

HARMON, CURRAN & TOUSLEY

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WASHINGTON, D.C. 20009-1125

GAIL MCGREEVY HARMON  
DIANE CURRAN  
DEAN R. TOUSLEY  
ANNE SPIELBERG  
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TELEPHONE  
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August 4, 1989

Internal Revenue Service  
EP/EO Division  
P.O. Box 17010  
Baltimore, Maryland 21203

Dear Madam/Sir:

Enclosed is Form 1023, Application for Recognition of Exemption under Section 501(c)(3), filed on behalf of The Center for Public Integrity. Also enclosed is a duly executed Power of Attorney form, a duly executed User Fee form (Form 8718) and a check for \$300 to cover the user fee.

If you have any questions or require any further information, please contact the undersigned.

Thank you.

Sincerely,

  
Gail M. Harmon

Enclosures

cc: client

# Application for Recognition of Exemption Under Section 501(c)(3) of the Internal Revenue Code

For Paperwork Reduction Act Notice, see page 1 of the instructions.

To be filed in the key district for the area in which the organization has its principal office or place of business.

This application, when properly completed, constitutes the notice required under section 508(a) of the Internal Revenue Code so that an applicant may be treated as described in section 501(c)(3) of the Code, and the notice required under section 508(b) for an organization claiming not to be a private foundation within the meaning of section 509(a). (Read the instructions for each part carefully before making any entries.) If required information, a conformed copy of the organizing and operational documents, or financial data are not furnished, the application will not be considered on its merits and the organization will be notified accordingly. Do not file this application if the applicant has no organizing instrument (see Part II).

### Part I Identification

1 Full name of organization  The Center for Public Integrity		2 Employer identification number (If none, see instructions)  SS-4 attached	
3a Address (number and street) 11807 Briar Mill Lane.		Check here if applying under section: <input type="checkbox"/> 501(e) <input type="checkbox"/> 501(f) <input type="checkbox"/> 501(k)	
3b City or town, state, and ZIP code Reston, VA 22904		4 Name and telephone number of person to be contacted Gail Harmon ((202) 328-3500	
5 Month the annual accounting period ends March	6 Date incorporated or formed March 30, 1989	7 Activity codes 124      125      120	
8 Has the organization filed Federal income tax returns or exempt organization information returns? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes," state the form number(s), years filed, and Internal Revenue office where filed.			

### Part II Type of Entity and Organizational Document (see instructions)

Check the applicable entity box below and attach a conformed copy of the organization's organizing document and bylaws as indicated for each entity.

Corporation—Articles of incorporation and bylaws.  Trust—Trust indenture.  Other—Constitution or articles of association and bylaws.  
See Exhibits 2 and 3

### Part III Activities and Operational Information

1 What are or will be the organization's sources of financial support? List as follows:

Corporation contributions  
labor Union contributions  
foundation grants  
membership dues

*revenue sources*

2 Describe the organization's fund-raising program, both actual and planned, and explain to what extent it has been put into effect. (Include details of fund-raising activities such as selective mailings, formation of fund-raising committees, use of professional fund raisers, etc.) Attach representative copies of solicitations for financial support.

See exhibit 4

I declare under the penalties of perjury that I am authorized to sign this application on behalf of the above organization and I have examined this application, including the accompanying statements, and to the best of my knowledge it is true, correct, and complete.

*Charles R. E. Hewitt*  
(Signature)

*Chairman*  
(Title or authority of signer)

*7/4/89*  
(Date)

**Part III** Activities and Operational Information (Continued)

- 3 Give a **detailed** narrative description of the organization's past, present, and proposed future activities, and the purposes for which it was formed. The narrative should identify the specific benefits, services, or products the organization has provided or will provide. If the organization is not fully operational, explain what stage of development its activities have reached, what further steps remain for it to become fully operational, and when such further steps will take place. (**Do not state the purposes and activities of the organization in general terms or repeat the language of the organizational documents.**) If the organization is a school, hospital, or medical research organization, include enough information in your description to clearly show that the organization meets the definition of that particular activity that is contained in the instructions for Part VI-A.

See Exhibit 5

## 4 The membership of the organization's governing body is:

a Names, addresses, and titles of officers, directors, trustees, etc.	b Annual compensation
Charles Lewis, President and Director 11807 Briar Mill Ln. Reston, VA 22094	\$110,000 (for services as executive director)
Charles Piller, Secretary and Director 3522 Wilson Ave. Oakland, CA 94602	None
Alex Benes, Treasurer and Director 1412 27th Street North Bergen, NJ 07047	None

**Part III** Activities and Operational Information (Continued)

4 c Do any of the above persons serve as members of the governing body by reason of being public officials or being appointed by public officials?  Yes  No  
If "Yes," name those persons and explain the basis of their selection or appointment.

d Are any members of the organization's governing body "disqualified persons" with respect to the organization (other than by reason of being a member of the governing body) or do any of the members have either a business or family relationship with "disqualified persons?" (See the Specific Instructions for line 4d.)  Yes  No  
If "Yes," explain.

e Have any members of the organization's governing body assigned income or assets to the organization, or is it anticipated that any current or future member of the governing body will assign income or assets to the organization?  Yes  No  
If "Yes," attach a complete explanation stating which applies and including copies of any assignments plus a list of items assigned. See Exhibit 6

5 Does the organization control or is it controlled by any other organization?  Yes  No  
Is the organization the outgrowth of another organization, or does it have a special relationship to another organization by reason of interlocking directorates or other factors?  Yes  No  
If either of these questions is answered "Yes," explain.

6 Is the organization financially accountable to any other organization?  Yes  No  
If "Yes," explain and identify the other organization. Include details concerning accountability or attach copies of reports if any have been submitted.

7 a What assets does the organization have that are used in the performance of its exempt function? (Do not include property producing investment income.) If any assets are not fully operational, explain their status, what additional steps remain to be completed, and when such final steps will be taken. None yet

b To what extent have you used, or do you plan to use, contributions as an endowment fund, i.e., hold contributions to produce income for the support of your exempt activities? None

8 Will any of the organization's facilities be managed by another organization or individual under a contractual agreement?  Yes  No  
If "Yes," attach a copy of each contract and explain the relationship between the applicant and each of the other parties.

**Part III** Activities and Operational Information (Continued)

9 a Have the recipients been required or will they be required to pay for the organization's benefits, services, or products?  Yes  No  
If "Yes," explain and show how the charges are determined.

See Exhibit 7

b Does or will the organization limit its benefits, services, or products to specific classes of individuals?  Yes  No  
If "Yes," explain how the recipients or beneficiaries are or will be selected.

10 Is the organization a membership organization?  Yes  No  
If "Yes," complete the following: See Exhibit 8

a Describe the organization's membership requirements and attach a schedule of membership fees and dues.

b Describe your present and proposed efforts to attract members, and attach a copy of any descriptive literature or promotional material used for this purpose.

c Are benefits, services, or products limited to members?  Yes  No  
If "No," explain.

11 Does or will the organization engage in activities tending to influence legislation or intervene in any way in political campaigns?  Yes  No  
If "Yes," explain. (Note: You may wish to file Form 5768, Election/Revocation of Election by an Eligible Section 501(c)(3) Organization to Make Expenditures to Influence Legislation.)

12 Does the organization have a pension plan for employees?  Yes  No

13 a Are you filing Form 1023 within 15 months from the end of the month in which you were organized or reorganized as required by section 508(a) and the related regulations? (See General Instructions.)  Yes  No

b If you answer "No," to 13a and you claim that you fit an exception to the notice requirements under section 508(a), attach an explanation of your basis for the claimed exception.

c If you answer "No," to 13a and section 508(a) does apply to you, you may be eligible for relief under regulations section 1.9100 from the application of section 508(a). Do you wish to request relief?  Yes  No

d If you answer "Yes," to 13c, attach a detailed statement that satisfies the requirements of Rev. Proc. 79-63.

e If you answer "No," to both 13a and 13c and section 508(a) does apply to you, your qualification as a section 501(c)(3) organization can be recognized only from the date this application is filed with your key District Director. Therefore, do you want us to consider your application as a request for recognition of exemption as a section 501(c)(3) organization from the date the application is received and not retroactively to the date you were formed (see instructions)?  Yes  No

**Part IV** Statement as to Private Foundation Status (see instructions)

1 Is the organization a private foundation?  Yes  No

2 If you answer "Yes," to question 1 and the organization claims to be a private operating foundation, check here  and complete Part VII.

