

covid-19 resources A GUIDE TO STIMULUS PACKAGES

A Guide from Richey May's Audit & Tax Experts.

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Mortgage Industry Specific

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The following will be added as more announcements come out, please stay tuned for our updated guide.

- Accounting for SBA Loans
- Lease Accounting delays
- CECL delays

Phase 4 – Highlights of additional stimulus currently being discussed in Congress



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Economic Injury Disaster Loans (EIDL)

Phase 1 – <u>H.R. 6074</u>, the Coronavirus Preparedness and Response Supplemental Appropriations Act - Business Provisions

Benefit/Relief Description

Low-interest loans for working capital to small businesses suffering substantial economic injury due to COVID-19. Borrowers can request \$10,000 payable three days after application which is classified as an advance. If the EIDL loan is denied, the advanced funds do not need to be returned.

- Max Loan Length 30 years
- Interest Rate Cannot Exceed 4%
- Max Loan Amount \$2,000,000

Method of Application

Applicants exclusively work through the Small Business Administration (SBA) Applications are submitted electronically or by mail

Covered Period

January 31, 2020 – December 31, 2020

Limits & Eligibility

- Any business, private nonprofit organization, agricultural cooperative, employee stock ownership plan or 501(c)(19) veterans organization in operation since January 31, 2020, that has fewer than 500 employees or falls within the SBA Size Standard for the applicable industry (whichever is higher).
- Sole proprietors, independent contractors and self-employed individuals.
- A business must have suffered "substantial economic injury" as a result of the COVID-19 pandemic, meaning it is unable to meet its financial obligations, pay ordinary and necessary operating expenses or has a reduction in working capital.
- Businesses are ineligible that have not complied with a previous SBA loan.

Additional Resources

SBA EIDL Info

Emergency Paid Sick Leave (EPSLA)

Phase 2 – <u>H.R. 6201</u>, the Families First Coronavirus Response Act (FFCR) Act Business Provisions

Benefit/Relief Description

Employees are eligible for up to 80 hours paid sick leave, if sick, under a COVID-19 quarantine, or caring for an individual or child.

Employers receive a refundable tax credit in the amount of total paid sick leave gross pay, plus employer potion of Medicare sick pay & employer insurance cost(s) for those on sick leave.

Sick pay is exempt from Social Security employer tax

Method of Application

Payroll tax credit filed on form 941

Covered Employers

- Private Sector employers with fewer than 500 employees
- Public Sector employers with 1 or more employees
- Good cause exemption for employers with fewer than 50 employees

Limits & Eligibility

- Eligible to all employees and limited to 80 hours of pay (max). (i.e. Ten 8-hour days)
- For self-care or quarantine order limited to Employee's regular pay capped at \$511/ day & \$5,111 total
- For care of another limited to employee's regular pay capped at \$200/day & \$2,000 total

Effective Dates

April 1, 2020 – December 31,2020

Additional Resources

<u>Check Out Our Blog Post</u> <u>DOL Qualifying Reasons for Leave & Related Required Wage Replacement Amounts</u> <u>GOP Ways and Means Summary</u>

Expanded Family and Medical Leave (EFMLA)

Phase 2 – <u>H.R. 6201</u>, the Families First Coronavirus Response Act (FFCR) Act Business Provisions

Benefit/Relief Description

- Employees unable to work due to the need to care for a child under 18 are eligible for up to an additional 10 weeks of paid family and medical leave (on top of EPSLA see above)
- Employers receive a refundable tax credit in the amount of total leave gross wages, plus employer potion of Medicare & employer health insurance cost(s) for those on leave.
- Family and medical leave wages are exempt from social security taxes

Method of Application

Payroll tax credit filed on form 941 Form 7200 for advanced credit payments

Covered Employers

- Private Sector employers with fewer than 500 employees
- Good cause exemption for employers with fewer than 50 employees

Limits & Eligibility

- Employees must been employed for 30 days prior to their leave request
- Paid leave rate is 2/3 regular pay limited to \$200/day and \$10,000 total

Effective Dates

April 1, 2020 – December 31,2020

Additional Resources

<u>Check Out Our Blog Post</u> <u>DOL Qualifying Reasons for Leave & Related Required Wage Replacement Amounts</u> <u>GOP Ways and Means Summary</u>

