

Policy for the Solicitation of Contributions and Acceptance of Gifts by The Foundation for Christian Civilization, Inc.

To accomplish its charitable and educational purposes of developing and fostering the religious and cultural heritage of Christian civilization, The Foundation for a Christian Civilization, Inc. (the “organization”) maintains an ongoing program for the solicitation of funds from the general public and interested organizations to the organizations as well as for its outreach programs: America Needs Fatima, The American TFP, TFP Student Action, Return to Order and other programs yet to be developed.

The organization’s mission is to work in a legal and peaceful manner in the realm of ideas to defend and promote the principles of private ownership, family, and perennial Christian values with their twofold function: individual and social. It desires to win the heart and soul of America for Mary by spreading Our Lady’s Fatima message and promoting devotion to Her Immaculate Heart. America urgently needs the prophetic messages of Our Lady at Fatima. Above all, America needs a clear direction, a great purpose, and the means to achieve it. The admonitions, requests, and warnings of Mary Most Holy can rightly be called a heaven-sent survival manual.

The following policies and guidelines govern acceptance of gifts made to the Foundation, assure that donors to the organization are entitled to an income tax deduction for their charitable contributions, and assure that the organization continues to remain responsible to the interests of the general public rather than to the interests of specific donors. The organization adopts the following policy:

1. Purpose of Policies and Guidelines

The Board of directors of the organization and its staff solicit current and deferred gifts from individuals, corporations, and foundations to secure the future growth and missions of the organization. It is the purpose of these policies and guidelines to govern the acceptance of gifts by the organization and to provide guidance to prospective donors and their advisors when making gifts to the Foundation. The provisions of these policies shall apply to all gifts received by the organization for any of its programs or services.

2. Use of Legal Counsel

The organization shall seek the advice of legal counsel in matters relating to acceptance of gifts where appropriate. Review by counsel is recommended for:

- Review of closely held stock transfers that are subject to restrictions or buy-sell agreements;
- Review of documents naming the organization as trustee;
- Review of all gifts involving contracts, such as bargain sales or other documents requiring the Organization to assume an obligation;
- Review of all transactions with potential conflict of interest that may invoke IRS sanctions;

- Other instances in which the use of counsel is deemed appropriate by the Fundraising Committee

3. Conflict of Interest

All prospective donors shall be strongly urged to seek the assistance of personal legal and financial advisors in matters relating to their gifts and the resulting tax and estate planning consequences.

4. Substantial Contributions

No contribution from an individual equal to or greater than the higher of \$5,000 or 2% of the organization's total support during the year (as this term is defined by the IRS for purposes of the public support test) in which the contribution is made shall be accepted by the organization unless: (1) the contribution is made unconditionally and the donor imposes no material restrictions or conditions on the organization in connection with the contribution; (2) the contribution is in the form of cash, readily marketable securities or assets that directly further the tax-exempt purposes of the organization; and (3) the contribution is used either to finance capital expenditures or to underwrite no more than one year's operating expenses. Individuals who have contributed the greater of \$5,000 or 2% of the organization's total support during the year in which the contribution is made to the organization (and members of their immediate family) shall not be entitled to become members of the Board of Directors and shall have no authority to influence the policies or activities of the organization or otherwise to exercise control over the organization.

5. Restrictions on Gifts

The organization will accept unrestricted gifts and gifts for specific programs and purposes, provided that such gifts are not inconsistent with its stated mission, purposes, and priorities.

The organization will not accept gifts that are too restrictive in purpose or that, in the sole discretion of the organization, are not deemed advisable. Gifts that are too restrictive or not deemed advisable include, but are not limited to, those that violate the terms of the articles of incorporation, bylaws, Internal Revenue Code or IRS regulations, gifts that are too difficult to administer, or gifts that are for purposes outside the mission. The organization shall make all final decisions on the restrictive nature or advisability of a gift and its acceptance or refusal.

6. Fundraising Committee

The Board of Directors shall appoint a three-member committee to oversee and operate the organization's program for the solicitation of contributions and grants from the general public and other organizations. The purpose and goal of the Committee shall be to develop and implement fundraising strategies to seek broad-based sources of public support for the organization. The Committee shall make periodic reports to the Board which set forth the Committee's activities and recommendations in furtherance of its purpose and goal.

The Fundraising Committee is charged with the responsibility of reviewing all gifts made to the organization and properly screening and accepting those gifts, and making recommendations to the Board on gift acceptance issues where appropriate. The Fundraising Committee reserves the right to consider any and all gifts to the organization.

