club Lodge 2058 Inc. is a Tax-Exempt 501(c)(8) Organization and Private Club. Defendant is a chartered lodge of a fraternal benefit society whose uniform bylaws restrict membership to persons of Polish lineage or affinity, require each member to purchase a life insurance or annuity certificate issued by the society, and condition admission upon Defendant's approval. On the loan application(s) at issue herein, this defendant gave its address as 14 1/2 Mill Street, Amesbury, MA.

111. Defendant Prince Hall Masonic Grand Lodge is a Tax-Exempt 501(c)(8) Organization and Private Club. Under the uniform rules governing membership in Defendant, every applicant must submit a written petition declaring his belief in a Supreme Being, must be a man of good moral character at least 18 years of age, must be recommended in writing by members of the lodge petitioned, must submit to an investigation by a committee of the lodge, and is admitted only upon a favorable ballot of the lodge's membership. On the loan application(s) at issue herein, this defendant gave its address as 24 Washington Street, Dorchester, MA.

112. Defendant Sons of Italy in America—Grand Lodge of Massachusetts is a Tax-Exempt 501(c)(8) Organization and Private Club. Under the uniform rules governing membership in Defendant, admission as a voting member is restricted to persons of Italian birth or descent and their spouses, applicants not of Italian descent may hold only a separate social membership with reduced or no voting privileges, and every applicant must be certified eligible and recommended by a sponsoring member. On the loan application(s) at issue herein, this defendant gave its address as 93 Concord Avenue, Belmont, MA.

113. Defendant Sons of Italy in America—Methuen Lodge No. 902 is a Tax-Exempt 501(c)(8) Organization and Private Club. Under the uniform rules governing membership in Defendant, admission as a voting member is restricted to persons of Italian birth or descent and their spouses, applicants not of Italian descent may hold only a separate social membership with reduced or no voting privileges, and every applicant must be certified eligible and recommended by a sponsoring member. On the loan application(s) at issue herein, this defendant gave its address as 459 Merrimack Street, Methuen, MA.

114. Defendant Sons of Italy in America—Quincy Lodge No. 1295 is a Tax-Exempt 501(c)(8) Organization and Private Club. Under the uniform rules governing membership in Defendant, admission as a voting member is restricted to persons of Italian birth or descent and their spouses, applicants not of Italian descent may hold only a separate social membership with reduced or no voting privileges, and every applicant must be certified eligible and recommended by a sponsoring member. On the loan application(s) at issue herein, this defendant gave its address as 120 Quarry Street, Quincy, MA.

115. Defendant Supreme Council of the Royal Arcanum is a Tax-Exempt 501(c)(8) Organization and Private Club. Under the uniform rules governing membership in Defendant, membership is limited to persons of sound bodily health and good moral standing who are socially acceptable and at least eighteen years of age, each applicant must be recommended for admission, and each must qualify for and purchase a minimum life insurance certificate underwritten by Defendant as a condition of local council membership. On the loan application(s) at issue herein, this defendant gave its address as 61 Batterymarch Street, Boston, MA.

Parties—501(c)(9) Defendant

116. Defendant Massachusetts Laborers' Health & Welfare Fund is an entity exempt from taxation under section 501(c)(9) of the Internal Revenue Code, 26 U.S.C. § 501(c)(9) ("Tax-Exempt 501(c)(9) Organization"). On the loan application(s) at issue herein, this defendant gave its address as 1400 District Avenue, Suite 200, Burlington, MA.

Parties—501(c)(10) Defendant

117. Defendant Master, Wardens, and Members of The Grand Lodge of Masons in Massachusetts is an entity exempt from taxation under section 501(c)(10) of the Internal Revenue Code, 26 U.S.C. § 501(c)(10) ("Tax-Exempt 501(c)(10) Organization") and Private

Club. Under the uniform rules governing membership in Defendant, every applicant must submit a written petition declaring his belief in the existence of a Supreme Being, must be a man of good moral character at least 18 years of age who is recommended by a Mason, must submit to an investigation by a committee of the lodge petitioned, and is admitted only upon a unanimous favorable ballot of the lodge's membership. On the loan application(s) at issue herein, this defendant gave its address as 186 Tremont Street, Boston, MA.

Parties—501(c)(13) Defendants

118. Defendant Forestdale Cemetery Association is an entity exempt from taxation under section 501(c)(13) of the Internal Revenue Code, 26 U.S.C. § 501(c)(13) ("Tax-Exempt 501(c)(13) Organization"). On the loan application(s) at issue herein, this defendant gave its address as 304 Cabot Street, Holyoke, MA.

119. Defendant Oak Grove Cemetery Association of Falmouth Inc. is a Tax-Exempt 501(c)(13) Organization. On the loan application(s) at issue herein, this defendant gave its address as 46 Jones Road, Falmouth, MA.

120. Defendant Pine Grove Cemetery Corporation is a Tax-Exempt 501(c)(13) Organization. On the loan application(s) at issue herein, this defendant gave its address as 2 Oscars Road, Spencer, MA.

121. Defendant The Proprietors of Forest Hills Cemetery is a Tax-Exempt 501(c)(13) Organization. On the loan application(s) at issue herein, this defendant gave its address as 95 Forest Hills Avenue, Jamaica Plain, MA.

122. Defendant Worcester County Memorial Park Inc. is a Tax-Exempt 501(c)(13) Organization. On the loan application(s) at issue herein, this defendant gave its address as 217 Richards Avenue, Paxton, MA.

Parties—Individual Defendants

123. Defendants Unknown John or Jane Does were at all relevant times directors, officers, employees, or otherwise agents by and through whom Defendants respectively acted.

Background

124. To provide economic relief and stimulate the economy during the COVID-19 pandemic, Congress in 2020 enacted the Coronavirus Aid, Relief, and Economic Security Act, Pub. L. 116-136, amended by, inter alia, the Paycheck Protection Program Flexibility Act of 2020, Pub. L. 116-142 and the American Rescue Plan Act of 2021, Pub. L. 117-2 (2021) (together with implementing regulations, referred to herein as the "PPP Program"). The PPP Program effectively transferred money from the federal government to eligible recipients via the United States Small Business Administration ("SBA"). The transfers took the form of private loans guaranteed, forgiven and reimbursed by the SBA ("PPP Loans").

125. PPP Loan recipients could receive up to two loans, one in each of two tranches, each called a "draw," i.e., first-draw and second-draw PPP Loans.

126. A recipient could receive a second-draw loan only after having obtained a first-draw loan.

127. As a condition of receiving PPP Loans and forgiveness thereof, each applicant was required to certify its eligibility under the PPP Program.

128. To receive a PPP Loan, each applicant was required to complete, sign, and submit to a participating lender a borrower application form prescribed by the SBA. On that form, the applicant was required to certify, among other things, that it was eligible to receive a PPP Loan under the rules in effect at the time of the application. Such certification was material to, and a prerequisite of, the approval and disbursement of each PPP Loan and the SBA's guarantee thereof. But for such certification, an applicant could not and would not receive a PPP Loan.

129. To obtain forgiveness of a PPP Loan, each borrower was likewise required to complete, sign, and submit to its lender a forgiveness application form prescribed by the SBA. On that form, the borrower was required to certify, among other things, its compliance with the requirements of the PPP Program, including its eligibility rules, and the truth and accuracy of the information provided. Each forgiveness application form advised the borrower that the SBA could direct the lender to disapprove the application if the SBA determined that the borrower was ineligible for its PPP Loan. Such certifications were material to, and a prerequisite of, forgiveness of each PPP Loan. But for such certifications, a borrower could not and would not obtain forgiveness.

130. The PPP Program excluded Tax-Exempt 501(c)(2) Organizations from eligibility until March 11, 2021.

131. The PPP Program excluded Tax-Exempt 501(c)(5) Organizations from eligibility until March 11, 2021.

132. The PPP Program excluded Tax-Exempt 501(c)(6) Organizations from eligibility until December 27, 2020.

133. The PPP Program excluded Tax-Exempt 501(c)(7) Organizations from eligibility until March 11, 2021.

134. The PPP Program excluded Tax-Exempt 501(c)(8) Organizations from eligibility until March 11, 2021.

135. The PPP Program excluded Tax-Exempt 501(c)(9) Organizations from eligibility until March 11, 2021.

136. The PPP Program excluded Tax-Exempt 501(c)(10) Organizations from eligibility until March 11, 2021.

137. The PPP Program excluded Tax-Exempt 501(c)(13) Organizations from eligibility until March 11, 2021.

138. The PPP Program at all times excluded Private Clubs from eligibility.

139. Each defendant, by and through the individual defendants who acted on its behalf, applied for and received one or more PPP Loans for which it was legally ineligible.

