

# Form 1023 Checklist

(Revised December 2017)

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

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**Note:** Retain a copy of the completed Form 1023 in your permanent records. Refer to the General Instructions regarding Public Inspection of approved applications.

**Check each box to finish your application (Form 1023). Send this completed Checklist with your filled-in application. If you have not answered all the items below, your application may be returned to you as incomplete.**

- ☒ Assemble the application and materials in this order.
  - ✓ • Form 1023 Checklist
  - Form 2848, *Power of Attorney and Declaration of Representative* (if filing)
  - Form 8821, *Tax Information Authorization* (if filing)
  - Expedite request (if requesting)
  - ✓ Application (Form 1023 and Schedules A through H, as required)
  - ✓ Articles of organization
    - Amendments to articles of organization in chronological order
  - ✓ Bylaws or other rules of operation and amendments
    - Documentation of nondiscriminatory policy for schools, as required by Schedule B
  - Form 5768, *Election/Revocation of Election by an Eligible Section 501(c)(3) Organization To Make Expenditures To Influence Legislation* (if filing)
  - All other attachments, including explanations, financial data, and printed materials or publications. Label each page with name and EIN.
- ☒ User fee payment placed in envelope on top of checklist. DO NOT STAPLE or otherwise attach your check or money order to your application. Instead, just place it in the envelope.
- ☒ Employer Identification Number (EIN)
- ☒ Completed Parts I through XI of the application, including any requested information and any required Schedules A through H.
  - You must provide specific details about your past, present, and planned activities.
  - Generalizations or failure to answer questions in the Form 1023 application will prevent us from recognizing you as tax exempt.
  - Describe your purposes and proposed activities in specific easily understood terms.
  - Financial information should correspond with proposed activities.
- ☒ Schedules. Submit only those schedules that apply to you and check either "Yes" or "No" below.

Schedule A	Yes ___	No <input checked="" type="checkbox"/>	Schedule E	Yes ___	No <input checked="" type="checkbox"/>
Schedule B	Yes ___	No <input checked="" type="checkbox"/>	Schedule F	Yes ___	No <input checked="" type="checkbox"/>
Schedule C	Yes ___	No <input checked="" type="checkbox"/>	Schedule G	Yes ___	No <input checked="" type="checkbox"/>
Schedule D	Yes ___	No <input checked="" type="checkbox"/>	Schedule H	Yes <input checked="" type="checkbox"/>	No ___

- ☒ An exact copy of your complete articles of organization (creating document). Absence of the proper purpose and dissolution clauses is the number one reason for delays in the issuance of determination letters.
  - Location of Purpose Clause from Part III, line 1 (Page, Article and Paragraph Number) Pg. 1, Article II
  - Location of Dissolution Clause from Part III, line 2b or 2c (Page, Article and Paragraph Number) or by operation of state law Pg. 1-2, Article IV
- ☒ Signature of an officer, director, trustee, or other official who is authorized to sign the application.
  - Signature at Part XI of Form 1023.
- ☒ Your name on the application must be the same as your legal name as it appears in your articles of organization.

Send completed Form 1023, user fee payment, and all other required information, to:

Internal Revenue Service  
Attention: EO Determination Letters  
Stop 31  
P.O. Box 12192  
Covington, KY 41012-0192

If you are using express mail or a delivery service, send Form 1023, user fee payment, and attachments to:

Internal Revenue Service  
Attention: EO Determination Letters  
Stop 31  
201 West Rivercenter Boulevard  
Covington, KY 41011

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

▶ **Do not enter social security numbers on this form as it may be made public.**  
▶ **Go to [www.irs.gov/Form1023](http://www.irs.gov/Form1023) for instructions and the latest information.**

**Note:** If exempt status is approved, this application will be open for public inspection.

Use the instructions to complete this application and for a definition of all **bold** items. For additional help, call IRS Exempt Organizations Customer Account Services toll-free at 1-877-829-5500. Visit our website at [www.irs.gov](http://www.irs.gov) for forms and publications. If the required information and documents are not submitted with payment of the appropriate user fee, the application may be returned to you.

Attach additional sheets to this application if you need more space to answer fully. Put your name and EIN on each sheet and identify each answer by Part and line number. Complete Parts I – XI of Form 1023 and submit only those Schedules (A through H) that apply to you.

**Part I Identification of Applicant**

<b>1</b> Full name of organization (exactly as it appears in your <b>organizing document</b> )		<b>2</b> c/o Name (if applicable)	
Freedom of Form Foundation, Inc.		Michael Norsworthy	
<b>3</b> Mailing address (Number and street) (see instructions)	Room/Suite	<b>4</b> Employer Identification Number (EIN)	
66 Dinsmore Ave	Apt 503	82-4415111	
City or town, state or country, and ZIP + 4		<b>5</b> Month the annual accounting period ends (01 – 12)	
Framingham, MA 01702		12	
<b>6</b> Primary contact (officer, director, trustee, or <b>authorized representative</b> )		<b>b</b> Phone: 404-630-2427	
a Name:		<b>c</b> Fax: (optional)	
Michael Norsworthy			
<b>7</b> Are you represented by an authorized representative, such as an attorney or accountant? If "Yes," provide the authorized representative's name, and the name and address of the authorized representative's firm. Include a completed Form 2848, <i>Power of Attorney and Declaration of Representative</i> , with your application if you would like us to communicate with your representative.		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>8</b> Was a person who is not one of your officers, directors, trustees, employees, or an authorized representative listed in line 7, paid, or promised payment, to help plan, manage, or advise you about the structure or activities of your organization, or about your financial or tax matters? If "Yes," provide the person's name, the name and address of the person's firm, the amounts paid or promised to be paid, and describe that person's role.		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>9a</b> Organization's website: <a href="http://www.freedomofform.org">www.freedomofform.org</a>			
<b>b</b> Organization's email: (optional) <a href="mailto:mnorsworthy@gmail.com">mnorsworthy@gmail.com</a>			
<b>10</b> Certain organizations are not required to file an information return (Form 990 or Form 990-EZ). If you are granted tax-exemption, are you claiming to be excused from filing Form 990 or Form 990-EZ? If "Yes," explain. See the instructions for a description of organizations not required to file Form 990 or Form 990-EZ.		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>11</b> Date incorporated if a corporation, or formed, if other than a corporation. (MM/DD/YYYY)		02 / 13 / 2018	
<b>12</b> Were you formed under the laws of a <b>foreign country</b> ? If "Yes," state the country.		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

**Part II Organizational Structure**

You must be a corporation (including a limited liability company), an unincorporated association, or a trust to be tax exempt. See instructions. **DO NOT file this form unless you can check "Yes" on lines 1, 2, 3, or 4.**

- 1 Are you a **corporation**? If "Yes," attach a copy of your articles of incorporation showing **certification of filing** with the appropriate state agency. Include copies of any amendments to your articles and be sure they also show state filing certification. ☒ **Yes** ☐ **No**
- 2 Are you a **limited liability company (LLC)**? If "Yes," attach a copy of your articles of organization showing certification of filing with the appropriate state agency. Also, if you adopted an operating agreement, attach a copy. Include copies of any amendments to your articles and be sure they show state filing certification. Refer to the instructions for circumstances when an LLC should not file its own exemption application. ☐ **Yes** ☒ **No**
- 3 Are you an **unincorporated association**? If "Yes," attach a copy of your articles of association, constitution, or other similar organizing document that is dated and includes at least two signatures. Include signed and dated copies of any amendments. ☐ **Yes** ☒ **No**
- 4a Are you a **trust**? If "Yes," attach a signed and dated copy of your trust agreement. Include signed and dated copies of any amendments. ☐ **Yes** ☒ **No**
- b Have you been funded? If "No," explain how you are formed without anything of value placed in trust. ☐ **Yes** ☒ **No**
- 5 Have you adopted **bylaws**? If "Yes," attach a current copy showing date of adoption. If "No," explain how your officers, directors, or trustees are selected. ☒ **Yes** ☐ **No**

**Part III Required Provisions in Your Organizing Document**

The following questions are designed to ensure that when you file this application, your organizing document contains the required provisions to meet the organizational test under section 501(c)(3). Unless you can check the boxes in both lines 1 and 2, your organizing document does not meet the organizational test. **DO NOT file this application until you have amended your organizing document.** Submit your original and amended organizing documents (showing state filing certification if you are a corporation or an LLC) with your application.

- 1 Section 501(c)(3) requires that your organizing document state your exempt purpose(s), such as charitable, religious, educational, and/or scientific purposes. Check the box to confirm that your organizing document meets this requirement. Describe specifically where your organizing document meets this requirement, such as a reference to a particular article or section in your organizing document. Refer to the instructions for exempt purpose language. ☒
- Location of Purpose Clause (Page, Article, and Paragraph): **Page 1, Article II**
- 2a Section 501(c)(3) requires that upon dissolution of your organization, your remaining assets must be used exclusively for exempt purposes, such as charitable, religious, educational, and/or scientific purposes. Check the box on line 2a to confirm that your organizing document meets this requirement by express provision for the distribution of assets upon dissolution. If you rely on state law for your dissolution provision, do not check the box on line 2a and go to line 2c. ☒
- b If you checked the box on line 2a, specify the location of your dissolution clause (Page, Article, and Paragraph). Do not complete line 2c if you checked box 2a. **Page 1-2, Article IV**
- c See the instructions for information about the operation of state law in your particular state. Check this box if you rely on operation of state law for your dissolution provision and indicate the state: ☐

**Part IV Narrative Description of Your Activities**

Using an attachment, describe your *past*, *present*, and *planned* activities in a narrative. If you believe that you have already provided some of this information in response to other parts of this application, you may summarize that information here and refer to the specific parts of the application for supporting details. You may also attach representative copies of newsletters, brochures, or similar documents for supporting details to this narrative. Remember that if this application is approved, it will be open for public inspection. Therefore, your narrative description of activities should be thorough and accurate. Refer to the instructions for information that must be included in your description.

**Part V Compensation and Other Financial Arrangements With Your Officers, Directors, Trustees, Employees, and Independent Contractors**

- 1a List the names, titles, and mailing addresses of all of your officers, directors, and trustees. For each person listed, state their total annual **compensation**, or proposed compensation, for all services to the organization, whether as an officer, employee, or other position. Use actual figures, if available. Enter "none" if no compensation is or will be paid. If additional space is needed, attach a separate sheet. Refer to the instructions for information on what to include as compensation.

Name	Title	Mailing address	Compensation amount (annual actual or estimated)
Michael Norsworthy	President	66 Dinsmore Ave, Apt 503 Framingham, MA 01702	None
Daniel Davies	Vice President	9 Crighten Lang Ct, Coupar Angus Prethshire, Scotland, UK PH13 9FD	None
Matthew Cabrera	Secretary	1100 Bering Dr, Apt 141 Houston, TX 77057	None
See narrative for other 2 board members			

**Part V Compensation and Other Financial Arrangements With Your Officers, Directors, Trustees, Employees, and Independent Contractors (Continued)**

- b** List the names, titles, and mailing addresses of each of your five highest compensated employees who receive or will receive compensation of more than \$50,000 per year. Use the actual figure, if available. Refer to the instructions for information on what to include as compensation. Do not include officers, directors, or trustees listed in line 1a.

Name	Title	Mailing address	Compensation amount (annual actual or estimated)
<b>Not Applicable</b>			

- c** List the names, names of businesses, and mailing addresses of your five highest compensated **independent contractors** that receive or will receive compensation of more than \$50,000 per year. Use the actual figure, if available. Refer to the instructions for information on what to include as compensation.

Name	Title	Mailing address	Compensation amount (annual actual or estimated)
<b>Not Applicable</b>			

The following "Yes" or "No" questions relate to *past, present, or planned* relationships, transactions, or agreements with your officers, directors, trustees, highest compensated employees, and highest compensated independent contractors listed in lines 1a, 1b, and 1c.

- 2a** Are any of your officers, directors, or trustees **related** to each other through **family** or **business relationships**? If "Yes," identify the individuals and explain the relationship. ☐ Yes ☒ No
- b** Do you have a business relationship with any of your officers, directors, or trustees other than through their position as an officer, director, or trustee? If "Yes," identify the individuals and describe the business relationship with each of your officers, directors, or trustees. ☐ Yes ☒ No
- c** Are any of your officers, directors, or trustees related to your highest compensated employees or highest compensated independent contractors listed on lines 1b or 1c through family or business relationships? If "Yes," identify the individuals and explain the relationship. ☐ Yes ☒ No

- 3a** For each of your officers, directors, trustees, highest compensated employees, and highest compensated independent contractors listed on lines 1a, 1b, or 1c, attach a list showing their name, qualifications, average hours worked, and duties.

- b** Do any of your officers, directors, trustees, highest compensated employees, and highest compensated independent contractors listed on lines 1a, 1b, or 1c receive compensation from any other organizations, whether tax exempt or taxable, that are related to you through **common control**? If "Yes," identify the individuals, explain the relationship between you and the other organization, and describe the compensation arrangement. ☐ Yes ☒ No

- 4** In establishing the compensation for your officers, directors, trustees, highest compensated employees, and highest compensated independent contractors listed on lines 1a, 1b, and 1c, the following practices are recommended, although they are not required to obtain exemption. Answer "Yes" to all the practices you use.

- a** Do you or will the individuals that approve compensation arrangements follow a conflict of interest policy? ☒ Yes ☐ No
- b** Do you or will you approve compensation arrangements in advance of paying compensation? ☒ Yes ☐ No
- c** Do you or will you document in writing the date and terms of approved compensation arrangements? ☒ Yes ☐ No

**Part V Compensation and Other Financial Arrangements With Your Officers, Directors, Trustees, Employees, and Independent Contractors (Continued)**

- d** Do you or will you record in writing the decision made by each individual who decided or voted on compensation arrangements? ☒ **Yes** ☐ **No**
- e** Do you or will you approve compensation arrangements based on information about compensation paid by **similarly situated** taxable or tax-exempt organizations for similar services, current compensation surveys compiled by independent firms, or actual written offers from similarly situated organizations? Refer to the instructions for Part V, lines 1a, 1b, and 1c, for information on what to include as compensation. ☒ **Yes** ☐ **No**
- f** Do you or will you record in writing both the information on which you relied to base your decision and its source? ☒ **Yes** ☐ **No**
- g** If you answered "No" to any item on lines 4a through 4f, describe how you set compensation that is **reasonable** for your officers, directors, trustees, highest compensated employees, and highest compensated independent contractors listed in Part V, lines 1a, 1b, and 1c.

- 5a** Have you adopted a **conflict of interest policy** consistent with the sample conflict of interest policy in Appendix A to the instructions? If "Yes," provide a copy of the policy and explain how the policy has been adopted, such as by resolution of your governing board. If "No," answer lines 5b and 5c. ☒ **Yes** ☐ **No**
- b** What procedures will you follow to assure that persons who have a conflict of interest will not have influence over you for setting their own compensation?
- c** What procedures will you follow to assure that persons who have a conflict of interest will not have influence over you regarding business deals with themselves?
- Note:** A conflict of interest policy is recommended though it is not required to obtain exemption. Hospitals, see Schedule C, Section I, line 14.

- 6a** Do you or will you compensate any of your officers, directors, trustees, highest compensated employees, and highest compensated independent contractors listed in lines 1a, 1b, or 1c through **non-fixed payments**, such as discretionary bonuses or revenue-based payments? If "Yes," describe all non-fixed compensation arrangements, including how the amounts are determined, who is eligible for such arrangements, whether you place a limitation on total compensation, and how you determine or will determine that you pay no more than reasonable compensation for services. Refer to the instructions for Part V, lines 1a, 1b, and 1c, for information on what to include as compensation. ☐ **Yes** ☒ **No**
- b** Do you or will you compensate any of your employees, other than your officers, directors, trustees, or your five highest compensated employees who receive or will receive compensation of more than \$50,000 per year, through non-fixed payments, such as discretionary bonuses or revenue-based payments? If "Yes," describe all non-fixed compensation arrangements, including how the amounts are or will be determined, who is or will be eligible for such arrangements, whether you place or will place a limitation on total compensation, and how you determine or will determine that you pay no more than reasonable compensation for services. Refer to the instructions for Part V, lines 1a, 1b, and 1c, for information on what to include as compensation. ☐ **Yes** ☒ **No**

- 7a** Do you or will you purchase any goods, services, or assets from any of your officers, directors, trustees, highest compensated employees, or highest compensated independent contractors listed in lines 1a, 1b, or 1c? If "Yes," describe any such purchase that you made or intend to make, from whom you make or will make such purchases, how the terms are or will be negotiated at **arm's length**, and explain how you determine or will determine that you pay no more than **fair market value**. Attach copies of any written contracts or other agreements relating to such purchases. ☐ **Yes** ☒ **No**
- b** Do you or will you sell any goods, services, or assets to any of your officers, directors, trustees, highest compensated employees, or highest compensated independent contractors listed in lines 1a, 1b, or 1c? If "Yes," describe any such sales that you made or intend to make, to whom you make or will make such sales, how the terms are or will be negotiated at **arm's length**, and explain how you determine or will determine you are or will be paid at least fair market value. Attach copies of any written contracts or other agreements relating to such sales. ☐ **Yes** ☒ **No**

- 8a** Do you or will you have any leases, contracts, loans, or other agreements with your officers, directors, trustees, highest compensated employees, or highest compensated independent contractors listed in lines 1a, 1b, or 1c? If "Yes," provide the information requested in lines 8b through 8f. ☐ **Yes** ☒ **No**
- b** Describe any written or oral arrangements that you made or intend to make.
- c** Identify with whom you have or will have such arrangements.
- d** Explain how the terms are or will be negotiated at **arm's length**.
- e** Explain how you determine you pay no more than fair market value or you are paid at least fair market value.
- f** Attach copies of any signed leases, contracts, loans, or other agreements relating to such arrangements.

- 9a** Do you or will you have any leases, contracts, loans, or other agreements with any organization in which any of your officers, directors, or trustees are also officers, directors, or trustees, or in which any individual officer, director, or trustee owns more than a 35% interest? If "Yes," provide the information requested in lines 9b through 9f. ☐ **Yes** ☒ **No**

**Part V Compensation and Other Financial Arrangements With Your Officers, Directors, Trustees, Employees, and Independent Contractors (Continued)**

- b** Describe any written or oral arrangements you made or intend to make.
- c** Identify with whom you have or will have such arrangements.
- d** Explain how the terms are or will be negotiated at arm's length.
- e** Explain how you determine or will determine you pay no more than fair market value or that you are paid at least fair market value.
- f** Attach a copy of any signed leases, contracts, loans, or other agreements relating to such arrangements.

**Part VI Your Members and Other Individuals and Organizations That Receive Benefits From You**

The following "Yes" or "No" questions relate to goods, services, and funds you provide to individuals and organizations as part of your activities. Your answers should pertain to *past, present, and planned* activities. See instructions.

- 1 a** In carrying out your exempt purposes, do you provide goods, services, or funds to individuals? If "Yes," describe each program that provides goods, services, or funds to individuals. ☒ **Yes** ☐ **No**
- b** In carrying out your exempt purposes, do you provide goods, services, or funds to organizations? If "Yes," describe each program that provides goods, services, or funds to organizations. ☒ **Yes** ☐ **No**
- 2** Do any of your programs limit the provision of goods, services, or funds to a specific individual or group of specific individuals? For example, answer "Yes," if goods, services, or funds are provided only for a particular individual, your members, individuals who work for a particular employer, or graduates of a particular school. If "Yes," explain the limitation and how recipients are selected for each program. ☐ **Yes** ☒ **No**
- 3** Do any individuals who receive goods, services, or funds through your programs have a family or business relationship with any officer, director, trustee, or with any of your highest compensated employees or highest compensated independent contractors listed in Part V, lines 1a, 1b, and 1c? If "Yes," explain how these related individuals are eligible for goods, services, or funds. ☐ **Yes** ☒ **No**

**Part VII Your History**

The following "Yes" or "No" questions relate to your history. See instructions.

- 1** Are you a **successor** to another organization? Answer "Yes," if you have taken or will take over the activities of another organization; you took over 25% or more of the fair market value of the net assets of another organization; or you were established upon the conversion of an organization from for-profit to nonprofit status. If "Yes," complete Schedule G. ☐ **Yes** ☒ **No**
- 2** Are you submitting this application more than 27 months after the end of the month in which you were legally formed? If "Yes," complete Schedule E. ☐ **Yes** ☒ **No**

**Part VIII Your Specific Activities**

The following "Yes" or "No" questions relate to specific activities that you may conduct. Check the appropriate box. Your answers should pertain to *past, present, and planned* activities. See instructions.