3 If you answer "No," to question 1, indicate the type of ruling you are requesting regarding the organization's status under section 509 by checking the box(es) below that apply:

a Definitive ruling under section 509(a)(1), (2), (3), or (4)  Complete Part VI.

b Advance ruling under  sections 509(a)(1) and 170(b)(1)(A)(vi) or  section 509(a)(2)—see instructions.

(Note: If you want an advance ruling, you must complete and attach two Forms 872-C to the application.)

**Part V Financial Data**

**Statement of Support, Revenue, and Expenses for the period beginning** ..... , 19 ..... , and ending ..... , 19 .....

**Note:** Complete the financial statements for the current year and for each of the three years immediately before it. If in existence less than four years, complete the statements for each year in existence. If in existence less than one year, also provide proposed budgets for the two years following the current year. See Exhibit 9

<b>Support and Revenue</b>	1	Gross contributions, gifts, grants, and similar amounts received	1
	2	Gross dues and assessments of members	2
	3 a	Gross amounts derived from activities related to organization's exempt purpose (attach schedule)	3c
	b	Minus cost of sales	
	4 a	Gross amounts from unrelated business activities (attach schedule)	4c
	b	Minus cost of sales	
	5 a	Gross amount received from sale of assets, excluding inventory items (attach schedule)	5c
	b	Minus cost or other basis and sales expenses of assets sold	
6	Investment income (see instructions)	6	
7	Other revenue (attach schedule)	7	
8	<b>Total support and revenue</b>	8	
<b>Expenses</b>	9	Fundraising expenses	9
	10	Contributions, gifts, grants, and similar amounts paid (attach schedule)	10
	11	Disbursements to or for benefit of members (attach schedule)	11
	12	Compensation of officers, directors, and trustees (attach schedule)	12
	13	Other salaries and wages	13
	14	Interest	14
	15	Rent	15
	16	Depreciation and depletion	16
	17	Other (attach schedule)	17
	18	<b>Total expenses</b>	18
	19	Excess of support and revenue over expenses (line 8 minus line 18)	19

**Balance Sheet**  
(at the end of the period shown above)

<b>Assets</b>		
20	Cash: a Interest bearing accounts	20a
	b Other	20b
21	Accounts receivable, net	21
22	Inventories	22
23	Bonds and notes (attach schedule)	23
24	Corporate stocks (attach schedule)	24
25	Mortgage loans (attach schedule)	25
26	Other investments (attach schedule)	26
27	Depreciable and depletable assets (attach schedule)	27
28	Land	28
29	Other assets (attach schedule)	29
30	<b>Total assets</b>	30
<b>Liabilities</b>		
31	Accounts payable	31
32	Contributions, gifts, grants, etc., payable	32
33	Mortgages and notes payable (attach schedule)	33
34	Other liabilities (attach schedule)	34
35	<b>Total liabilities</b>	35
<b>Fund Balances or Net Worth</b>		
36	Total fund balances or net worth	36
37	<b>Total liabilities and fund balances or net worth</b> (line 35 plus line 36)	37

If there has been any substantial change in any aspect of your financial activities since the period shown above ended, check the box and attach a detailed explanation

**Part VI Non-Private Foundation Status (Definitive ruling only)**

**A.—Basis for Non-Private Foundation Status (Check one of the boxes below.)**

The organization is not a private foundation because it qualifies as:

	✓	Kind of organization	Within the meaning of	Complete
1		a church or a convention or association of churches	Sections 509(a)(1) and 170(b)(1)(A)(i)	
2		a school	Sections 509(a)(1) and 170(b)(1)(A)(ii)	
3		a hospital or a cooperative hospital service organization or a medical research organization operated in conjunction with a hospital	Sections 509(a)(1) and 170(b)(1)(A)(iii)	
4		a governmental unit described in section 170(c)(1)	Sections 509(a)(1) and 170(b)(1)(A)(v)	
5		being organized and operated exclusively for testing for public safety	Section 509(a)(4)	
6		being operated for the benefit of a college or university that is owned or operated by a governmental unit	Sections 509(a)(1) and 170(b)(1)(A)(iv)	Part VI.—B
7		normally receiving a substantial part of its support from a governmental unit or from the general public	Sections 509(a)(1) and 170(b)(1)(A)(vi)	Part VI.—B
8		normally receiving not more than one-third of its support from gross investment income and more than one-third of its support from contributions, membership fees, and gross receipts from activities related to its exempt functions (subject to certain exceptions)	Section 509(a)(2)	Part VI.—B
9		being operated solely for the benefit of or in connection with one or more of the organizations described in 1 through 4, or 6, 7, and 8 above	Section 509(a)(3)	Part VI.—C

**B.—Analysis of Financial Support (Complete if you checked box 6, 7, or 8 above.)**

	(a) Most recent tax year	(Years next preceding most recent tax year)			(e) Total
	19 .....	(b) 19 .....	(c) 19 .....	(d) 19 .....	
1 Gifts, grants, and contributions received					
2 Membership fees received					
3 Gross receipts from admissions, sales of merchandise or services, or furnishing of facilities in any activity that is not an unrelated business within the meaning of section 513					
4 Gross investment income (see instructions for definition)					
5 Net income from organization's unrelated business activities not included on line 4					
6 Tax revenues levied for and either paid to or spent on behalf of the organization					
7 Value of services or facilities furnished by a governmental unit to the organization without charge (not including the value of services or facilities generally furnished the public without charge)					
8 Other income (not including gain or loss from sale of capital assets)—attach schedule					
9 Total of lines 1 through 8					
10 Line 9 minus line 3					
11 Enter 2% of line 10, column (e) only					

12 If the organization has received any unusual grants during any of the above tax years, attach a list for each year showing the name of the contributor, the date and amount of grant, and a brief description of the nature of such grant. Do not include such grants on line 1 above—(See instructions).

THE CENTER FOR PUBLIC INTEGRITY, INC.  
List of Exhibits for Form 1023

1. Form SS-4
2. Articles of Incorporation
3. Bylaws
4. Answer to Part III, Question 2
5. Answer to Part III, Question 3
6. Answer to Part III, Question 4e
7. Answer to Part III, Question 9a
8. Answer to Part III, Question 10
9. Statement of Support, Revenue and Expenses for the period  
1989 - 1991
10. Power of Attorney
11. Form 872-C (two copies)
12. Form 8718, User Fee for Exempt Organization Determination  
Letter Request



EXHIBIT 1

# Application for Employer Identification Number

(For use by employers and others. Please read the attached instructions before completing this form.) Please type or print clearly.

Official Use Only

OMB No. 1545-0003  
 Expires 7-31-91

1 Name of applicant (True legal name. See instructions.)  
The Center for Public Integrity

2 Trade name of business if different from item 1 \_\_\_\_\_

3 Executor, trustee, "care of name"  
Charles Lewis

4 Mailing address (street address) (room, apt., or suite no.)  
4600 Connecticut Ave. NW, Suite 923

5 Address of business, if different from item 4. (See instructions.) \_\_\_\_\_

4a City, state, and ZIP code  
Washington, DC 20008

5a City, state, and ZIP code \_\_\_\_\_

6 County and State where principal business is located  
Washington, DC

7 Name of principal officer, grantor, or general partner. (See instructions.) Charles Lewis

8 Type of entity (Check only one.) (See instructions.)

<input type="checkbox"/> Individual SSN _____	<input type="checkbox"/> Plan administrator SSN _____	<input type="checkbox"/> Partnership
<input type="checkbox"/> REMIC	<input type="checkbox"/> Personal service corp.	<input type="checkbox"/> Other corporation (specify) _____
<input type="checkbox"/> State/local government	<input type="checkbox"/> National guard	<input type="checkbox"/> Federal government/military
<input checked="" type="checkbox"/> Other nonprofit organization (specify) <u>charitable</u>	If nonprofit organization, enter GEN (if applicable) _____	
<input type="checkbox"/> Farmers' cooperative		
<input type="checkbox"/> Estate	<input type="checkbox"/> Trust	
<input type="checkbox"/> Other (specify) ▶ _____		

8a If a corporation, give name of foreign country (if applicable) or state in the U.S. where incorporated ▶ Foreign country \_\_\_\_\_ State DC

9 Reason for applying (check only one)

<input checked="" type="checkbox"/> Started new business	<input type="checkbox"/> Changed type of organization (specify) ▶ _____
<input type="checkbox"/> Hired employees	<input type="checkbox"/> Purchased going business
<input type="checkbox"/> Created a pension plan (specify type) ▶ _____	<input type="checkbox"/> Created a trust (specify) ▶ _____
<input type="checkbox"/> Banking purpose (specify) ▶ _____	<input type="checkbox"/> Other (specify) ▶ _____

10 Business start date or acquisition date (Mo., day, year) (See instructions.)  
3/30/89

11 Enter closing month of accounting year (See instructions.)  
March

12 First date wages or annuities were paid or will be paid (Mo., day, year). Note: If applicant is a withholding agent, enter date income will first be paid to nonresident alien. (Mo., day, year) . . . . . ▶ June 1, 1989

13 Enter highest number of employees expected in the next 12 months. Note: If the applicant does not expect to have any employees during the period, enter "0."