Employee Retention Credits

Phase 3 – <u>H.R. 758</u>, the Coronavirus Aid, Relief, and Economic Security (CARES) Act - Business Provisions

Benefit/Relief Description

Intended to keep eligible employees on payroll by giving employers a payroll tax credit. Tax credit equals 50% of gross pay & employer paid health insurance costs

Method of Application

Credit on income tax return

Limits & Eligibility

- Capped at \$10,000 of qualified wages per employee
- NOT eligible to employers who received an SBA PPP Loan

For employers with > 100 employees in 2019 – Credit on qualified wages paid to employees who are not working due to employer's full or partial cessation of business

For employers with 100 or fewer employees in 2019 – all employee wages are eligible, even if employees haven't been prevented from providing services

Covered Period March 12, 2020 – December 31, 2020

Additional Sources

Payroll Tax Incentives CARES Act Summary

Deferral of Employer Portion of Payroll Tax

Phase 3 – <u>H.R. 758</u>, the Coronavirus Aid, Relief, and Economic Security (CARES) Act - Business Provisions

Benefit/Relief Description

Employer's portion of social security tax (6.2%) through December 31, 2020 may be deferred – payable in 2 equal installments due December 31, 2021 and December 31,2022.

Method of Application

Federal form 941 will be revised for the 2nd calendar quarter of 2020 (April-June). No special election is required.

Limits & Eligibility

Once limited for PPP borrowers but limitations were removed. Employers using PPP loan proceeds for payroll costs, can now defer FICA from March 27th – December 31, 2020 – half to be paid in 2021 and half to be paid in 2022.

Effective Dates

Wages Paid after March 12, 2020 through December 31, 2020

Additional Resources

<u>Check Out Our Blog Post</u> <u>IRS FAQ</u>

SBA Payment Protection Program (PPP) Loan

Phase 3 – <u>H.R. 758,</u> the Coronavirus Aid, Relief, and Economic Security (CARES) Act - Business Provisions

Benefit/Relief Description

Small business loan designed to be forgiven if the borrower uses the loan proceeds to finance payroll and other specific expenses. If forgiveness is not granted, the default terms of the loan are an interest rate of 1% and maturity of 5 years. No collateral, personal guarantees, or loan origination fees are required.

Method of Application

Apply for Small Business Administration (SBA) loan through an approved SBA financial institution. Certain borrower certifications must be included in application process. Once the PPP loan has been approved, and loan proceeds have been spent, the borrower will have to apply for forgiveness through their lender as well.

Limits & Eligibility

Loan Forgiveness Eligibility

- Funds used for payroll costs, interests on mortgages, rent and utilities.
- At least 60% of the loan proceeds must be spent on eligible payroll costs to receive 100% foregiveness. Partial forgiveness can still be granted if this threshold is not reached. See PPP Flexibility Act guidance linked below.
- Employer must maintain or quickly rehire employees and maintain salary levels. Forgiveness will be reduced if full-time headcount declines, or if salaries and wages decrease by too much.

See linked resources for details about employee counts, eligible payrolls costs, covered periods, measurement alternatives, affiliated business rules, and interplay with EIDL program.

Covered Period

- February 15, 2020 through December 31, 2020
- Borrowers with a biweekly (or more frequent) payroll schedule may elect to calculate eligible payroll costs using the 24-week period that begins on the first day of their first pay period following their PPP Loan Disbursement Date.
- For those borrowers reviewing the required certification they made regarding loan necessity for applications prior to April 24, 2020, a loan repayment safe harbor is available to borrowers who repay PPP funds by May 18, 2020.

Additional Resources

Check out Our Blog Posts: <u>PPP Flexibility Act</u> <u>PPP Loan Forgiveness Updates</u>, <u>Tax</u> <u>implications of PPP Loans</u>

SBA FAQInterim Final RuleLoan Forgiveness Application and InstructionsAICPA FAQ

Net Operating Losses*

Phase 3 – <u>H.R. 758</u>, the Coronavirus Aid, Relief, and Economic Security (CARES) Act - Business Provisions