- 1** Do you support or oppose candidates in **political campaigns** in any way? If "Yes," explain. ☐ **Yes** ☒ **No**
- 2 a** Do you attempt to **influence legislation**? If "Yes," explain how you attempt to influence legislation and complete line 2b. If "No," go to line 3a. ☐ **Yes** ☒ **No**
- b** Have you made or are you making an **election** to have your legislative activities measured by expenditures by filing Form 5768? If "Yes," attach a copy of the Form 5768 that was already filed or attach a completed Form 5768 that you are filing with this application. If "No," describe whether your attempts to influence legislation are a substantial part of your activities. Include the time and money spent on your attempts to influence legislation as compared to your total activities. ☐ **Yes** ☒ **No**
- 3 a** Do you or will you operate bingo or **gaming** activities? If "Yes," describe who conducts them, and list all revenue received or expected to be received and expenses paid or expected to be paid in operating these activities. **Revenue and expenses** should be provided for the time periods specified in Part IX, Financial Data. ☐ **Yes** ☒ **No**
- b** Do you or will you enter into contracts or other agreements with individuals or organizations to conduct bingo or gaming for you? If "Yes," describe any written or oral arrangements that you made or intend to make, identify with whom you have or will have such arrangements, explain how the terms are or will be negotiated at arm's length, and explain how you determine or will determine you pay no more than fair market value or you will be paid at least fair market value. Attach copies or any written contracts or other agreements relating to such arrangements. ☐ **Yes** ☒ **No**
- c** List the states and local jurisdictions, including Indian Reservations, in which you conduct or will conduct gaming or bingo.

**Part VIII Your Specific Activities (Continued)**

**4a** Do you or will you undertake **fundraising**? If "Yes," check all the fundraising programs you do or will conduct. See instructions. ☒ **Yes** ☐ **No**

- |   |  |
|---|--|
| <input type="checkbox"/> mail solicitations                         | <input type="checkbox"/> phone solicitations                                   |
| <input type="checkbox"/> email solicitations                        | <input checked="" type="checkbox"/> accept donations on your website           |
| <input checked="" type="checkbox"/> personal solicitations          | <input type="checkbox"/> receive donations from another organization's website |
| <input type="checkbox"/> vehicle, boat, plane, or similar donations | <input checked="" type="checkbox"/> government grant solicitations             |
| <input checked="" type="checkbox"/> foundation grant solicitations  | <input checked="" type="checkbox"/> Other                                      |

Attach a description of each fundraising program.

**b** Do you or will you have written or oral contracts with any individuals or organizations to raise funds for you? If "Yes," describe these activities. Include all revenue and expenses from these activities and state who conducts them. Revenue and expenses should be provided for the time periods specified in Part IX, Financial Data. Also, attach a copy of any contracts or agreements. ☐ **Yes** ☒ **No**

**c** Do you or will you engage in fundraising activities for other organizations? If "Yes," describe these arrangements. Include a description of the organizations for which you raise funds and attach copies of all contracts or agreements. ☐ **Yes** ☒ **No**

**d** List all states and local jurisdictions in which you conduct fundraising. For each state or local jurisdiction listed, specify whether you fundraise for your own organization, you fundraise for another organization, or another organization fundraises for you.

**e** Do you or will you maintain separate accounts for any contributor under which the contributor has the right to advise on the use or distribution of funds? Answer "Yes" if the donor may provide advice on the types of investments, distributions from the types of investments, or the distribution from the donor's contribution account. If "Yes," describe this program, including the type of advice that may be provided and submit copies of any written materials provided to donors. ☐ **Yes** ☒ **No**

**5** Are you **affiliated** with a governmental unit? If "Yes," explain. ☐ **Yes** ☒ **No**

**6a** Do you or will you engage in **economic development**? If "Yes," describe your program. ☐ **Yes** ☒ **No**

**b** Describe in full who benefits from your economic development activities and how the activities promote exempt purposes.

**7a** Do or will persons other than your employees or volunteers **develop** your facilities? If "Yes," describe each facility, the role of the developer, and any business or family relationship(s) between the developer and your officers, directors, or trustees. ☐ **Yes** ☒ **No**

**b** Do or will persons other than your employees or volunteers **manage** your activities or facilities? If "Yes," describe each activity and facility, the role of the manager, and any business or family relationship(s) between the manager and your officers, directors, or trustees. ☐ **Yes** ☒ **No**

**c** If there is a business or family relationship between any manager or developer and your officers, directors, or trustees, identify the individuals, explain the relationship, describe how contracts are negotiated at arm's length so that you pay no more than fair market value, and submit a copy of any contracts or other agreements.

**8** Do you or will you enter into **joint ventures**, including partnerships or **limited liability companies** treated as partnerships, in which you share profits and losses with partners other than section 501(c)(3) organizations? If "Yes," describe the activities of these joint ventures in which you participate. ☐ **Yes** ☒ **No**

**9a** Are you applying for exemption as a childcare organization under section 501(k)? If "Yes," answer lines 9b through 9d. If "No," go to line 10. ☐ **Yes** ☒ **No**

**b** Do you provide childcare so that parents or caretakers of children you care for can be **gainfully employed** (see instructions)? If "No," explain how you qualify as a childcare organization described in section 501(k). ☐ **Yes** ☐ **No**

**c** Of the children for whom you provide childcare, are 85% or more of them cared for by you to enable their parents or caretakers to be gainfully employed (see instructions)? If "No," explain how you qualify as a childcare organization described in section 501(k). ☐ **Yes** ☐ **No**

**d** Are your services available to the general public? If "No," describe the specific group of people for whom your activities are available. Also, see the instructions and explain how you qualify as a childcare organization described in section 501(k). ☐ **Yes** ☐ **No**

**10** Do you or will you publish, own, or have rights in music, literature, tapes, artworks, choreography, scientific discoveries, or other **intellectual property**? If "Yes," explain. Describe who owns or will own any copyrights, patents, or trademarks, whether fees are or will be charged, how the fees are determined, and how any items are or will be produced, distributed, and marketed. ☐ **Yes** ☒ **No**

**Part VIII Your Specific Activities (Continued)**

- 11** Do you or will you accept contributions of: real property; conservation easements; closely held securities; intellectual property such as patents, trademarks, and copyrights; works of music or art; licenses; royalties; automobiles, boats, planes, or other vehicles; or collectibles of any type? If "Yes," describe each type of contribution, any conditions imposed by the donor on the contribution, and any agreements with the donor regarding the contribution. ☐ Yes ☒ No
- 
- 12a** Do you or will you operate in a **foreign country** or **countries**? If "Yes," answer lines 12b through 12d. If "No," go to line 13a. ☒ Yes ☐ No
- b** Name the foreign countries and regions within the countries in which you operate.
- c** Describe your operations in each country and region in which you operate.
- d** Describe how your operations in each country and region further your exempt purposes.
- 
- 13a** Do you or will you make grants, loans, or other distributions to organization(s)? If "Yes," answer lines 13b through 13g. If "No," go to line 14a. ☒ Yes ☐ No
- b** Describe how your grants, loans, or other distributions to organizations further your exempt purposes.
- c** Do you have written contracts with each of these organizations? If "Yes," attach a copy of each contract. ☐ Yes ☒ No
- d** Identify each recipient organization and any **relationship** between you and the recipient organization.
- e** Describe the records you keep with respect to the grants, loans, or other distributions you make.
- f** Describe your selection process, including whether you do any of the following.
- (i)** Do you require an application form? If "Yes," attach a copy of the form. ☒ Yes ☐ No
- (ii)** Do you require a grant proposal? If "Yes," describe whether the grant proposal specifies your responsibilities and those of the grantee, obligates the grantee to use the grant funds only for the purposes for which the grant was made, provides for periodic written reports concerning the use of grant funds, requires a final written report and an accounting of how grant funds were used, and acknowledges your authority to withhold and/or recover grant funds in case such funds are, or appear to be, misused. ☒ Yes ☐ No
- g** Describe your procedures for oversight of distributions that assure you the resources are used to further your exempt purposes, including whether you require periodic and final reports on the use of resources.
- 
- 14a** Do you or will you make grants, loans, or other distributions to foreign organizations? If "Yes," answer lines 14b through 14f. If "No," go to line 15. ☒ Yes ☐ No
- b** Provide the name of each foreign organization, the country and regions within a country in which each foreign organization operates, and describe any relationship you have with each foreign organization.
- c** Does any foreign organization listed in line 14b accept contributions earmarked for a specific country or specific organization? If "Yes," list all earmarked organizations or countries. ☐ Yes ☒ No
- d** Do your contributors know that you have ultimate authority to use contributions made to you at your discretion for purposes consistent with your exempt purposes? If "Yes," describe how you relay this information to contributors. ☒ Yes ☐ No
- e** Do you or will you make pre-grant inquiries about the recipient organization? If "Yes," describe these inquiries, including whether you inquire about the recipient's financial status, its tax-exempt status under the Internal Revenue Code, its ability to accomplish the purpose for which the resources are provided, and other relevant information. ☒ Yes ☐ No
- f** Do you or will you use any additional procedures to ensure that your distributions to foreign organizations are used in furtherance of your exempt purposes? If "Yes," describe these procedures, including site visits by your employees or compliance checks by impartial experts, to verify that grant funds are being used appropriately. ☒ Yes ☐ No

**Part VIII** Your Specific Activities (Continued)

- |           |  |   |
|-----------|--|---|
| <b>15</b> | Do you have a <b>close connection</b> with any organizations? If "Yes," explain.   | <input type="checkbox"/> <b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> |
| <b>16</b> | Are you applying for exemption as a <b>cooperative hospital service organization</b> under section 501(e)? If "Yes," explain.  | <input type="checkbox"/> <b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> |
| <b>17</b> | Are you applying for exemption as a <b>cooperative service organization of operating educational organizations</b> under section 501(f)? If "Yes," explain.  | <input type="checkbox"/> <b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> |
| <b>18</b> | Are you applying for exemption as a <b>charitable risk pool</b> under section 501(n)? If "Yes," explain.   | <input type="checkbox"/> <b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> |
| <b>19</b> | Do you or will you operate a <b>school</b> ? If "Yes," complete Schedule B. Answer "Yes," whether you operate a school as your main function or as a secondary activity.   | <input type="checkbox"/> <b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> |
| <b>20</b> | Is your main function to provide <b>hospital or medical care</b> ? If "Yes," complete Schedule C.  | <input type="checkbox"/> <b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> |
| <b>21</b> | Do you or will you provide <b>low-income housing</b> or housing for the <b>elderly</b> or <b>handicapped</b> ? If "Yes," complete Schedule F.  | <input type="checkbox"/> <b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> |
| <b>22</b> | Do you or will you provide scholarships, fellowships, educational loans, or other educational grants to individuals, including grants for travel, study, or other similar purposes? If "Yes," complete Schedule H. | <input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> |
- Note: Private foundations** may use Schedule H to request advance approval of individual grant procedures.

**Part IX Financial Data**

For purposes of this schedule, years in existence refer to completed tax years.

1. If in existence less than 5 years, complete the statement for each year in existence and provide projections of your likely revenues and expenses based on a reasonable and good faith estimate of your future finances for a total of:
  - a. Three years of financial information if you have not completed one tax year, or
  - b. Four years of financial information if you have completed one tax year. See instructions.
2. If in existence 5 or more years, complete the schedule for the most recent 5 tax years. You will need to provide a separate statement that includes information about the most recent 5 tax years because the data table in Part IX has not been updated to provide for a 5th year. See instructions.

**A. Statement of Revenues and Expenses**

	Type of revenue or expense	Current tax year	3 prior tax years or 2 succeeding tax years				(e) Provide Total for (a) through (d)
		(a) From <u>2/13/18</u> To <u>12/31/18</u>	(b) From <u>1/1/19</u> To <u>12/31/19</u>	(c) From <u>1/1/20</u> To <u>12/31/20</u>	(d) From _____ To _____		
Revenues	1 Gifts, grants, and contributions received (do not include unusual grants)	118,200	217,400	319,800		655,400	
	2 Membership fees received						
	3 Gross investment income						
	4 Net unrelated business income						
	5 Taxes levied for your benefit						
	6 Value of services or facilities furnished by a governmental unit without charge (not including the value of services generally furnished to the public without charge)						
	7 Any revenue not otherwise listed above or in lines 9–12 below (attach an itemized list)						
	8 Total of lines 1 through 7	118,200	217,400	319,800		655,400	
	9 Gross receipts from admissions, merchandise sold or services performed, or furnishing of facilities in any activity that is related to your exempt purposes (attach itemized list)						
	10 Total of lines 8 and 9	118,200	217,400	319,800		655,400	
	11 Net gain or loss on sale of capital assets (attach schedule and see instructions)						
	12 Unusual grants						
	13 Total Revenue Add lines 10 through 12	118,200	217,400	319,800		655,400	
Expenses	14 Fundraising expenses	3,000	6,000	6,000			
	15 Contributions, gifts, grants, and similar amounts paid out (attach an itemized list)						
	16 Disbursements to or for the benefit of members (attach an itemized list)						
	17 Compensation of officers, directors, and trustees						
	18 Other salaries and wages						
	19 Interest expense						
	20 Occupancy (rent, utilities, etc.)						
	21 Depreciation and depletion						
	22 Professional fees	10,200	6,400	8,800			
	23 Any expense not otherwise classified, such as program services (attach itemized list)	100,000	200,000	300,000			
	24 Total Expenses Add lines 14 through 23	113,200	212,400	314,800			

**Part IX Financial Data (Continued)****B. Balance Sheet (for your most recently completed tax year)**Year End: **2017**

(Whole dollars)

Assets			
1	Cash . . . . .	1	0
2	Accounts receivable, net . . . . .	2	0
3	Inventories . . . . .	3	0
4	Bonds and notes receivable (attach an itemized list) . . . . .	4	0
5	Corporate stocks (attach an itemized list) . . . . .	5	0
6	Loans receivable (attach an itemized list) . . . . .	6	0
7	Other investments (attach an itemized list) . . . . .	7	0
8	Depreciable and depletable assets (attach an itemized list) . . . . .	8	0
9	Land . . . . .	9	0
10	Other assets (attach an itemized list) . . . . .	10	0
11	Total Assets (add lines 1 through 10) . . . . .	11	0
Liabilities			
12	Accounts payable . . . . .	12	0
13	Contributions, gifts, grants, etc. payable . . . . .	13	0
14	Mortgages and notes payable (attach an itemized list) . . . . .	14	0
15	Other liabilities (attach an itemized list) . . . . .	15	0
16	Total Liabilities (add lines 12 through 15) . . . . .	16	0
Fund Balances or Net Assets			
17	Total fund balances or net assets . . . . .	17	0
18	Total Liabilities and Fund Balances or Net Assets (add lines 16 and 17) . . . . .	18	0
19	Have there been any substantial changes in your assets or liabilities since the end of the period shown above? If "Yes," explain.		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**Part X Public Charity Status**

Part X is designed to classify you as an organization that is either a **private foundation** or a **public charity**. Public charity status is a more favorable tax status than private foundation status. If you are a private foundation, Part X is designed to further determine whether you are a **private operating foundation**. See instructions.

**1 a** Are you a private foundation? If "Yes," go to line 1b. If "No," go to line 5 and proceed as instructed. If you are unsure, see the instructions. ☐ Yes ☒ No

**b** As a private foundation, section 508(e) requires special provisions in your organizing document in addition to those that apply to all organizations described in section 501(c)(3). Check the box to confirm that your organizing document meets this requirement, whether by express provision or by reliance on operation of state law. Attach a statement that describes specifically where your organizing document meets this requirement, such as a reference to a particular article or section in your organizing document or by operation of state law. See the instructions, including Appendix B, for information about the special provisions that need to be contained in your organizing document. Go to line 2. ☐

**2** Are you a private operating foundation? To be a private operating foundation you must engage directly in the active conduct of charitable, religious, educational, and similar activities, as opposed to indirectly carrying out these activities by providing grants to individuals or other organizations. If "Yes," go to line 3. If "No," go to the signature section of Part XI. ☐ Yes ☐ No

**3** Have you existed for one or more years? If "Yes," attach financial information showing that you are a private operating foundation; go to the signature section of Part XI. If "No," continue to line 4. ☐ Yes ☐ No

**4** Have you attached either (1) an affidavit or opinion of counsel, (including a written affidavit or opinion from a certified public accountant or accounting firm with expertise regarding this tax law matter), that sets forth facts concerning your operations and support to demonstrate that you are likely to satisfy the requirements to be classified as a private operating foundation; or (2) a statement describing your proposed operations as a private operating foundation? ☐ Yes ☐ No

**5** If you answered "No" to line 1a, indicate the type of public charity status you are requesting by checking one of the choices below. You may check only one box.

The organization is not a private foundation because it is:

**a** 509(a)(1) and 170(b)(1)(A)(i)—a church or a convention or association of churches. Complete and attach Schedule A. ☐

**b** 509(a)(1) and 170(b)(1)(A)(ii)—a **school**. Complete and attach Schedule B. ☐

**c** 509(a)(1) and 170(b)(1)(A)(iii)—a **hospital**, a cooperative hospital service organization, or a medical research organization operated in conjunction with a hospital. Complete and attach Schedule C. ☐

**d** 509(a)(3)—an organization supporting either one or more organizations described in line 5a through c, f, h, or i or a publicly supported section 501(c)(4), (5), or (6) organization. Complete and attach Schedule D. ☐

**Part X Public Charity Status (Continued)**

- e 509(a)(4) – an organization organized and operated exclusively for testing for public safety. ☐
- f 509(a)(1) and 170(b)(1)(A)(iv) – an organization operated for the benefit of a college or university that is owned or operated by a governmental unit. ☐
- g 509(a)(1) and 170(b)(1)(A)(ix) – an agricultural research organization directly engaged in the continuous active conduct of agricultural research in conjunction with a college or university. ☐
- h 509(a)(1) and 170(b)(1)(A)(vi) – an organization that receives a substantial part of its financial support in the form of contributions from publicly supported organizations, from a governmental unit, or from the general public. ☒
- i 509(a)(2) – an organization that normally receives not more than one-third of its financial support from gross **investment income** and receives more than one-third of its financial support from contributions, membership fees, and gross receipts from activities related to its exempt functions (subject to certain exceptions). ☐
- j A publicly supported organization, but unsure if it is described in 5h or 5i. You would like the IRS to decide the correct status. ☐

6 If you checked box h, i, or j in question 5 above, and you have been in existence more than 5 years, you must confirm your public support status. Answer line 6a if you checked box h in line 5 above. Answer line 6b if you checked box i in line 5 above. If you checked box j in line 5 above, answer both lines 6a and 6b.

- a (i) Enter 2% of line 8, column (e) on Part IX-A Statement of Revenues and Expenses \_\_\_\_\_
- (ii) Attach a list showing the name and amount contributed by each person, company, or organization whose gifts totaled more than the 2% amount. If the answer is "None," state this.
- b (i) For each year amounts are included on lines 1, 2, and 9 of Part IX-A Statement of Revenues and Expenses, attach a list showing the name and amount received from each **disqualified person**. If the answer is "None," state this.
- (ii) For each year amounts were included on line 9 of Part IX-A Statement of Revenues and Expenses, attach a list showing the name of and amount received from each payer, other than a disqualified person, whose payments were more than the larger of (1) 1% of Line 10, Part IX-A Statement of Revenues and Expenses, or (2) \$5,000. If the answer is "None," state this.

7 Did you receive any unusual grants during any of the years shown on Part IX-A Statement of Revenues and Expenses? If "Yes," attach a list including the name of the contributor, the date and amount of the grant, a brief description of the grant, and explain why it is unusual. ☐ Yes ☐ No

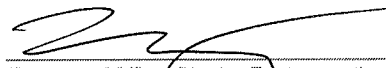
**Part XI User Fee Information and Signature**

You must include the correct user fee payment with this application. If you do not submit the correct user fee, we will not process the application and we will return it to you. Your check or money order must be made payable to the United States Treasury. User fees are subject to change. Check our website at [www.irs.gov](http://www.irs.gov) and type "Exempt Organizations User Fee" in the search box, or call Customer Account Services at 1-877-829-5500 for current information.