Nonagricultural	Agricultural	Household
<u>2</u>	<u>0</u>	<u>0</u>

14 Does the applicant operate more than one place of business? . . . . .  Yes  No  
 If "Yes," enter name of business. ▶ \_\_\_\_\_

15 Principal activity or service (See instructions.) ▶ charitable: educate public about ethics in government

16 Is the principal business activity manufacturing? . . . . .  Yes  No  
 If "Yes," principal product and raw material used. ▶ \_\_\_\_\_

17 To whom are most of the products or services sold? Please check the appropriate box.  Business (wholesale)  N/A  
 Public (retail)  Other (specify) ▶ \_\_\_\_\_

18 Has the applicant ever applied for an identification number for this or any other business? . . . . .  Yes  No  
 Note: If "Yes," please answer items 18a and 18b.

18a If the answer to item 18 is "Yes," give applicant's true name and trade name, if different when applicant applied.

True name ▶ \_\_\_\_\_ Trade name ▶ \_\_\_\_\_

18b Enter approximate date, city, and state where the application was filed and the previous employer identification number if known.

Approximate date when filed (Mo., day, year)	City, and state where filed	Previous EIN

Under penalties of perjury, I declare that I have examined this application, and to the best of my knowledge and belief, it is true, correct, and complete.

Name and title (please type or print clearly) ▶ Charles Lewis, President Telephone number (include area code) (202) 659-1177

Signature ▶ \_\_\_\_\_ Date ▶ \_\_\_\_\_

Note: Do not write below this line. For official use only.

Please leave blank ▶	Geo.	Ind.	Class	Reason for applying

EXHIBIT 2

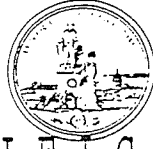
Certificate

I, Charles Lewis, do hereby certify that I am President of The Center for Public Integrity, Inc. and that attached hereto is a current, complete and correct copy of its Certificate of Incorporation, which was filed on March 30, 1989 and is now in effect.

Date: \_\_\_\_\_

\_\_\_\_\_  
President

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS  
OFFICE OF THE DIRECTOR




C E R T I F I C A T E

THIS IS TO CERTIFY that all applicable provisions of the DISTRICT OF COLUMBIA NONPROFIT CORPORATION ACT have been complied with and accordingly, this CERTIFICATE of INCORPORATION is hereby issued to THE CENTER FOR PUBLIC INTEGRITY

as of MARCH 30TH , 1989 .

Donald G. Murray  
Director

Henry C. Lee, III  
Administrator  
Business Regulation Administration

  
Vandy L. Jamison, Jr.  
Assistant Superintendent of Corporations  
Corporations Division

Assistant

Marion Barry, Jr.  
Mayor

FILED  
MAR 30 1989  
BY: *WJ*

ARTICLES OF INCORPORATION  
OF  
THE CENTER FOR PUBLIC INTEGRITY

TO: The D.C. Department of Consumer Regulatory Affairs  
Washington, D.C.

We, the undersigned natural persons of the age of twenty-one years or more, acting as incorporators, adopt the following Articles of Incorporation pursuant to the District of Columbia Non-Profit Corporation Act:

FIRST: The name of the corporation is THE CENTER FOR PUBLIC INTEGRITY.

SECOND: The period of duration is perpetual and the corporation shall have members.

THIRD: The corporation is organized and will be operated exclusively for the charitable and educational purposes of bringing a higher standard of integrity to the American political process and to government through informing and educating the public about critical issues of integrity. In pursuance of these purposes it shall have the powers to do all things necessary, proper and consistent with maintaining its tax exempt status under section 501 (c) (3). All references to sections in these Articles refer to the Internal Revenue Code of 1986 as amended or to comparable sections of subsequent internal revenue laws.

FOURTH: No part of the net earnings of the corporation shall inure to the benefit of or be distributed to any director, employee or other individual, partnership, estate, trust or corporation having a personal or private interest in the corporation. Compensation for services actually rendered and reimbursement for expenses actually incurred in attending to the affairs of this corporation shall be limited to reasonable amounts. No part of the activities of this corporation shall be the carrying on of propaganda or otherwise attempting to influence legislation to an extent that would disqualify it for tax exemption under Section 501(c) (3), and this corporation shall not participate in or intervene in (including the publishing or distributing of statements) any political campaign on behalf of or in opposition to any candidate for public office. Notwithstanding any other provision of these Articles or of any By-laws adopted thereunder, this corporation shall not take any action not permitted by the laws which then apply to this corporation.

FIFTH: The internal affairs of the corporation shall be regulated by its Board of Directors as described in the By-laws. Upon dissolution of the corporation, its assets shall be disposed of exclusively for the purposes of the corporation or distributed to such organizations organized and operated exclusively for charitable purposes which shall, at the time, qualify as exempt organizations under section 501(c)(3).

SIXTH: The registered agent is Gail M. Harmon, and the address, including street and number, of its initial registered office is 2001 S Street, N.W., Suite 430, Washington, D.C. 20009.

SEVENTH: The number of directors constituting the initial Board of Directors is three, and the names and addresses, including street number, of the persons who are to serve as the initial directors until the first annual meeting, or until their successors are elected and qualified, are:

- |                    |  |
|--------------------|--|
| (1) Charles Lewis  | 11807 Briar Mill Lane<br>Reston, VA 22094          |
| (2) Charles Piller | 3522 Wilson Avenue<br>Oakland, California 94602    |
| (3) Alex Benes     | 1412 27th Street<br>North Bergen, New Jersey 07047 |

The members of the Board of Directors shall be those individuals elected, from time to time, in accordance with the Bylaws.

EIGHTH: The names and addresses, including street and number, of the incorporators are:

- |                       |  |
|-----------------------|--|
| Valerie J. Wald       | 1750 T Street, N.W.<br>Washington, D.C. 20009  |
| Laury Marshall-Forbes | 1210 N. Stuart Street<br>Arlington, VA 22201   |
| Felissa F. Whitlock   | 4726 15th Street, NW<br>Washington, D.C. 20001 |

IN WITNESS THEREOF, we have hereunto set our hands and seals  
this 27<sup>th</sup> day of March, 1989.

Subscribed and sworn to  
before me this 27<sup>th</sup> day of  
March, 1989.

Blanca M. Perry  
Notary Public

My Commission Expires April 30, 1992

Valerie Wald  
Dr. M. M. Kuhn  
Susan J. Mitchell



EXHIBIT 3

Certificate

I, Charles Lewis, do hereby certify that I am President of The Center for Public Integrity, Inc. and that attached hereto is a current, complete and correct copy of its By-laws, which were adopted on \_\_\_\_\_ and are now in effect.

Date: \_\_\_\_\_

\_\_\_\_\_  
President

BY-LAWS  
OF  
THE CENTER FOR PUBLIC INTEGRITY  
As Adopted As of

ARTICLE I

Name and Purposes

Section 1.01. Name. The name of the organization is THE CENTER FOR PUBLIC INTEGRITY.

Section 1.02. Purpose. The Corporation is organized for the charitable and educational purposes of bringing a higher standard of integrity to the American political process and to government by informing and educating the public about critical issues of integrity.