140. Each Private Club defendant, by and through the individual defendants who acted on its behalf, applied for and received one or more PPP Loans for which it was legally ineligible as a Private Club.

141. Some defendants, by and through the individual defendants who acted on their behalf, also applied for and received second PPP Loans for which they were ineligible as "fruit of the poisonous tree," because receipt of a first-draw loan was a prerequisite to receive a second-draw loan.

PPP Loans

142. Defendants received approval for, and forgiveness of, their PPP Loans on the dates and in the amounts shown on the table attached hereto, despite being legally ineligible for the same.

First Cause of Action
False Claims Act, 31 U.S.C. § 3729(a)(1)(A) and (B)
First-Draw PPP Loan Applications
(Against All Defendants and Unknown John or Jane Does)

143. Relator repeats and realleges each of the foregoing paragraphs.

144. Each defendant applied for and received a first-draw PPP Loan, which the SBA approved on the date and in the amount shown for that loan on the table attached hereto.

145. On its application form for its first-draw PPP Loan, each defendant other than Edgewood Club Inc., Gremio Lusitano Club Inc., Italian Naturalization Club Inc. of Taunton,

Lafayette Naturalization Club Inc., New Bedford Sports Club Inc., Polish American Veterans of Webster Inc., Portuguese National Club, Volunteer Yacht Club, and West End Beagle Club Inc. of Gardner certified that "The Applicant is eligible to receive a loan under the rules in effect at the time this application is submitted that have been issued by the Small Business Administration (SBA) implementing the Paycheck Protection Program . . ."

146. Defendants Edgewood Club Inc., Gremio Lusitano Club Inc., Italian Naturalization Club Inc. of Taunton, Lafayette Naturalization Club Inc., New Bedford Sports Club Inc., Polish American Veterans of Webster Inc., Portuguese National Club, Volunteer Yacht Club, and West End Beagle Club Inc. of Gardner, which applied for their first-draw PPP Loans in early 2021, each certified on their application forms: "The Applicant is eligible to receive a loan under the rules in effect at the time this application is submitted that have been issued by the Small Business Administration (SBA) and the Department of the Treasury (Treasury) implementing the Paycheck Protection Program . . ."

147. Each such certification was required as a material prerequisite to receive a PPP Loan.

148. Each such certification was false and known by the certifying defendant and the individual defendants acting on its behalf to be false within the meaning of the False Claims Act. Each defendant was ineligible for its first-draw PPP Loan because it was exempt from taxation under a subsection of section 501(c) of the Internal Revenue Code that was excluded from PPP eligibility until after the date on which the SBA approved the loan, as shown on the table attached hereto.

149. By making the foregoing false certifications, each such defendant and the individual defendants acting on its behalf did knowingly present, or cause to be presented, a false

claim for payment or approval, and did knowingly make, use, or cause to be made or used, a false record or statement material to a false claim, in violation of 31 U.S.C. § 3729(a)(1)(A) and (B), to the injury of the United States.

Second Cause of Action
False Claims Act, 31 U.S.C. § 3729(a)(1)(A) and (B)
Second-Draw PPP Loan Applications
(Against the Defendants Listed Below and Unknown John or Jane Does)

150. Relator repeats and realleges each of the foregoing paragraphs.

151. The following defendants applied for and received second-draw PPP Loans, which the SBA approved on the dates and in the amounts shown on the table attached hereto:

a. Acoaxet Club Inc.

b. Administrators of Special Education Inc.

c. American Civic Association Inc. dba Sons of Italy

d. Arlington Chamber of Commerce Inc.

e. Benevolent & Protective Order of Elks of the USA—Haverhill Lodge No. 165

f. Bertocci Memorial Club of Brockton Inc.

g. Boston Madison Square Garden Club

h. Builders and Remodelers Association of Greater Boston Inc.

i. Cambridge Chamber of Commerce

j. Cape Cod Cranberry Growers' Association

k. Club Franco American de Westford Massachusetts

l. Concord Chamber of Commerce

m. Cottage Park Yacht Club Inc.

n. Dennis Yacht Club Inc.

o. Employers Association of the Northeast Inc.

p. Everett Chamber of Commerce Inc.

q. Fall River Country Club

r. Grand Lodge of Theta Delta Chi Inc.

s. Greater Chicopee Chamber of Commerce Inc.

t. Greylock Community Club Inc.

u. H. E. Fletcher Social & Athletic Club Inc.

v. Hampden County Bar Association Inc.

w. Holyoke Canoe Club Inc.

x. Irish-American Club Inc. of Woburn

y. John Alden Sportsmen's Club Inc.

z. Knights of Columbus dba Cardinal Spellman Council 347

aa. Lakeville Aerie No. 3944 Fraternal Order of Eagles

ab. Ludlow Fish & Game Club Inc.

ac. Malden Lodge No. 1910 Loyal Order of Moose

ad. Massachusetts Association of Accountants Inc.

ae. Massachusetts Chiefs of Police Association Inc.

af. Massachusetts LGBT Chamber of Commerce

ag. Massachusetts Systems Contractors Association Inc.

ah. Nabnasset Lake Country Club Inc.

ai. New Bedford Sports Club Inc.

aj. North Shore Tennis & Squash Club Inc.

ak. North of Boston Convention & Visitors Bureau Inc.

al. Orleans Yacht Club Inc.

am. Outdoor Amusement Business Association Inc.

an. Plymouth Country Club Inc.

ao. Salem Chamber of Commerce & Civics

ap. Salem Office of Tourism & Cultural Affairs Inc. dba Destination Salem

aq. Singletary Rod & Gun Club Inc.

ar. Sons of Italy in America—Quincy Lodge No. 1295

as. Stoneham Chamber of Commerce Inc.

at. Swampscott Yacht Club

au. Tennis and Racquet Club

av. The Advertising Club of Greater Boston Inc. dba The Ad Club

aw. The Fay Club

ax. The New England Affordable Housing Management Association Inc.

ay. The North Shore Chamber of Commerce, Inc.

az. The Old Colony Yacht Club

ba. The Plymouth Area Chamber of Commerce Inc.

bb. The Polish Club Lodge 2058 Inc.

bc. Town River Yacht Club

bd. Wequaquet Lake Yacht Club

be. West Dennis Yacht Club Inc.

bf. Wood Products Manufacturers Association

bg. Young Men's Club of Hadley Inc.

152. On its application form for its second-draw PPP Loan, each of these defendants certified: "The Applicant is eligible to receive a loan under the rules in effect at the time this application is submitted that have been issued by the Small Business Administration (SBA) and the Department of the Treasury (Treasury) implementing Second Draw Paycheck Protection Program Loans . . ."

153. Each such certification was required as a material prerequisite to receive a PPP Loan.

154. Each such certification was false and known by the certifying defendant and the individual defendants acting on its behalf to be false within the meaning of the False Claims Act. Each of these defendants was ineligible for its second-draw PPP Loan because its first-draw PPP Loan had been unlawfully obtained and receipt of a first-draw loan was a prerequisite to receive a second-draw loan, rendering the second-draw PPP Loan unlawful as "fruit of the poisonous tree." Defendants American Civic Association Inc. dba Sons of Italy, Benevolent & Protective Order of Elks of the USA—Haverhill Lodge No. 165, Bertocci Memorial Club of Brockton Inc., Club Franco American de Westford Massachusetts, Cottage Park Yacht Club Inc., Dennis Yacht Club Inc., Fall River Country Club, Greylock Community Club Inc., H. E. Fletcher Social & Athletic Club Inc., Holyoke Canoe Club Inc., Irish-American Club Inc. of Woburn, John Alden Sportsmen's Club Inc., Knights of Columbus dba Cardinal Spellman Council 347, Ludlow Fish & Game Club Inc., Nabnasset Lake Country Club Inc., North Shore Tennis & Squash Club Inc., Orleans Yacht Club Inc., Sons of Italy in America—Quincy Lodge No. 1295, Swampscott Yacht Club, Tennis and Racquet Club, The Old Colony Yacht Club, The Polish Club Lodge 2058 Inc., Town River Yacht Club, Wequaquet Lake Yacht Club, West Dennis Yacht Club Inc., and Young Men's Club of Hadley Inc. were also ineligible because each was exempt from taxation under a

subsection of section 501(c) of the Internal Revenue Code that was excluded from PPP eligibility until after the date on which SBA approved the loan, as shown on the table attached hereto.

155. By making the foregoing false certifications, each such defendant and the individual defendants acting on its behalf did knowingly present, or cause to be presented, a false claim for payment or approval, and did knowingly make, use, or cause to be made or used, a false record or statement material to a false claim, in violation of 31 U.S.C. § 3729(a)(1)(A) and (B), to the injury of the United States.