Enter the amount of the user fee paid: **\$600.00**

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

Please  
Sign  
Here

  
(Signature of Officer, Director, Trustee, or other authorized official)

**Michael Norsworthy**  
(Type or print name of signer)

**President**  
(Type or print title or authority of signer)

**March 30, 2018**  
(Date)

**Schedule H. Organizations Providing Scholarships, Fellowships, Educational Loans, or Other Educational Grants to Individuals and Private Foundations Requesting Advance Approval of Individual Grant Procedures****Section I** *Names of individual recipients are not required to be listed in Schedule H.***Public charities and private foundations complete lines 1a through 7 of this section. See the instructions to Part X if you are not sure whether you are a public charity or a private foundation.**

- 1 a Describe the types of educational grants you provide to individuals, such as scholarships, fellowships, loans, etc.  
 b Describe the purpose and amount of your scholarships, fellowships, and other educational grants and loans that you award.  
 c If you award educational loans, explain the terms of the loans (interest rate, length, forgiveness, etc.).  
 d Specify how your program is publicized.  
 e Provide copies of any solicitation or announcement materials.  
 f Provide a sample copy of the application used.
- 2 Do you maintain case histories showing recipients of your scholarships, fellowships, educational loans, or other educational grants, including names, addresses, purposes of awards, amount of each grant, manner of selection, and relationship (if any) to officers, trustees, or donors of funds to you? If "No," refer to the instructions. ☒ **Yes** ☐ **No**
- 3 Describe the specific criteria you use to determine who is eligible for your program. (For example, eligibility selection criteria could consist of graduating high school students from a particular high school who will attend college, writers of scholarly works about American history, etc.)
- 4 a Describe the specific criteria you use to select recipients. (For example, specific selection criteria could consist of prior academic performance, financial need, etc.)  
 b Describe how you determine the number of grants that will be made annually.  
 c Describe how you determine the amount of each of your grants.  
 d Describe any requirement or condition that you impose on recipients to obtain, maintain, or qualify for renewal of a grant. (For example, specific requirements or conditions could consist of attendance at a four-year college, maintaining a certain grade point average, teaching in public school after graduation from college, etc.)
- 5 Describe your procedures for supervising the scholarships, fellowships, educational loans, or other educational grants. Describe whether you obtain reports and grade transcripts from recipients, or you pay grants directly to a school under an arrangement whereby the school will apply the grant funds only for enrolled students who are in good standing. Also, describe your procedures for taking action if the terms of the award are violated.
- 6 Who is on the selection committee for the awards made under your program, including names of current committee members, criteria for committee membership, and the method of replacing committee members?
- 7 Are relatives of members of the selection committee, or of your officers, directors, or **substantial contributors** eligible for awards made under your program? If "Yes," what measures are taken to ensure unbiased selections? ☐ **Yes** ☒ **No**

**Note:** If you are a private foundation, you are not permitted to provide educational grants to **disqualified persons**. Disqualified persons include your substantial contributors and foundation managers and certain family members of disqualified persons.

**Section II** **Private foundations complete lines 1a through 4f of this section. Public charities do not complete this section.**

- 1 a If we determine that you are a private foundation, do you want this application to be considered as a request for advance approval of grant making procedures? ☐ **Yes** ☐ **No** ☐ **N/A**  
 b For which section(s) do you wish to be considered?  
     • 4945(g)(1)—Scholarship or fellowship grant to an individual for study at an educational institution ☐  
     • 4945(g)(3)—Other grants, including loans, to an individual for travel, study, or other similar purposes, to enhance a particular skill of the grantee or to produce a specific product ☐
- 2 Do you represent that you will (1) arrange to receive and review grantee reports annually and upon completion of the purpose for which the grant was awarded, (2) investigate diversions of funds from their intended purposes, and (3) take all reasonable and appropriate steps to recover diverted funds, ensure other grant funds held by a grantee are used for their intended purposes, and withhold further payments to grantees until you obtain grantees' assurances that future diversions will not occur and that grantees will take extraordinary precautions to prevent future diversions from occurring? ☐ **Yes** ☐ **No**
- 3 Do you represent that you will maintain all records relating to individual grants, including information obtained to evaluate grantees, identify whether a grantee is a disqualified person, establish the amount and purpose of each grant, and establish that you undertook the supervision and investigation of grants described in line 2? ☐ **Yes** ☐ **No**

**Schedule H. Organizations Providing Scholarships, Fellowships, Educational Loans, or Other Educational Grants to Individuals and Private Foundations Requesting Advance Approval of Individual Grant Procedures (Continued)****Section II** Private foundations complete lines 1a through 4f of this section. Public charities do not complete this section. (Continued)

- 4a** Do you or will you award scholarships, fellowships, and educational loans to attend an educational institution based on the status of an individual being an *employee of a particular employer*? If "Yes," complete lines 4b through 4f. ☐ Yes ☐ No
- b** Will you comply with the seven conditions and either the percentage tests or facts and circumstances test for scholarships, fellowships, and educational loans to attend an educational institution as set forth in Revenue Procedures 76-47, 1976-2 C.B. 670, and 80-39, 1980-2 C.B. 772, which apply to inducement, selection committee, eligibility requirements, objective basis of selection, employment, course of study, and other objectives? (See lines 4c, 4d, and 4e, regarding the percentage tests.) ☐ Yes ☐ No
- c** Do you or will you provide scholarships, fellowships, or educational loans to attend an educational institution to employees of a particular employer? ☐ Yes ☐ No ☐ N/A
- If "Yes," will you award grants to 10% or fewer of the eligible applicants who were actually considered by the selection committee in selecting recipients of grants in that year as provided by Revenue Procedures 76-47 and 80-39? ☐ Yes ☐ No
- d** Do you provide scholarships, fellowships, or educational loans to attend an educational institution to children of employees of a particular employer? ☐ Yes ☐ No ☐ N/A
- If "Yes," will you award grants to 25% or fewer of the eligible applicants who were actually considered by the selection committee in selecting recipients of grants in that year as provided by Revenue Procedures 76-47 and 80-39? If "No," go to line 4e. ☐ Yes ☐ No
- e** If you provide scholarships, fellowships, or educational loans to attend an educational institution to children of employees of a particular employer, will you award grants to 10% or fewer of the number of employees' children who can be shown to be eligible for grants (whether or not they submitted an application) in that year, as provided by Revenue Procedures 76-47 and 80-39? ☐ Yes ☐ No ☐ N/A
- If "Yes," describe how you will determine who can be shown to be eligible for grants without submitting an application, such as by obtaining written statements or other information about the expectations of employees' children to attend an educational institution. If "No," go to line 4f.
- Note:** Statistical or sampling techniques are not acceptable. See Revenue Procedure 85-51, 1985-2 C.B. 717, for additional information.
- f** If you provide scholarships, fellowships, or educational loans to attend an educational institution to *children of employees of a particular employer* without regard to either the 25% limitation described in line 4d, or the 10% limitation described in line 4e, will you award grants based on facts and circumstances that demonstrate that the grants will not be considered compensation for past, present, or future services or otherwise provide a significant benefit to the particular employer? If "Yes," describe the facts and circumstances that you believe will demonstrate that the grants are neither compensatory nor a significant benefit to the particular employer. In your explanation, describe why you cannot satisfy either the 25% test described in line 4d or the 10% test described in line 4e. ☐ Yes ☐ No

## **PART IV – Narrative Description of Our Activities**

*Freedom of Form Foundation, Inc.* is a nonprofit organization that will fund, legitimize, and popularize research that will improve the lives of those with incapacitating and chronic diseases, disorders, and disabilities. We will support research projects that include the following frameworks: remodeling, genetic and morphological modifications, neuroprosthetics, and bioprinting. We will also fund research proposals by predoctoral and postdoctoral individuals, research laboratories, biomedical scientists, and engineers.

Recently, there has been great scientific progress in the development of prosthetics, neural interfaces, gene therapy, stem cells, and other breakthroughs in medicine. These are showing great promise and success in improving the lives of patients with incapacitating and chronic diseases, disorders, and disabilities. While funding for these efforts provided by governments and private foundations are focused on solving diseases and disorders, we think the technology has revolutionary applications beyond healing and restoration.

Scientists and engineers are interested in directly researching how to achieve morphological freedom. However, these scientists are often bound in their work by the pressure of applying for and renewing research grants from more conservative funding sources. Therefore, we are working to fund, legitimize, and popularize scientific research that will enable freedom of one's physical form. We will directly support the full-time work of the most promising scientists. We will demonstrate that it is viable and even appreciated for scientists to research these topics. We will encourage more outward and open discussion of self-modification. With the rapid advancement of bioscience and the increasing attention of both advocates and skeptics towards biotechnology, we can help guide the future of biological research.

Initially, we will fund research projects that fall into one or more of the following frameworks beginning in the United States (Framingham, Massachusetts), Scotland and (all regions), and expand to other countries as the organization grows over time.

### **1. Remodeling:**

Careful application of orthotics makes it possible to substantially alter someone's body shape gradually, through self-regulating and self-limiting processes, while preserving their musculoskeletal, neurological, and other functions. This only allows modification of existing systems, not the creation of new muscle or sensory functions. Remodeling does not accommodate any hormonal changes.

### **2. Genetic and morphological modifications:**

Gene therapy strategies involve the introduction of new, engineered DNA (or RNA) to cells, whether those cells are inside a patient, or outside the body with *in vitro* culture. This makes it possible to more or less target specific cells and tissues with genetic treatments. The following are a few possibilities for these types of studies:

1. Deliver regulators of metabolism and cell growth.
2. Manipulate developmental morphogen signaling.
3. Regulate cell adhesion or structural properties (e.g., through adhesion and cytoskeletal genes).
4. Control transcription factor networks to manipulate the differentiation status of cells.

### **3. Neuroprosthetics:**

A *neuroprosthetic* is simply any prosthetic, a synthetic device on (or in) the body, that has a neural interface with the user, communicating with sensory and motor information, via nerves or the brain. Neuroprosthetics can take many forms and provide a huge diversity of motor and sensory functions throughout the body. We will fund neuroprosthetics research in the areas of further development of both motorized and sensory prosthetics.

### **4. Bioprinting:**

Bioprinting basically means "biological printing." Bioprinting is a very new area of scientific and medical research that involves "printing" biological matter and material for use in prosthetics, replacement organs, veins, and human tissues. With 3D bioprinting, doctors will be able to order a new 3D printed heart, lung, liver, or kidney for a patient instead of putting them on a transplant list.

*Freedom of Form Foundation, Inc.* will advance rights and ethics. We are exceptionally proactive in ensuring that all funded research satisfies robust ethical requirements to protect the rights of research subjects, whether the subjects are animals or human volunteers. We are proud to have some of the strongest protections of any grant-making foundation for human subjects and to outright prohibit any use of our funds for new non-human primate research. Furthermore, our views on ethics extend to how data and conclusions are shared among researchers. If research is not openly shared, then how can one justify the sacrifices made by research subjects, or by the generous contributions of the public towards that research? Closed-access research is a disservice to everyone.

We will fund researchers through a competitive research proposal application process. Actual research will be performed by the individuals and research laboratories that win our competitive application process. Researchers will not be employees of the *Freedom of Form Foundation, Inc.* They will remain employed by their home research institutions.

The board will only consider credible applications from individuals with at least bachelor or equivalent degrees who are working at qualified research institutions. Research is highly encouraged to fall within one of our frameworks: remodeling, genetic and morphological modifications, neuroprosthetics, and bioprinting.

Research grants will be provided to any applicant who is selected through our competitive process. Applicants may be predoctoral or postdoctoral individuals, research laboratories (e.g., headed by a professor or principal investigator), biomedical scientists, or engineers.

For example, if the applicant is an individual, then the applicant will submit a full design of a scientific study in the form of a research proposal, along with accompanying information such as school transcripts and letters of recommendation. If the applicant is an entire research lab, we'll require a more thorough research proposal and other details.

We plan to mail out acceptance/denial decisions to applicants each April 1, August 1, and December 1 of each year.

We will fund two types of grants:

**Initially, we will fund fellowship grants:**

Candidates must demonstrate:

1. A promising career trajectory.
2. Interest in continuing in either academic or industrial morphological freedom research.
3. A research project which may lead to technologies or platforms that support morphological freedom.
4. Enthusiasm about a long-term career in morphological freedom research.
5. A reasonably convincing outline of how their current research proposal will benefit our objectives and framework.

Fellowship proposals will have these requirements and stipulations:

1. Funding for up to 5 years.
2. Must submit a yearly project report updating progress.
3. Awards will cover the full standard yearly stipend or salary at the awardee's home institution.
4. Funding for necessary travel.

In the future, we will fund laboratory grants such as the routine R01-scale grants. These grants allow for focused research efforts of an entire laboratory. We also plan to expand to psychological and behavioral studies and to publish a peer-reviewed journal to publish our findings and accelerated the exchange of ideas and results among professionals.

Currently, we have no committed partners but are seeking pledges from potential partners who will help our foundation get off to a great start. We want to build long-term relationships with

those who share our vision. We will start small and build the organization larger with greater impact over the coming years.

We will begin with 10 - 20 hours per week invested by board members to develop and implement programs that will fund, legitimize, and popularize research that will improve the lives of those with incapacitating and chronic diseases, disorders, and disabilities and 100% of all funds from all sources (donations, fundraising, and grants) will be used for tax-exempt activities.

We plan to travel internationally once or twice a year to perform on-site visits where research is going on. Initially, we will work in the U. S., however, we have two board members in Scotland, so we will also operate there. Over time, we plan to expand to additional countries but have no firm decisions at this time on which countries those will be. We will decide based on the research proposals we accept and the countries those researchers live in.

We will not engage in financial transactions (for example, loans, payments, rents, etc.) with any of our donors or any entities they own or control.

As an organization in its beginning stages, we envision the primary objectives of the corporation to be:

1. Funding, legitimizing, and popularizing research through fellowship grants that will help guide the future of biological research.
2. Improving the lives of those with incapacitating and chronic diseases, disorders, and disabilities through the research projects we fund.
3. Supporting research projects that include the following frameworks: remodeling, genetic and morphological modifications, neuroprosthetics, and bioprinting.
4. Funding research proposals by predoctoral and postdoctoral individuals, research laboratories, biomedical scientists, and engineers.

**Part V, 1a – Compensation and Other Financial Arrangements with Your Officers, Directors, Trustees, Employees, and Independent Contractors.**

Board members will not be paid for their services as board members but may be reimbursed for necessary and reasonable expenses while performing services and traveling on organization business.

IRS tax law allows a public charity 501(c) (3) to make payments to insiders as long as the amounts are reasonable, and the goods and/or services are actually rendered. When considering the implications of 1996 Congress enacted Section 4958 of the Internal Revenue Code, which

imposed a tax on “excess benefit” transactions, we conclude that the payments proposed to reimburse out of pocket expenses (with receipts provided) are not unreasonably high or excessive.

**Part V, 3a - For each officer, director, trustee, highest compensated employees and highest compensated independent contractors listed on lines 1a, 1b, or 1c, attach a list showing their name, qualifications, hours worked and duties:**

No officers, directors, or trustees will be compensated for serving on the board.

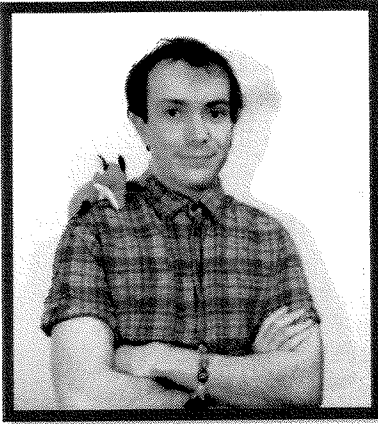
1. The duties of the President of the Board are found in the organization’s bylaws, Page 8, Paragraph 6, Section 6.04. The President will work about 20 hours per week.
2. The duties of the Vice President of the Board are found in the organization’s bylaws, Page 8, Paragraph 6, Section 6.05. The Vice President will work about 20 hours per week.
3. The duties of the Secretary of the Board are found in the organization’s bylaws, Page 8, Paragraph 6, Section 6.06. The Secretary will work about 10 hours a week.
4. The duties of the Treasurer of the Board are found in the organization’s bylaws, Page 8, Paragraph 6, Section 6.07. The Treasurer will work about 10 hours a week.

The Board of Directors is made up of people who love to research science. The board is eager to share their love with others by helping them to explore science through fellowship grants.



### **President:**

Michael Norsworthy  
66 Dinsmore Ave, Apt 503  
Framingham, MA 01702  
No compensation  
5 hours per week  
40+ hours per week while traveling internationally on  
nonprofit business  
**See Attached Resume**



**Vice President:**

Daniel Davies  
9 Crighton Lang Court  
Coupar Angua, Perthshire  
Scotland, United Kingdom PH13 9FD  
No compensation  
5 hours per week  
40+ hours per week while traveling internationally on nonprofit  
business  
**See Attached Resume**

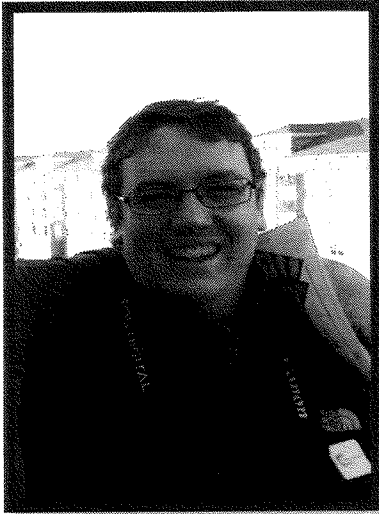


**Secretary:**

Matthew Cabrera  
1100 Bering Dr, Apt 141  
Houston, TX 77057  
No compensation  
5 hours per week  
40+ hours per week while traveling internationally on  
nonprofit business  
**See Attached Resume**

**Treasurer:**

Matthew Flentje  
2120 Elmview Dr, Condo I  
Green Bay, WI 54304  
No compensation  
5 hours per week  
40+ hours per week while traveling internationally on nonprofit business  
**See Attached Resum**



**Board Member:**

Keiran Stevenson  
68-10 Craighouse Gardens  
Edinburgh, Scotland, United Kingdom, EH10 5UN  
No compensation  
5 hours per week  
40+ hours per week while traveling internationally on  
nonprofit business.  
**See Attached Resume**

**Part V, 5a – Have you adopted a conflict of interest policy consistent with sample conflict of interest policy in Appendix A to the instructions? If yes, provide a copy and explain how the policy has been adopted such as by resolution of your governing body.**

Yes. The board of directors of this organization has adopted a Conflict of Interest Policy, which is attached to this Form 1023 Exemption Application. This policy is based on the sample conflict of interest policy contained in Appendix A of the official instructions to IRS Form 1023. Article VI requires each interested party to annually sign a statement that affirms that such person received a copy of the conflict of interest policy, has read and understood it, agrees to follow it, and understands that the organization is charitable and in order to maintain its federal tax exemption, it must engage primarily in activities which accomplish one or more of its tax-exempt purposes. A copy of the Conflict of Interest Statement is attached.

**Part VI, 1a – In carrying out your exempt purpose, do you provide goods, services, or funds to individuals? Describe each program that provides goods, services, or funds to individuals.**

Yes. *Freedom of Form Foundation, Inc.* will fund, legitimize, and popularize research that will improve the lives of those with incapacitating and chronic diseases, disorders, and disabilities. We will support research projects that include the following frameworks: remodeling, genetic and morphological modifications, neuroprosthetics, and bioprinting. We will also fund research proposals by predoctoral and postdoctoral individuals, research laboratories, biomedical scientists, and engineers.

In the future, we plan to expand to psychological and behavioral studies and to publish a peer-reviewed journal to publish our findings and accelerated the exchange of ideas and results among professionals.

**Part VI, 1b – In carrying out your exempt purpose, do you provide goods, services, or funds to organizations? Describe each program that provides goods, services, or funds to organizations.**

Yes. *Freedom of Form Foundation, Inc.* has future plans to fund laboratory grants such as the routine R01-scale grants. These grants allow for focused research efforts of an entire laboratory.

Currently, we have no committed partners but are seeking pledges from potential partners who will help our foundation get off to a great start and make our research activities possible. We want to build long-term relationships with those who share our vision throughout the United States (Framingham, Massachusetts), Scotland (all regions), and eventually other countries around the world.

**Part VIII, 4a – Attach a description of each fundraising program:**

**Personal solicitation:** We intend to raise funds from individuals, groups, and businesses by direct contact and through our website. We will invite individuals and groups with a commitment to our purposes and efforts to contribute to our organization. We do not have printed materials or brochures at this time. All donations will be solicited and recorded according to IRS codes.

**Foundation grant solicitation:** We intend to raise funds by applying for foundation grants from organizations that support the type of work we are providing.

**Governmental grant solicitation:** We intend to raise funds by applying for government grants that support our efforts.

**Accept donations on your website:** Once we have our website up and running, we intend to accept donations from those that support our efforts.

**Other:** In the future, we plan to seek funding from corporate sponsors.

**Part VIII, 4d – List all states and local jurisdictions in which you will conduct fundraising. For each state or local jurisdiction listed, specify whether you fundraise for your own organization, you fundraise for another organization or another organization fundraises for you.**

*Freedom of Form Foundation, Inc.* would be involved in fundraising for our own organization throughout Massachusetts, but because potential donors live across the United States, funds could potentially come from any state.

**Part VIII, 12b – Name the foreign countries and regions within the countries in which you operate:**

At this time, we will begin in Scotland (all regions) and over the years expanding to other countries around the world as funds become available.

Revenue Ruling 71-460, 1971-2 C.B. 231 states that a domestic corporation that conducts a part or all of its charitable activities in a foreign country is not precluded from exemption under section 501(c)(3) of the Code.

**Part VIII, 12c - Describe your operation in each country and region in which you operate:**

We will fund, legitimize, and popularize research that will improve the lives of those with incapacitating and chronic diseases, disorders, and disabilities. We will support research projects that include the following frameworks: remodeling, genetic and morphological modifications, neuroprosthetics, and bioprinting. We will also fund research proposals by predoctoral and postdoctoral individuals, research laboratories, biomedical scientists, and engineers.

Initially, we will begin by funding fellowship grants that will help guide the future of biological research beginning in Scotland (all regions) and expanding to other countries over time.