ARTICLE II

Members

Section 2.01. Qualification. Membership shall be open to any organization or individual interested in bringing a higher

standard of integrity to the American political process and to government.

Section 2.02. Granting of Membership. Membership shall be granted when an organization or individual has met the standards for dues or contributions or any other uniform standards established by the Board of Directors. Members shall have no voting rights.

Section 2.03. Termination of Membership. The Board of Directors, by affirmative vote of two-thirds of all of the members of the Board, may suspend or expel a member, and may, by a majority vote or those present at any regularly constituted meeting, terminate the membership of any member who becomes ineligible for membership, or suspend or expel any member who shall be in default in the payment of dues for the period fixed in Section 2.05 of this article.

Section 2.04. Resignation. Any member may resign by filing a written resignation with the Secretary; however, such resignation shall not relieve the member so resigning of the obligation to pay any dues or other charges theretofore accrued and unpaid.

Section 2.05. Dues. Dues for members shall be established by the Board of Directors. The membership of any member

who is in default in the payment of dues for a period of three months from the time such dues became payable may be terminated by the Board in the manner provided in Section 2.03 of this article.

### ARTICLE III

#### AUTHORITY AND DUTIES OF DIRECTORS

Section 3.01. Authority of Directors. The Board of Directors is the policy-making body and may exercise all the powers and authority granted to the Corporation by law.

Section 3.02. Number, Selection, and Tenure. The Board shall consist of not less than three (3) directors. Each director shall hold office for a term of three (3) years. Terms of directors shall be staggered so that the terms of no more than one-third plus one of the directors shall expire in any year. Vacancies existing by reason of resignation, death, incapacity or removal before the expiration of his/her term shall be filled by a majority vote of the remaining directors. In the event of a tie vote, the President shall choose the succeeding director. Directors will elect their successors. A director elected to fill a vacancy shall be elected for the unexpired term of that director's predecessor in office.

Section 3.03. Resignation. Resignations are effective upon receipt by the Secretary of the Corporation of written notification.

Section 3.04. Regular Meetings. The Board of Directors shall hold at least two (2) regular meetings per calendar year. No less than five nor more than seven months shall elapse between regular meetings. The Board of Directors may provide by resolution the time and place of such meetings without other notice than such resolution.

Section 3.05. Special Meetings. Meetings shall be at such dates, times and places as the Board shall determine.

Section 3.06. Notice. Meetings may be called by the Chairperson or at the request of any two (2) directors by notice mailed, telephone, or telegraphed to each member of the Board not less than forty-eight (48) hours before such meeting.

Section 3.07. Quorum. A quorum shall consist of a majority of the Board attending in person or through teleconferencing. All decisions will be by majority vote of those present at a meeting at which a quorum is present. If less than a majority of the directors is present at said meeting, a majority of the directors present may adjourn the meeting on occasion without further notice.

Section 3.08. Action Without a Meeting. Any action required or permitted to be taken at a meeting of the Board of Directors (including amendment of these By-Laws) or of any committee may be taken without a meeting if all the members of the Board or committee consent in writing to taking the action without a meeting and to approving the specific action. Such consents shall have the same force and effect as a unanimous vote of the Board or of the committee as the case may be.

Section 3.09. Participation in Meeting by Conference Telephone. Members of the Board may participate in a meeting through use of conference telephone or similar communications equipment, so long as members participating in such meeting can hear one another.

Section 3.10. Committees. Committees of the Board. The Board of Directors may, by resolution adopted by a majority of the Directors in office, establish committees of the Board composed of at least two (2) persons which, except for an Executive Committee, may include non-Board members. The Board may make such provisions for appointment of the chair of such committees, establish such procedures to govern their activities, and delegate thereto such authority as may be necessary or desirable for the efficient management of the property, affairs, business, activities of the Corporation.

Section 3.11. Nominating Committee. There shall be a Nominating Committee, composed of the Chairperson and at least two (2) other members of the Board of Directors. Each member of the committee shall have one (1) vote and decision shall be made by the majority.

Section 3.12. Reimbursement. Directors shall serve without compensation with the exception that expenses incurred in the furtherance of The Center for Integrity's business are allowed to be reimbursed with documentation and with prior approval for expenses above two hundred dollars (\$200.00). In addition, Directors serving the organization in any other capacity are allowed to receive compensation therefore.

#### ARTICLE IV

##### AUTHORITY AND DUTIES OF OFFICERS

Section 4.01. Officers. The officers of the Center shall be a Chairperson, a Secretary, a Treasurer, and such other officers as the Board of Directors may designate. Any two (2) or more offices may be held by the same person, except the offices of Chairperson and Secretary.

Section 4.02. Appointment of Officers; Terms of Office. The officers of the Center shall be elected by the Board of



Directors at regular meetings of the Board, or, in the case of vacancies, as soon thereafter as convenient. New offices may be created and filled at any meeting of the Board of Directors. Terms of office may be established by the Board of Directors, but shall not exceed three (3) years. Officers shall hold office until a successor is duly elected and qualified. Officers shall be eligible for reappointment.

Section 4.03. Resignation. Resignations are effective upon receipt by the Secretary of the Board of a written notification.

Section 4.04. Removal. An officer may be removed by the Board of Directors at a meeting, or by action in writing pursuant to Section 2.05, whenever in the Board's judgment the best interests of the Corporation will be served thereby. Any such removal shall be without prejudice to the contract rights, if any, of the person so removed.

Section 4.05. Chairperson. The Chairperson of the Board shall be a director of the Center and will preside at all meetings of the Board of Directors. The Chairperson shall perform all duties attendant to that office, subject, however, to the control of the Board of Directors, and shall perform such other duties as on occasion shall be assigned by the Board of Directors.

Section 4.06. Treasurer. The Treasurer shall be a director of the Center and shall report to the Board of Directors at each regular meeting on the status of the Center's finances. The Treasurer shall work closely with the Executive Director to ascertain that appropriate procedures are being followed in the financial affairs of the Center, and shall perform such other duties as occasionally may be assigned by the Board of Directors.

Section 4.07. Secretary. The Board of Directors shall designate a Secretary to keep the minutes of all meetings of the Board of Directors in the books proper for that purpose. The Secretary may be a member of the Board of Directors or another person designated to fulfill these duties.

Section 4.08. Executive Director. The Executive Director of the Center shall be appointed by the Board of Directors and shall have such powers and duties as may be assigned by the Board. The Executive Director shall supervise the day-to-day operations of the Center and the receipt and disbursement of all funds, within guidelines established by the Board of Directors. The Executive Director shall report to the Board of Directors on a regular basis on all activities of the Center.

The Executive Director shall keep or cause to be kept complete and accurate accounts of receipts and disbursements of the Center, and shall deposit all money and other valuable

effects of the Center in such banks or depositories as the Board of Directors may designate. The Executive Director shall work closely with the Treasurer to ascertain that appropriate procedures are being followed in the financial affairs of the Center, and shall provide the Treasurer all information necessary for reports to the Board of Directors on the Center's finances. The Executive Director at all reasonable times shall exhibit the books and accounts to any officer or director of the Center, and shall arrange for an audit of the Center's finances on an annual basis.

The Executive Director will also serve as a full voting member of the Center Board of Directors. However, the Executive Director shall be disqualified from participating in any Board decision regarding compensation for that position.

## ARTICLE V

### INDEMNIFICATION

Every member of the Board of Directors, officer or employee of The Center for Integrity may be indemnified by the corporation against all expenses and liabilities, including counsel fees, reasonably incurred or imposed upon such members of the Board, officer or employee in connection with any threatened, pending, or completed action, suit or proceeding to which she/he may become involved by reason of her/his being or having been a

member of the Board, officer, or employee of the corporation, or any settlement thereof, unless adjudged therein to be liable for negligence or misconduct in the performance of her/his duties.

Provided, however, that in the event of a settlement the indemnification herein shall apply only when the Board approves such settlement and reimbursement as being in the best interest of the corporation. The foregoing right of indemnification shall be in addition and not exclusive of all other rights which such member of the Board, officer or employee is entitled.

ARTICLE VI

ADVISORY BOARDS AND COMMITTEE

Section 6.01. Establishment. The Board of Directors may establish one or more Advisory Boards or Committees.

Section 6.02. Size, Duration, and Responsibilities. The size, duration, and responsibilities of such boards and committees shall be established by a majority vote of the Board of Directors.