Benefit/Relief Description

5 Year carryback of NOLs arising in 2018, 2019, or 2020

Method of Application

Amended income tax returns

Limits & Eligibility

The 2017 Tax Cuts and Jobs Act (TCJA) limited NOLs arising after 2017 to 80% of taxable income and eliminated the ability to carry NOLs back to prior tax years. For NOLs arising in tax years beginning before 2021, the CARES Act allows taxpayers to carryback 100% of NOLs to the prior five tax years, effectively delaying the 80% of income limitation and carryback prohibition until 2021. The Act also temporarily liberalizes treatment of NOL carryforwards. For tax years beginning before 2021, taxpayers can take an NOL deduction equal to 100% of taxable income (rather than the present 80% limit). For tax years beginning after 2021, taxpayers will be eligible for:

- (1) a 100% deduction of NOLs arising in tax years before 2018, and
- (2) a deduction limited to 80% of taxable income for NOLs arising in tax years after 2017

The CARES Act also temporarily removed the excess business loss limitation set-out by the TCJA.

Covered Periods

Tax Years prior to 2021

Additional Resources

IRS Revenue Procedure 2020-24 IRS Notice 2020-26

Business Interest Limitation*

Phase 3 – <u>H.R. 758,</u> the Coronavirus Aid, Relief, and Economic Security (CARES) Act - Business & Individual Provisions

Benefit/Relief Description

In general, a deduction for business interest expense is limited to a taxpayer's business interest income plus 30% of adjusted taxable income (ATI). The CARES act increased the limitation threshold from 30% to 50%.

Method of Application

Current or amended income tax return filings

Limits & Eligibility

The CARES Act generally allows businesses, unless they elect otherwise, to increase the interest limitation to 50% of ATI for 2019 and 2020, and to elect to use 2019 ATI in calculating their 2020 limitation. For partnerships, the 30% of ATI limit remains in place for 2019 but is 50% for 2020. However, unless a partner elects otherwise, 50% of any business interest allocated to a partner in 2019 is deductible in 2020 and not subject to the 50% (formerly 30%) ATI limitation. The remaining 50% of excess business interest from 2019 allocated to the partner is subject to the ATI limitations. Partnerships, like other businesses, may elect to use 2019 partnership ATI in calculating their 2020 limitation.

Covered Period

Tax Years 2019 & 2020

Additional Resources

IRS FAQ

Charitable Contributions

Phase 3 – <u>H.R. 758,</u> the Coronavirus Aid, Relief, and Economic Security (CARES) Act - Business Provisions

Benefit/Relief Description

The Adjusted Gross Income (AGI) limitation increased for Corporations

Method of Application

Current or amended income tax return filing

Limits & Eligibility

For the 2020 tax year, AGI limitation increased from 10% to 25%

Effective Dates

2020

Qualified Improvement Property

Phase 3 – <u>H.R. 758,</u> the Coronavirus Aid, Relief, and Economic Security (CARES) Act - Business Provisions

Benefit/Relief Description

100% Bonus Depreciation now available on 15-year QIP

Method of Application

Current or amended income tax return filing or method change

Limits & Eligibility

The CARES Act makes a technical correction to the 2017 Tax Law that retroactively treats;

- a wide variety of interior, non-load-bearing building improvements (qualified improvement property (QIP)) as eligible for bonus deprecation (and hence a 100% writeoff) or for treatment as 15-year MACRS property or
- if required to be treated as alternative depreciation system property, as eligible for a write-off over 20 years.

The correction of the error in the 2017 Tax Law restores the eligibility of QIP for bonus depreciation, and in giving QIP 15-year MACRS status, restores 15-year MACRS write-offs for many leasehold, restaurant and retail improvements.

100% Bonus depreciation on QIP is available for tax years through 2022, then annually reduced by 20% through 2027

Effective Dates

Property acquired and placed in service after 9/27/2017

Recovery Rebates

Phase 3 – <u>H.R. 758</u>, the Coronavirus Aid, Relief, and Economic Security (CARES) Act - Individual Provisions

Benefit/Relief Description

2020 refundable tax credit with advance funding feature to effectively get cash in the hands of individual taxpayers prior to 2020 tax season.