6. Types of Gifts

The following gifts may be **acceptable**:

- Cash
- Tangible personal property
- Securities
- Real estate
- Remainder interests in property
- Life insurance
- Charitable remainder trusts
- Charitable lead trusts
- Retirement plan beneficiary designations
- Bequests
- Life insurance beneficiary designations
- Cryptocurrency
- Precious metals

The following criteria govern the acceptance of each gift form:

- **Cash:** Cash is acceptable in any form. Gifts of cash (i.e., currency) in excess of \$10,000 must be referred to the Fundraising Committee for a final determination regarding acceptance of the gift. Checks shall be made payable to the Foundation for a Christian Civilization, Inc. or one of its programs as specified and shall be delivered to the Treasurer of the Organization.
- **Tangible personal property:** All other gifts of tangible personal property shall be examined in light of the following criteria:
 - Does the property fulfill the mission of the organization?
 - Is the property marketable?
 - Are there any restrictions on the use, display, or sale of the property?
 - Are there any carrying costs for the property?

The Fundraising Committee may consider other factors in rendering a determination as to whether the gift should be accepted, including but not limited to another party's possession of any type of lien or interest in the property. The Fundraising Committee shall have the discretion to seek an appraisal of the property from an independent appraiser. The Fundraising Committee of the organization shall make the final determination on the acceptance of other tangible property gifts. Such gifts may be sold upon receipt by the organization.

- **Securities:** the organization can accept both publicly traded securities and closely held securities.
- **Publicly traded securities:** Publicly traded and marketable securities may be transferred to an account maintained at one or more brokerage firms or delivered physically with the transferor's signature or stock power attached. As a general rule, all marketable securities shall be sold upon receipt. In some cases, applicable securities laws may restrict marketable securities; in such instance, the Fundraising Committee of the organization

shall make the final determination on the acceptance of the restricted securities and whether or not the donor will be asked to pay for the expenses of lifting the restriction and/or any other expenses associated with the administration of the gift.

- **Closely held securities:** Closely held securities, which include not only debt and equity positions in non-publicly traded companies but also interests in LLPs and LLCs or other ownership forms, can be accepted subject to the approval of the Fundraising Committee of the organization. However, gifts must be reviewed prior to acceptance to determine that:
 - There are no restrictions on the security that would prevent the organization from ultimately converting those assets to cash
 - The security is marketable
 - The security will not generate any undesirable tax consequences for the organization.

If potential problems arise on an initial review of the security, further review and recommendation by an outside professional may be obtained before making a final decision on acceptance of the gift. The Fundraising Committee of the Organization and legal counsel shall make the final determination on the acceptance of the closely held securities where necessary. Every effort will be made to sell non-marketable securities as quickly as possible.

- **Real estate:** Gifts of real estate may include developed property, undeveloped property or gifts subject to a prior life interest. All gifts of real estate shall be subject to the review and approval of the Fundraising Committee. Prior to acceptance of real estate, the organization shall require an initial environmental review of the property to ensure that the property is not contaminated with environmental damage. Environmental inspection forms are attached as an appendix to this document. In the event that the initial inspection reveals a potential problem, the organization shall retain a qualified inspection firm to conduct an environmental audit. The cost of the environmental audit shall generally be an expense of the donor.

Where appropriate, a title binder shall be obtained by the organization prior to the acceptance of the real property gift. The cost of this title binder shall generally be an expense of the donor.

The donor may be asked to provide any or all of the following items to the organization: a property deed, a property tax bill, a property title report, a property ALTA survey, site plans or development surveys relating to the property, a plot plan, any existing leases or agreements encumbering the property, substantiation of zoning status and verification of title insurance.

Prior to acceptance of the real property, the gift shall be approved by the Fundraising Committee of the organization and by its legal counsel. Criteria for acceptance of the property shall include:

- Is the property useful for the purposes of the organization?
- Is the property marketable?

- Are there any restrictions, reservations, easements, or other limitations associated with the property?
 - Are there carrying costs, which may include legal, maintenance, insurance, property taxes, mortgages, or notes, or any other costs, etc., associated with the property?
 - Does the environmental audit reflect that the property is not damaged?
- **Remainder interests in property:** the organization will accept a remainder interest in a personal residence, farm, or vacation subject to the provisions of the above paragraph on real estate. The donor or other occupants may continue to occupy the real property for the duration of the stated life. At the death of the donor, the organization may use the property or reduce it to cash. Where the organization receives a gift of the remainder interest, expenses for maintenance, real estate taxes, and any property indebtedness are to be paid by the donor or primary beneficiary.
 - **Life insurance:** the organization must be named as both beneficiary and irrevocable owner of an insurance policy before a life insurance policy can be recorded as a gift. Generally, the gifts are valued at their interpolated terminal reserve value, or cash surrender value, upon receipt. If the donor contributes future premium payments, the organization will include the entire amount of the additional premium payment as a gift in the year that it is made. Notwithstanding the above, the gifts acceptance committee may consult with professional financial and legal advisors regarding the valuation of any gifts of life insurance policies.