ARTICLE VII

FINANCIAL ADMINISTRATION

Section 7.01. Fiscal Year. The fiscal year of the Corporation shall be January 1 - December 31 but may be changed by resolution of the Board of Directors.

Section 7.02. Checks, Drafts, Etc. All checks orders for the payment of money, bills of lading, warehouse receipts, obligations, bills of exchange, and insurance certificates shall be signed or endorsed by such officer or officers or agent or agents of the Corporation and in such manner as shall from time to time be determined by resolution of the Board of Directors or

of any committee to which such authority has been delegated by the Board.

Section 7.03. Deposits and Accounts. All funds of the Corporation, not otherwise employed, shall be deposited from time to time in general or special accounts in such banks, trust companies, or other depositories as the Board of Directors or any committee to which such authority has been delegated by the Board may select, or as may be selected by the President or by any other officer or officers or agent or agents of the Corporation, to whom such power may from time to time be delegated by the Board. For the purpose of deposit and for the purpose of collection for that account of the Corporation, checks, drafts, and other orders of the Corporation may be endorsed, assigned, and delivered on behalf of the Corporation by any officer or agent of the Corporation.

Section 7.04. Investments. The funds of the Center may be retained in whole or in part in cash or be invested and reinvested on occasion in such property, real, personal, or otherwise, or stock, bonds, or other securities, as the Board of Directors in its sole discretion may deem desirable, without regard to the limitations, if any, now imposed or which may hereafter be imposed by law regarding such investments, and which are permitted to organizations exempt from Federal income taxation under Section 501(c)(3) of the Internal Revenue Code.

ARTICLE VIII

BOOKS AND RECORDS

Correct books of account of the activities and transactions of the Center shall be kept at the office of the Center. These shall include a minute book, which shall contain a copy of the Certificate of Incorporation, a copy of these By-laws, and all minutes of meetings of the Board of Directors.

ARTICLE IX

AMENDMENT OF BY-LAWS

These By-Laws may be amended by a majority vote of the Board of Directors, provided prior notice is given of the proposed amendment in the notice of the meeting at which such action is taken, or provided all members of the Board waive such notice, or by unanimous consent in writing without a meeting pursuant to Section 2.08.

Certified as approved by the Board of Directors this  
\_\_\_\_\_ day of \_\_\_\_\_, 1989.

\_\_\_\_\_  
Secretary

The Center for Public Integrity  
Form 1023, Part III, Question 2  
Exhibit 4

The Center for Public Integrity has outlined its fundraising plans for the next three years. In years one and two, the Center will be financed entirely by donations from corporations, labor organizations and foundations. Beginning in year two and continuing into year three, the Center may receive additional revenue from a computerized database that will contain information compiled by the Center from various government agencies. The Center intends to charge a small fee for access to the database. (See answer to part III, question 9 for more information.) In year three, the Center will also launch a nationwide membership campaign and will begin raising funds through collection of membership dues.

*deacs.  
Fundraising*



EXHIBIT 5

EXHIBIT 4

The Center for Public Integrity ("the Center") was created for the charitable and educational purposes of informing and educating the American public about critical issues of integrity in the political process and in government. The Center will accomplish these purposes by sponsoring long-term analyses of federal agencies and their employees and reporting the results of its research to the public.

#### Purposes

As the New York Times recently observed, "Americans are being insulted by a political culture that places private gain above public trust." The "revolving door" of Washington politics describes a widespread practice of former government officials cashing in on the prestige, experience, access and sometimes inside knowledge of their positions of public trust. For example, despite unprecedented trade deficits, U.S. officials responsible for negotiating trade agreements with other nations have often left their jobs only to be employed the next week as trade consultants for foreign governments. EPA officials pledged to preserve the environment leave their jobs to work for companies convicted of hazardous waste dumping.

Instead of public service, current political culture encourages government officials to use their positions as step-

ping stones to lucrative private sector employment. When employees assume positions of public trust with the intention of later working for their "opponents," be they regulated companies or foreign governments, Americans can no longer assume that public officials are acting in their best interests.

The Center recognizes that existing laws regulating ethics in government, which could curb some of this behavior, are weak and full of loopholes. Even the vague laws that are on the books are seldom enforced. By educating the public about government's "revolving door" and exposing its pervasiveness, the Center hopes to encourage the public to demand higher levels of ethics in government and a better quality of government service.

#### Background

Charles Lewis, founder and executive director of the Center for Public Integrity, became aware of these unethical practices while working as an investigative reporter for ABC and CBS television news. Most recently, he was a producer for the award-winning program "60 MINUTES." The last story he reported and produced, "Foreign Agent," discussed the very phenomenon the Center is designed to combat. That story covered U.S. officials and political consultants -- including top campaign aides to the two presidential candidates -- who are registered as foreign agents

with the U.S. Justice Department, paid to represent and assist foreign countries and foreign companies in Washington.

### Activities

The Center will use a quasi-journalistic approach to accomplish its mission. With a small, savvy, responsible staff of young investigative reporters, the Center will focus not so much on individual problems of malfeasance, as the overall, institutional extent and effects of such widespread mercenary activity.

In its first year of operation, the Center plans to conduct comprehensive, thorough "revolving door" analyses of several key federal agencies involved in trade, including the U.S. Trade Representative's office, the International Trade Commission, and the trade components of the U.S. Departments of Commerce and State. The Center's reporting will not focus on particular individuals, but on entire agencies. Investigations will reveal, name by name, who the agency's officials went to work for, how much they were paid, and whether their actions appear to have influenced the agency's policies. The research will not focus on a year time period, but instead on durations of a decade or more.

Conventional news media are not tackling this type of broad, time-consuming, detailed reporting, and most of the coverage they

have provided is not illuminating. Furthermore, no public interest group is specifically and directly addressing the integrity problem. The Center's brand of research and reporting activities are therefore not only necessary, but they are not and likely will not be undertaken by existing organizations.

Once data is collected, the Center will provide its findings to the national news media. Center reporters may write newspaper or magazine articles themselves, or the Center may reach the public by holding news conferences and making bold pronouncements that the media can quote. The Center also intends to distribute its findings in a free bi-monthly newsletter. An initial circulation list compiled by the Center will be targeted towards newspaper and magazine reporters and concerned members of associations or businesses. Any interested individual may contact the Center to be put on the newsletter mailing list at no charge. In addition, the Center may also publish its information in reports and monographs, assist in the preparation of television documentaries and testify before Congress.

In the future, the Center will explore the possibilities of doing analyses of other government agencies, such as the Department of Defense and the Environmental Protection Agency. Other project ideas include investigative profiles of Washington's

leading foreign lobbyists and the effects on various American industries of the revolving door to foreign lobbying. The Center may also highlight examples of real courage and integrity by public officials.

The Center will also explore the possibility of creating a centralized educational computer database of public information that is now scattered throughout a maze of government agencies. For example, pieces of government data on foreign investment in the United States are compiled by the Departments of Agriculture, Commerce, Interior and up to thirteen other agencies. By putting the disparate pieces of the data in one easily accessible place, the Center will assist the public in obtaining a full range of information on a given subject.

Users may gain access to the database for a small fee designed to help the Center cover its operating costs. Many of the anticipated subscribers, such as libraries and news organizations, will help disseminate the information to even wider segments of the general public.

Over time, the Center will help increase public awareness of these issues. As a force for constructive change, the Center may also recommend new standards of conduct aimed at raising the

quality of government service. Through all of these means, the Center will attempt to hold those in public positions accountable to reasonable, appropriate standards of integrity, and will propose constructive ways to implement permanently those standards.

### Analysis

It is submitted that the Center for Public Integrity qualifies as a charitable and educational organization within the meaning of Section 501(c)(3) of the Internal Revenue Code.

Department of Treasury regulations provide that an organization that advances education is charitable. See Treas. Reg. 1.501(c)(3)-1(d)(3). Informing the public about the professional activities of government officials that are otherwise unreported is clearly an educational activity. Furthermore, because this information can alert the public to situations in which officials' activities adversely influence the operations of government, the subject is both useful to the individual and beneficial to the community.

IRS has ruled that the publication and dissemination of research advances education. See Rev. Rul. 67-4, 1967-1 C.B. 121.