Third Cause of Action
False Claims Act, 31 U.S.C. § 3729(a)(1)(A) and (B)
PPP Loan Applications of the Private Club Defendants
(Against the Private Club Defendants and Unknown John or Jane Does)

156. Relator repeats and realleges each of the foregoing paragraphs.

157. The Private Club defendants are the following:

a. Acoaxet Club Inc.

b. American Civic Association Inc. dba Sons of Italy

c. Benevolent & Protective Order of Elks of the USA—Fall River Lodge No. 118

d. Benevolent & Protective Order of Elks of the USA—Haverhill Lodge No. 165

e. Benevolent & Protective Order of Elks of the USA—Waltham-Watertown Lodge No. 953

f. Bertocci Memorial Club of Brockton Inc.

g. Billerica Lodge No. 2648 Loyal Order of Moose

h. Boston Madison Square Garden Club

i. Brockton Country Club Inc.

j. Clube Desportivo Faialense Inc.

k. Cohasse Country Club

l. Cottage Park Yacht Club Inc.

m. Dennis Yacht Club Inc.

n. Fall River Country Club

o. Grand Lodge of Theta Delta Chi Inc.

p. Greenfield Lodge No. 997 Loyal Order of Moose

q. Gremio Lusitano Club Inc.

r. Greylock Community Club Inc.

s. Irish-American Club Inc. of Woburn

t. Italian Naturalization Club Inc. of Taunton

u. Jubilee Yacht Club

v. Knights of Columbus dba Cardinal Spellman Council 347

w. Lafayette Naturalization Club Inc.

x. Lakeville Aerie No. 3944 Fraternal Order of Eagles

y. Lexington Golf Club

z. Ludlow Country Club Inc.

aa. Ludlow Fish & Game Club Inc.

ab. Malden Lodge No. 1910 Loyal Order of Moose

ac. Marshfield Country Club

ad. Master, Wardens, and Members of The Grand Lodge of Masons in Massachusetts

ae. Milton Hoosic Club Inc.

af. Minute Man Sportsmans Club Inc.

ag. Nabnasset Lake Country Club Inc.

ah. New Bedford Sports Club Inc.

ai. North Shore Skating Club Inc.

aj. Orleans Yacht Club Inc.

ak. Palmer's Cove Yacht Club Inc.

al. Pleasant Park Yacht Club Inc.

am. Plymouth Country Club Inc.

an. Point Independence Yacht Club Inc.

ao. Polish American Veterans of Webster Inc.

ap. Portuguese National Club

aq. Prince Hall Masonic Grand Lodge

ar. Rowley Veterans' Association Inc.

as. Sandy Bay Yacht Club, Inc.

at. Singletary Rod & Gun Club Inc.

au. Sons of Italy in America—Grand Lodge of Massachusetts

av. Sons of Italy in America—Methuen Lodge No. 902

aw. Sons of Italy in America—Quincy Lodge No. 1295

ax. Stockbridge Golf Club

ay. Supreme Council of the Royal Arcanum

az. Swampscott Yacht Club

ba. Tennis and Racquet Club

bb. The Fay Club

bc. The Old Colony Yacht Club

bd. The Polish Club Lodge 2058 Inc.

be. Town River Yacht Club

bf. Volunteer Yacht Club

bg. Wampatuck Country Club of Canton Inc.

bh. Wequaquet Lake Yacht Club

bi. West Dennis Yacht Club Inc.

bj. West End Beagle Club Inc. of Gardner

bk. Whitinsville Golf Club

bl. Winthrop Yacht Club Inc.

158. Each Private Club defendant applied for and received one or more PPP Loans, which the SBA approved on the dates and in the amounts shown on the table attached hereto.

159. On its application form for each PPP Loan it received, each Private Club defendant certified that "The Applicant is eligible to receive a loan under the rules in effect at the time this application is submitted that have been issued by the Small Business Administration (SBA) . . . ," as quoted more fully in the First and Second Causes of Action. Each such certification was required as a material prerequisite to receive a PPP Loan.

160. Each such certification was false and known by the certifying Private Club defendant and the individual defendants acting on its behalf to be false within the meaning of the False Claims Act, because each Private Club defendant was a Private Club, which was at all times excluded from PPP eligibility.

161. By making the foregoing false certifications, each such defendant and the individual defendants acting on its behalf did knowingly present, or cause to be presented, a false

claim for payment or approval, and did knowingly make, use, or cause to be made or used, a false record or statement material to a false claim, in violation of 31 U.S.C. § 3729(a)(1)(A) and (B), to the injury of the United States.

Fourth Cause of Action
False Claims Act, 31 U.S.C. § 3729(a)(1)(A), (B), and (G)
First-Draw PPP Loan Forgiveness Applications
(Against All Defendants Except Those Identified Below, and Unknown John or Jane Does)

162. Relator repeats and realleges each of the foregoing paragraphs.

163. Each defendant except Defendants Benevolent & Protective Order of Elks of the USA—Fall River Lodge No. 118, Jubilee Yacht Club, Master, Wardens, and Members of The Grand Lodge of Masons in Massachusetts, Sons of Italy in America—Methuen Lodge No. 902, Stockbridge Golf Club, and The Proprietors of Forest Hills Cemetery applied for and obtained forgiveness of its first-draw PPP Loan by submitting a forgiveness application form to its lender. SBA forgave each such loan on the date and in the amount shown on the table attached hereto. The forgiveness status of the first-draw PPP Loans of the six excepted defendants is unknown to Relator, and those defendants are not included in this Count.

164. On the forgiveness application forms for their first-draw PPP Loans, the following defendants each certified: "The Borrower has complied with all requirements in the Paycheck Protection Program Rules (Sections 7(a)(36), (7)(a)(37), and 7A of the Small Business Act, the PPP interim final rules, and guidance issued by SBA through the date of this application)":

a. Administrators of Special Education Inc.

b. American Civic Association Inc. dba Sons of Italy

c. Arlington Chamber of Commerce Inc.

d. Benevolent & Protective Order of Elks of the USA—Haverhill Lodge No. 165

e. Benevolent & Protective Order of Elks of the USA—Waltham-Watertown Lodge No. 953

f. Berkshire County Board of Realtors Inc

g. Bertocci Memorial Club of Brockton Inc.

h. Billerica Lodge No. 2648 Loyal Order of Moose

i. Boston Madison Square Garden Club

j. Bridgewater Citizens' Club Inc.

k. Brockton Country Club Inc.

l. Cambridge Chamber of Commerce

m. Cape Cod Cranberry Growers' Association

n. Clube Desportivo Faialense Inc.

o. Cohasse Country Club

p. Construction Industries of Massachusetts Inc.

q. Cottage Park Yacht Club Inc.

r. Curve Triangle & Rectangle Institute Inc.

s. Dennis Yacht Club Inc.

t. Edgewood Club Inc.

u. Ellinwood Country Club Inc.

v. Everett Chamber of Commerce Inc.

w. Forestdale Cemetery Association

x. Grand Lodge of Theta Delta Chi Inc.

y. Greater Chicopee Chamber of Commerce Inc.

z. Greenfield Lodge No. 997 Loyal Order of Moose

aa. Gremio Lusitano Club Inc.

ab. Hampden County Bar Association Inc.

ac. Harvard Square Business Association Inc.

ad. Italian Naturalization Club Inc. of Taunton

ae. Knights of Columbus dba Cardinal Spellman Council 347

af. Lafayette Naturalization Club Inc.

ag. Lakeville Aerie No. 3944 Fraternal Order of Eagles

ah. Longwood Covered Courts Trust

ai. Ludlow Country Club Inc.

aj. Ludlow Fish & Game Club Inc.

ak. Ludlow Tennis Club Inc.

al. Malden Lodge No. 1910 Loyal Order of Moose

am. Marblehead Yacht Club Inc.

an. Massachusetts Association of Accountants Inc.

ao. Massachusetts Chiefs of Police Association Inc.

ap. Massachusetts LGBT Chamber of Commerce

aq. Minute Man Sportsmans Club Inc.

ar. National Board of Trial Advocacy Inc.

as. New Bedford Sports Club Inc.

at. North Shore Tennis & Squash Club Inc.

au. North of Boston Convention & Visitors Bureau Inc.

av. Oak Grove Cemetery Association of Falmouth Inc.

aw. Outdoor Amusement Business Association Inc.

ax. Palmer's Cove Yacht Club Inc.

ay. Pine Grove Cemetery Corporation

az. Pleasant Park Yacht Club Inc.

ba. Point Independence Yacht Club Inc.

bb. Polish American Veterans of Webster Inc.

bc. Portuguese National Club

bd. Prince Hall Masonic Grand Lodge

be. Rowley Veterans' Association Inc.

bf. Salem Chamber of Commerce & Civics

bg. Salem Office of Tourism & Cultural Affairs Inc. dba Destination Salem

bh. Singletary Rod & Gun Club Inc.

bi. Sons of Italy in America—Grand Lodge of Massachusetts

bj. Stoneham Chamber of Commerce Inc.

bk. Swampscott Yacht Club

bl. Tennis and Racquet Club

bm. The Fay Club

bn. The New England Affordable Housing Management Association Inc.

bo. The North Shore Chamber of Commerce, Inc.

bp. The Old Colony Yacht Club

bq. The Polish Club Lodge 2058 Inc.

br. Volunteer Yacht Club

bs. Wampatuck Country Club of Canton Inc.

bt. West Dennis Yacht Club Inc.

bu. West End Beagle Club Inc. of Gardner

bv. Whitinsville Golf Club

bw. Winthrop Golf Club

bx. Winthrop Yacht Club Inc.

by. Young Men's Club of Hadley Inc.