Amount of credit

- \$1,200 for Individuals and Head of Household
- \$2,400 for those married filing jointly
- an additional \$500 for each dependent child under 17

Limits & Eligibility

- Must be a US Citizen or resident alien
- must have a valid SSN
- can not be claimed as dependent of anothe rtaxpayer
- have Adjusted Gross Income between
 - \$75k-\$99k for individual taxpayers
 - \$112.5k-\$136.5k for head of household
 - \$150k-\$198k for married taxpayers filing jointly

To receive the advanced payment automatically

- must have filed a federal income tax return for 2018 or 2019 or
- be a recipient of social security, survivor, or railroad retirement benefits

Covered Period

2020 tax year

Additional Resources

FAQ and Rebate Calculator

Retirement Plans

Phase 3 – <u>H.R. 758,</u> the Coronavirus Aid, Relief, and Economic Security (CARES) Act - Individual Provisions

Benefit/Relief Description

- Required Minimum Distributions for 2020 waived and
- 10% early withdrawal penalty waived for Coronavirus-related distributions up to \$100k

Method of Application

Different with each plan provider or account

Limits & Eligibility

Penalty waiver relates to Coronavirus-related amounts drawn up to \$100k. Distribution can be re-contributed subject to guidelines, and income taxed over 3 years unless taxpayer elects 1 year taxation.

Required minimum distributions that otherwise would have to be made in 2020 from defined contribution plans (such as 401(k) plans) and IRAs are waived. This includes distributions that would have been required by April 1, 2020, due to the account owner's having turned age 70 1/2 in 2019.

Additional rules increase the ability to borrow from and IRA (up to \$100k and 100% vested balance).

Covered Period

2020

Charitable Contributions

Phase 3 – <u>H.R. 758</u>, the Coronavirus Aid, Relief, and Economic Security (CARES) Act - Individual Provisions

Benefit/Relief Description

Above-the-line deduction of up to \$300 for contributions made and the Adjusted Gross Income (AGI) limitation increased

Method of Application

Income Tax Return

Limits & Eligibility

\$300 above the line deduction is not available to taxpayer who itemizes deductions You can make deductible cash contributions of up to 100% of you AGI

Covered Period

2020

Excess Business Loss Limitation

Phase 3 – <u>H.R. 758,</u> the Coronavirus Aid, Relief, and Economic Security (CARES) Act - Individual Provisions

Benefit/Relief Description

The CARES Act retroactively turns off the excess active business loss limitation rule of the TCJA in Code Sec. 461(l) by deferring its effective date to tax years beginning after December 31, 2020 (rather than December 31, 2017).

Method of Application

Income Tax Return

Limits & Eligibility

Under the superseded rule, active net business losses in excess of \$250,000 (\$500,000 for joint filers) were disallowed and treated as NOL carryforwards to future tax periods.

The at-risk limits and the passive activity limits are applied before calculating the amount of any excess business loss.

Covered Period

Tax Years prior to 2021

Student Loan Interest & Payment Forbearance

Phase 3 – <u>H.R. 758</u>, the Coronavirus Aid, Relief, and Economic Security (CARES) Act - Individual Provisions

Benefit/Relief Description

Interest rates set to 0% and no payments required for a period for six months

Method of Application

Pursue relief options through loan servicer

Limits & Eligibility

Automatic six-month payment relief and interest rate reduction to 0% for loans owned by the U.S. Department of Education. Perkins Loans and Federal Family Education Loans are not automatic, apply for forbearance with loan servicer.

Covered Period

March 27th, 2020 – September 30th, 2020

Additional Resources The Balance

Student Loans Paid by Employers

Phase 3 – <u>H.R. 758</u>, the Coronavirus Aid, Relief, and Economic Security (CARES) Act - Individual Provisions

Benefit/Relief Description

Exclusion from income of up to \$5,250 for payments made to employee's education loans

Method of Application

Payment can be made to employee or directly to lender

Limits & Eligibility

Employer determination. Note an employee cannot take a deduction for student loan interest under IRC Sec. 221 for the amount attributable to any student loan repayment benefits.

Effective Dates

March 27th, 2020 – December 31, 2020

Disaster Payments Specifically Due to COVID-19

Other Provisions, Assistance, and Guidance

Benefit/Relief Description

Utilization of Code Section 139 for Qualified disaster relief payments to employees to assist with Coronavirus-related expenses without employee having to recognize taxable income.