In the future, we will fund laboratory grants such as the routine R01-scale grants. These grants allow for focused research efforts of an entire laboratory. We also plan to expand to psychological and behavioral studies and to publish a peer-reviewed journal to publish our findings and accelerated the exchange of ideas and results among professionals.

Currently, we have no committed partners but are seeking pledges from potential partners who will help our foundation get off to a great start. We want to build long-term relationships with those who share our vision.

We plan to travel internationally once or twice a year to perform on-site visits where research is going on. Initially, we will work in the U. S., however, we have two board members in Scotland, so we will also operate there. Over time, we plan to expand to additional countries but have no firm decisions at this time on which countries those will be. We will decide based on the research proposals we accept and the countries those researchers live in.

**Part VIII, 12d – Describe how your operation in each country and region further your exempt purpose:**

After *Freedom of Form Foundation, Inc.* establishes ongoing successful relationships with local charitable organizations in Scotland (all regions) our plan would be to continue this work and expand to other countries around the world. Our exempt purpose is to develop and implement programs that will fund, legitimize, and popularize research that will improve the lives of those with incapacitating and chronic diseases, disorders, and disabilities starting in Scotland (all regions) and then as funds become available, expand to other countries around the world.

We plan to further our exempt purpose by:

1. Funding, legitimizing, and popularizing research through fellowship grants that will help guide the future of biological research.
2. Improving the lives of those with incapacitating and chronic diseases, disorders, and disabilities through the research projects we fund.
3. Supporting research projects that include the following frameworks: remodeling, genetic and morphological modifications, neuroprosthetics, and bioprinting.
4. Funding research proposals by predoctoral and postdoctoral individuals, research laboratories, biomedical scientists, and engineers.

In the future, we will fund laboratory grants such as the routine R01-scale grants. These grants allow for focused research efforts of an entire laboratory. We also plan to expand to psychological and behavioral studies and to publish a peer-reviewed journal to publish our findings and accelerated the exchange of ideas and results among professionals.

By doing these things, we further our exempt purpose.

**Part VIII, 13a – Do you or will you make grants, loans or other distributions to organization(s)?**

**We plan to make fellowship and research grants.** We will provide research grants to any applicant who is selected through our competitive process. Applicants may be predoctoral or postdoctoral individuals, research laboratories (e.g., headed by a professor or principal investigator), biomedical scientists, or engineers.

For example, if the applicant is an individual, then the applicant will submit a full design of a scientific study in the form of a research proposal, along with accompanying information such as school transcripts and letters of recommendation. If the applicant is an entire research lab, we'll require a more thorough research proposal and other details.

We plan to mail out acceptance/denial decisions to applicants each April 1, August 1, and December 1 of each year (see attached application)

We will fund two types of grants:

**Initially, we will fund fellowship grants:**

Candidates must demonstrate:

1. A promising career trajectory.
2. Interest in continuing in either academic or industrial morphological freedom research.
3. A research project which may lead to technologies or platforms that support morphological freedom.
4. Enthusiasm about a long-term career in morphological freedom research.
5. A reasonably convincing outline of how their current research proposal will benefit our objectives and framework.

Fellowship proposals will have these requirements and stipulations:

1. Funding for up to 5 years.
2. Must submit a yearly project report updating progress.
3. Awards will cover the full standard yearly stipend or salary at the awardee's home institution.
4. Funding for necessary travel.

**In the future, we will fund laboratory grants such as the routine R01-scale grants.** These grants allow for focused research efforts of an entire laboratory. We also plan to expand to providing grants to psychological and behavioral studies.

**We have no plans to make grants to organizations.** If we do make other distributions to organizations assisting us in conducting our mission will be documented with copies of receipts, letters, or other relevant documentation. According to our bylaws, all business including any distributions would have to be approved by the board of directors. The method of approval would be documented. Distributions to organizations have not yet occurred since the incorporation.

It is our intent that *if* we distribute through organizations, that they would be 501(c) (3) eligible if they were located in the United States, however, Revenue Ruling 68-489, 1968-2 C.B. 210 states that an organization will not jeopardize its exemption under Section 501(c) (3) of the code, even though it distributes funds to nonexempt organizations, provided it retains control and discretion over use of the funds for Section 501(c) (3) purposes.

An organization exempt from Federal income tax under Section 501(c) (3) of the Internal Revenue Code of 1954 distributed part of its funds to organizations not themselves exempt under that provision. The exempt organization ensured use of the funds for Section 501(c) (3) purposes by limiting distributions to specific projects that are in furtherance of its own exempt purposes. It

retained control and discretion as to the use of funds and maintained records establishing that the funds were used for Section 501(c) (3) purposes. Held: the distributions did not jeopardize the organization's exemption under Section 501(c) (3) of the Code.

**Part VIII, 13b – Describe how your grants, loans, or other distributions to other organizations further your exempt purposes:**

Our exempt purpose is to develop and implement programs that will fund, legitimize, and popularize research that will improve the lives of those with incapacitating and chronic diseases, disorders, and disabilities beginning in the United States (Framingham, Massachusetts), Scotland (all regions) and expanding to other countries as funds become available. By providing fellowships research grants to predoctoral or postdoctoral individuals, research laboratories (e.g., headed by a professor or principal investigator), biomedical scientists, or engineers they will improve the lives of those with incapacitating and chronic diseases, disorders, and disabilities, we further our exempt purpose.

**Part VIII, 13D – Identify each recipient organization and any relationship between you and the recipient organization:**

We have no current financial relationships with recipient organizations.

**Part VIII, 13e – Describe the record you keep with respect to grants, loans and other distributions you make:**

*Freedom of Form Foundation, Inc.* will maintain its financial records on QuickBooks or similar accounting software in accordance with general accounting principles for nonprofit organizations. Cash received is applied to Accounts Receivable ledger and cash distributed is recorded in Accounts Payable ledger. Likewise, organizations such as churches and schools are required to maintain general accounting records and are required by *Freedom of Form Foundation, Inc.* to report on a regular/monthly basis as to how, when, and where funds were applied.

**Part VIII, 13g – Describe your procedure for oversight of distributions that assures your resources are used to further your exempt purpose, including whether you required periodic and final reports on the use of resources.**

General accounting methods are used, maintained, monitored, and audited on a regular/recurring basis. Likewise, any organization working on behalf of *Freedom of Form Foundation, Inc.* requires similar accounting methods. Various members of *Freedom of Form Foundation, Inc.* will maintain written and verbal contact with NGOs in Scotland (all regions) or other areas we may expand to in the future.

We plan to travel internationally once or twice a year to perform on-site visits where research is going on. Initially, we will work in the U. S., however, we have two board members in Scotland, so we will also operate there. Over time, we plan to expand to additional countries but have no firm decisions at this time on which countries those will be. We will decide based on the research proposals we accept and the countries those researchers live in.

**Part VIII, 14a – Do you make grants, loans, or other distributions to foreign organizations?  
If so, answer lines 14 b through 14f.**

**We plan to make fellowship grants.** We will provide research grants to applicants selected through our competitive process. Applicants may be predoctoral or postdoctoral individuals, research laboratories (e.g., headed by a professor or principal investigator), biomedical scientists, or engineers.

For example, if the applicant is an individual, then the applicant will submit a full design of a scientific study in the form of a research proposal, along with accompanying information such as school transcripts and letters of recommendation. If the applicant is an entire research lab, we'll require a more thorough research proposal and other details.

We plan to mail out acceptance/denial decisions to applicants each April 1, August 1, and December 1 of each year (see attached application)

We will fund two types of grants:

**Initially, we will fund fellowship grants:**

Candidates must demonstrate:

1. A promising career trajectory.
2. Interest in continuing in either academic or industrial morphological freedom research.
3. A research project which may lead to technologies or platforms that support morphological freedom.
4. Enthusiasm about a long-term career in morphological freedom research.
5. A reasonably convincing outline of how their current research proposal will benefit our objectives and framework.

Fellowship proposals will have these requirements and stipulations:

1. Funding for up to 5 years.
2. Must submit a yearly project report updating progress.
3. Awards will cover the full standard yearly stipend or salary at the awardee's home institution.

4. Funding for necessary travel.

**In the future, we will fund laboratory grants such as the routine R01-scale grants.** These grants allow for focused research efforts of an entire laboratory. We also plan to expand to funding grants for psychological and behavioral studies.

We have no plans to make grants to foreign or domestic organizations except for research laboratories. If we decide a contribution or distribution is necessary to fulfill our mission to further our exempt status, we will contribute to foreign organizations at the discretion of the board of directors. If we decide to contribute to an organization, we will stipulate how the funds shall be used and require the recipient to provide us with detailed records and financial proof of how the funds were utilized.

We plan to travel internationally once or twice a year to perform on-site visits where research is going on. Initially, we will work in the U. S., however, we have two board members in Scotland, so we will also operate there. Over time, we plan to expand to additional countries but have no firm decisions at this time on which countries those will be. We will decide based on the research proposals we accept and the countries those researchers live in.

**Part VIII, 14b. Do you or will you make grants, loans, or other distributions to foreign organizations? Provide the name of each foreign organization, the country, and regions within a country in which each foreign organization operates, and describe the relationship you have with each foreign organization.**

**We do not make grants to foreign organizations except for research laboratories.** If we choose to make distributions of any kind to nonprofits in the United States, and Scotland (all regions) or other countries we will eventually operate in would qualify for distributions to develop and implement programs that will fund, legitimize, and popularize research that will improve the lives of those with incapacitating and chronic diseases, disorders, and disabilities. We do not currently have any foreign organizations that we are making or plan to make grants.

**Part VIII, 14d – Do your contributors know that you have ultimate authority to use contributions made to you at your discretion for purposes consistent with your exempt purposes? If “Yes,” describe how you relay this information to contributors.**

Yes. We will tell them specifically during direct contact and will have it printed on a receipt of donation once receipts are developed.

**Part VIII, 14e – Do you or will you make pre-grant inquiries about the recipient organization? If “Yes,” describe these inquiries, including whether you inquire about the recipient’s financial status, its tax-exempt status under Internal Revenue Code, its ability to**

**accomplish the purpose for which the resources are provided and other relevant information.**

**We will offer fellowship research grants.** Initially, we will begin by funding fellowship grants that will help guide the future of biological research beginning in Scotland (all regions) and expanding to other countries over time (see Part VIII, Line 14a above for full details).

In the future, we will fund laboratory grants such as the routine R01-scale grants. These grants allow for focused research efforts of an entire laboratory. We also plan to expand to funding grants for psychological and behavioral studies.

For any contributions made by *Freedom of Form Foundation, Inc.* to any organization, we take into consideration the tax-exempt status (based on whether it would be exempt under Internal Revenue Code if located in the United States), overall financial standing of the recipient, and we inquire about any reasonably available historical information about the recipient's identity and integrity; the available postal, email, and website addresses and phone number of each place of business of the recipient; and a statement of general purpose of the recipient, including a detailed report of the recipient's projects and goals.

**Part VIII, Line 14f – Do you or will you use any additional procedures to ensure your distributions to foreign organizations are used in furtherance of your exempt purposes?**

We plan to travel internationally once or twice a year to perform on-site visits where research is going on. Initially, we will work in the U. S., however, we have two board members in Scotland, so we will also operate there. Over time, we plan to expand to additional countries but have no firm decisions at this time on which countries those will be. We will decide based on the research proposals we accept and the countries those researchers live in.

Although adherence and compliance with the U. S. Department of the Treasury's publication the "Voluntary Best Practices for U. S. Based Charities" is not mandatory, we willfully and voluntarily recognize and put into practice these guidelines and suggestions to reduce, develop, re-evaluate, and strengthen a risk-based approach to guard against the threat of diversion of charitable funds or exploitation of charitable activity by terrorist organizations and their support networks.

We also comply and put into practice the federal guidelines, suggestions, laws, and limitations set forth by pre-existing U. S. legal requirements related to combatting terrorist financing, which include, but are not limited to, various sanctions programs administered by the Office of Foreign Assets Control (OFAC) in regard to our foreign activities.

Although we do not plan to work in any sanctioned countries, we will use the alphabetical OFAC listing or conduct searches online at <https://sanctionssearch.ofac.treas.gov/>

We will check the OFAC List of Specially Designated Nationals and Blocked Persons for names of individuals and entities to determine they are not on the list. We have no plans to work in any sanctioned countries such as Myanmar (Burma), Balkans, Belarus, Cuba, Lebanon, Libya, Somalia, Sudan, Ukraine, Venezuela, Yemen, Zimbabwe, and others.

Attached are the "Voluntary Best Practices for U. S. Based Charities" we operate under and by attaching them, are certifying that we adhere to each and every guideline included, including checking the OFAC List of Specially Designated Nationals and Blocked Persons to ensure we are not dealing with terrorists.

**Part IX, 15 – Contributions, gifts, grants, and similar amounts paid out (attach an itemized list)**

These figures are *projected, not actual*:

**2018:** Line 23: Fellowship Grants: \$100,000.

**2019:** Line 23: Fellowship Grants: \$200,000.

**2020:** Line 23: Fellowship Grants: \$300,000.

## **Schedule H.**

### **Organizations Providing Scholarships, Fellowships, Educational Loans, or Other Educational Grants to Individuals and Private Foundations Requesting Advance Approval of Individual Grant Procedures**

#### **Section I:**

**1a. Describe the types of educational grants you provide to individuals, such as scholarships, fellowships, loans, etc.**

We will fund two types of grants:

**Initially, we will fund fellowship grants:**

Candidates must demonstrate:

1. A promising career trajectory.
2. Interest in continuing in either academic or industrial morphological freedom research.
3. A research project which may lead to technologies or platforms that support morphological freedom.
4. Enthusiasm about a long-term career in morphological freedom research.
5. A reasonably convincing outline of how their current research proposal will benefit our objectives and framework.

Fellowship proposals will have these requirements and stipulations:

1. Funding for up to 5 years.
2. Must submit a yearly project report updating progress.
3. Awards will cover the full standard yearly stipend or salary at the awardee's home institution.
4. Funding for necessary travel.

In the future, we will fund laboratory grants such as the routine R01-scale grants. These grants allow for focused research efforts of an entire laboratory. We also plan to expand funding to psychological and behavioral studies.

**1b. Describe the purpose and amount of your scholarships, fellowships, and other educational grants and loans that you award.**

We will fund, legitimize, and popularize research that will improve the lives of those with incapacitating and chronic diseases, disorders, and disabilities. We will support research projects that include the following frameworks: remodeling, genetic and morphological modifications, neuroprosthetics, and bioprinting. We will also fund research proposals by predoctoral and postdoctoral individuals, research laboratories, biomedical scientists, and engineers.

We plan to mail out acceptance/denial decisions to applicants each April 1, August 1, and December 1 of each year.

Fellowship proposals will have these requirements and stipulations:

1. Funding for up to 5 years.
2. Must submit a yearly project report updating progress.
3. Awards will cover the full standard yearly stipend or salary at the awardee's home institution.
4. Funding for necessary travel.

In the future, we will fund laboratory grants such as the routine R01-scale grants. These grants allow for focused research efforts of an entire laboratory. We also plan to expand funding to psychological and behavioral studies.

**1c. If you award educational loans, explain the terms of the loans (interest rate, length, forgiveness, etc.).**

We do not award educational loans.

**1d. Specify how your program is publicized.**

We do not currently have programs in place to publicize. However, once we do, we will publicize through the local schools, universities, medical centers, social media, and newspapers.

**1e. Provide copies of any solicitation or announcement materials.**

We do not have any solicitation or announcement materials developed yet.

**1f. Provide a sample copy of the application used.**

See attached draft application. We are not finished perfecting it, but this is what we have so far.

**3. Describe the specific criteria you use to determine who is eligible for your program. (For example, eligibility selection criteria could consist of graduating high school students from a particular high school who will attend college, writers of scholarly works about American history, etc.)**

The board will only consider credible applications from individuals with at least bachelor or equivalent degrees who are working at qualified research institutions. Research is highly encouraged to fall within one of our frameworks: remodeling, genetic and morphological modifications, neuroprosthetics, and bioprinting.

Research grants will be provided to applicants selected through our competitive process. Applicants may be predoctoral or postdoctoral individuals, research laboratories (e.g., headed by a professor or principal investigator), biomedical scientists, or engineers.

For example, if the applicant is an individual, then the applicant will submit a full design of a scientific study in the form of a research proposal, along with accompanying information such as school transcripts and letters of recommendation. If the applicant is an entire research lab, we'll require a more thorough research proposal and other details.

Initially, we will begin by funding fellowship grants that will help guide the future of biological research beginning in the United States and Scotland (all regions), and expanding to other countries over time (see question 1a above for full details).

In the future, we will fund laboratory grants such as the routine R01-scale grants. These grants allow for focused research efforts of an entire laboratory. We also plan to expand to funding grants for psychological and behavioral studies.

**4a. Describe the specific criteria you use to select recipients. (For example, specific selection criteria could consist of prior academic performance, financial need, etc.)**

The board will only consider credible applications from individuals with at least bachelor or equivalent degrees who are working at qualified research institutions. Research is highly encouraged to fall within one of our frameworks: remodeling, genetic and morphological modifications, neuroprosthetics, and bioprinting.

Research grants will be provided to any applicant who is selected through our competitive process. Applicants may be predoctoral or postdoctoral individuals, research laboratories (e.g., headed by a professor or principal investigator), biomedical scientists, or engineers.

For example, if the applicant is an individual, then the applicant will submit a full design of a scientific study in the form of a research proposal, along with accompanying information such as school transcripts and letters of recommendation. If the applicant is an entire research lab, we'll require a more thorough research proposal and other details.

Initially, we will begin by funding fellowship grants that will help guide the future of biological research beginning in the United States (Framingham, Massachusetts), Scotland (all regions), and expanding to other countries over time (see question 1a above for full details).

In the future, we will fund laboratory grants such as the routine R01-scale grants. These grants allow for focused research efforts of an entire laboratory. We also plan to expand to funding grants for psychological and behavioral studies.

**4b Describe how you determine the number of grants that will be made annually.**

The number of grants given will be determined by the amount of funds available each year. We have not determined the number of grants because we are just getting set up.

We plan to mail out acceptance/denial decisions to applicants each April 1, August 1, and December 1 of each year.

**4c. Describe how you determine the amount of each of your grants.**

The amount of each grant is determined by the amount of funds raised each year and the need of each research project.

**4d. Describe any requirement or condition that you impose on recipients to obtain, maintain, or qualify for renewal of a grant. (For example, specific requirements or conditions could consist of attendance at a four-year college, maintaining a certain grade point average, teaching in public school after graduation from college, etc.)**

We do not plan to renew grants because they are awarded for up to five-year studies. If we do choose to renew grants, they would have to reapply and be reevaluated by the selection committee based on the same criteria as the first time.

We will fund two types of grants:

**Initially, we will fund fellowship grants:**

Candidates must demonstrate:

1. A promising career trajectory.
2. Interest in continuing in either academic or industrial morphological freedom research.
3. A research project which may lead to technologies or platforms that support morphological freedom.
4. Enthusiasm about a long-term career in morphological freedom research.
5. A reasonably convincing outline of how their current research proposal will benefit our objectives and framework.

Fellowship proposals will have these requirements and stipulations:

1. Funding for up to 5 years.
2. Must submit a yearly project report updating progress.
3. Awards will cover the full standard yearly stipend or salary at the awardee's home institution.
4. Funding for necessary travel.

In the future, we will fund laboratory grants such as the routine R01-scale grants. These grants allow for focused research efforts of an entire laboratory. We also plan to expand to funding grants for psychological and behavioral studies.

**5. Describe your procedures for supervising the scholarships, fellowships, educational loans, or other educational grants. Describe whether you obtain reports and grade transcripts from recipients, or you pay grants directly to a school under an arrangement whereby the school will apply the grant funds only for enrolled students who are in good standing. Also, describe your procedures for taking action if the terms of the award are violated.**

Grants will be supervised by requiring progress reports, performing periodic visits (announced and unannounced), grade transcripts for students, and administration of funds by the institution for student in good standing.

If a grantee is no longer in good standing with the institution, we will terminate grant payments. We will also defund in the case of failure to provide required progress reports, whether individual research grants or laboratory research grants.

*Freedom of Form Foundation, Inc.* will also advance rights and ethics. We are exceptionally proactive in ensuring that all funded research satisfies robust ethical requirements to protect the rights of research subjects. We have some of the strongest protections of any grant-making foundation that outright prohibit any use of our funds for new non-human primate research. Furthermore, our views on ethics extend to how data and conclusions are shared among researchers. Closed-access research is a disservice to everyone.

**6. Who is on the selection committee for the awards made under your program, including names of current committee members, criteria for committee membership, and the method of replacing committee members?**

We are currently a small organization, so the board of directors will also be the selection committee at this time. The creation of committees and methods of election and replacing committee member is in the bylaws. Over time, we hope to have research professionals join the selection committee by invitation and referral.

*See next page for IRS International Activities Question*

## International Activities Questions

*Although not required, as a proactive attempt to reduce workload on the part of the IRS agent who processes this application, we are providing answers to your international activities questionnaire as part of our 501c3 application.*

**1. Your application indicates that you operate (or will operate) in a foreign country, but did not clearly describe the activity. Please provide the following:**

**a. Identify the specific countries (and regions within the countries) in which you operate.**

The United States (Framingham, Massachusetts), Scotland (all regions) initially and other countries as the organization grows and expands over time, careful to observe all OFAC sanctions.