If the donor does not elect to continue to make gifts to cover premium payments on the life insurance policy, the organization may:

- Continue to pay the premiums
 - Convert the policy to paid-up insurance
 - Surrender the policy for its current cash value
- **Charitable remainder trusts:** the organization may accept designation as the remainder beneficiary of the charitable remainder trust with the approval of the Fundraising Committee of the organization. The organization will not accept appointment as trustee of a charitable remainder trust. The gift acceptance committee may consider: the fair market value of the gift, the projected financial benefit to the organization, whether the gift is useful for the organization's purposes and mission, the presence of any restrictions, obligations, or limitations associated with the gift, as well as any carrying costs, administrative costs, and/or professional expenses associated with the gift.
 - **Charitable lead trusts:** The organization may accept a designation as income beneficiary of a charitable lead trust. The Board of the organization will not accept an appointment as trustee of a charitable lead trust. The Fundraising Committee may consider: the fair market value of the gift, the projected financial benefit to the organization, whether the gift is useful for the organization's purposes and mission, the presence of any restrictions, obligations, or limitations associated with the gift, as well as any carrying costs, administrative costs, and/or professional expenses associated with the

gift.

- **Retirement plan beneficiary designation:** Donors and supporters of the organization shall be encouraged to name the organization as the beneficiary of their retirement plans. Such designations shall not be recorded as gifts until such time as the gift is irrevocable. Where the gift is irrevocable, but is not due until a future date, the present value of that gift may be recorded at the time the gift becomes irrevocable. The Fundraising Committee may consult with professional financial and legal advisors regarding the valuation of any gifts of life insurance policies. Gifts will be recorded at such time as they are irrevocable.
- **Bequests:** Donors and supporters of the organization shall be encouraged to make bequests to the organization under their wills and trusts. Such bequests shall not be recorded as gifts to the organization until such time as the gift is probated. Donors who indicate that they have made a bequest to the organization may be asked to disclose the relevant clause or documentation that evidences such a bequest.
- **Life insurance beneficiary designations:** Donors and supporters of the organization shall be encouraged to name the organization as beneficiary or contingent beneficiary of their life insurance policies. Such designations shall not be recorded as gifts until such time as the gift is irrevocable. Where the gift is irrevocable, but is not due until a future date, the present value of that gift may be recorded at the time the gift becomes irrevocable. The gift acceptance committee may consult with professional financial and legal advisors regarding the valuation of any gifts of life insurance policies. Gifts will be recorded at such time as they are irrevocable.
- **Donor Advised Funds and Supporting Organization:** The Fundraising Committee may discuss with donors whether donor advised funds and supporting organizations can be helpful in fulfilling the mission of the organization. The Fundraising Committee must approve the acceptance of gifts in this category.

7. Foreign Expenditures

No funds shall be expended by the organization outside the United States, or transmitted outside the United States for expenditure, except for specific projects approved by the Board of Directors and purchases of supplies and inventory items or travel expenses approved by the Treasurer.

Funds may be distributed to foreign organizations only for projects so approved in accordance with the Organization's grant-making procedures and only on condition that a written agreement to use such funds only for the projects so approved be obtained from the grantee. A full accounting must be made of all distributed funds to ensure that all such funds are expended only for the purposes and in the manner approved by the Board of Directors. The Board of Directors may, in its absolute discretion, refuse any conditional or otherwise earmarked contribution including, without limitation, any donation made upon condition that it be paid out for a specific purpose. The Board of Directors also may, in its absolute discretion, return to the donor any such donation actually received.

8. Miscellaneous Provisions

- **Securing appraisals and legal fees for gifts to the Organization:** It shall generally be the responsibility of the donor to secure an appraisal (where required) and independent legal counsel for all gifts made to the organization. Donors are advised to consult with legal or tax counsel or other appropriate advisors.
- **Valuation of gifts for development purposes:** the organization shall record a gift received at its valuation for gift purposes on the date of the gift.
- The organization shall administer gifts properly, shall comply with all applicable laws and regulations, including those governing reporting and retention, and shall provide formal acknowledgments for gifts. The organization shall not furnish property appraisals or gift valuations to donors for tax purposes. Acknowledgment letters may acknowledge the value of a gift in the case of a cash, check, or other monetary donation or if required by applicable law. Otherwise, the donor is solely responsible for determining gift valuations for his or her own tax purposes.
- The organization shall consult with independent advisors where it deems such action to be appropriate.
- **Responsibility for IRS filings upon sale of gift items:** The Treasurer is responsible for filing IRS Form 8282 upon the sale or disposition of any asset sold within two years of receipt where the charitable deduction value of the item was \$5,000 or greater. The Organization must file this form within 125 days of the date of sale or disposition of the asset.
- Acknowledgment of all gifts made to the Organization and compliance with the current IRS requirements in acknowledgment of such gifts shall be the responsibility of the Board of the Organization.

9. Changes to Policies

This policy has been reviewed and accepted by the Board of Directors of the organization. The Board of organization must approve any changes to or deviations from these policies.

Approved on the Eight day of March, 2023.