Method of Application

Employer determination

Limits & Eligibility

Section 139 permits individuals to receive "qualified disaster relief payments" to assist with expenses incurred as a result of a "qualified disaster" and exclude these payments from taxable income. Notice 2020-18 clarifies that the IRS was permitted to postpone the due date for filing of returns and payment of taxes due on April 15, 2020 to July 15, 2020 as a result of the President's emergency declaration under the Robert T. Stafford Disaster Relief and Emergency Assistance Act. This action by the President made the Coronavirus pandemic a federally declared disaster, which may be considered a "qualified disaster" for purposes of Section 139. Revenue Ruling 2003-12 clarified that employers can make "qualified disaster relief payments" to employees to assist them during a "qualified disaster".

Covered Period

March 1, 2020 – date disaster declaration is lifted

Additional Resources

Check out our summary

Disaster Losses Specifically Due to COVID-19

Other Provisions, Assistance, and Guidance

Benefit/Relief Description

Election to take deduction for preceding year specifically attributable to federally declared disaster

Method of Application

- **Manner of making election.** An election under section 165(i) to deduct a disaster loss for the preceding year is made either on an original Federal income tax return for the preceding year or an amended Federal income tax return for the preceding year in the manner specified by guidance issued pursuant to this section.
- **Due date for making election.** The due date for making the section 165(i) election is six months after the due date for filing the taxpayer's Federal income tax return for the disaster year (determined without regard to any extension of time to file).
- **Revocation.** Subject to the requirements in paragraph (d) of this section, a section 165(i) election may be revoked on or before the date that is ninety (90) days after the due date for making the election."

Limits & Eligibility

- **Scope and effect of election.** An election made pursuant to section 165(i) for a disaster loss attribut- able to a particular disaster applies to the entire loss sustained by the taxpayer from that disaster during the disaster year. If the taxpayer makes a section 165(i) election with respect to a particular disaster occurring during the disaster year, the disaster to which the election relates is deemed to have occurred, and the disaster loss to which the election applies is deemed to have been sustained, in the preceding year.
- **Requirement to file consistent returns.** A taxpayer may not make a section 165(i) election for a disas- ter loss if the taxpayer claims a deduction (as a loss, as cost of goods sold, or otherwise) for the same loss for the disaster year. If a taxpayer has claimed a deduction for a disaster loss for the disaster year and the taxpayer wants to make a section 165(i) election with respect to that loss, the taxpayer must file an amended Federal income tax return to remove the previously deducted loss on or before the date that the taxpayer makes the section 165(i) election for the loss. Similarly, if a taxpayer has claimed a deduction for a disaster loss for the taxpayer has claimed a deduction for a disaster loss for the taxpayer has claimed a new mater to revoke that election, the taxpayer must file an amended Federal income tax return to revoke that election, the taxpayer must file an amended Federal income tax return or amended Federal income tax return or amended Federal income tax return or a disaster loss for the preceding year based on a section 165(i) election and the taxpayer wants to revoke that election, the taxpayer must file an amended Federal income tax return to remove the loss for the preceding year on or before the date the taxpayer files the Federal income tax return or amended Federal income tax return for the disaster year that includes the loss."

Effective Dates

March 1, 2020 – date disaster declaration is lifted

Additional Resources

Check out our blog post

Mainstreet New Loan Facility

Other Provisions, Assistance, and Guidance

Benefit/Relief Description

Intended to facilitate lending to small and medium-sized Businesses by Eligible Lenders. Under the New Loan Facility (Facility), the Main Street Priority Loan Facility ("MSPLF"), and the Main Street Expanded Loan Facility ("MSELF"), the Federal Reserve Bank of Boston ("Reserve Bank") will commit to lend to a single common special purpose vehicle ("SPV") on a recourse basis. The SPV will purchase 95% participations in Eligible Loans from Eligible Lenders. Eligible Lenders will retain 5% of each Eligible Loan. The Department of the Treasury, using funds appropriated to the Exchange Stabilization Fund under section 4027 of the CARES Act, will make a \$75 billion equity investment in the single common SPV in connection with the Facility, the MSPLF, and the MSELF. The combined size of the Facility, the MSPLF, and the MSELF will be up to \$600 billion.

Fees for new loans

- Loan Origination and Servicing: An Eligible Borrower will pay an Eligible Lender an origination fee of 100 basis points of the principal amount of the Eligible Loan. The SPV will pay an Eligible Lender 25 basis points of the principal amount of its participation in the Eligible Loan per annum for loan servicing.
- **Facility Fee:** An Eligible Lender will pay the SPV a facility fee of 100 basis points of the principal amount of the loan participation purchased by the SPV. The Eligible Lender may require the Eligible Borrower to pay this fee.