**b. Describe your operations in each country.**

*Freedom of Form Foundation, Inc.* is a nonprofit organization that will fund, legitimize, and popularize research that will improve the lives of those with incapacitating and chronic diseases, disorders, and disabilities. We will support research projects that include the following frameworks: remodeling, genetic and morphological modifications, neuroprosthetics, and bioprinting. We will also fund research proposals by predoctoral and postdoctoral individuals, research laboratories, biomedical scientists, and engineers.

Initially, we will begin by funding fellowship grants that will help guide the future of biological research beginning in the United States, Scotland (all regions), and expanding to other countries over time (see above for full details).

In the future, we will fund laboratory grants such as the routine R01-scale grants. These grants allow for focused research efforts of an entire laboratory. We also plan to expand to psychological and behavioral studies and to publish a peer-reviewed journal to publish our findings and accelerated the exchange of ideas and results among professionals.

We plan to travel internationally once or twice a year to perform on-site visits where research is going on. Initially, we will work in the U. S., however, we have two board members in Scotland, so will also operate there. Over time, we plan to expand to additional countries but have no firm decisions at this time on which countries those will be. We will decide based on the research proposals we accept and the countries those researchers live in.

**2. Please answer the following in regard to Office of Foreign Assets Control (OFAC) compliance:**

**a. When you conduct activities in foreign countries, will you check the OFAC List of Specially Designated Nationals and Blocked Persons for names of individuals and entities with whom you are dealing to determine if they are included on the list?**

Yes, we will. Consistently.

**b. What other practices will you engage in to ensure that foreign expenditures or grants are not diverted to support terrorism or other non-charitable activities?**

We plan to travel internationally once or twice a year to perform on-site visits where research is going on. Initially, we will work in the U. S., however, we have two board members in Scotland, so will also operate there. Over time, we plan to expand to additional countries but have no firm decisions at this time on which countries those will be. We will decide based on the research proposals we accept and the countries those researchers live in.

**c. Will you comply with all United States statutes, executive orders, and regulations that restrict or prohibit U.S. persons from engaging in transactions and dealings with designated countries, entities, or individuals, or otherwise engaging in activities in violation of economic sanctions administered by OFAC?**

Yes, we will comply with all United States statutes, executive orders, and regulations that restrict or prohibit U.S. persons from engaging in transactions and dealings with designated countries, entities, or individuals, or otherwise engaging in activities in violation of economic sanctions administered by OFAC.

Although adherence and compliance with the U. S. Department of the Treasury's publication the "Voluntary Best Practices for U. S. Based Charities" is not mandatory, we the directors willfully and voluntarily recognize and put into practice these guidelines and suggestions to reduce, develop, re-evaluate, and strengthen a risk-based approach to guard against the threat of diversion of charitable funds or exploitation of charitable activity by terrorist organizations and their support networks.

We also comply and put into practice the federal guidelines, suggestions, laws, and limitations set forth by pre-existing U. S. legal requirements related to combatting terrorist financing, which include, but are not limited to, various sanctions programs administered by the Office of Foreign Assets Control (OFAC) in regard to our foreign activities.

**d. Will you acquire from OFAC the appropriate license and registration where necessary?**

Yes, we will, **being careful to observe all OFAC sanctions to the letter and the intent of the sanctions.** We know that certain types of activities and transactions which would otherwise be prohibited with respect to sanctioned countries have been authorized by general licenses, subject to certain conditions and limitations. Those licensed activities and transactions include the export and reexport of services in support of humanitarian and other not-for-profit activities by the U.S. and third-country non-governmental organizations. We will apply for necessary licenses before having any involvement in these countries. We will also check the OFAC listing of block individuals to make sure we are not dealing with anyone on the banned list.

**3. Please answer the following about grants you will make to organizations or individuals located in foreign countries:**

**a. State the organizations to which you do (or will) distribute funds or goods, and if they have been recognized as tax-exempt by the IRS, state their exempt status.**

We do not currently have established relationships with other organizations. It is our intent that if we distribute through organizations, that they would be 501(c)(3) eligible if they were located in the United States, however, Revenue Ruling 68-489, 1968-2 C.B. 210 states that an organization will not jeopardize its exemption under Section 501(c)(3) of the code, even though it distributes funds to nonexempt organizations, provided it retains control and discretion over use of the funds for Section 501(c)(3) purposes.

**b. List any distributions (in funds or goods) you made to date, including the recipient, what and how much was disbursed, and how the distribution furthered your exempt purposes.**

N/A. No distributions to date, we are just getting set up.

**c. Describe your process for reviewing and approving requests for funds or goods, including the pre-grant inquiries you conduct on potential grantees, and how you determine grant amounts.**

The board will only consider credible applications from individuals with at least bachelor or equivalent degrees who are working at qualified research institutions. Research is highly

encouraged to fall within one of our frameworks: remodeling, genetic and morphological modifications, neuroprosthetics, and bioprinting.

Research grants will be provided to applicants selected through our competitive process. Applicants may be predoctoral or postdoctoral individuals, research laboratories (e.g., headed by a professor or principal investigator), biomedical scientists, or engineers.

For example, if the applicant is an individual, then the applicant will submit a full design of a scientific study in the form of a research proposal, along with accompanying information such as school transcripts and letters of recommendation. If the applicant is an entire research lab, we'll require a more thorough research proposal and other details.

Initially, we will begin by funding fellowship grants that will help guide the future of biological research beginning in the United States, Scotland (all regions), and expanding to other countries over time.

We plan to mail out acceptance/denial decisions to applicants each April 1, August 1, and December 1 of each year.

We will fund two types of grants:

**Initially, we will fund fellowship grants:**

Candidates must demonstrate:

1. A promising career trajectory.
2. Interest in continuing in either academic or industrial morphological freedom research.
3. A research project which may lead to technologies or platforms that support morphological freedom.
4. Enthusiasm about a long-term career in morphological freedom research.
5. A reasonably convincing outline of how their current research proposal will benefit our objectives and framework.

Fellowship proposals will have these requirements and stipulations:

1. Funding for up to 5 years.
2. Must submit a yearly project report updating progress.
3. Awards will cover the full standard yearly stipend or salary at the awardee's home institution.
4. Funding for necessary travel.

In the future, we will fund laboratory grants such as the routine R01-scale grants. These grants allow for focused research efforts of an entire laboratory. We also plan to expand to funding grants for psychological and behavioral studies.

**d. If you enter into a written grant agreement with grantees, submit representative copies of the grant agreements.**

We do make grants, and we have a draft grant application (see attached) but we do not have grant agreements developed at this time. We are just getting started.

**e. If a grant recipient is eligible for repeated grants, explain whether they must reapply and continue to provide information regarding how funds or goods are used.**

We do not plan to renew grants because they are rewarded for up to five years depending on the nature of the study. If we do choose to renew grants, they would have to reapply and be reevaluated by the selection committee based on the same criteria as the first time.

**f. Explain whether you accept donations earmarked for particular organizations or individuals.**

No, we will not.

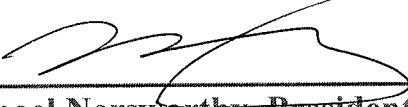
**g. Specify how you will exercise control and responsibility over the use of any funds or goods granted to foreign organizations or individuals to ensure they are used properly (e.g., requiring grantees to submit periodic reports, or accountings, engaging accountants to audit grantees, sending representatives or agents for field investigations, etc.).**

We plan to travel internationally once or twice a year to perform on-site visits where research is going on. Initially, we will work in the U. S., however, we have two board members in Scotland, so will also operate there. Over time, we plan to expand to additional countries but have no firm decisions at this time on which countries those will be. We will decide based on the research proposals we accept and the countries those researchers live in.

**h. Specify to what extent, if any, you share board members or other key personnel with recipient organizations.**

N/A. We do not share board members or other key personnel.

*Under penalties of perjury, I declare that I have examined this information, including accompanying documents, and, to the best of my knowledge and belief, the information contains all the relevant facts relating to the request for the information, and such facts are true, correct, and complete.*

  
\_\_\_\_\_  
**Michael Norsworthy, President**

**Date:** *March 30, 2018*

### OFAC COMPLIANCE DECLARATION

We hereby agree that all officers, board members and employees of the organization will check all individuals and organizations that we will deal with against the Office of Foreign Assets Control (OFAC) List that is located within the U.S. Department of Treasury and that we will not deal with any of these individuals or organizations located on the OFAC List.

Name: **Freedom of Form Foundation, Inc.**  
EIN: **82-4415111**

Michael Norsworthy  
President

Signature: \_\_\_\_\_



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

March 30, 2018

**Michael Wayne Norsworthy, Ph.D.**

Harvard University Department of Chemistry and Chemical Biology

**Home address:**

66 Dinsmore Ave  
Apartment 503  
Framingham, MA 01702  
404 630 2427  
mnorsworthy@gmail.com

**Date of birth:**

1989, June 5      Atlanta, GA.

**Education:**

2011-2018	<b>Harvard University / Harvard Medical School</b> Ph.D. in Biological and Biomedical Sciences (thesis defense completed)
2007-2011	<b>Georgia Institute of Technology</b> B.S. with Highest Honor in Biology with Research Option

**Awards and honors:**

2016-2017	Supported fellow of the T32 4T32HL007901-19 Institutional National Research Service Award for the Training Program in Sleep, Circadian, and Respiratory Neurobiology
2013	Supported fellow of the T32 GM007226 Institutional Training Grant "Cellular and Developmental Biology"
2011	Faculty Award "Given annually to a senior Biology major who has demonstrated outstanding scholastic achievement, meritorious character, and significant contributions to the School of Biology"
2010	President's Undergraduate Research Award
2009	Russell Bell Scholar
2009	Petit Undergraduate Research Scholarship
2007-2011	Faculty Honors
2007-2011	HOPE Scholarship

**Publications:**

**Norsworthy MW** (2017, accepted, elective 12 month embargo). "Sox11 promotes neuronal regeneration or death: complexities from heterogeneity". *PhD Thesis*, Harvard University.

**Michael W. Norsworthy\***, Fengfeng Bei\*, Riki Kawaguchi, Qing Wang, Nicholas M. Tran, Yi Li, Benedikt Brommer, Yiming Zhang, Chen Wang, Joshua R. Sanes, Giovanni Coppola\*\*, Zhigang He\*\* (2017) "Sox11 expression in adult retina promotes regeneration of some ganglion cell types but kills others". *Neuron* 94(6):1112-1120.

Cartoni R, **Norsworthy MW**, Bei F, Wang C, Li S, Zhang Y, Gabel CV, Schwarz TL, He Z. (2016). "The Mammalian-Specific Protein Armcx1 Regulates Mitochondrial Transport during Axon Regeneration." *Neuron*. 92(6):1294-1307

Belin, S., **Norsworthy, M.**, & He, Z. (2014). Independent Control of Aging and Axon Regeneration. *Cell Metabolism*, 19(3), 354–356. doi:10.1016/j.cmet.2014.02.014

Lienert, F., Torella, J. P., Chen, J.-H., **Norsworthy, M.**, Richardson, R. R., & Silver, P. A. (2013). "Two- and three-input TALE-based AND logic computation in embryonic stem cells." *Nucleic acids research*, 1–9. doi:10.1093/nar/gkt758

**Norsworthy, M.** (2011). "Novel expression sites and genetic diversity of FoxP2 in Lake Malawi cichlids." *Undergraduate thesis*, Georgia Institute of Technology.

\* contributed equally

\*\* co-senior authors

### **Skills and background:**

#### **Leadership and communication:**

- Project inception and evolution
- Coordination of collaborators, technicians, and contractors
- Scientific writing
- Presentations (scientific and layperson)
- Discussion and interpretation of results
- Selecting, creating, and improving protocols and reagents
- Identifying directed-screening targets based on literature

#### **Knowledge base:**

- Molecular and cell biology
- Neuroscience and neural regeneration
- Embryonic development

#### **Technical skills:**

- Quantitative and statistical analysis
- Experimental design
- Wet-lab related:
  - Microscopy (confocal, fluorescent, and brightfield)
  - Flow cytometry and cell sorting
  - Histology (immunofluorescence, *in-situ* hybridization, LacZ /  $\beta$ -gal)
  - Tissue dissection, preservation, and sectioning
  - Mammalian cell and tissue culture
  - PCR and cloning
  - Mouse and fish husbandry

- Vector preparation (AAVs)
- Computer programming (Java)
- Image processing (Photoshop)

**Detailed research experience:**

- 2018-present      **Xiaowei Zhuang's lab, HHMI, Dept of Chemistry and Chemical Biology, Harvard University**
- Accepted an offer for employment as a Postdoctoral Fellow to develop improved microscopy and detection methods, and analysis strategies for the new types of data obtained.
    - This will enable new discoveries and applications in neuroscience, cancer, and other fields
    - Furthermore, we will finally be able to fully understand the complexities of biological systems, needed for achieving neural regeneration and other bioengineering applications.
- 2014-2017      **Zhigang He's lab, Dept of Neurobiology, BCH/Harvard Medical School**
- Identified *Sox11* as a regulator of Retinal Ganglion Cell regeneration in the optic nerve.
    - Identified *Sox11* as a regulator of melanopsin-positive, intrinsically photosensitive RGC (ipRGC) regeneration.
    - *Sox11* also synergizes with PTEN deletion for high-efficiency axon regeneration through the mouse optic nerve to the brain.
    - *Sox11* simultaneously kills alpha-RGCs, a warning to other regeneration researchers that side-effects of possible therapeutics can be serious, and hard to predict in advance.
- 2012-2013      **Pam Silver's lab, Department of Systems Biology, Harvard Medical School**
- Designed, built, and tested synthetic gene networks, which may be useful for more specific genetic therapies, and tools for scientific research:
    - A 3-input logic gate with a *trans*-splicing intein mechanism, resulting a functional transcription factor driving expression of a fluorescent reporter in mammalian cells.
    - A synthetic trigger/memory system in both *Escherichia coli* and *Salmonella enterica* cells.
- 2012      **Richard Maas's lab, Division of Genetics, Brigham and Women's Hospital**
- Research in early organ development and signaling through epithelial-mesenchymal interactions. Specifically, *Wnt* and *Bmp* signal transduction in epithelia and mesenchyme in tooth buds of mouse embryos.
    - Contributed to understanding of many other organs forming with epithelial-mesenchymal interactions such as lungs, and may inform future regenerative medicine strategies.

- 2011                    **Sean Megason's lab, Department of Systems Biology, Harvard Medical School**
- Studied gene expression, cell proliferation, and tissue movements in the neural tube of zebrafish.
- 2010-2011           **Todd Streelman's lab, School of Biology, Georgia Tech**
- Characterized evolutionary diversity and regulation of *FoxP2*, a language- and motor control-related gene, in cichlid fish of Lake Malawi.
  - Investigated genetic and developmental basis of natural diversity in tooth shape in Lake Malawi cichlid fishes
- 2009-2010           **Yury Chernoff's lab, School of Biology, Georgia Tech**
- Screened deletion library to find the genetic basis of aggresome formation in *Saccharomyces cerevisiae*. Advanced understanding of cell responses to prions and amyloids.

**Training and collaboration:**

- Training Yiling Zhang on experimental design, techniques, imaging, and analysis.
- Working with Jinyong Zhou on experimental design and performance of FACS. Troubleshooting occasional problems e.g. with the FACS machine and RNA extraction.

**Teaching and mentorship:**

- 2015-2016           **Mentoring Vineet Mathur, a high school student, and advising him on his own project**
- Vineet conceived of using a graphene bridge to help populations of neurons communicate *in vitro*
  - I advised him and taught him techniques of how to dissect and culture primary embryonic neurons *in vitro*, and how to perform stimulation and observation using transfected channelrhodopsin and a calcium indicator.
  - Under my guidance and supervision we cultured primary mouse dorsal root ganglia neurons on graphene and achieved expression of AAV-delivered genes.
  - We then characterized the ability of carbon nano-tubes to improve conduction of an electrical signal across an *ex vivo* spinal cord.
- 2012-2013           **Experimental design and scientific writing, Timilty Middle School**  
Co-instructor
- Teaching students about experimental design, including the importance of controls
  - Individually assisting students design their own experiments for Science Fair.

**Presentations:**

Beijing Institute for Brain Disorders: Beijing International Forum on Brain Disorders (2017/9/28)

- Audience: Basic scientists, students, administrators of research institutes, medical doctors
- Attendance: several hundred

Scientific Staff Meeting of the Division of Sleep and Circadian Disorders (2016/11/7)

- Audience: Primarily clinical
- Attendance: ~20 people

BCH Stem Cell Day (2016/10/25)

- Audience: Researchers throughout Boston Children's Hospital
- Attendance: several hundred

Research in Progress Presentation for the Research Training Program in Sleep, Circadian and Respiratory Neurobiology (2016/5/23)

- Audience: Primarily trainees
- Attendance: ~15 people

Lab Results Talk for the F.M. Kirby Neurobiology Center (2016/6/8).

- Audience: Researchers in the Neurology department
- Attendance: ~50 people

**Posters:**

**M Norsworthy\***, F Bei\*, R Kawaguchi, C Wang, Q Wang, Y Li, N Tran, B Brommer, Y Zhang, J Sanes, G Coppola, Z He "Sox11 expression in retinal ganglion cells differentially promotes either regeneration or ablation of RGC subtypes."

Presented at:

- Society for Neuroscience annual meeting (2017)

**M Norsworthy\***, F Bei\*, C Wang, L Ma, H Nawabi, B Brommer, N Tran, P Yirong, Y Li, J Sanes, Z He "Heterogeneity in neural regeneration: Sox11 regulates regeneration in ip-RGCs and not  $\alpha$ -RGCs."

Presented at:

- Division of Sleep Medicine Benefit Dinner (2016)
- Program in Neuroscience @ Kirby Center (2016)
- Program in Neuroscience (2016)
- Division of Sleep Medicine Benefit Dinner (2015)
- Program in Neuroscience @ Kirby Center (2015)

**Michael Norsworthy**, Eddie Loh, Jonathan Sylvester, Todd Streelman. "Novel expression sites and genetic diversity of FoxP2 in Lake Malawi cichlid fishes"

Presented at:

- Undergraduate research poster session @ Georgia Institute of Technology (2011/4)

**Public appearances:**

Massachusetts Walks Again fundraiser and political rally organized by Dr. Eric Ruby (Sept 15, 2015)

- Advocated for the importance and impact of state funding for scientific research to lead to cures for spinal cord injury.
- I was the only graduate student and one of only two scientists that gave speeches at the event.

Daniel Steven Davies BSc.  
*Genetic Biodesign Systems Engineer*  
9 Crighton Lang Court,  
Coupar Angus,  
Perthshire,  
Scotland,  
United Kingdom  
PH13 9FD  
+44 1828 627900  
[danfox@protonmail.com](mailto:danfox@protonmail.com)

**Date of birth:**

1990, April 11      Pontefract, West Yorkshire, England, United Kingdom

**Education:**

2013–2016      **University of Southampton**  
BSc in Biochemistry (Graduated UK 2:2 / US GPA 3.0)

**Publications:**

D Davies (2018, in peer review). "Death just ain't what it used to be". *The Journal of Personal Cyberconsciousness*, Terasem Movement Inc.

Daniel Steven Davies\*, Adolphus L Cammack, Jordan Eckhoff\*, Mircea Filipescu Alexandru, Taylor J. Conway\*\*, Declan Lordan, Roland Metivier, Jess Golden\*\* (2017, in preparation). "Setting the scene for Freedom of Form: an evolution revolution". *Technical Research Publication & Statement of Intent*, Vulpine Designs Ltd.

Daniel Steven Davies (2017, in preparation) "Genetic and Molecular Scanning, Manipulation, Modification, Bioprinting and Analysis Enablement Device". *Defensive Publication (Open Patent)*, Vulpine Designs Ltd.

D Davies (2016) "Are your ribosomes in a twist?" *Biocoder*, O'Reilly (also published on the O'Reilly website 'Ideas' section).

Daniel Steven Davies (2016) "Ribosomes & mRNA Alternative Initiation Codons: where to start? Early development of tools for mapping the translome". *Undergraduate Dissertation*, University of Southampton.