165. Each of the other defendants included in this Count certified on the forgiveness application form for its first-draw PPP Loan: "The information provided in this application and the information provided in all supporting documents and forms is true and correct in all material respects."

166. Each forgiveness application form further advised the borrower that "SBA may direct a lender to disapprove the Borrower's loan forgiveness application if SBA determines that the Borrower was ineligible for the PPP loan."

167. Each certification described above was required as a material prerequisite to obtain forgiveness of a PPP Loan.

168. Each such certification was false and known by the certifying defendant and the individual defendants acting on its behalf to be false within the meaning of the False Claims Act, because each such defendant had been ineligible to receive its first-draw PPP Loan, as set forth in the First Cause of Action, and therefore was not entitled to forgiveness of that loan.

169. By making the foregoing false certifications, each such defendant and the individual defendants acting on its behalf did knowingly present, or cause to be presented, a false claim for payment or approval, did knowingly make, use, or cause to be made or used, a false record or statement material to a false claim, and did knowingly conceal, or knowingly and improperly avoid or decrease, an obligation to pay or transmit money or property to the United

States government, in violation of 31 U.S.C. § 3729(a)(1)(A), (B), and (G), to the injury of the United States.

Fifth Cause of Action
False Claims Act, 31 U.S.C. § 3729(a)(1)(A), (B), and (G)
Second-Draw PPP Loan Forgiveness Applications
(Against the Defendants Listed in the Second Cause of Action and Unknown John or Jane Does)

170. Relator repeats and realleges each of the foregoing paragraphs.

171. The defendants listed in the Second Cause of Action each applied for and obtained forgiveness of their second-draw PPP Loans by submitting forgiveness application forms to their lenders. SBA forgave each such loan on the dates and in the amounts shown on the table attached hereto.

172. On the forgiveness application forms for their second-draw PPP Loans, Defendants Employers Association of the Northeast Inc., Fall River Country Club, Plymouth Country Club Inc., and The Advertising Club of Greater Boston Inc. dba The Ad Club each certified: "The information provided in this application and the information provided in all supporting documents and forms is true and correct in all material respects."

173. Each of the other defendants listed in the Second Cause of Action certified on the forgiveness application form for its second-draw PPP Loan: "The Borrower has complied with all requirements in the Paycheck Protection Program Rules (Sections 7(a)(36), (7)(a)(37), and 7A of the Small Business Act, the PPP interim final rules, and guidance issued by SBA through the date of this application)".

174. Each forgiveness application form further advised the borrower that "SBA may direct a lender to disapprove the Borrower's loan forgiveness application if SBA determines that the Borrower was ineligible for the PPP loan."

175. Each certification described above was required as a material prerequisite to obtain forgiveness of a PPP Loan.

176. Each such certification was false and known by the certifying defendant and the individual defendants acting on its behalf to be false within the meaning of the False Claims Act, because each of these defendants had been ineligible to receive its second-draw PPP Loan, as set forth in the Second Cause of Action, and therefore was not entitled to forgiveness of that loan.

177. By making the foregoing false certifications, each such defendant and the individual defendants acting on its behalf did knowingly present, or cause to be presented, a false claim for payment or approval, did knowingly make, use, or cause to be made or used, a false record or statement material to a false claim, and did knowingly conceal, or knowingly and improperly avoid or decrease, an obligation to pay or transmit money or property to the United States government, in violation of 31 U.S.C. § 3729(a)(1)(A), (B), and (G), to the injury of the United States.

Sixth Cause of Action
False Claims Act, 31 U.S.C. § 3729(a)(1)(A), (B), and (G)
PPP Loan Forgiveness Applications of the Private Club Defendants
(Against the Private Club Defendants Identified Below and Unknown John or Jane Does)

178. Relator repeats and realleges each of the foregoing paragraphs.

179. Each Private Club defendant except Defendants Benevolent & Protective Order of Elks of the USA—Fall River Lodge No. 118, Jubilee Yacht Club, Master, Wardens, and Members of The Grand Lodge of Masons in Massachusetts, Sons of Italy in America—Methuen Lodge No. 902, and Stockbridge Golf Club applied for and obtained forgiveness of each of its PPP Loans by submitting forgiveness application forms to its lender. SBA forgave each such loan on the dates and in the amounts shown on the table attached hereto. The forgiveness status

of the PPP Loans of the five excepted defendants is unknown to Relator, and those defendants are not included in this Count.

180. On the forgiveness application forms for the PPP Loans identified below, the following Private Club defendants each certified: "The Borrower has complied with all requirements in the Paycheck Protection Program Rules (Sections 7(a)(36), (7)(a)(37), and 7A of the Small Business Act, the PPP interim final rules, and guidance issued by SBA through the date of this application)":

a. Acoaxet Club Inc. (second-draw)

b. American Civic Association Inc. dba Sons of Italy (first- and second-draw)

c. Benevolent & Protective Order of Elks of the USA—Haverhill Lodge No. 165 (first- and second-draw)

d. Benevolent & Protective Order of Elks of the USA—Waltham-Watertown Lodge No. 953 (first-draw)

e. Bertocci Memorial Club of Brockton Inc. (first- and second-draw)

f. Billerica Lodge No. 2648 Loyal Order of Moose (first-draw)

g. Boston Madison Square Garden Club (first- and second-draw)

h. Brockton Country Club Inc. (first-draw)

i. Clube Desportivo Faialense Inc. (first-draw)

j. Cohasse Country Club (first-draw)

k. Cottage Park Yacht Club Inc. (first- and second-draw)

l. Dennis Yacht Club Inc. (first- and second-draw)

m. Grand Lodge of Theta Delta Chi Inc. (first- and second-draw)

n. Greenfield Lodge No. 997 Loyal Order of Moose (first-draw)

o. Gremio Lusitano Club Inc. (first-draw)

p. Greylock Community Club Inc. (second-draw)

q. Irish-American Club Inc. of Woburn (second-draw)

r. Italian Naturalization Club Inc. of Taunton (first-draw)

s. Knights of Columbus dba Cardinal Spellman Council 347 (first- and second-draw)

t. Lafayette Naturalization Club Inc. (first-draw)

u. Lakeville Aerie No. 3944 Fraternal Order of Eagles (first- and second-draw)

v. Ludlow Country Club Inc. (first-draw)

w. Ludlow Fish & Game Club Inc. (first- and second-draw)

x. Malden Lodge No. 1910 Loyal Order of Moose (first- and second-draw)

y. Minute Man Sportsmans Club Inc. (first-draw)

z. Nabnasset Lake Country Club Inc. (second-draw)

aa. New Bedford Sports Club Inc. (first- and second-draw)

ab. Orleans Yacht Club Inc. (second-draw)

ac. Palmer's Cove Yacht Club Inc. (first-draw)

ad. Pleasant Park Yacht Club Inc. (first-draw)

ae. Point Independence Yacht Club Inc. (first-draw)

af. Polish American Veterans of Webster Inc. (first-draw)

ag. Portuguese National Club (first-draw)

ah. Prince Hall Masonic Grand Lodge (first-draw)

ai. Rowley Veterans' Association Inc. (first-draw)

aj. Singletary Rod & Gun Club Inc. (first- and second-draw)

ak. Sons of Italy in America—Grand Lodge of Massachusetts (first-draw)

al. Sons of Italy in America—Quincy Lodge No. 1295 (second-draw)

am. Swampscott Yacht Club (first- and second-draw)

an. Tennis and Racquet Club (first- and second-draw)

ao. The Fay Club (first- and second-draw)

ap. The Old Colony Yacht Club (first- and second-draw)

aq. The Polish Club Lodge 2058 Inc. (first- and second-draw)

ar. Town River Yacht Club (second-draw)

as. Volunteer Yacht Club (first-draw)

at. Wampatuck Country Club of Canton Inc. (first-draw)

au. Wequaquet Lake Yacht Club (second-draw)

av. West Dennis Yacht Club Inc. (first- and second-draw)

aw. West End Beagle Club Inc. of Gardner (first-draw)

ax. Whitinsville Golf Club (first-draw)

ay. Winthrop Yacht Club Inc. (first-draw)