The Center will conduct research that, due to its extensive and painstaking nature, is not being done by other organizations. The results of the research will be published by the Center itself, by other widely circulated newspapers or magazines, and may be accessed through its proposed database.

An organization formed to elevate the standards of ethics and morality in political campaigns and which collects and disseminates campaign practice information in a non-partisan manner qualifies as an educational organization under Section 501(c)(3). See Rev. Rul. 76-456, IRB 1976-47, 11. Like that organization, the Center hopes to raise standards of ethics and morality in government, specifically executive branch administrative agencies, and its research will be conducted in a non-partisan manner.

The ultimate goal of the Center -- for citizens to increase their knowledge and understanding of government officials' practices and participate more effectively in establishing necessary standards of conduct for these officials -- is also analogous to the goals of a political education organization. In the ruling cited above, IRS determined that this type of educational activity on the subject of political campaigns is both useful to the individual and beneficial to the community.

IRS has also ruled that an organization formed "to encourage [a] newspaper to meet high standards of journalism by educational methods" is an exempt educational organization under Treas. Reg. § 1.501(c)(3)-1(d)(3). Rev. Rul. 74-615, IRB 1974-52, 9. By researching and educating the public about how the "revolving door" can influence government's operations, the Center also hopes to encourage high standards of professional conduct. The Center's reports will be factual, non-partisan and not intended to further any political or ideological view.

Accordingly, the Center qualifies as a charitable and educational organization and should be granted tax exemption under Section 501(c)(3) of the Internal Revenue Code.

EXHIBIT 6

The Center for Public Integrity  
Form 1023, Part III, Question 4e  
Exhibit 6

None of the current board members of the Center for Public Integrity will be contributing money to the Center. However, it is anticipated that some members of the Board who will be added in the future may make contributions to the Center.

EXHIBIT 7

The Center for Public Integrity  
Form 1023, Part III, Question 9a  
Exhibit 7

The Center will require payment for access to its computerized database, which is still in the planning stages. The cost of developing the database is estimated at \$280,000 over the next three years. This total includes costs of a feasibility study of the project, researchers, keypunch operators, marketers, and computer hardware and software.

The charge for accessing the computer database will be designed to cover the Center's costs in developing and operating it. Specific charges will be based on marketers' estimates of the number of users and the frequency of use, and different charges may be determined for on-line and call-up subscribers to the database. Any revenue from the database that exceeds the operating costs will go to the general budget of the Center.

The computerized database will further the Center's educational purposes by helping the American public gain access to information paid for with their tax dollars. As explained more fully in Part III, Question 3, government-compiled data is often organized by agency, not by subject matter. By working to compile government information by subject, the Center will increase public access to a wider range of government information. In addition, the Center will reduce the overall burdens of government by eliminating the need for individual agencies to respond repeatedly to numerous public requests for that information.

EXHIBIT 8

Center for Public Integrity  
Form 1023, Part III, Question 10  
Exhibit 8

(a) The only requirements for membership are payment of dues and United States citizenship. Annual membership dues are currently \$20.

(b) The Center's first large-scale efforts to attract members will occur around 1991, after the Center has already established its operations and obtained initial publicity through public speakers and published reports. The membership solicitation effort will be conducted through a national direct mail campaign.

(c) All services, products and benefits of the Center for Public Integrity will be available to the general public, either for free or for a nominal charge designed to cover the Center's costs. These benefits include results of the Center's research, access to its proposed computerized database, and any literature published by the Center.



EXHIBIT 9

THE CENTER FOR PUBLIC INTEGRITY

Annual Budget  
Year 1 -- Beginning April 1, 1989

I. General and Administrative

Rent/Utilities (1500 square feet @ \$28/ft.)	\$42,000.00
Salaries, Benefits and Taxes	\$327,600.00
(Broken down as follows:	
Office Manager/Research	\$30,000.00
Dir. of Marketing (P/T)	30,000.00
or six month)	
Researcher	30,000.00
Reporter	40,000.00
Reporter	40,000.00
Executive Director	110,000.00
Benefits and Taxes	47,600.00
Telephone (6 units) (Note 1)	
Lease	
a. First Installation (3 units @12 mos.)	\$6,000.00
b. Second Installation (3 units @ 6 mos.)	3,000.00
Service	
a. First Installation	3,600.00
d. Second Installation	1,800.00
Automation Package (Note 1)	
Equipment(4terms., fax, printer, software, etc.)	9,000.00
Service	2,000.00
Typewriters	1,000.00
Office Supplies	
Copy machine lease/maintenance	\$ 5,000.00
Miscellaneous (paper, etc.)	2,000.00
NEXIS	11,400.00
Installation	\$ 200
Printer	1,600
Monthly fees	9,600
(incl. usage; 800 X 12)	
Legal and Accounting	
Legal	\$ 3,000.00
Audit Fee	2,000.00
Accountants Retainer	2,400.00
Dues and Subscriptions	500.00
Business Entertainment	10,000.00
(lunches with sources, etc.)	
Total: General and Administrative	\$ 432,300.00

II. General Publications

Group brochure	\$ 3,000.00
Annual Report	5,000.00
Center BiMonthly Newsletter	
Printing	\$ 12,000.00
Postage and Distribution	3,000.00

Total: General Publications \$ 23,000.00

III. Special Projects/Events

Annual Meeting	\$ 5,000.00
Travel/Lodging	1,000.00
Press Conferences	2,000.00

Total: Special Projects/Events \$ 8,000.00

IV. Database Feasibility Project

Hiring of part-time consultant(s) to assist Center in determining how viable it would be to prepare and organize a specific, unique database of government information, to be sold to on-line or call-up subscriber. Information must be obtained from approximately 16 federal agencies, and a computer program must be developed to make the information accessible and useful.	\$20,000.00
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Total: Database Feasibility Project \$ 20,000.00

TOTAL ESTIMATED EXPENSES \$ 483,000.00

Note 1: Lease with option to buy.

THE CENTER FOR PUBLIC INTEGRITY

Annual Budget  
Year 1 -- Beginning April 1, 1989

Estimated Income

I. High Dollar Donors	\$50,000
II. Institutional Contributions (Foundations, Corporations) and Labor Unions	\$500,000
III. Interest Income	\$30,000
 TOTAL ESTIMATED INCOME	 \$580,000

THE CENTER FOR PUBLIC INTEGRITY

Annual Budget  
Year 2 -- Beginning April 1, 1990

I. General and Administrative

Rent/Utilities (1500 square feet @ \$28/ft.)	\$42,000.00
Salaries, Benefits and Taxes	\$397,800.00
(Broken down as follows:	
Office Manager/Research	\$35,000.00
Dir. of Marketing (P/T)	35,000.00
or six month)	
Researcher	30,000.00
Reporter	45,000.00
Reporter	45,000.00
Reporter	40,000.00
Executive Director	110,000.00
Benefits and Taxes	57,800.00
Telephone (7 units) (Note 1)	
Lease	
a. First and Second Installation	
(6 units @ 12 mos.)	\$12,000.00
b. Third Installation (1 unit @ 12 mos.)	2,000.00
Service	
a. First and Second Installation	
(6 units)	7,200.00
b. Third Installation (1 unit)	1,200.00
Automation Package (Note 1)	
Equipment (6 terms., fax, printer,	
software, etc.)	\$ 13,500.00
Service	3,000.00
Office Supplies	
Copy machine lease/maintenance	\$ 5,000.00
Miscellaneous (paper, etc.)	2,000.00
NEXIS	
Monthly fees	
(incl. usage; 1000 X 12)	15,000.00
Legal and Accounting	
Legal	\$ 3,000.00
Audit Fee	2,000.00
Accountants Retainer	2,500.00
Dues and Subscriptions	
Business Entertainment	700.00
(lunches with sources, etc.)	12,000.00
Total: General and Administrative	\$ 520,900.00

## II. General Publications

Group brochure	\$ 6,000.00
Annual Report	7,000.00
Center BiMonthly Newsletter	
Printing	\$ 15,000.00
Postage and Distribution	5,000.00
Total: General Publications	\$ 33,000.00

## III. Special Projects/Events

Annual Meeting	\$ 7,000.00
Travel/Lodging	3,000.00
Press Conferences	2,500.00
Documentary Production	150,000.00
(research, reporting, shooting, and editing an hour documentary on a subject pertinent to the Center for Public Integrity. Any revenue the tape earns goes to supporting the Center).	
Total: Special Projects/Events	\$ 162,500.00

## IV. Database Project

Following the Year 1 feasibility study and development of a computer program -- assuming that all signs point to full development -- through research and computer keypunch work, etc., via the use of necessary, state-of-the-art equipment, a specific, unique database of government information will be created and sold. Information must be obtained from approximately 16 federal agencies, and must be made accessible and useful to on-line or call-up subscribers. Anticipated costs -- researchers, keypunch operators, marketers, computer hardware and software, etc. -- are at this juncture difficult to estimate. Any revenue received from the database, beyond its operating costs, will go towards supporting the budget of the Center for Public Integrity.	\$ 130,000.00
Total: Database Project	\$130,000.00

TOTAL ESTIMATED EXPENSES \$846,400.00

Note 1: Lease with option to buy.