D Davies (2016) "A New World Example" *Pirate Party UK Magazine*

D Davies (2015) "School's Out: A Transhuman Education" *Pirate Party UK Magazine*

D Davies (2015) "The Genetic Grinch Scenario" *Pirate Party UK Magazine*

\* Corresponding Authors

\*\* Press Queries

**Skills and background:**

**Leadership and communication:**

- Project inception, design and evolution
- Business networking
- Co-ordination of collaborators, technicians, business partners and peers
- Scientific and technical writing & documentation
- Presentations (scientific and layperson, to audiences large and small)
- Discussion and interpretation of results
- Selecting, creating and improving bioinformatic protocols for pioneering uses
- Developing wet lab studies
- Implementation of best practises and regulations in Health & Safety preventatively and during real incidents.
- Pro-actively seeking and driving forward community outreach opportunities.
- Debating bioethical philosophies with a wide range of people

**Knowledge base:**

- Molecular and Cellular Biology
- Biochemistry
- Bioinformatics – experience including Translatome Predictive Software
- Genetics

**Technical Skills:**

- Systems design
- Simulation design
- Vector design (plasmid, insertion and DNA-Origami)
- Wet Lab related:
  - Laboratory equipment maintenance, repair and refurbishment
  - Microscopy
  - Spectrophotometry
  - Histology
  - Tissue dissection
  - PCR
  - Centrifugation
  - Lab safety
- 2D and 3D modelling (CAD & VR)
- Translation from concept to programming language (Unified Modelling Language)
- IT Systems
- Agile project management
- Git based version control systems
- Image processing (GIMP, Krita)
- Video editing (Cinelerra)
- Electronics

Detailed Research Experience:

- |              |   |
|--------------|---|
| 2016-present | <p><b>The GUESS project, Vulpine Designs Ltd</b></p> <ul style="list-style-type: none"><li>• Assembled a technical team of remote workers for our bioinformatics systems developments, using Agile project management.<ul style="list-style-type: none"><li>◦ Assisted team members in establishing critical IT infrastructure and backup systems to underpin development.</li></ul></li><li>• Designed a multifunctional, modular software system to simulate the entire body at all levels, from the DNA to the whole organism.<ul style="list-style-type: none"><li>◦ Various software systems were evaluated. <i>BioPython</i> was then selected as a basis for our translome handling module, one of 25 planned.</li><li>◦ A blockchain based gene-editing vector design sharing and sales platform, <i>Liberation</i>, was devised and is to be implemented soon.</li></ul></li><li>• Conceived and designed the <i>Geneticiser</i>, a molecular bioprinter.<ul style="list-style-type: none"><li>◦ Assembled a defensive publication and open-patented this invention.</li></ul></li></ul> |
| 2016-2017    | <p><b>The Jemma Redmond Laboratory, Forma Biolabs, Cork</b></p> <ul style="list-style-type: none"><li>• Presented DNA separation techniques to a young audience as part of <i>BioCoder Dojo</i></li><li>• Carried out laboratory equipment repairs and refurbishments<ul style="list-style-type: none"><li>◦ Rebuilt an Eppendorf Thermocycler to return it to working condition with help from colleagues.</li><li>◦ Refurbished an air filtration unit</li><li>◦ Repaired 2 gel electrophoresis kits</li></ul></li><li>• Oversaw the separation and safe clean-up of spills of waste and out-of-date chemicals from stockrooms</li><li>• Contributed to planning and management of facilities and systems<ul style="list-style-type: none"><li>◦ Agile methodologies were implemented to enhance efficiency of task allocation and completion</li><li>◦ A review of systems and resources was carried out in preparation for a downsizing relocation.</li><li>◦ Assisted in relocation of the laboratory to new premises.</li></ul></li></ul>   |
| 2015-2016    | <p><b>Mark Coldwell's lab, Dept. for Life Sciences, Uni. of Southampton</b></p> <ul style="list-style-type: none"><li>• Laid the groundwork for a translome handling system to predict Alternative Initiation Codon usage.<ul style="list-style-type: none"><li>◦ Defined all subsystems required</li><li>◦ Identified areas for improvement based on existing software systems used in previous research by our lab.</li></ul></li></ul>   |
| 2015-2016    | <p><b>Jessica Teeling's lab, Dept. For Life Sciences, Uni. of Southampton</b></p>   |

- Investigated the effects of bacterial, viral and fungal antigens on the toll-like receptors of *Daphnia pulex* by way of observations of the impact on heart rate.
  - Utilised digital optical microscopy
  - Prepared multiple concentrations of hazardous substances and maintained an organised lab bench throughout the study.

#### Teaching and mentorship:

- 2016      **Explaining DNA extraction to children of primary school age**  
Co-demonstrator with Cathal Garvey, Biocoder Dojo stall at an event organised by Grainne Bagnall (of University College Cork) at Boston Scientific, Cork.
- Presenting complex scientific processes in a fun and easy way using household items and chemicals.
  - Allowing children to be involved in the demonstration by preparing samples and making first observations of results.
  - Working as a team to simultaneously engage parents and children in the presentation.

#### Presentations:

- 2016      **Data Project Results Presentation, "Ribosomes and mRNA Alternative Initiation Codons: Where to Start?" University of Southampton**
- Audience: Lecturers and professors
  - Attendance: ~4 people
- 2015      **Student Presentation on Vitamin C, University of Southampton**
- Audience: Fellow students, group mentor
  - Attendance: ~10 people
- 2011      **Earth Charter event at the Green House Hotel, Bournemouth**
- Audience: Journalists, businesspeople, school children, hotel staff, environmental non-profit leaders.
  - Attendance: ~45 people

#### Posters:

Daniel Davies "Leptons", "Hadrons" and "Bosons" set of three posters.

Presented at:

- Brockenhurst College Physics Laboratory (2013)

## Matthew Cabrera

mattcab@outlook.com • 512-922-3253

### EDUCATION

#### Austin College

Graduated 2015

#### Bachelor of Arts Degree

Dual Majors in Business Administration and Environmental Science

Accomplishments: Received academic scholarship

Leadership: Environmental Council Organization of Students (ECOS) – Officer and Event Organizer

### EXPERIENCE

#### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY, Houston, Texas

##### Environmental Investigator

October 2017 – Present

- Conducted compliance investigations for the State of Texas to Comply with rules and regulations
- Conducted numerous training courses that helped develop additional skills to further my work
- Balanced a variety of workloads, from major investigations and site approval, from major and minor regulated entities

#### TRUSOURCE LABS, Austin, TX

##### Solutions Expert

October 2015 to September 2017

- Team lead for Dropbox Inc. productivity solutions support, coordinated formally and informally with liaisons between the contractor and TruSource Labs
- *De Facto* Subject Matter Expert for Dropbox Team software, conducted internal troubleshooting for other agents regarding proprietary business solutions
- Moved to team supporting Nest Learning Thermostats that require advanced software, customer support, and hardware knowledge requirements
- Excelling in a fast-paced and technically challenging customer service environment, achieving top status with tickets answered with over 95% customer satisfaction
- Exceeding customer response quotas while maintaining high quality-response standards; regularly exceeded response quotas by 25 to 30%
- Salesforce and Zendesk proficiency

### TECHNICAL SKILLS:

Windows

Microsoft Office (Excel, Word, PowerPoint)

Mac OS

QuickBooks

Access

Filemaker Pro

Salesforce

ZenDesk

Project Access

Malware Bytes

Photoshop

Advanced computer builds

### OTHER INTERESTS

National Eagle Scout Association, New technology, Aviation, Travel, Photography, Creative writing

MATTHEW FLENTJE  
2120 Elmview Dr. Condo I  
Green Bay, Wisconsin 54304  
(920) 980-3358  
Flenmm14@live.com

**SUMMARY OF ACCOMPLISHMENTS**

*Zoological intern*

*Zoning intern*

*I am action-oriented, focused on solving immediate problems.*

*I am skillful at processing data, information, keeping records, and tabulations.*

*I am high-energy, enthusiastic, and dependable individual who excels in challenging and competitive environments.*

*I am skilled in explicit, concise writing and effective editing, and am able to gather, compile, and analyze information from many different sources.*

*Proficient with GLP, PCR, VIDAS, and other biological testing means.*

*Participated in several audits for ISO and FDA certification.*

*I have strong negotiating skills, and I am persuasive, persistent, and resolute..*

*College Honor Roll Student*

*Past treasurer for several college interest clubs*

*Accomplished Eagle Scout for 10+ years*

*Owner/Founder of Smilodon Studio*

**EDUCATION****2009**

Bachelor Degree-Graduated-University of Wisconsin Green Bay

Major: Biology and Environmental Science

Graduated: bachelor's degree 2009 with honors.

**EMPLOYMENT HISTORY****Tectron Tube** **920-336-3318** **May 2015 to October 2017****Quality Control Tech** *651 Heritage Rd.  
De Pere, Wisconsin 54115*

Oversaw quality control and data acquisition, performed corrective actions and investigated root causes of problems, performed quality control and physical tolerance testing, managed quality control data, calibrated instruments, tested product to make sure it met product guidelines.

**Griffin Industries** **920-434-4440** **May 2015 to October 2017****Quality Control Tech** *1898 Pride Terrace  
Suamico, Wisconsin 54313*

Oversaw quality control and data acquisition, performed corrective actions and investigated root causes of problems, performed quality control and physical tolerance testing, managed quality control data, labeled design specs for prototype parts.

**Northland Labs** **920-336-7465** **February 2012 to May 2014****Lab Technician 2** *1030 Parkview Dr.  
Green Bay, Wisconsin 54304*

Preparation of daily lab schedule for Micro Tech 1's, responsible for establishing meetings with other Tech 2's for preventative measures of lab, oversee problems that occur in the lab, check samples throughout testing process for consistency and errors, and inform clients of presumptive and out-of-spec results. Worked with labworks system in the logging and preparation of samples, as well as reading the final results. Responsible for good lab practices, proper cleaning and data entry procedures, and documentation of samples for both microbiological and chemical testing. Participated in AOAC and FDA audits.

**Food Safety Net Services** **(920) 465-4013** **July 2010 to August 2011****Lab Tech** *2343 Verlin Rd.  
Green Bay, Wisconsin 54311*

Preparation and analysis of lab specimens, excellent working knowledge of good lab practices and techniques, preparation and entry of confidential paperwork, use of LIMS and Word computer systems, sanitation of laboratory equipment, and quality control of all work.

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**Keiran Stevenson**

**Curriculum Vitae**

**Address:** 68/10 Craighouse Gardens,  
Edinburgh,  
EH10 5UN

**Email:** keiranstevenson@live.co.uk

**Mobile:** (+44)07786933509

**Qualifications:**

***University of Edinburgh: (PhD Cell biology)***  
***In progress***

***Pilizota lab, SynthSys. Funded by BBSRC iCASE, Sponsor: Ineos Bio***

**Title: Engineering bacteria for improved ethanol resistance using bacterial osmoregulatory mechanisms.**

The overall goal of the project is to develop strains or conditions that allow for increased resistance to ethanol by *Escherichia coli* and Ineos proprietary bacteria. We plan to use the bacterial osmoregulatory systems to help the bacteria resist damage from the ethanol by stabilising proteins and reinforcing the cell membrane. In addition, we are utilising cutting edge fluorescence microscopy to understand the effects of high osmolarity on our bacteria, and how the osmoregulatory systems are used to adapt.

Techniques used:

Fluorescence microscopy, neural networking in Tensorflow (python) for image segmentation and analysis, custom python code for single particle tracking, genetic modification with Crispr, lambda red and Gibson assembly, EM microscopy for nanoparticle identification

***University of Edinburgh: BSc (Hons) Biotechnology (Degree classification 2:1)***  
***Awarded: 2014***

***Honours project, Pilizota lab, University of Edinburgh***

**Title: *The role of K<sup>+</sup> transporters in E.coli osmoregulation.***

Developed a protocol to produce growth curves in a 96-well microplate reader in a high throughput manner to analyse the growth of *E.coli* at various osmolalities. I then designed an analysis program using MATLAB coding to produce yields and maximum growth rates in a systematic and reliable manner. Additionally I used genetic modification techniques to create a number of K<sup>+</sup> transporter knockout strains and to test using the protocol in an attempt to understand their relationship with osmolality.

**Degree outline:**

My degree covered a wide range of subjects, including genetics & genomics, molecular cell biology as well as synthetic biology techniques and industrial applications. Additionally I undertook courses in physiology and biochemistry to expand my knowledge in the biological field.

A detailed record of courses and grades is available on request delivered by email.

***Qualifications Continued:***

**Dumfries Academy:**

Advanced Higher- Physics (A), Chemistry (A), Biology (B)

**2010**

**Perth High School:****2004-2009**

Higher- Physics (A), Chemistry (A), Biology (A), Mathematics (A), English (C)

**Publications**

**Stevenson K**, McVey A F, Clark I B N, Swain P S and Pilizota T\*\*. General calibration of microbial growth in microplate readers. *Scientific Reports* 2016;6:38828

Swain P S\*\*, **Stevenson K**, Leary A, Montano-Gutierrez L F, Clark I B N, Vogel J and Pilizota T. Inferring time-derivatives, including cell growth rates, using Gaussian processes. *Nature Communications* 2016;7:13766

Buda R\*, Liu Y\*, Yang J\*, Hegde S\*, **Stevenson K**, Bai F\*\* and Pilizota T\*\*. Dynamics of *Escherichia coli*'s passive response to a sudden decreases in external osmolarity. *PNAS* September 2016, doi:10.1073/pnas.1522185113

**Work Experience**

Assistant Laboratory technician, Pilizota lab, University of Edinburgh **July 2014 – June 2015**

During this time I continued my research into growth of *E.coli* in culture at high osmolality with the view of gaining a better understanding of the population growth. Additionally with some modifications to the curve fitting program developed during my honours project I have begun to define a model relating growth rate, yield and osmolality as well as including factors such as the presence of osmolytes.

I have also taken part in the construction of an affordable pipetting robot made from LEGO Mindstorms™ and programmed using Labview to aid in the production of growth curves in a sterile and controlled manner.

Summer student position, Pilizota lab, University of Edinburgh

**May 2014 – June 2014**

- Undertaking laboratory research into hyperosmotic regulation

Work experience in Dumfries Royal Infirmary biochemistry laboratory

**Summer 2011**

- observed mass clinical analysis of blood, serum and urine samples
- analysed and calibrated various pieces of apparatus
- gained insight into quality controls and policies regarding testing
- gained insight in clinical results processing, scrutiny and doctor-lab communication

Work experience in Dumfries and Galloway Council  
Chief Executives Office

**Summer 2012**

- Worked with team on production of Single Outcome Agreement

**Volunteer and other relevant experience**

"Click" young arts group;

- Developed skills in video editing and presentation to create promotional materials for Perth.

Perth and Kinross Youth council; volunteer

- Developed influencing, marketing and team work skills
- Undertook event planning
- Secured financing

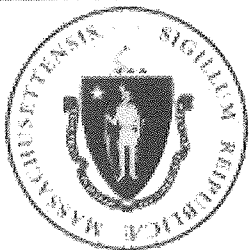
EUSAC (Edinburgh University Sub-Aqua Club); Member

Obtained SCUBA Ocean diver level qualification requiring:

- trust in partner divers with teamwork
- use of technical equipment

## **Personal Interests**

- Extensive ICT skills and provide ICT support to elderly residents in Dumfries
- Game design and computer construction
- Continued personal development including active subscription to New Scientist journal



**The Commonwealth of Massachusetts**  
**William Francis Galvin**

Minimum Fee: \$35.00

Secretary of the Commonwealth, Corporations Division  
One Ashburton Place, 17th floor  
Boston, MA 02108-1512  
Telephone: (617) 727-9640

**Articles of Organization**

(General Laws, Chapter 180)

Identification Number: 001312806**ARTICLE I**

The exact name of the corporation is:

FREEDOM OF FORM FOUNDATION, INC.**ARTICLE II**

The purpose of the corporation is to engage in the following business activities:

FREEDOM OF FORM FOUNDATION, INC. WILL FUND, LEGITIMIZE, AND POPULARIZE RESEARCH THAT WILL IMPROVE THE LIVES OF THOSE WITH INCAPACITATING AND CHRONIC DISEASES, DISORDERS, AND DISABILITIES. WE WILL ALSO SUPPORT RESEARCH PROJECTS THAT INCLUDE THE FOLLOWING FRAMEWORKS: REMODELING, GENETIC AND MORPHOLOGICAL MODIFICATIONS, NEUROPROSTHETICS, AND BIOPRINTING. WE WILL ALSO FUND RESEARCH PROPOSALS BY PRE-DOCTORAL AND POSTDOCTORAL INDIVIDUALS, RESEARCH LABORATORIES, BIOMEDICAL SCIENTISTS, AND ENGINEERS. WE ARE ORGANIZED EXCLUSIVELY FOR CHARITABLE, RELIGIOUS, EDUCATIONAL, AND SCIENTIFIC PURPOSES, INCLUDING, FOR SUCH PURPOSES, THE MAKING OF DISTRIBUTIONS TO ORGANIZATIONS THAT QUALIFY AS EXEMPT ORGANIZATIONS UNDER SECTION 501(C)(3) OF THE INTERNAL REVENUE CODE, OR THE CORRESPONDING SECTION OF ANY FUTURE FEDERAL TAX CODE.

**ARTICLE III**

A corporation may have one or more classes of members. If it does, the designation of such classes, the manner of election or appointments, the duration of membership and the qualifications and rights, including voting rights, of the members of each class, may be set forth in the by-laws of the corporation or may be set forth below:

FREEDOM OF FORM FOUNDATION, INC. WILL HAVE NO MEMBERS.

**ARTICLE IV**

Other lawful provisions, if any, for the conduct and regulation of the business and affairs of the corporation, for its voluntary dissolution, or for limiting, defining, or regulating the powers of the corporation, or of its directors or members, or of any class of members, are as follows:  
(If there are no provisions state "NONE")

UPON THE DISSOLUTION THE ASSETS SHALL BE DISTRIBUTED AS GOVERNED BY MASSACHUSETTS GENERAL LAW CHAPTER 180 FOR ONE OR MORE EXEMPT PURPOSES WITHIN THE MEANING OF SECTION 501(C)(3) OF THE INTERNAL REVENUE CODE, OR CORRESPONDING SECTION OF ANY FUTURE FEDERAL TAX CODE, OR SHALL BE DISTRIBUTED TO THE FEDERAL GOVERNMENT, OR TO A STATE OR LOCAL GOVERNMENT, FOR A PUBLIC PURPOSE. AN

Y SUCH ASSETS NOT SO DISPOSED OF SHALL BE DISPOSED OF BY A COURT OF COMPETENT JURISDICTION OF THE COUNTY IN WHICH THE PRINCIPAL OFFICE OF THE CORPORATION IS THEN LOCATED, EXCLUSIVELY FOR SUCH PURPOSES OR TO SUCH ORGANIZATION OR ORGANIZATIONS AS SAID COURT SHALL DETERMINE WHICH ARE ORGANIZED AND OPERATED EXCLUSIVELY FOR SUCH PURPOSES. NO PART OF THE NET EARNINGS OF THE CORPORATION SHALL INURE TO THE BENEFIT, OR BE DISTRIBUTABLE TO ITS MEMBERS, TRUSTEES, OFFICERS, OR OTHER PRIVATE PERSONS, EXCEPT THAT THE CORPORATION SHALL BE AUTHORIZED AND EMPOWERED TO PAY REASONABLE COMPENSATION FOR SERVICES RENDERED AND TO MAKE PAYMENTS AND DISTRIBUTIONS IN FURTHERANCE OF THE PURPOSES SET FORTH IN PREVIOUS ARTICLES HEREOF. NO SUBSTANTIAL PART OF THE ACTIVITIES OF THE CORPORATION SHALL BE THE CARRYING ON OF PROPAGANDA, OR OTHERWISE ATTEMPTING TO INFLUENCE LEGISLATION, AND THE CORPORATION SHALL NOT PARTICIPATE IN, OR INTERVENE IN (INCLUDING THE PUBLISHING OR DISTRIBUTION OF STATEMENTS) ANY POLITICAL CAMPAIGN ON BEHALF OR IN OPPOSITION TO ANY CANDIDATE FOR PUBLIC OFFICE. NOTWITHSTANDING ANY OTHER PROVISION OF THESE ARTICLES, THE CORPORATION SHALL NOT CARRY ON ANY OTHER ACTIVITIES NOT PERMITTED TO BE CARRIED ON (A) BY A CORPORATION EXEMPT FROM FEDERAL INCOME TAX UNDER SECTION 501(C)(3) OF THE INTERNAL REVENUE CODE, OR THE CORRESPONDING SECTION OF ANY FUTURE FEDERAL TAX CODE, OR (B) BY A CORPORATION, CONTRIBUTIONS TO WHICH ARE DEDUCTIBLE UNDER SECTION 170(C)(2) OF THE INTERNAL REVENUE CODE, OR THE CORRESPONDING SECTION OF ANY FUTURE FEDERAL TAX CODE.

Notes: The preceding four (4) articles are considered to be permanent and may only be changed by filing appropriate Articles of Amendment.

#### ARTICLE V

The by-laws of the corporation have been duly adopted and the initial directors, president, treasurer and clerk or other presiding, financial or recording officers, whose names are set out on the following page, have been duly elected.

#### ARTICLE VI

The effective date of organization of the corporation shall be the date approved and filed by the Secretary of the Commonwealth. If a *later* effective date is desired, specify such date which shall not be more than *thirty days* after the date of filing.

#### ARTICLE VII

The information contained in Article VII is not a permanent part of the Articles of Organization.