181. On the forgiveness application forms for the PPP Loans identified below, the following Private Club defendants each certified: "The information provided in this application and the information provided in all supporting documents and forms is true and correct in all material respects":

a. Acoaxet Club Inc. (first-draw)

b. Fall River Country Club (first- and second-draw)

c. Greylock Community Club Inc. (first-draw)

d. Irish-American Club Inc. of Woburn (first-draw)

e. Lexington Golf Club (first-draw)

f. Marshfield Country Club (first-draw)

g. Milton Hoosic Club Inc. (first-draw)

h. Nabnasset Lake Country Club Inc. (first-draw)

i. North Shore Skating Club Inc. (first-draw)

j. Orleans Yacht Club Inc. (first-draw)

k. Plymouth Country Club Inc. (first- and second-draw)

l. Sandy Bay Yacht Club Inc. (first-draw)

m. Sons of Italy in America—Quincy Lodge No. 1295 (first-draw)

n. Supreme Council of the Royal Arcanum (first-draw)

o. Town River Yacht Club (first-draw)

p. Wequaquet Lake Yacht Club (first-draw)

182. Each forgiveness application form further advised the borrower that "SBA may direct a lender to disapprove the Borrower's loan forgiveness application if SBA determines that the Borrower was ineligible for the PPP loan."

183. Each certification described above was required as a material prerequisite to obtain forgiveness of a PPP Loan.

184. Each such certification was false and known by the certifying Private Club defendant and the individual defendants acting on its behalf to be false within the meaning of the False Claims Act, because each Private Club defendant was a Private Club, which was at all

times excluded from PPP eligibility, and therefore was neither entitled to receive nor entitled to forgiveness of any PPP Loan.

185. By making the foregoing false certifications, each such defendant and the individual defendants acting on its behalf did knowingly present, or cause to be presented, a false claim for payment or approval, did knowingly make, use, or cause to be made or used, a false record or statement material to a false claim, and did knowingly conceal, or knowingly and improperly avoid or decrease, an obligation to pay or transmit money or property to the United States government, in violation of 31 U.S.C. § 3729(a)(1)(A), (B), and (G), to the injury of the United States.

Prayer for Relief

186. WHEREFORE, Relator prays for the following relief against each defendant:

a. A declaration that each defendant did violate the False Claims Act.

b. An amount thrice the amount of PPP Loans and interest forgiven or otherwise not repaid with respect to each defendant, lending fees paid by the SBA, foregone interest, and all other damages suffered by the United States government, plus civil penalties and applicable interest, under 31 U.S.C. § 3729(a)(1).

c. The cost of this civil action, apportioned to each defendant respectively in proportion to its share of the aggregate damages recouped herein, under 31 U.S.C. § 3729(a)(3).

d. An award to relator, including its reasonable expenses, attorneys' fees, and costs, under 31 U.S.C. § 3730(d)(1) or (2), as applicable.

e. Such other and further relief as may be just and proper.

Demand for Jury Trial

187. Relator demands a trial by jury.

Respectfully submitted,

/s/

Bruce Ellis Fein

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Great Falls, VA 22066
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Attorney for Relator The Tarbell Group, LLC

United States of America ex rel. The Tarbell Group, LLC v. Acoaxet Club Inc., et al.
Defendants' PPP Loans

Name	Type	Loan No.	Draw	Date Eligible	Date Approved	Loan Amount	Forgiveness Date	Amount Forgiven
Acoaxet Club Inc.	501(c)(7)	8024327705	1st	Never	5/1/2020	$192,096.00	11/12/2020	$193,090.69
Acoaxet Club Inc.	501(c)(7)	3575248803	2nd	Never	4/15/2021	$120,957.00	8/20/2021	$121,371.24
Administrators of Special Education Inc.	501(c)(6)	3499357410	1st	12/27/2020	5/7/2020	$20,877.00	3/25/2021	$21,060.60
Administrators of Special Education Inc.	501(c)(6)	4646418602	2nd	12/27/2020	3/18/2021	$20,877.00	9/15/2021	$20,979.38
The Advertising Club of Greater Boston Inc. dba The Ad Club	501(c)(6)	6537807104	1st	12/27/2020	4/14/2020	$269,000.00	2/23/2021	$271,262.55
The Advertising Club of Greater Boston Inc. dba The Ad Club	501(c)(6)	8124848505	2nd	12/27/2020	3/9/2021	$221,455.00	11/9/2021	$222,880.81
American Civic Association Inc. dba Sons of Italy	501(c)(8)	3013757206	1st	Never	4/16/2020	$9,930.00	2/12/2021	$9,998.54
American Civic Association Inc. dba Sons of Italy	501(c)(8)	6083108510	2nd	Never	3/2/2021	$9,930.00	9/22/2021	$9,985.44
Amherst Golf Club Inc.	501(c)(7)	5535637103	1st	3/11/2021	4/13/2020	$30,000.00	1/14/2021	$30,219.45
Arlington Chamber of Commerce Inc.	501(c)(6)	4072917200	1st	12/27/2020	4/27/2020	$9,932.00	1/28/2021	$10,006.56
Arlington Chamber of Commerce Inc.	501(c)(6)	3143398308	2nd	12/27/2020	1/21/2021	$9,931.73	10/25/2021	$10,006.29
Bar Association of Norfolk County Inc.	501(c)(6)	2574527202	1st	12/27/2020	4/16/2020	$8,100.00	11/12/2020	$8,143.72

United States of America ex rel. The Tarbell Group, LLC v. Acoaxet Club Inc., et al.
Defendants' PPP Loans

Name	Type	Loan No.	Draw	Date Eligible	Date Approved	Loan Amount	Forgiveness Date	Amount Forgiven
Benevolent & Protective Order of Elks of the USA—Fall River Lodge No. 118	501(c)(8)	6183517309	1st	Never	4/30/2020	$27,700.00	Unknown	Unknown
Benevolent & Protective Order of Elks of the USA—Haverhill Lodge No. 165	501(c)(8)	4840527401	1st	Never	5/11/2020	$17,500.00	8/5/2021	$17,716.81
Benevolent & Protective Order of Elks of the USA—Haverhill Lodge No. 165	501(c)(8)	8998738301	2nd	Never	1/30/2021	$17,582.00	8/10/2021	$17,673.33
Benevolent & Protective Order of Elks of the USA—Waltham-Watertown Lodge No. 953	501(c)(8)	8976137203	1st	Never	4/28/2020	$21,000.00	6/16/2021	$21,236.47
Berkshire County Board of Realtors Inc	501(c)(6)	9267417304	1st	12/27/2020	5/1/2020	$30,705.00	3/31/2021	$30,986.46
Bertocci Memorial Club of Brockton Inc.	501(c)(7)	1253177209	1st	Never	4/15/2020	$18,750.00	7/28/2021	$18,990.10
Bertocci Memorial Club of Brockton Inc.	501(c)(7)	7658898509	2nd	Never	3/6/2021	$13,750.00	11/3/2021	$13,838.61
Billerica Lodge No. 2648 Loyal Order of Moose	501(c)(8)	8244957403	1st	Never	5/18/2020	$5,284.00	2/9/2021	$5,322.46
Boston Madison Square Garden Club	501(c)(7)	7558847806	1st	Never	6/3/2020	$54,800.00	5/20/2021	$55,301.46
Boston Madison Square Garden Club	501(c)(7)	4450188908	2nd	Never	4/29/2021	$54,800.00	10/22/2021	$55,052.23

United States of America ex rel. The Tarbell Group, LLC v. Acoaxet Club Inc., et al.
Defendants' PPP Loans