Limits & Eligibility

An Eligible Loan is an unsecured term loan made by an Eligible Lender(s) to an Eligible Borrower that was originated on or after April 8, 2020, provided that the loan has the following features:

- 1. 5 year maturity;
- 2. Principal repayment deferred for two years. Years 3-5: 15%, 15%, 70%
- 3. Interest payments deferred for one year.
- 4. Rate = LIBOR + 3%;
- 5. Minimum loan size of \$250,000
- 6. Maximum loan size that is the lesser of (i) \$35 million or (ii) an amount that, when added to the Eligible Borrower's existing outstanding and committed but undrawn debt, does not exceed four times the Eligible Borrower's 2019 earnings before interest, taxes, depreciation, and amortization ("EBITDA"); and
- 7. Prepayment permitted without penalty

Eligible Borrowers are businesses with up to 10,000 employees or up to \$2.5 billion in 2019 annual revenues. Each Eligible Borrower must be a business that is created or organized

Mainstreet New Loan Facility (continued)

Other Provisions, Assistance, and Guidance

in the United States or under the laws of the United States with significant operations in and a majority of its employees based in the United States. Eligible Borrowers that participate in the Facility may not also participate in the MSELF or the Primary Market Corporate Credit Facility.

Effective Dates

SPV will cease purchasing participations in eligible loans on September 30, 2020

Additional Resources

June 8th – Expansion Press Release

Federal Reserve FAQ

Federal Reserve Monetary Policy

GNMA PTAP

Other Provisions, Assistance, and Guidance

Benefit/Relief Description

The purpose of PTAP/C19 is to honor the statutory duty Ginnie Mae has to pay timely and in full principal and interest payments due Mortgage-Backed Security (MBS) holders while minimizing any disruptions that may occur in the mortgage servicing market as a result of COVID-19. PTAP/C19 will also support Issuers in their administration of borrower relief measures, such as extended forbearance and moratoriums on foreclosures and evictions, announced by the federal agencies providing the mortgage insurance or guaranty.

Method of Application

Extension of assistance under PTAP/C19 will be made through a Request for Pass-Through Assistance Related to COVID-19 and Repayment Agreement ("Request and Repayment Agreement"), and subject to a Master Supervisory Agreement which will govern the terms of any PTAP/C19 assistance. Assis- tance advanced by Ginnie Mae will bear a fixed rate of interest. The rate that will apply to a given month's pass-through assistance to all Issuers will be posted on Ginnie Mae's website on the second business day of each month.

Limits & Eligibility

Issuers may request PTAP/C19 assistance only once per month to cover shortfalls on the P&I due mortgage-backed security (MBS) holders for the month the request is made.

Phase-out

Assistance rendered under PTAP/C19, as provided for below and in Chapter 34, is to be considered an extraordinary measure, for use when other resources have been exhausted and with the requirement of full repayment by the Issuer.

Effective Dates

All requests for PTAP/C19, including the required documents identified in bullets (a) and (b) above, must be submitted no earlier than the fifth (5th) business day of the month and no later than the sixth (6th) business day of each month. The Ginnie Mae advance associated with each Repayment Agreement, together with interest, will be due on the last calendar day of the month that is the seventh month from the month in which the corresponding investor remittance was made, or on July 30, 2021, whichever is earlier.

Additional Sources

Ginnie Mae Memo

Various Due Dates Postponed

Other Provisions, Assistance, and Guidance

Benefit/Relief Description

Tax Filings and Payments – All Federal income tax return filings and payments due on or after April 1, 2020, and before July 15, 2020, are now due on July 15, 2020.

Financial Statements for Mortgage Lenders – HUD approved Mortgagees with calendar year-ends have an automatic 30-day extension to submit audited financial statements and re-certify through HUD's LEAP system pushing the deadline from March 31, 2020 to April 30, 2020.

Additional Resources

IRS FAQ on filing and payment deadlines FHA Single Family FAQ

About Richey May & Co.

Founded on serving clients with top-quality assurance, tax, audit, business advisory and technology solutions.

The experts at Richey May possess the technical proficiency and years of experience needed to provide you with top quality solutions no matter how complex your needs. Our expertise, combined with a commitment to building strong client relationships is what makes us unique.

Please contact us with any comments or questions about this guide.