**a. The street address (post office boxes are not acceptable) of the principal office of the corporation in Massachusetts is:**

No. and Street: 66 DINSMORE AVE, APT 503  
 City or Town: FRAMINGHAM State: MA Zip: 01702 Country: USA

**b. The name, residential street address and post office address of each director and officer of the corporation is as follows:**

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code	Expiration of Term
PRESIDENT	MICHAEL NORSWORTHY	66 DINSMORE AVE, APT 503 FRAMINGHAM, MA 01702 USA 66 DINSMORE AVE, APT 503 FRAMINGHAM, MA 01702 USA	until new election
TREASURER	MATTHEW FLENTJE	2120 ELMVIEW DR, CONDO I GREEN BAY, WI 54304 USA 2120 ELMVIEW DR, CONDO I	until new election

		GREEN BAY, WI 54304 USA	
CLERK	MATTHEW CABRERA	1100 BERING DR, APT 141 HOUSTON, TX 77057 USA 1100 BERING DR, APT 141 HOUSTON, TX 77057 USA	until new election
VICE PRESIDENT	DANIEL DAVIES	9 CRIGHTON LANG COURT COUPAR ANGUS, SCOTLAND, PH139FD GBR 9 CRIGHTON LANG COURT COUPAR ANGUS, SCOTLAND, PH139FD GBR	until new election
DIRECTOR	KEIRAN STEVENSON	68/10 CRAIGHOUSE GARDENS EDINBURGH, SCOTLAND, EH105UN GBR 68/10 CRAIGHOUSE GARDENS EDINBURGH, SCOTLAND, EH105UN GBR	until new election

c. The fiscal year (i.e., tax year) of the business entity shall end on the last day of the month of:  
December

d. The name and business address of the resident agent, if any, of the business entity is:

Name: REGISTERED AGENTS INC.  
No. and Street: 82 WENDELL AVE STE 100  
City or Town: PITTSFIELD State: MA Zip: 01201 Country: USA

I/We, the below signed incorporator(s), do hereby certify under the pains and penalties of perjury that I/we have not been convicted of any crimes relating to alcohol or gaming within the past ten years. I/We do hereby further certify that to the best of my/our knowledge the above-named officers have not been similarly convicted. If so convicted, explain:

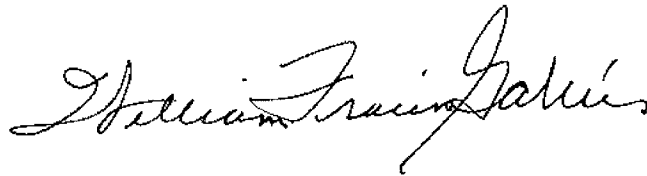
IN WITNESS WHEREOF AND UNDER THE PAINS AND PENALTIES OF PERJURY, I/we, whose signature(s) appear below as incorporator(s) and whose name(s) and business or residential address (es) beneath each signature do hereby associate with the intention of forming this business entity under the provisions of General Law, Chapter 180 and do hereby sign these Articles of Organization as incorporator(s) this 13 Day of February, 2018. (If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)

MICHAEL NORSWORTHY 66 DINSMORE AVE, APT 503 FRAMINGHAM, MA 01702

THE COMMONWEALTH OF MASSACHUSETTS

I hereby certify that, upon examination of this document, duly submitted to me, it appears that the provisions of the General Laws relative to corporations have been complied with, and I hereby approve said articles; and the filing fee having been paid, said articles are deemed to have been filed with me on:

February 13, 2018 02:13 PM

A handwritten signature in cursive script, reading "William Francis Galvin". The signature is written in black ink and is positioned centrally below the date.

WILLIAM FRANCIS GALVIN

*Secretary of the Commonwealth*

## **FREEDOM OF FORM FOUNDATION, INC.**

### **NONPROFIT CORPORATE BYLAWS**

#### **ARTICLE I**

##### **NAME**

###### **1.01 Name**

The legal name of this corporation shall be Freedom of Form Foundation, Inc. The business of the corporation will be conducted as Freedom of Form Foundation, Inc.

#### **ARTICLE II**

##### **PURPOSES AND POWERS**

###### **2.01 Purpose**

Freedom of Form Foundation, Inc. – hereafter referred to as “The Corporation” is a non-profit corporation and shall be operated exclusively for charitable, religious, educational, and scientific purposes, including, for such purposes, the making of distributions to organizations that qualify as exempt organizations, under Section 501 (c)(3) of the Internal Revenue Code, or the corresponding section of any future federal tax code.

Freedom of Form Foundation, Inc.’s mission is to fund, legitimize, and popularize research that will improve the lives of those with incapacitating and chronic diseases, disorders, and disabilities. We will support research projects that include the following frameworks: remodeling, genetics and morphological modifications, neuroprosthetics, and bioprinting. We will also fund research proposals by predoctoral and postdoctoral individuals, research laboratories, biomedical scientist, and engineers.

To maximize our impact on current efforts, we may seek to collaborate with other non-profit organizations which fall under the 501(c) (3) section of the internal revenue code and are operated exclusively for educational and charitable purposes.

At times, per the discretion of the Board of Directors, we may provide internships or volunteer opportunities which shall provide opportunities for involvement in said activities and programs in order to have a greater impact for change.

###### **2.02 Powers**

The corporation shall have the power, directly or indirectly, alone or in conjunction or cooperation with others, to do any and all lawful acts which may be necessary or convenient to

affect the charitable purposes, for which the corporation is organized, and to aid or assist other organizations or persons whose activities further accomplish, foster, or attain such purposes. The powers of the corporation may include, but not be limited to, the acceptance of contributions from the public and private sectors, whether financial or in-kind contributions.

#### 2.03 Nonprofit Status and Exempt Activities Limitation.

(a) Nonprofit Legal Status. Freedom of Form Foundation, Inc. is a Massachusetts non-profit public benefit corporation, recognized as tax exempt under Section 501(c)(3) of the United States Internal Revenue Code.

(b) Exempt Activities Limitation. Notwithstanding any other provision of these Bylaws, no Director, officer, employee, member, or representative of this corporation shall take any action or carry on any activity by or on behalf of the corporation not permitted to be taken or carried on by an organization exempt under Section 501(c)(3) of the Internal Revenue Code as it now exists or may be amended, or by any organization contributions to which are deductible under Section 170(c)(2) of such Code and Regulations as it now exists or may be amended. No part of the net earnings of the corporation shall inure to the benefit or be distributable to any Director, officer, member, or other private person, except that the corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes set forth in the Articles of Incorporation and these Bylaws.

(c) Distribution Upon Dissolution. Upon termination or dissolution of Freedom of Form Foundation, Inc., any assets lawfully available for distribution shall be distributed to one (1) or more qualifying organizations described in Section 501(c)(3) of the 1986 Internal Revenue Code (or described in any corresponding provision of any successor statute) which organization or organizations have a charitable purpose which, at least generally, includes a purpose similar to the terminating or dissolving corporation.

The organization to receive the assets of Freedom of Form Foundation, Inc. hereunder shall be selected in the discretion of a majority of the managing body of the corporation, and if its members cannot so agree, then the recipient organization shall be selected pursuant to a Verified Petition in equity, or such other court of appropriate jurisdiction, filed in a court of proper jurisdiction against Freedom of Form Foundation, Inc., by one (1) or more of its managing body, which Verified Petition shall contain such statements as reasonably indicate the applicability of this section. The court upon a finding that this section is applicable shall select the qualifying organization or organizations to receive the assets to be distributed, giving preference if practicable to organizations located within the State of Massachusetts.

In the event that the court shall find that this section is applicable but that there is no qualifying organization known to it which has a charitable purpose, which, at least generally, includes a purpose similar to Freedom of Form Foundation, Inc., then the court shall direct the distribution

of its assets lawfully available for distribution to the Treasurer of the State of Massachusetts to be added to the general fund.

### **ARTICLE III**

#### **MEMBERSHIP**

##### **3.01 No Membership Classes**

The corporation shall have no members who have any right to vote or title or interest in or to the corporation, its properties and franchises.

##### **3.02 Non-Voting Affiliates**

The Board of Directors may approve classes of non-voting affiliates with rights, privileges, and obligations established by the Board. Affiliates may be individuals, businesses, and other organizations that seek to support the mission of the corporation. The Board, a designated committee of the Board, or any duly-elected officer in accordance with Board policy, shall have authority to admit any individual or organization as an affiliate, to recognize representatives of affiliates, and to make determinations as to affiliates' rights, privileges, and obligations. At no time shall affiliate information be shared with or sold to other organizations or groups without the affiliate's consent. At the discretion of the Board of Directors, affiliates may be given endorsement, recognition and media coverage at fundraising activities, clinics, other events or at the corporation website. Affiliates have no voting rights, and are not members of the corporation.

##### **3.03 Dues**

Any dues for affiliates shall be determined by the Board of Directors.

### **ARTICLE IV**

#### **BOARD OF DIRECTORS**

##### **4.01 Number of Directors**

Freedom of Form Foundation, Inc. shall have a Board of Directors consisting of at least 3 and no more than 15 Directors. Within these limits, the Board may increase or decrease the number of Directors serving on the Board, including for the purpose of staggering the terms of Directors.

##### **4.02 Powers**

All corporate powers shall be exercised by or under the authority of the Board and the affairs of Freedom of Form Foundation, Inc. shall be managed under the direction of the Board, except as otherwise provided by law.

#### 4.03 Terms

- (a) All Directors shall be elected to serve a two-year term; however, the term may be extended until a successor has been elected.
- (b) Director terms shall be staggered so that approximately half the number of Directors will end their terms in any given year.
- (c) Directors may serve terms in succession.
- (d) The term of office shall be considered to begin January 1 and end December 31 of the second year in office, unless the term is extended until such time as a successor has been elected.

#### 4.04 Qualifications and Election of Directors

In order to be eligible to serve as a Director on the Board of Directors, the individual must be 18 years of age and an affiliate within affiliate classifications created by the Board of Directors. Directors may be elected at any Board meeting by the majority vote of the existing Board of Directors. The election of Directors to replace those who have fulfilled their term of office shall take place in January of each year.

#### 4.05 Vacancies

The Board of Directors may fill vacancies due to the expiration of a Director's term of office, resignation, death, or removal of a Director or may appoint new Directors to fill a previously unfilled Board position, subject to the maximum number of Directors under these Bylaws.

- (a) Unexpected Vacancies. Vacancies in the Board of Directors due to resignation, death, or removal shall be filled by the Board for the balance of the term of the Director being replaced.

#### 4.06 Removal of Directors

A Director may be removed by a majority vote of the Board of Directors then in office, if:

- (a) the Director is absent and unexcused from two or more meetings of the Board of Directors in a twelve-month period. The Board President is empowered to excuse Directors from attendance for a reason deemed adequate by the Board President. The President shall not have the power to excuse him/herself from the Board meeting attendance, and in that case, the Board Vice President or Secretary shall excuse the President. Or:
- (b) for cause or no cause, if before any meeting of the Board at which a vote on removal will be made the Director in question is given electronic or written notification of the Board's intention to discuss her/his case and is given the opportunity to be heard at a meeting of the Board.

#### 4.07 Board of Directors Meetings

(a) Regular Meetings. The Board of Directors shall have a minimum of four (4) regular meetings each calendar year at times and places fixed by the Board. Board meetings shall be held upon four (4) days notice by first-class mail, electronic mail, or facsimile transmission or forty-eight (48) hours notice delivered personally or by telephone. If sent by mail, facsimile transmission, or electronic mail, the notice shall be deemed to be delivered upon its deposit in the mail or transmission system. Notice of meetings shall specify the place, day, and hour of meeting. The purpose of the meeting need not be specified.

(b) Special Meetings. Special meetings of the Board may be called by the President, Vice President, Secretary, Treasurer, or any two (2) other Directors of the Board of Directors. A special meeting must be preceded by at least 2-days notice to each Director of the date, time, and place, but not the purpose, of the meeting.

(c) Waiver of Notice. Any Director may waive notice of any meeting, in accordance with Massachusetts statutes.

#### 4.08 Manner of Acting.

(a) Quorum. A majority of the Directors in office immediately before a meeting shall constitute a quorum for the transaction of business at that meeting of the Board. No business shall be considered by the Board at any meeting at which a quorum is not present.

(b) Majority Vote. Except as otherwise required by law or by the Articles of Incorporation, the act of the majority of the Directors present at a meeting at which a quorum is present shall be the act of the Board.

(c) Hung Board Decisions. On the occasion that Directors of the Board are unable to make a decision based on a tied number of votes, the President or Treasurer in the order of presence shall have the power to swing the vote based on his/her discretion.

(d) Participation. Except as required otherwise by law, the Articles of Incorporation, or these Bylaws, Directors may participate in a regular or special meeting through the use of any means of communication by which all Directors participating may simultaneously hear each other during the meeting, including in person, internet video meeting or by telephonic conference call.

#### 4.09 Compensation for Board Service

Directors shall receive no compensation for carrying out their duties as Directors. The Board may adopt policies providing for reasonable reimbursement of Directors for expenses incurred in conjunction with carrying out Board responsibilities, such as travel expenses to attend Board meetings.

#### 4.10 Compensation for Professional Services by Directors

Directors are not restricted from being remunerated for professional services provided to the corporation. Such remuneration shall be reasonable and fair to the corporation and must be reviewed and approved in accordance with the Board Conflict of Interest policy and applicable state law or law of the U.S. territory.

## ARTICLE V

### COMMITTEES

#### 5.01 Committees

The Board of Directors may, by the resolution adopted by a majority of the Directors then in office, designate one or more committees, each consisting of two or more Directors, to serve at the pleasure of the Board. Any committee, to the extent provided in the resolution of the Board, shall have all the authority of the Board, except that no committee, regardless of Board resolution, may:

- (a) take any final action on matters which also requires Board members' approval or approval of a majority of all members;
- (b) fill vacancies on the Board of Directors or in any committee which has the authority of the Board;
- (c) amend or repeal Bylaws or adopt new Bylaws;
- (d) amend or repeal any resolution of the Board of Directors which by its express terms is not so amendable or repealable;
- (e) appoint any other committees of the Board of Directors or the members of these committees;
- (f) expend corporate funds to support a nominee for Director; or
- (g) approve any transaction;
  - (i) to which the corporation is a party and one or more Directors have a material financial interest; or
  - (ii) between the corporation and one or more of its Directors or between the corporation or any person in which one or more of its Directors have a material financial interest.

#### 5.02 Meetings and Action of Committees

Meetings and action of the committees shall be governed by, and held and taken in accordance with, the provisions of Article IV of these Bylaws concerning meetings of the Directors, with such changes in the context of those Bylaws as are necessary to substitute the committee and its

members for the Board of Directors and its members, except that the time for regular meetings of committees may be determined either by resolution of the Board of Directors or by resolution of the committee. Special meetings of the committee may also be called by resolution of the Board of Directors. Notice of special meetings of committees shall also be given to any and all alternate members, who shall have the right to attend all meetings of the committee. Minutes shall be kept of each meeting of any committee and shall be filed with the corporate records. The Board of Directors may adopt rules for the governing of the committee not inconsistent with the provision of these Bylaws.

#### 5.03 Informal Action by the Board of Directors

Any action required or permitted to be taken by the Board of Directors at a meeting may be taken without a meeting if consent in writing, setting forth the action so taken, shall be agreed by the consensus of a quorum. For purposes of this section, an e-mail transmission from an e-mail address on record constitutes a valid writing. The intent of this provision is to allow the Board of Directors to use email to approve actions, as long as a quorum of Board members gives consent.

### ARTICLE VI

#### OFFICERS

##### 6.01 Board Officers

The officers of the corporation shall be a Board President, Vice President, Secretary, and Treasurer, all of whom shall be chosen by, and serve at the pleasure of, the Board of Directors. Each Board officer shall have the authority and shall perform the duties set forth in these Bylaws or by resolution of the Board or by direction of an officer authorized by the Board to prescribe the duties and authority of other officers. The Board may also appoint additional Vice Presidents and such other officers as it deems expedient for the proper conduct of the business of the corporation, each of whom shall have such authority and shall perform such duties as the Board of Directors may determine. One person may hold two or more Board offices, but no Board officer may act in more than one capacity where action of two or more officers is required.

##### 6.02 Term of Office

Each officer shall serve a two-year term of office and may serve consecutive terms of office.

##### 6.03 Removal and Resignation

The Board of Directors may remove an officer at any time, with or without cause. Any officer may resign at any time by giving written notice to the corporation without prejudice to the rights, if any, of the corporation under any contract to which the officer is a party. Any resignation shall take effect at the date of the receipt of the notice or at any later time specified in the notice.

unless otherwise specified in the notice. The acceptance of the resignation shall not be necessary to make it effective.

#### 6.04 Board President

The Board President shall be the Chief Volunteer Officer of the corporation. The Board President shall lead the Board of Directors in performing its duties and responsibilities, including, if present, presiding at all meetings of the Board of Directors, and shall perform all other duties incident to the office or properly required by the Board of Directors.

#### 6.05 Vice President

In the absence or disability of the Board President, the ranking Vice President or Vice President designated by the Board of Directors shall perform the duties of the Board President. When so acting, the Vice President shall have all the powers of and be subject to all the restrictions upon the Board President. The Vice President shall have such other powers and perform such other duties prescribed for them by the Board of Directors or the Board President.

#### 6.06 Secretary

The Secretary shall keep or cause to be kept a book of minutes of all meetings and actions of Directors and committees of Directors. The minutes of each meeting shall state the time and place that it was held and such other information as shall be necessary to determine the actions taken and whether the meeting was held in accordance with the law and these Bylaws. The Secretary shall cause notice to be given of all meetings of Directors and committees as required by the Bylaws. The Secretary shall have such other powers and perform such other duties as may be prescribed by the Board of Directors or the Board President. The Secretary may appoint, with approval of the Board, a Director to assist in performance of all or part of the duties of the Secretary.

#### 6.07 Treasurer

The Treasurer shall be the lead Director for oversight of the financial condition and affairs of the corporation. The Treasurer shall oversee and keep the Board informed of the financial condition of the corporation and of audit or financial review results. In conjunction with other Directors or officers, the Treasurer shall oversee budget preparation and shall ensure that appropriate financial reports, including an account of major transactions and the financial condition of the corporation, are made available to the Board of Directors on a timely basis or as may be required by the Board of Directors. The Treasurer shall perform all duties properly required by the Board of Directors or the Board President. The Treasurer may appoint, with approval of the Board, a qualified fiscal agent or member of the staff to assist in performance of all or part of the duties of the Treasurer.

#### 6.08 Non-Director Officers

The Board of Directors may designate additional officer positions of the corporation and may appoint and assign duties to other non-Director officers of the corporation.

## ARTICLE VII

### CONTRACTS, CHECKS, LOANS, INDEMNIFICATION AND RELATED MATTERS

#### 7.01 Contracts and other Writings

Except as otherwise provided by resolution of the Board or Board policy, all contracts, deeds, leases, mortgages, grants, and other agreements of the corporation shall be executed on its behalf by the Treasurer or other persons to whom the corporation has delegated authority to execute such documents in accordance with policies approved by the Board.

#### 7.02 Checks, Drafts

All checks, drafts, or other orders for payment of money, notes, or other evidence of indebtedness issued in the name of the corporation, shall be signed by such officer or officers, agent or agents, of the corporation and in such manner as shall from time to time be determined by resolution of the Board.

#### 7.03 Deposits

All funds of the corporation not otherwise employed shall be deposited from time to time to the credit of the corporation in such banks, trust companies, or other depository as the Board or a designated committee of the Board may select.

#### 7.04 Loans

No loans shall be contracted on behalf of the corporation and no evidence of indebtedness shall be issued in its name unless authorized by resolution of the Board. Such authority may be general or confined to specific instances.

#### 7.05 Indemnification

(a) Mandatory Indemnification. The corporation shall indemnify a Director or former Director, who was wholly successful, on the merits or otherwise, in the defense of any proceeding to which he or she was a party because he or she is or was a Director of the corporation against reasonable expenses incurred by him or her in connection with the proceedings.

(b) Permissible Indemnification. The corporation shall indemnify a Director or former Director made a party to a proceeding because he or she is or was a Director of the corporation, against liability incurred in the proceeding, if the determination to indemnify him or her has been made in the manner prescribed by the law and payment has been authorized in the manner prescribed by law.

(c) Advance for Expenses. Expenses incurred in defending a civil or criminal action, suit or proceeding may be paid by the corporation in advance of the final disposition of such action, suit or proceeding, as authorized by the Board of Directors in the specific case, upon receipt of (i) a written affirmation from the Director, officer, employee or agent of his or her good faith belief that he or she is entitled to indemnification as authorized in this Article, and (ii) an undertaking by or on behalf of the Director, officer, employee or agent to repay such amount, unless it shall ultimately be determined that he or she is entitled to be indemnified by the corporation in these Bylaws.

(d) Indemnification of Officers, Agents and Employees. An officer of the corporation who is not a Director is entitled to mandatory indemnification under this Article to the same extent as a Director. The corporation may also indemnify and advance expenses to an employee or agent of the corporation who is not a Director, consistent with the law of the state in which the non-profit is incorporated and public policy, provided that such indemnification, and the scope of such indemnification, is set forth by the general or specific action of the Board or by contract.