Name	Type	Loan No.	Draw	Date Eligible	Date Approved	Loan Amount	Forgiveness Date	Amount Forgiven
Bridgewater Citizens' Club Inc.	501(c)(7)	3300107300	1st	3/11/2021	4/29/2020	$14,200.00	8/18/2021	$14,381.68
Brockton Country Club Inc.	501(c)(7)	1747607305	1st	Never	4/28/2020	$39,642.12	9/28/2021	$40,208.12
Builders and Remodelers Association of Greater Boston Inc.	501(c)(6)	1709018104	1st	12/27/2020	7/10/2020	$50,900.00	11/17/2020	$51,068.25
Builders and Remodelers Association of Greater Boston Inc.	501(c)(6)	5390718500	2nd	12/27/2020	2/27/2021	$50,900.00	6/23/2021	$51,047.04
Cambridge Chamber of Commerce	501(c)(6)	5765007206	1st	12/27/2020	4/27/2020	$77,500.00	5/10/2021	$78,287.74
Cambridge Chamber of Commerce	501(c)(6)	5388768309	2nd	12/27/2020	1/25/2021	$98,028.33	10/6/2021	$98,705.13
Cape Cod Cranberry Growers' Association	501(c)(5)	2427227304	1st	3/11/2021	4/29/2020	$58,873.00	11/17/2021	$59,771.42
Cape Cod Cranberry Growers' Association	501(c)(5)	3193008806	2nd	3/11/2021	4/14/2021	$60,238.00	1/3/2022	$60,630.78
Club Franco American de Westford Massachusetts	501(c)(7)	1872287402	1st	3/11/2021	5/5/2020	$8,900.00	12/10/2020	$8,952.41
Club Franco American de Westford Massachusetts	501(c)(7)	6219918408	2nd	3/11/2021	2/10/2021	$9,375.00	9/22/2021	$9,430.99
Clube Desportivo Faialense Inc.	501(c)(7)	3795418002	1st	Never	6/25/2020	$14,219.37	6/3/2021	$14,352.21
Cohasse Country Club	501(c)(7)	1069827203	1st	Never	4/15/2020	$77,000.00	5/6/2021	$77,812.19

United States of America ex rel. The Tarbell Group, LLC v. Acoaxet Club Inc., et al.
Defendants' PPP Loans

Name	Type	Loan No.	Draw	Date Eligible	Date Approved	Loan Amount	Forgiveness Date	Amount Forgiven
Concord Chamber of Commerce	501(c)(6)	5938017404	1st	12/27/2020	5/13/2020	$7,220.00	10/22/2020	$7,251.09
Concord Chamber of Commerce	501(c)(6)	3878998508	2nd	12/27/2020	2/24/2021	$7,220.00	5/16/2022	$7,307.44
Construction Industries of Massachusetts Inc.	501(c)(6)	9147017210	1st	12/27/2020	4/28/2020	$95,000.00	8/26/2021	$96,241.51
Cottage Park Yacht Club Inc.	501(c)(7)	2648048200	1st	Never	8/3/2020	$48,600.00	6/2/2021	$48,998.12
Cottage Park Yacht Club Inc.	501(c)(7)	2551938407	2nd	Never	2/3/2021	$48,600.00	10/6/2021	$48,907.58
Curve Triangle & Rectangle Institute Inc.	501(c)(6)	8677897306	1st	12/27/2020	5/1/2020	$24,225.00	1/25/2021	$24,399.55
Dennis Yacht Club Inc.	501(c)(7)	2980197401	1st	Never	5/6/2020	$62,680.00	2/4/2021	$63,144.88
Dennis Yacht Club Inc.	501(c)(7)	4440278406	2nd	Never	2/6/2021	$49,725.00	10/25/2021	$50,077.22
Edgewood Club Inc.	501(c)(7)	4595348408	1st	3/11/2021	2/6/2021	$27,377.00	12/14/2021	$27,605.77
Ellinwood Country Club Inc.	501(c)(7)	8072197000	1st	3/11/2021	4/8/2020	$31,565.00	2/16/2021	$31,753.98
Employers Association of the Northeast Inc.	501(c)(6)	1058497303	1st	12/27/2020	4/28/2020	$434,000.00	11/12/2020	$405,678.82
Employers Association of the Northeast Inc.	501(c)(6)	3010768406	2nd	12/27/2020	2/4/2021	$417,098.57	6/23/2021	$418,618.41
Everett Chamber of Commerce Inc.	501(c)(6)	6114697204	1st	12/27/2020	4/27/2020	$7,800.00	2/17/2021	$7,861.55
Everett Chamber of Commerce Inc.	501(c)(6)	8218418408	2nd	12/27/2020	2/13/2021	$7,856.22	10/25/2021	$7,906.59

United States of America ex rel. The Tarbell Group, LLC v. Acoaxet Club Inc., et al.
Defendants' PPP Loans

Name	Type	Loan No.	Draw	Date Eligible	Date Approved	Loan Amount	Forgiveness Date	Amount Forgiven
Fall River Country Club	501(c)(7)	5181307002	1st	Never	4/5/2020	$314,400.00	1/20/2021	$249,680.56
Fall River Country Club	501(c)(7)	6259378308	2nd	Never	1/26/2021	$253,032.50	1/28/2022	$255,542.03
The Fay Club	501(c)(7)	9463407004	1st	Never	4/9/2020	$41,500.00	4/5/2021	$41,902.32
The Fay Club	501(c)(7)	1796328808	2nd	Never	4/11/2021	$44,005.00	8/23/2022	$44,611.29
Forestdale Cemetery Association	501(c)(13)	9450517809	1st	3/11/2021	6/8/2020	$50,700.00	7/22/2021	$51,252.84
Grand Lodge of Theta Delta Chi Inc.	501(c)(7)	9334437300	1st	Never	5/1/2020	$24,581.00	5/13/2021	$24,832.20
Grand Lodge of Theta Delta Chi Inc.	501(c)(7)	8347738602	2nd	Never	3/24/2021	$27,200.00	9/1/2021	$27,318.49
Greater Chicopee Chamber of Commerce Inc.	501(c)(6)	6772447408	1st	12/27/2020	5/15/2020	$13,460.00	3/1/2021	$13,565.81
Greater Chicopee Chamber of Commerce Inc.	501(c)(6)	5005908307	2nd	12/27/2020	1/23/2021	$13,460.00	10/6/2021	$13,547.86
Greenfield Lodge No. 997 Loyal Order of Moose	501(c)(8)	9078527205	1st	Never	4/28/2020	$13,815.00	5/6/2021	$13,953.53
Gremio Lusitano Club Inc.	501(c)(7)	1523568401	1st	Never	2/2/2021	$14,870.00	1/11/2022	$15,010.44
Greylock Community Club Inc.	501(c)(7)	5947458002	1st	Never	6/29/2020	$17,400.00	1/7/2021	$17,488.93
Greylock Community Club Inc.	501(c)(7)	8342198509	2nd	Never	3/9/2021	$15,623.00	8/9/2021	$15,686.79

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Name	Type	Loan No.	Draw	Date Eligible	Date Approved	Loan Amount	Forgiveness Date	Amount Forgiven
H. E. Fletcher Social & Athletic Club Inc.	501(c)(7)	8742027104	1st	3/11/2021	4/15/2020	$17,029.00	12/31/2020	$17,147.50
H. E. Fletcher Social & Athletic Club Inc.	501(c)(7)	6694768301	2nd	3/11/2021	1/27/2021	$17,035.00	12/8/2021	$17,180.61
Hampden County Bar Association Inc.	501(c)(6)	8283407209	1st	12/27/2020	4/28/2020	$103,000.00	4/6/2021	$66,877.63
Hampden County Bar Association Inc.	501(c)(6)	6337348502	2nd	12/27/2020	3/3/2021	$58,107.00	1/19/2022	$58,608.47
Harvard Square Business Association Inc.	501(c)(6)	4777887204	1st	12/27/2020	4/27/2020	$52,500.00	4/12/2021	$52,989.04
Holyoke Canoe Club Inc.	501(c)(7)	1192927400	1st	3/11/2021	5/4/2020	$8,800.00	12/17/2020	$8,854.25
Holyoke Canoe Club Inc.	501(c)(7)	3534228507	2nd	3/11/2021	2/24/2021	$8,352.50	1/12/2022	$8,425.96
International Brotherhood of Electrical Workers Building Corporation	501(c)(2)	6674497103	1st	3/11/2021	4/14/2020	$166,200.00	12/17/2020	$167,238.75
Irish-American Club Inc. of Woburn	501(c)(7)	8490947210	1st	Never	4/28/2020	$17,517.00	11/2/2020	$17,604.10
Irish-American Club Inc. of Woburn	501(c)(7)	1797418410	2nd	Never	2/2/2021	$16,100.00	1/18/2022	$16,253.40
Italian Naturalization Club Inc. of Taunton	501(c)(7)	4358648400	1st	Never	2/6/2021	$19,815.00	5/10/2022	$20,063.24
John Alden Sportsmen's Club Inc.	501(c)(7)	8718727200	1st	3/11/2021	4/28/2020	$27,293.00	12/17/2020	$27,373.78