THE CENTER FOR PUBLIC INTEGRITY

Annual Budget  
Year 2 -- Beginning April 1, 1990

Estimated Income

I. High Dollar Donors	\$100,000
II. Institutional Contributions (Foundations, Corporations) and Labor Unions	\$600,000
III. Database Subscriber Fees	\$50,000
III. Interest Income	\$40,000
 TOTAL ESTIMATED INCOME	 \$790,000

THE CENTER FOR PUBLIC INTEGRITY

Annual Budget  
Year 3 -- Beginning April 1, 1991

I. General and Administrative

Rent/Utilities (1500 square feet @ \$30/ft.)	\$66,000.00
Salaries, Benefits and Taxes	663,160.00
(Broken down as follows:	
Office Manager/Research	\$38,000.00
Dir. of Marketing (P/T or six month)	38,000.00
Researcher	32,000.00
Reporter	45,000.00
Reporter	45,000.00
Reporter	40,000.00
Reporter	40,000.00
Executive Director	110,000.00
Benefits and Taxes	101,160.00
Telephone (7 units) (Note 1)	
Lease	
a. First and Second Installation (6 units @ 12 mos.)	\$ 12,000.00
b. Third Installation (1 unit @ 12 mos.)	2,000.00
c. Fourth Installation (2 units @12 mos.)	4,000.00
Service	
a. First and Second Installation (6 units)	7,200.00
b. Third Installation (1 unit)	1,200.00
c. Fourth Installation (2 units)	2,400.00
Automation Package (Note 1)	
Equipment (8 terms., fax, printer, software, etc.)	\$ 17,500.00
Service	5,000.00
Office Supplies	
Copy machine lease/maintenance	\$ 5,000.00
Miscellaneous (paper, etc.)	3,000.00
NEXIS-Monthly fees (incl. usage; 1000 X 12)	24,000.00
Legal and Accounting	
Legal	\$ 3,000.00
Audit Fee	2,500.00
Accountants Retainer	2,500.00
Dues and Subscriptions	
Business Entertainment (lunches with sources, etc.)	900.00 14,000.00
Total: General and Administrative	\$ 835,360.00



## II. General Publications

Group brochure	\$ 6,000.00
Annual Report	7,000.00
Center BiMonthly Newsletter	
- Printing	\$ 18,000.00
Postage and Distribution	7,000.00

Total: General Publications \$ 38,000.00

## III. Special Projects/Events

Annual Meeting	\$ 7,500.00
Travel/Lodging	5,000.00
Press Conferences	3,000.00

Total: Special Projects/Events \$ 15,500.00

## IV. Database Project

Following Year 1 and 2 of studying and setting up a specific, unique database of government information obtained from approximately 16 federal agencies, and made accessible and useful to on-line or call-up subscribers -- Year 3 will be the first unfettered year of its operation. Anticipated costs -- researchers, keypunch operators, marketers, computer hardware and software, etc. -- are at this juncture difficult to estimate. Any revenue received from this educational database, beyond its operating costs, will go towards supporting the budget of the Center for Public Integrity.

\$ 130,000.00

Total: Database Project \$130,000.00

## V. Direct Mail/National Membership Project

Thousands of membership solicitation letters will be mailed throughout the country, to expand the group and to educate the public about the Center's research findings. By Year 3, the Center for Public Integrity will be financially more secure to enable such an outreach, growth effort and it will have a track record of accomplishment to present and explain to the American people.

Total: Direct Mail/National Membership Project \$ 80,000.00

TOTAL ESTIMATED EXPENSES \$1,098,860.00

Note 1: Lease with option to buy.

THE CENTER FOR PUBLIC INTEGRITY

Annual Budget  
Year 3 -- Beginning April 1, 1991

Estimated Income

I. High Dollar Donors	\$100,000
II. Institutional Contributions (Foundations, Corporations) and Labor Unions	\$700,000
III. Database Subscriber Fees	\$100,000
IV. Documentary Receipts	\$200,000
V. Interest Income	\$60,000
 TOTAL ESTIMATED INCOME	 \$1,160,000

EXHIBIT 10

# Power of Attorney and Declaration of Representative

▶ See separate instructions.

Part I Power of Attorney			For IRS Use Only		
Please type or print	Taxpayer(s) name(s) The Center for Public Integrity	Taxpayer identification number pending	File So.		
	Address (number and street) 4600 Connecticut Ave. NW, Suite 923	Plan number (if applicable)	Level		
	City, state, and ZIP code Washington, DC 20008	Telephone number 202/659-1177	Receipt		
			Powers		
			Blind T.		
			Action		
			Ret. Ind.		

hereby appoint(s) the following individual(s)\*

Name	CAF Number	Address	New Address	Telephone Number
Gail M. Harmon	2600-4394R	2001 S Street, NW, Suite 430 Washington, DC 20009		(202)328-3500
Sandra K. Pfau	pending	same as above		same

as attorney(s)-in-fact to represent the taxpayer(s) before any office of the Internal Revenue Service for the following tax matter(s) (specify the type(s) of tax and year(s) or period(s) (date of death if estate tax)):

Type of tax (Individual, corporate, etc.)	Federal tax form number (1040, 1120, etc.)	Year(s) or period(s) (Date of death if estate tax)
Application for federal tax exemption	Form 1023	

The attorney(s)-in-fact (or either of them) are authorized, subject to revocation, to receive confidential information and to perform any and all acts that the principal(s) can perform with respect to the above specified tax matters (excluding the power to receive refund checks and the power to sign the return, unless specifically granted below). See Regulations section 1.6012-1(a)(5) for information on returns made by agents. (List excludable powers below. Indicate if you are granting the power to sign the return.)

- Send originals of all notices and all other written communications in proceedings involving the above tax matters to the appointee first named above, and a duplicate copy of all notices and all other written communications to the taxpayer named above, or
- Send copies of all notices and all other written communications addressed to the taxpayer(s) in proceedings involving the above tax matters to:
  - 1  the appointee first named above, or
  - 2  (names of not more than two of the appointees named above)

- Initial here ▶ ..... if you are granting the power to receive, but not to endorse or cash, refund checks for the above tax matters to:
- 3  the appointee first named above, or
  - 4  (name of one of the above designated appointees) ▶ .....

This power of attorney revokes all earlier powers of attorney and tax information authorizations on file with the Internal Revenue Service for the same tax matters and years or periods covered by this power of attorney, except the following:

(Specify to whom granted, date, and address including ZIP code, or refer to attached copies of earlier powers and authorizations.)

### Signature of or for taxpayer(s)

(If signed by a corporate officer, partner, or fiduciary on behalf of the taxpayer, I certify that I have the authority to execute this power of attorney on behalf of the taxpayer.)

..... (Signature) ..... (Title, if applicable) ..... (Date)

(Also type or print your name below if signing for a taxpayer who is not an individual.)

..... (Signature) ..... (Title, if applicable) ..... (Date)

If the power of attorney is granted to a person other than an attorney, certified public accountant, enrolled agent, or enrolled actuary, the taxpayer(s) signature must be witnessed or notarized below. (The representative must complete Part II. List representatives there only if they are recognized to practice before the Internal Revenue Service.)

The person(s) signing as or for the taxpayer(s): (Check and complete one.)

is/are known to and signed in the presence of the two disinterested witnesses whose signatures appear here:

----- (Signature of Witness) ----- (Date)

----- (Signature of Witness) ----- (Date)

appeared this day before a notary public and acknowledged this power of attorney as a voluntary act and deed.

