

DA Strategic Action Plan – Womply Feb 2023

RED FLAG

All data contained in this report is Confidential and produced under Privilege

Evaluated current risk of situation: High

Action plan for Womply Engagement:

[For background into this project document "2023.02.02 letter from A. Cheney to SBA" in the data pack be best read first]

Recent email from Alex Cheney Womply's Lawyer:

We exchanged initial witness lists with Benworth yesterday, and we were surprised to see that Benworth intends to call Dianna Seaborn, director of the office of financial assistance at the SBA, as a witness. They claim she will testify about: "Whether Womply's technology fees and API fees are subject to the agent fee cap in the Interim Final Rule and whether Womply must return to Benworth all fees Benworth paid Womply that exceed the agent fee cap; the SBA's underwriting requirements for PPP loans; whether Womply engaged in underwriting; and whether Womply acted as an LSP."

Based on this and other data contained in the Womply Data Pack we can see that the SBA (Small Business Association - <https://www.sba.gov/>) has been compromised by Benworth or Lenders in general. The consequence of this is that the SBA could rule that our clients fees fall within their regulation (which as a company who had no direct contract with the SBA should not be the case). This could create a situation where our client, instead of being owed the contested \$200M from Benworth, actually would end up having to pay back to Benworth over \$400M

[Please read data pack for details on the above]

Thus we need a quick fire action plan to destabilize the SBA over the next few weeks in order for the current arbitration between Benworth and our client to be concluded. If we can reach the conclusion of the arbitration without the involvement of the SBA it would be to our clients advantage.

Action plan:

1. Discover who are the key players in the SBA with mini-bio's on each (including pictures)
2. From the above research isolate those individuals who could have the most effect positive and negative on our client.

3. Deep dive data research on those individuals we have identified to see if there is any negative or incriminatory open source data available.
4. Concurrent to the above recruit friendly journalists who would have a reason to be investigating or would have interest in writing stories into the SBA that could help us with our offensive actions against the SBA.
5. Provide an acceptable brief to these journalists as to the plan to create pressure on the SBA's code of conduct and handling of the PPP scheme and their potential pact with Lenders. Provide any data found in the above deep dive research targets on members of the SBA to show their incompetence and lack of being fit for purpose.
6. Have the Journalists or other members of the media community noisily investigate the SBA with FOI requests. It does not matter that these FOI requests may take a long time the goal is to knock the SBA off balance with the types of data being requested in the FOI filings and the questions media will be asking in relation to these requests.
7. Create media stories that show the incompetence of the SBA and its individuals.
8. Open source research on previous screw ups from SBA along with any critical opponents of the SBA who we could ally with. Locate organisations who have been opposed to the SBA (either governmental or non-governmental). Feed all data found to the Journalists being used above
9. Locate any small business who have been vocal in their condemning of the SBA and their practices. Feed all data found to the Journalists being used above.
10. Research and analyse data on lenders or other financial institutions who have worked with the SBA who have voiced concerns or disagreements with the SBA's practices.
11. Research and analyse data on governmental figures such as senators, congressmen, etc who have voiced concerns on the SBA and their practices. We need to locate and mark allies and detractors.

Overall target:

We need to locate weaknesses in the SBA that show how they and the individuals within are incompetent, unreliable and are externally influenced by biased sources.

We need to have media and other reputable groups and individuals bombard them with requests for sensitive and potentially incriminating data while at the same time informing the SBA that FOI requests are being activated, all to create a destabilizing effect on the organisation and its individuals.

We need to create an environment where the SBA is confused and disorganised and unable to aid Benworth or other similar entities in their attack on Fintech companies such as Womply.