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Name	Type	Loan No.	Draw	Date Eligible	Date Approved	Loan Amount	Forgiveness Date	Amount Forgiven
John Alden Sportsmen's Club Inc.	501(c)(7)	5403658506	2nd	3/11/2021	2/27/2021	$27,292.00	9/1/2021	$27,429.22
Jubilee Yacht Club	501(c)(7)	9738897000	1st	Never	4/9/2020	$65,600.00	Unknown	Unknown
Knights of Columbus dba Cardinal Spellman Council 347	501(c)(8)	5796807910	1st	Never	6/16/2020	$11,729.00	2/3/2022	$11,917.31
Knights of Columbus dba Cardinal Spellman Council 347	501(c)(8)	6905598506	2nd	Never	3/4/2021	$11,310.00	2/3/2022	$11,413.49
Lafayette Naturalization Club Inc.	501(c)(7)	1756868409	1st	Never	2/2/2021	$16,200.00	12/28/2021	$10,153.02
Lakeville Aerie No. 3944 Fraternal Order of Eagles	501(c)(8)	1258607206	1st	Never	4/15/2020	$16,250.00	2/16/2021	$15,037.58
Lakeville Aerie No. 3944 Fraternal Order of Eagles	501(c)(8)	4962688702	2nd	Never	4/1/2021	$14,917.00	9/27/2021	$14,989.51
Lenox Chamber of Commerce	501(c)(6)	4044067807	1st	12/27/2020	5/27/2020	$10,715.00	11/12/2020	$10,763.73
Lexington Golf Club	501(c)(7)	3956757201	1st	Never	4/27/2020	$12,800.00	11/27/2020	$12,875.02
Longwood Covered Courts Trust	501(c)(7)	1282337404	1st	3/11/2021	5/4/2020	$12,148.42	5/20/2021	$12,275.30
Ludlow Country Club Inc.	501(c)(7)	4339237110	1st	Never	4/13/2020	$26,100.00	7/20/2021	$26,428.43
Ludlow Fish & Game Club Inc.	501(c)(7)	2807187405	1st	Never	5/6/2020	$15,917.00	6/17/2021	$16,093.18

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Ludlow Fish & Game Club Inc.	501(c)(7)	6016288300	2nd	Never	1/26/2021	$7,335.00	10/25/2021	$7,387.65
Ludlow Tennis Club Inc.	501(c)(7)	4846367402	1st	3/11/2021	5/11/2020	$26,300.00	8/24/2021	$26,637.52
Malden Lodge No. 1910 Loyal Order of Moose	501(c)(8)	6714318010	1st	Never	6/30/2020	$6,625.00	3/22/2021	$6,673.03
Malden Lodge No. 1910 Loyal Order of Moose	501(c)(8)	9706708601	2nd	Never	3/26/2021	$6,625.00	9/28/2021	$6,658.31
Marblehead Yacht Club Inc.	501(c)(7)	8043577204	1st	3/11/2021	4/28/2020	$27,265.00	3/2/2021	$27,489.84
Marshfield Country Club	501(c)(7)	7167867009	1st	Never	4/7/2020	$366,490.00	6/23/2021	$370,817.59
Massachusetts Association of Accountants Inc.	501(c)(6)	1856317300	1st	12/27/2020	4/28/2020	$16,800.00	6/14/2021	$16,985.49
Massachusetts Association of Accountants Inc.	501(c)(6)	1890198606	2nd	12/27/2020	3/13/2021	$16,852.50	12/28/2021	$16,987.32
Massachusetts Chiefs of Police Association Inc.	501(c)(6)	3763237104	1st	12/27/2020	4/12/2020	$60,400.00	4/22/2021	$61,014.07
Massachusetts Chiefs of Police Association Inc.	501(c)(6)	6740638506	2nd	12/27/2020	3/4/2021	$58,400.00	11/26/2021	$58,808.80
Massachusetts Farm Bureau Federation Inc.	501(c)(5)	1838017202	1st	3/11/2021	4/15/2020	$135,367.00	12/31/2020	$136,301.59
Massachusetts LGBT Chamber of Commerce	501(c)(6)	7520967104	1st	12/27/2020	4/14/2020	$95,000.00	4/12/2021	$95,897.95
Massachusetts LGBT Chamber of Commerce	501(c)(6)	2064048403	2nd	12/27/2020	2/3/2021	$55,252.00	3/22/2022	$55,860.53

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Name	Type	Loan No.	Draw	Date Eligible	Date Approved	Loan Amount	Forgiveness Date	Amount Forgiven
Massachusetts Laborers' Health & Welfare Fund	501(c)(9)	9747417009	1st	3/11/2021	4/9/2020	$500,000.00	7/21/2021	$506,402.78
Massachusetts Systems Contractors Association Inc.	501(c)(6)	2069077208	1st	12/27/2020	4/15/2020	$22,300.00	10/13/2020	$22,402.21
Massachusetts Systems Contractors Association Inc.	501(c)(6)	2292448407	2nd	12/27/2020	2/3/2021	$22,300.00	8/18/2021	$22,417.92
Master, Wardens, and Members of The Grand Lodge of Masons in Massachusetts	501(c)(10)	9342647108	1st	Never	4/15/2020	$266,600.00	Unknown	Unknown
Milton Hoosic Club Inc.	501(c)(7)	9188897103	1st	Never	4/15/2020	$181,660.00	4/29/2021	$183,522.02
Minute Man Sportsmans Club Inc.	501(c)(7)	9630277109	1st	Never	4/15/2020	$19,600.00	2/11/2021	$19,755.71
Nabnasset Lake Country Club Inc.	501(c)(7)	8650027303	1st	Never	5/1/2020	$64,400.00	10/8/2020	$64,675.49
Nabnasset Lake Country Club Inc.	501(c)(7)	1792028401	2nd	Never	2/2/2021	$64,471.00	8/13/2021	$64,807.68
National Board of Trial Advocacy Inc.	501(c)(6)	5112067706	1st	12/27/2020	5/1/2020	$58,777.00	3/19/2021	$59,292.91
New Bedford Sports Club Inc.	501(c)(7)	2424928510	1st	Never	2/20/2021	$3,045.00	8/11/2021	$3,058.51
New Bedford Sports Club Inc.	501(c)(7)	3520158901	2nd	Never	4/28/2021	$4,263.00	8/13/2021	$4,274.80
The New England Affordable Housing Management Association Inc.	501(c)(6)	1413488008	1st	12/27/2020	6/22/2020	$31,000.00	3/1/2021	$31,205.53

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Name	Type	Loan No.	Draw	Date Eligible	Date Approved	Loan Amount	Forgiveness Date	Amount Forgiven
The New England Affordable Housing Management Association Inc.	501(c)(6)	3339878410	2nd	12/27/2020	2/4/2021	$31,000.00	10/25/2021	$31,219.97
North of Boston Convention & Visitors Bureau Inc.	501(c)(6)	8511777109	1st	12/27/2020	4/15/2020	$54,070.00	2/23/2021	$54,529.59
North of Boston Convention & Visitors Bureau Inc.	501(c)(6)	9739328710	2nd	12/27/2020	4/9/2021	$51,620.00	10/6/2021	$51,870.93
The North Shore Chamber of Commerce Inc.	501(c)(6)	5431667107	1st	12/27/2020	4/13/2020	$81,250.00	5/13/2021	$82,098.61
The North Shore Chamber of Commerce Inc.	501(c)(6)	6966438410	2nd	12/27/2020	2/11/2021	$67,000.00	10/20/2021	$67,463.42
North Shore Skating Club Inc.	501(c)(7)	9663987204	1st	Never	4/28/2020	$10,825.87	11/19/2020	$10,885.41
North Shore Tennis & Squash Club Inc.	501(c)(7)	4450347400	1st	3/11/2021	5/9/2020	$12,615.00	3/18/2021	$12,723.63
North Shore Tennis & Squash Club Inc.	501(c)(7)	9208768300	2nd	3/11/2021	1/30/2021	$12,615.00	12/23/2021	$12,728.53
Oak Grove Cemetery Association of Falmouth Inc.	501(c)(13)	8719457204	1st	3/11/2021	4/28/2020	$5,209.00	1/29/2021	$5,246.33
The Old Colony Yacht Club	501(c)(7)	8480977106	1st	Never	4/15/2020	$25,700.00	9/7/2021	$26,054.09
The Old Colony Yacht Club	501(c)(7)	4251608508	2nd	Never	2/25/2021	$25,700.00	11/15/2021	$25,882.76
Orleans Yacht Club Inc.	501(c)(7)	1668537201	1st	Never	4/15/2020	$36,997.00	12/22/2020	$37,237.48
Orleans Yacht Club Inc.	501(c)(7)	6205518307	2nd	Never	1/26/2021	$36,997.50	10/7/2021	$37,255.45