Witness: ----- (Signature of Notary) ----- (Date) ----- NOTARIAL SEAL (if required by state law)

**Part II Declaration of Representative**

I declare that I am not currently under suspension or disbarment from practice before the Internal Revenue Service; that I am aware of Treasury Department Circular No. 230 (31 CFR, Part 10), as amended, regulations governing the practice of attorneys, certified public accountants, enrolled agents, enrolled actuaries, and others; and that I am one of the following:

- a a member in good standing of the bar of the highest court of the jurisdiction shown below;
- b duly qualified to practice as a certified public accountant in the jurisdiction shown below;
- c enrolled as an agent under the requirements of Treasury Department Circular No. 230;
- d a bona fide officer of the taxpayer organization;
- e a full-time employee of the taxpayer;
- f a member of the taxpayer's immediate family (spouse, parent, child, brother or sister);
- g a fiduciary for the taxpayer;
- h an enrolled actuary (the authority of an enrolled actuary to practice before the Service is limited by section 10.3(d)(1) of Treasury Department Circular No. 230);
- i Commissioner's special authorization (see instructions for Part II, item i) -----

and that I am authorized to represent the taxpayer identified in Part I for the tax matters specified there.

Designation (insert appropriate letter from above list)	Jurisdiction (state, etc.) or Enrollment Card Number	Signature	Date
a	Mass DE	[Signature]	4.25.89
a	Id.	[Signature]	1.26.91

EXHIBIT 11

<b>Form 872-C</b> (Rev. March 1986)	Department of the Treasury—Internal Revenue Service <b>Consent Fixing Period of Limitation Upon          Assessment of Tax Under Section 4940 of the          Internal Revenue Code</b> (See Form 1023 instructions for Part IV, line 3.)	OMB No. 1545-0056 Expires 3-31-89
		To be used with Form 1023. Submit in duplicate.

Under section 6501(c)(4) of the Internal Revenue Code, and as part of a request filed with Form 1023 that the organization named below be treated as a publicly supported organization under section 170(b)(1)(A)(vi) or section 509(a)(2) during an advance ruling period,

The Center for Public Integrity  
*(Exact legal name of organization)*

4600 Connecticut Ave. NW, #923, Washington DC 20008  
*(Number, street, city or town, state, and ZIP code)*

} and the District Director  
 of Internal Revenue

Consent and agree that the period for assessing tax (imposed under section 4940 of the Code) for any of the 5 tax years in the advance ruling period will extend 8 years, 4 months, and 15 days beyond the end of the first tax year.

However, if a notice of deficiency in tax for any of these years is sent to the organization before the period expires, then the time for making an assessment will be further extended by the number of days the assessment is prohibited, plus 60 days.

Ending date of first tax year... March.....

Name of organization	Date
The Center for Public Integrity	
Officer or trustee having authority to sign	
<b>Signature ►</b>	
District Director	Date

By ►

Form **872-C**  
(Rev. March 1985)

Department of the Treasury—Internal Revenue Service

**Consent Fixing Period of Limitation Upon  
Assessment of Tax Under Section 4940 of the  
Internal Revenue Code**

(See Form 1023 instructions for Part IV, line 3.)

O.M.B. No. 1545-0056  
Expires 3-31-89

To be used with Form  
1023. Submit in  
duplicate.

Under section 6501(c)(4) of the Internal Revenue Code, and as part of a request filed with Form 1023 that the organization named below be treated as a publicly supported organization under section 170(b)(1)(A)(vi) or section 509(a)(2) during an advance ruling period.

The Center for Public Integrity

*(Exact legal name of organization)*

4600 Connecticut Ave. NW, #923, Washington DC 20008

*(Number, street, city or town, state, and ZIP code)*

} and the District Director  
of Internal Revenue

Consent and agree that the period for assessing tax (imposed under section 4940 of the Code) for any of the 5 tax years in the advance ruling period will extend 8 years, 4 months, and 15 days beyond the end of the first tax year.

However, if a notice of deficiency in tax for any of these years is sent to the organization before the period expires, then the time for making an assessment will be further extended by the number of days the assessment is prohibited, plus 60 days.

Ending date of first tax year... March .....

Name of organization

The Center for Public Integrity

Date

Officer or trustee having authority to sign

Signature ►

District Director

Date

By ►

For Paperwork Reduction Act Notice, see page 1 of the Form 1023 instructions.



EXHIBIT 12

**User Fee for Exempt Organization  
 Determination Letter Request**

For IRS Use Only

Control number \_\_\_\_\_  
 Amount paid \_\_\_\_\_  
 User fee screener \_\_\_\_\_

Attach to determination letter applications.

1 Name of organization The Center for Public Integrity

2 Type of request (check only one box and include a check or money order made payable to Internal Revenue Service for the amount of the indicated fee):

- a  Initial request for recognition of tax-exempt status under section 501(a) (except a section 401(a) trust) by an organization whose gross receipts have not exceeded (or are not expected to exceed) \$5,000 annually averaged over its first four taxable years. If you check this box you must complete the income certification below . . . . . \$ 150

**Certification**

I hereby certify that the gross receipts of \_\_\_\_\_ (enter name of organization) have not exceeded (or are not expected to exceed) \$5,000 annually averaged over its first four years of operation.

Signature > \_\_\_\_\_ Title \_\_\_\_\_

- b  All other initial requests for recognition of tax-exempt status under section 501(a) or 521 (except a section 401(a) trust) . . . . . \$ 300
- c  Private foundation which has completed a section 507 termination and which seeks a determination letter that it is now a public charity. . . . . \$ 200

**Instructions**

The Revenue Act of 1987 requires payment of a user fee for determination letter requests submitted to the Internal Revenue Service. The fee must accompany each request submitted to a key district office with a postmark date or receipt date (if not mailed) after January 31, 1988.

The fee for each type of request for an exempt organization determination letter is listed in item 2 of this form. Check the block that describes the type of request you are submitting, and attach this form to the front of your request form along with a check or money order for the amount indicated. Make the check or money order payable to the Internal Revenue Service.

Determination letter requests received with no payment or with an insufficient payment will be returned to the applicant for submission of the proper fee. To avoid delays in receiving a determination letter,

be sure that your application is sent to the applicable address shown below. These addresses supersede the addresses listed in Publication 557 and all application forms.

If entity is in this IRS District ▼	Send fee and request for determination letter to this address ▼	
Brooklyn, Albany, Augusta, Boston; Buffalo, Burlington, Hartford, Mannattan, Portsmouth, Providence	Internal Revenue Service EP/EO Division P. O. Box 1680, GPO Brooklyn, NY 11202	Dallas, Albuquerque, Austin, Cheyenne, Denver, Houston, Oklahoma City, Phoenix, Salt Lake City, Wichita Internal Revenue Service EP/EO Division Mail Code 4950 DAL 1100 Commerce Street Dallas, TX 75242
Baltimore, District of Columbia, Pittsburgh, Richmond, Newark, Philadelphia, Wilmington, any U.S. possession or foreign country	Internal Revenue Service EP/EO Division P. O. Box 17010 Baltimore, MD 21203	Atlanta, Birmingham, Columbia, Ft. Lauderdale, Greensboro, Jackson, Jacksonville, Little Rock, Nashville, New Orleans Internal Revenue Service EP/EO Division C-1130 Atlanta, GA 30301
Cincinnati, Cleveland, Detroit, Indianapolis, Louisville, Parkersburg	Internal Revenue Service EP/EO Division P. O. Box 3159 Cincinnati, OH 45201	Anchorage, Las Vegas, Boise, Los Angeles, Honolulu, Portland, Laguna Niguel, San Jose, Seattle Internal Revenue Service EO Application Receiving Room 5127, P. O. Box 486 Los Angeles, CA 90053-0486
		Sacramento, San Francisco Internal Revenue Service EO Application Receiving Stop SF 4446 P. O. Box 36001 San Francisco, CA 94102
		Chicago, Aberdeen, Des Moines, Fargo, Helena, Milwaukee, Omaha, St. Louis, St. Paul, Springfield Internal Revenue Service EP/EO Division 230 S. Dearborn DPN 20-5 Chicago, IL 60604

Attach Check or Money Order Here