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Name	Type	Loan No.	Draw	Date Eligible	Date Approved	Loan Amount	Forgiveness Date	Amount Forgiven
Outdoor Amusement Business Association Inc.	501(c)(6)	6201077705	1st	12/27/2020	5/1/2020	$61,013.00	3/24/2021	$61,557.94
Outdoor Amusement Business Association Inc.	501(c)(6)	8580698403	2nd	12/27/2020	2/13/2021	$61,012.00	8/18/2021	$61,319.57
Palmer's Cove Yacht Club Inc.	501(c)(7)	1541987210	1st	Never	4/15/2020	$20,337.50	4/6/2021	$20,534.10
Pine Grove Cemetery Corporation	501(c)(13)	7732157001	1st	3/11/2021	4/8/2020	$2,500.00	6/4/2021	$2,528.12
Pleasant Park Yacht Club Inc.	501(c)(7)	8954887705	1st	Never	5/1/2020	$13,871.00	3/11/2021	$13,985.77
The Plymouth Area Chamber of Commerce Inc.	501(c)(6)	4087557104	1st	12/27/2020	4/12/2020	$58,062.50	12/16/2020	$58,446.36
The Plymouth Area Chamber of Commerce Inc.	501(c)(6)	4945728405	2nd	12/27/2020	2/7/2021	$56,675.00	11/15/2021	$57,109.51
Plymouth Country Club Inc.	501(c)(7)	8546087103	1st	Never	4/15/2020	$329,595.00	8/2/2021	$333,839.10
Plymouth Country Club Inc.	501(c)(7)	9216188510	2nd	Never	3/12/2021	$329,595.00	11/26/2021	$331,888.62
Point Independence Yacht Club Inc.	501(c)(7)	9529387004	1st	Never	4/9/2020	$19,382.00	4/8/2021	$19,569.98
Polish American Veterans of Webster Inc.	501(c)(7)	6291328500	1st	Never	3/3/2021	$13,811.48	9/8/2021	$13,881.69
The Polish Club Lodge 2058 Inc.	501(c)(8)	5270307407	1st	Never	5/12/2020	$10,000.00	2/17/2021	$10,071.67
The Polish Club Lodge 2058 Inc.	501(c)(8)	1945808510	2nd	Never	2/19/2021	$13,762.00	1/26/2022	$13,890.83

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Portuguese National Club	501(c)(7)	8053438404	1st	Never	2/12/2021	$5,629.70	9/15/2021	$5,662.07
Prince Hall Masonic Grand Lodge	501(c)(8)	5101678201	1st	Never	8/7/2020	$4,865.00	10/12/2021	$4,921.11
The Proprietors of Forest Hills Cemetery	501(c)(13)	4199537201	1st	3/11/2021	4/27/2020	$385,180.00	Unknown	Unknown
Realtor Association of Central Massachusetts	501(c)(6)	6237267106	1st	12/27/2020	4/14/2020	$60,200.00	10/13/2020	$60,480.93
Rowley Veterans' Association Inc.	501(c)(7)	1657787200	1st	Never	4/15/2020	$26,006.00	9/24/2021	$2,102.60
Salem Chamber of Commerce & Civics	501(c)(6)	8915957002	1st	12/27/2020	4/9/2020	$49,000.00	2/11/2021	$49,408.33
Salem Chamber of Commerce & Civics	501(c)(6)	3052288304	2nd	12/27/2020	1/21/2021	$49,000.00	9/7/2021	$49,299.44
Salem Office of Tourism & Cultural Affairs Inc. dba Destination Salem	501(c)(6)	5401847308	1st	12/27/2020	4/30/2020	$38,228.00	2/25/2021	$38,536.97
Salem Office of Tourism & Cultural Affairs Inc. dba Destination Salem	501(c)(6)	9560608504	2nd	12/27/2020	3/12/2021	$36,551.00	9/22/2021	$36,737.26
Sandy Bay Yacht Club Inc.	501(c)(7)	1883257105	1st	Never	4/10/2020	$24,400.00	12/23/2020	$24,567.12
Singletary Rod & Gun Club Inc.	501(c)(7)	6146637409	1st	Never	5/14/2020	$15,212.00	2/12/2021	$15,325.78
Singletary Rod & Gun Club Inc.	501(c)(7)	1541498800	2nd	Never	4/10/2021	$15,212.52	8/20/2021	$15,266.61

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Sons of Italy in America—Grand Lodge of Massachusetts	501(c)(8)	9439897708	1st	Never	5/1/2020	$17,600.00	5/17/2021	$17,780.34
Sons of Italy in America—Methuen Lodge No. 902	501(c)(8)	7790557208	1st	Never	4/28/2020	$13,800.00	Unknown	Unknown
Sons of Italy in America—Quincy Lodge No. 1295	501(c)(8)	9753217102	1st	Never	4/15/2020	$27,000.00	1/13/2021	$27,358.93
Sons of Italy in America—Quincy Lodge No. 1295	501(c)(8)	8740638407	2nd	Never	2/13/2021	$27,165.00	8/10/2021	$27,291.77
Stockbridge Golf Club	501(c)(7)	7454647005	1st	Never	4/7/2020	$162,720.00	Unknown	Unknown
Stoneham Chamber of Commerce Inc.	501(c)(6)	9731177407	1st	12/27/2020	5/20/2020	$12,709.48	5/5/2021	$12,831.00
Stoneham Chamber of Commerce Inc.	501(c)(6)	1349128500	2nd	12/27/2020	2/18/2021	$12,709.48	5/5/2022	$12,862.34
Supreme Council of the Royal Arcanum	501(c)(8)	1305588104	1st	Never	7/9/2020	$300,000.00	1/8/2021	$301,425.00
Swampscott Yacht Club	501(c)(7)	4606967210	1st	Never	4/27/2020	$6,890.00	5/13/2021	$6,962.34
Swampscott Yacht Club	501(c)(7)	4460018504	2nd	Never	2/25/2021	$6,897.00	11/10/2021	$6,941.26
Tennis and Racquet Club	501(c)(7)	7271127304	1st	Never	4/30/2020	$132,525.00	4/29/2021	$133,821.20
Tennis and Racquet Club	501(c)(7)	6528838303	2nd	Never	1/27/2021	$109,105.00	8/11/2021	$109,672.94
Town River Yacht Club	501(c)(7)	4476837305	1st	Never	4/29/2020	$29,822.00	11/5/2020	$29,977.74
Town River Yacht Club	501(c)(7)	1687478307	2nd	Never	1/19/2021	$22,100.00	6/15/2021	$22,189.01

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Volunteer Yacht Club	501(c)(7)	5889208510	1st	Never	3/2/2021	$7,005.00	11/19/2021	$7,054.62
Wampatuck Country Club of Canton Inc.	501(c)(7)	6477477305	1st	Never	4/30/2020	$79,300.00	2/11/2021	$79,918.98
Wayland Swimming and Tennis Club Inc.	501(c)(7)	5801547300	1st	3/11/2021	4/30/2020	$29,685.00	11/27/2020	$29,846.03
Wequaquet Lake Yacht Club	501(c)(7)	8315677803	1st	Never	6/5/2020	$8,660.00	1/7/2021	$8,708.59
Wequaquet Lake Yacht Club	501(c)(7)	6533428303	2nd	Never	1/27/2021	$12,124.00	11/15/2021	$12,216.61
West Dennis Yacht Club Inc.	501(c)(7)	8141687304	1st	Never	5/1/2020	$41,272.00	3/10/2021	$41,612.35
West Dennis Yacht Club Inc.	501(c)(7)	9785768409	2nd	Never	2/17/2021	$41,272.00	11/10/2021	$41,570.52
West End Beagle Club Inc. of Gardner	501(c)(7)	8457908508	1st	Never	3/9/2021	$10,860.00	12/8/2021	$10,939.44
Whitinsville Golf Club	501(c)(7)	5948197002	1st	Never	4/6/2020	$101,800.00	3/25/2021	$102,769.93
Winthrop Golf Club	501(c)(7)	7970937800	1st	3/11/2021	6/4/2020	$45,401.00	11/17/2021	$46,060.25
Winthrop Yacht Club Inc.	501(c)(7)	2707777201	1st	Never	4/16/2020	$90,400.00	6/14/2021	$91,415.45
Wood Products Manufacturers Association	501(c)(6)	6322577709	1st	12/27/2020	5/1/2020	$57,091.00	1/14/2021	$57,488.29
Wood Products Manufacturers Association	501(c)(6)	5392498510	2nd	12/27/2020	2/27/2021	$57,090.00	9/22/2021	$57,404.39
Worcester County Memorial Park Inc.	501(c)(13)	8270767006	1st	3/11/2021	4/8/2020	$210,982.50	2/16/2021	$212,205.29

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Name	Type	Loan No.	Draw	Date Eligible	Date Approved	Loan Amount	Forgiveness Date	Amount Forgiven
Young Men's Club of Hadley Inc.	501(c)(7)	9798257107	1st	3/11/2021	4/15/2020	$25,800.00	8/24/2021	$26,144.94
Young Men's Club of Hadley Inc.	501(c)(7)	6134308305	2nd	3/11/2021	1/26/2021	$25,800.00	3/28/2022	$26,094.05