## ARTICLE VIII

### MISCELLANEOUS

#### 8.01 Books and Records

The corporation shall keep correct and complete books and records of account and shall keep minutes of the proceedings of all meetings of its Board of Directors, a record of all actions taken by Board of Directors without a meeting, and a record of all actions taken by committees of the Board. In addition, the corporation shall keep a copy of the corporation's Articles of Incorporation and Bylaws as amended to date.

#### 8.02 Fiscal Year

The fiscal year of the corporation shall be from January 1 to December 31 of each year.

#### 8.03 Conflict of Interest

The Board shall adopt and periodically review a Conflict of Interest Policy to protect the corporation's interest when it is contemplating any transaction or arrangement which may benefit any Director, officer, employee, affiliate, or member of a committee with Board-delegated powers.

#### 8.04 Nondiscrimination Policy

The officers, Directors, committee members, employees, and persons served by this corporation shall be selected entirely on a nondiscriminatory basis with respect to age, sex, race, religion, national origin, and sexual orientation. It is the policy of Freedom of Form Foundation, Inc. not to discriminate on the basis of race, creed, ancestry, marital status, gender, sexual orientation,

age, physical disability, veteran's status, political service or affiliation, color, religion, or national origin.

#### 8.05 Bylaw Amendment

These Bylaws may be amended, altered, repealed, or restated by a vote of the majority of the Board of Directors then in office at a meeting of the Board, provided, however,

- (a) that no amendment shall be made to these Bylaws which would cause the corporation to cease to qualify as an exempt corporation under Section 501 (c)(3) of the Internal Revenue Code of 1986, or the corresponding section of any future Federal tax code; and,
- (b) that an amendment does not affect the voting rights of Directors. An amendment that does affect the voting rights of Directors further requires ratification by a majority vote of a quorum of Directors at a Board meeting.
- (c) that all amendments be consistent with the Articles of Incorporation.

### ARTICLE IX

#### COUNTERTERRORISM AND DUE DILIGENCE POLICY

In furtherance of its exemption by contributions to other organizations, domestic or foreign, Freedom of Form Foundation, Inc. shall stipulate how the funds will be used and shall require the recipient to provide the corporation with detailed records and financial proof of how the funds were utilized.

Although adherence and compliance with the U.S. Department of the Treasury's publication entitled the "Voluntary Best Practice for U.S.-Based Charities," is not mandatory, Freedom of Form Foundation, Inc. willfully and voluntarily recognizes and puts to practice these guidelines and suggestions to reduce, develop, re-evaluate and strengthen a risk-based approach to guard against the threat of diversion of charitable funds or exploitation of charitable activity by terrorist organizations and their support networks.

Freedom of Form Foundation, Inc. shall also comply and put into practice the federal guidelines, suggestion, laws and limitation set forth by pre-existing U.S. legal requirements related to combating terrorist financing, which include, but are not limited to, various sanctions programs administered by the Office of Foreign Assets Control (OFAC) in regard to its foreign activities.

### ARTICLE X

#### DOCUMENT RETENTION POLICY

##### 10.01 Purpose

The purpose of this Document Retention Policy is to establish standards for document integrity, retention, and destruction, and to promote the proper treatment of records for Freedom of Form Foundation, Inc.

#### 10.02 Policy

Section 1. General Guidelines. Records should not be kept if they are no longer needed for the operation of the business or required by law. Unnecessary records should be eliminated from the files. The cost of maintaining records is an expense which can grow unreasonably if good housekeeping is not performed. A mass of records also makes it more difficult to find pertinent records. Where possible, the non-profit shall adopt a digital, non-paper filing and retention system.

From time to time, Freedom of Form Foundation, Inc. may establish retention or destruction policies or schedules for specific categories of records in order to ensure legal compliance, and also to accomplish other objectives, such as preserving intellectual property and cost management. Several categories of documents that warrant special consideration are identified below. While minimum retention periods are established, the retention of the documents identified below and of documents not included in the identified categories should be determined primarily by the application of the general guidelines affecting document retention, as well as the exception for litigation relevant documents and any other pertinent factors.

Section 2. Exception for Litigation Relevant Documents. Freedom of Form Foundation, Inc. expects all officers, Directors, and employees to comply fully with any published records retention or destruction policies and schedules, provided that all officers, Directors, and employees should note the following general exception to any stated destruction schedule: If you believe, or Freedom of Form Foundation, Inc. informs you, that corporate records are relevant to litigation, or potential litigation (i.e. a dispute that could result in litigation), then you must preserve those records until it is determined that the records are no longer needed. That exception supersedes any previously or subsequently established destruction schedule for those records.

#### Section 3. Minimum Retention Periods for Specific Categories

(a) Corporate Documents. Corporate records include the corporation's Articles of Incorporation, Bylaws and IRS Form 1023 and Application for Exemption. Corporate records should be retained permanently. IRS regulations require that the Form 1023 be available for public inspection upon request.

(b) Tax Records. Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of contributions made by donors, accounting procedures, and other documents concerning the corporation's revenues. Tax records should be retained for at least seven (7) years from the date of filing the applicable return.

(c) Employment Records/Personnel Records. State and federal statutes require the corporation to keep certain recruitment, employment and personnel information. The corporation should also keep personnel files that reflect performance reviews and any complaints brought against the corporation or individual employees under applicable state and federal statutes. The corporation should also keep in the employee's personnel file all final memoranda and correspondence reflecting performance reviews and actions taken by or against personnel. Employment applications should be retained for three (3) years. Retirement and pension records should be kept permanently. Other employment and personnel records should be retained for seven years.

(d) Board and Board Committee Materials. Meeting minutes should be retained in perpetuity in the corporation's minute book. A clean copy of all other Board and Board Committee materials should be kept for no less than three (3) years by the corporation.

(e) Press Releases/Public Filings. The corporation should retain permanent copies of all press releases and publicly filed documents under the theory that the corporation should have its own copy to test the accuracy of any document a member of the public can theoretically produce against the corporation.

(f) Legal Files. Legal counsel should be consulted to determine the retention period of particular documents, but legal documents should generally be maintained for a period of ten (10) years.

(g) Marketing and Sales Documents. The corporation should keep final copies of marketing and sales documents for the same period of time it keeps other corporate files, generally three (3) years. An exception to the three-year policy may be sales invoices, contracts, leases, licenses, and other legal documentation. These documents should be kept for at least three (3) years beyond the life of the agreement.

(h) Development/Intellectual Property and Trade Secrets. Development documents are often subject to intellectual property protection in their final form (e.g., patents, trademarks, service marks, and copyrights). The documents detailing the development process are often also of value to the corporation and are protected as a trade secret where the corporation:

- (i) derives independent economic value from the secrecy of the information; and
- (ii) has taken affirmative steps to keep the information confidential.

The corporation should keep all documents designated as containing trade secret information for at least the life of the trade secret.

(i) Contracts. Final, execution copies of all contracts entered into by the corporation should be retained. The corporation should retain copies of the final contracts for at least three (3) years beyond the life of the agreement, and longer in the case of publicly filed contracts.

(j) Correspondence. Unless correspondence falls under another category listed elsewhere in this policy, correspondence should generally be saved for two (2) years.

(k) Banking and Accounting. Accounts payable ledgers and schedules should be kept for seven (7) years. Bank reconciliations, bank statements, deposit slips and checks (unless for important payments and purchases) should be kept for three (3) years. Any inventories of products, materials, and supplies and any invoices should be kept for seven (7) years.

(l) Insurance. Expired insurance policies, insurance records, accident reports, claims, etc. should be kept permanently.

(m) Audit Records. External audit reports should be kept permanently. Internal audit reports should be kept for three (3) years.

Section 4. Electronic Mail. E-mail that needs to be saved should be either:

(i) printed in hard copy and kept in the appropriate file; or

(ii) downloaded to a computer file and kept electronically or on disk as a separate file.

The retention period depends upon the subject matter of the e-mail, as covered elsewhere in this policy.

## ARTICLE XI

### Transparency and Accountability

#### Disclosure of Financial Information with the General Public

##### 11.01 Purpose

By making full and accurate information about its mission, activities, finances, and governance publicly available, Freedom of Form Foundation, Inc. practices and encourages transparency and accountability to the general public. This Policy will:

(a) indicate which documents and materials produced by the corporation are presumptively open to staff and/or the public,

(b) indicate which documents and materials produced by the corporation are presumptively closed to staff and/or the public, and

(c) specify the procedures whereby the open/closed status of documents and materials can be altered.

The details of this Policy are as follow:

11.02 Financial and IRS documents (form 1023 and the form 990). Freedom of Form Foundation, Inc. shall provide its Internal Revenue forms 990, 990-T, 1023 and 5227, Bylaws, Conflict of Interest Policy, and financial statements to the general public for inspection free of charge.

11.03 Means and Conditions of Disclosure

Freedom of Form Foundation, Inc. shall make "Widely Available" the aforementioned documents on its internet website to be viewed and inspected by the general public.

- (a) The documents shall be posted in a format that allows an individual using the Internet to access, download, view and print them in a manner that exactly reproduces the image of the original document filed with the IRS (except information exempt from public disclosure requirements, such as contributor lists).
- (b) The website shall clearly inform readers that the document is available and provide instructions for downloading it.
- (c) Freedom of Form Foundation, Inc. shall not charge a fee for downloading the information. Documents shall not be posted in a format that would require special computer hardware or software (other than software readily available to the public free of charge).
- (d) Freedom of Form Foundation, Inc. shall inform anyone requesting the information where this information can be found, including the web address. This information must be provided immediately for in-person requests and within seven (7) days for mailed requests.

11.04 IRS Annual Information Returns (Form 990)

Freedom of Form Foundation, Inc. shall submit the Form 990 to its Board of Directors prior to the filing of the Form 990. While neither the approval of the Form 990 or a review of the 990 is required under federal law, the corporation's Form 990 shall be submitted to each member of the Board of Director's via hard copy or email at least ten (10) days before the Form 990 is filed with the IRS.

11.05 Board

- (a) All Board deliberations shall be open to the public except where the Board passes a motion to make any specific portion confidential.
- (b) All Board minutes shall be open to the public once accepted by the Board, except where the Board passes a motion to make any specific portion confidential.
- (c) All papers and materials considered by the Board shall be open to the public following the meeting at which they are considered, except where the Board passes a motion to make any specific paper or material confidential.

#### 11.06 Staff Records

- (a) All staff records shall be available for consultation by the staff member concerned or by their legal representatives.
- (b) No staff records shall be made available to any person outside the corporation except the authorized governmental agencies.
- (c) Within the corporation, staff records shall be made available only to those persons with managerial or personnel responsibilities for that staff member, except that
- (d) Staff records shall be made available to the Board when requested.

#### 11.07 Donor Records

- (a) All donor records shall be available for consultation by the members and donors concerned or by their legal representatives.
- (b) No donor records shall be made available to any other person outside the corporation except the authorized governmental agencies.
- (c) Within the corporation, donor records shall be made available only to those persons with managerial or personnel responsibilities for dealing with those donors, except that donor records shall be made available to the Board when requested.

### ARTICLE XII

#### CODES OF ETHICS AND WHISTLEBLOWER POLICY

##### 12.01 Purpose

Freedom of Form Foundation, Inc. requires and encourages Directors, officers and employees to observe and practice high standards of business and personal ethics in the conduct of their duties and responsibilities. The employees and representatives of the corporation must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. It is the intent of Freedom of Form Foundation, Inc. to adhere to all laws and regulations that apply to the corporation and the underlying purpose of this policy is to support the corporation's goal of legal compliance. The support of all corporate staff is necessary to achieving compliance with various laws and regulations.

##### 12.02 Reporting Violations

If any Director, officer, staff or employee reasonably believes that some policy, practice, or activity of Freedom of Form Foundation, Inc. is in violation of law, a written complaint must be filed by that person with the Board President.

#### **12.03 Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of a law or regulation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false shall be viewed as a serious disciplinary offense.

#### **12.04 Retaliation**

A person filing the aforesaid complaint is protected from retaliation only if she/he brings the alleged unlawful activity, policy, or practice to the attention of Freedom of Form Foundation, Inc. and provides Freedom of Form Foundation, Inc. with a reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described below is only available to individuals that comply with this requirement.

Freedom of Form Foundation, Inc. shall not retaliate against any Director, officer, staff or employee who in good faith, has made a protest or raised a complaint against some practice of Freedom of Form Foundation, Inc. or of another individual or entity with whom Freedom of Form Foundation, Inc. has a business relationship, on the basis of a reasonable belief that the practice is in violation of law, or a clear mandate of public policy.

Freedom of Form Foundation, Inc. shall not retaliate against any Director, officer, staff or employee who discloses or threatens to disclose to a supervisor or a public body, any activity, policy, or practice of Freedom of Form Foundation, Inc. that the individual reasonably believes is in violation of a law, or a rule, or regulation mandated pursuant to law or is in violation of a clear mandate of public policy concerning the health, safety, welfare, or protection of the environment.

#### **12.05 Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

#### **12.06 Handling of Reported Violations**

The Board President or Vice President shall notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports shall be promptly investigated by the Board and its appointed committee and appropriate corrective action shall be taken if warranted by the investigation.

This policy shall be made available to all Directors, officers, staffs or employees and they shall have the opportunity to ask questions about the policy.

### **ARTICLE XIII**

AMENDMENT OF Articles of Incorporation

13.01 Amendment

Any amendment to the Articles of Incorporation may be adopted by approval of two-thirds (2/3) of the Board of Directors.

**CERTIFICATE OF ADOPTION OF BYLAWS**

I do hereby certify that the above stated Bylaws of Freedom of Form Foundation, Inc. were approved by Freedom of Form Foundation, Inc.'s Board of Directors on

March 28, 2018, and constitute a complete copy of the Bylaws of the corporation.

President: \_\_\_\_\_

Michael Norsworthy

Date: March 30, 2018

**Conflict of Interest Policy**  
**FREEDOM OF FORM FOUNDATION, INC.**

**Article I**

**Purpose**

The purpose of the conflict of interest policy is to protect Freedom of Form Foundation, Inc. (the "Organization") interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer or director of the Organization or might result in a possible excess benefit transaction. This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest applicable to nonprofit and charitable organizations.

**Article II**

**Definitions**

**1. Interested Person**

Any director, principal officer, or member of a committee with governing board delegated powers, who has a direct or indirect financial interest, as defined below, is an interested person.

**2. Financial Interest**

A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:

- a. An ownership or investment interest in any entity with which the Organization has a transaction or arrangement.
- b. A compensation arrangement with the Organization or with any entity or individual with which the Organization has a transaction or arrangement, or
- c. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the Organization is negotiating a transaction or arrangement.

Compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial.

A financial interest is not necessarily a conflict of interest. Under Article III, Section 2, a person who has a financial interest may have a conflict of interest only if the appropriate governing board or committee decides that a conflict of interest exists.

### **Article III**

### **Procedures**

#### **1. Duty to Disclose**

In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts to the directors and members of committees with governing board delegated powers considering the proposed transaction or arrangement.

#### **2. Determining Whether a Conflict of Interest Exists**

After disclosure of the financial interest and all material facts, and after any discussion with the interested person, s/he shall leave the governing board or committee meeting while the determination of a conflict of interest is discussed and voted upon. The remaining board or committee members shall decide if a conflict of interest exists.

#### **3. Procedures for Addressing the Conflict of Interest**

- a. An interested person may make a presentation at the governing board or committee meeting, but after the presentation, s/he shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible conflict of interest.
- b. The chairperson of the governing board or committee shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.
- c. After exercising due diligence, the governing board or committee shall determine whether the Organization can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.

d. If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the governing board or committee shall determine by a majority vote of the disinterested directors whether the transaction or arrangement is in the Organization's best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination, it shall make its decision as to whether to enter into the transaction or arrangement.

**4. Violations of the Conflicts of Interest Policy**

a. If the governing board or committee has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.

b. If, after hearing the member's response and after making further investigation as warranted by the circumstances, the governing board or committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

**Article IV**

**Records of Proceedings**

The minutes of the governing board and all committees with board delegated powers shall contain:

a. The names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the governing board's or committee's decision as to whether a conflict of interest in fact existed.

b. The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

**Article V**

**Compensation**

- a. A voting member of the governing board who receives compensation, directly or indirectly, from the Organization for services is precluded from voting on matters pertaining to that member's compensation.
- b. A voting member of any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Organization for services is precluded from voting on matters pertaining to that member's compensation.
- c. No voting member of the governing board or any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Organization, either individually or collectively, is prohibited from providing information to any committee regarding compensation.

## Article VI

### Annual Statements

Each director, principal officer and member of a committee with governing board delegated powers shall annually sign a statement which affirms such person:

- a. Has received a copy of the conflicts of interest policy,
- b. Has read and understands the policy,
- c. Has agreed to comply with the policy, and
- d. Understands the Organization is charitable and in order to maintain its federal tax exemption, it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

## Article VII

### Reviews

To ensure the Organization operates in a manner consistent with charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects:

- a. Whether compensation arrangements and benefits are reasonable, based on competent survey information, and the result of arm's length bargaining,

b. Whether partnerships, joint ventures, and arrangements with management organizations conform to the Organization's written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes and do not result in inurement, impermissible private benefit or in an excess benefit transaction.

### Article VIII

#### Use of Outside Experts

When conducting the periodic reviews as provided for in Article VII, the Organization may, but need not, use outside advisors. If outside experts are used, their use shall not relieve the governing board of its responsibility for ensuring periodic reviews are conducted.

**PERSONAL AND CONFIDENTIAL**  
**FREEDOM OF FORM FOUNDATION, INC.**

**Conflict of Interest Statement**

1. As a(n) \_\_\_\_\_ of this Organization, I acknowledge that I:
- a. Received a copy of the Organization's Conflict of Interest Policy dated \_\_\_\_\_, 20\_\_\_\_.
  - b. Read and understood the policy;
  - c. Agree to comply with the spirit and intent of the policy and will disclose any potential conflicts , other than those stated on next page, as they may arise before completion of my next conflict of interest statement; and
  - d. Understand that the Organization is a charitable organization and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.
2. Based on a review of the Organization's Conflict of Interest Policy, are you aware of any interest that you or a related person may have that could give rise to a conflict of interest? If yes, please complete Attachment A to this form.

\_\_\_\_\_Yes

\_\_\_\_\_No

My answers above are accurately state to the best of my knowledge and belief.

Dated \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

**PERSONAL AND CONFIDENTIAL**

**FREEDOM OF FORM FOUNDATION, INC.**

**Conflict of Interest Statement**

**Attachment A**

1. Please list all relationships (if any) between you or a "related party" (as defined below) with the Organization that involve an actual or potential financial benefit to your or the related party or that otherwise may represent a conflict of interest within the spirit and intent of the policy. Include an estimate of the related actual or potential financial benefit.

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2. Please list any business dealings during the past year (or, as applicable, since your last submission of this Conflict of Interest Statement) of which you are aware in which your or a "related party" (as defined below) have received a salary, gifts, or loans from any source from which the Organization obtains goods or services or otherwise has business dealings:

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3. Please list any potential or pending transaction to which the Organization is a party and in which you or a "related party" (as defined below) has a direct or indirect interest.

---

Note: A "related party" (as defined in this policy) is a family member; a business or organization of which the person signing this statement or a family member owns or expects to own, directly or indirectly, more than a 5% interest; has a beneficial interest in a trust that owns directly or indirectly more than a 5% interest; or is a director, officer, or employee. A "family member" is a parent (or more remote ancestor), spouse, brother, sister, spouse of a brother or sister, child, step-child, grandchild, great-grandchild or spouse of a child, step-child, grandchild, or great-grandchild of the person signing this statement.

 **IRS** DEPARTMENT OF THE TREASURY  
INTERNAL REVENUE SERVICE  
CINCINNATI OH 45999-0023

Date of this notice: 02-14-2018

Employer Identification Number:  
82-4415111

Form: SS-4

Number of this notice: CP 575 E

FREEDOM OF FORM FOUNDATION INC  
% MICHAEL NORSWORTHY  
66 DINSMORE AVE APT 503  
FRAMINGHAM, MA 01702

For assistance you may call us at:  
1-800-829-4933

IF YOU WRITE, ATTACH THE  
STUB AT THE END OF THIS NOTICE.

WE ASSIGNED YOU AN EMPLOYER IDENTIFICATION NUMBER

Thank you for applying for an Employer Identification Number (EIN). We assigned you EIN 82-4415111. This EIN will identify you, your business accounts, tax returns, and documents, even if you have no employees. Please keep this notice in your permanent records.

When filing tax documents, payments, and related correspondence, it is very important that you use your EIN and complete name and address exactly as shown above. Any variation may cause a delay in processing, result in incorrect information in your account, or even cause you to be assigned more than one EIN. If the information is not correct as shown above, please make the correction using the attached tear-off stub and return it to us.

When you submitted your application for an EIN, you checked the box indicating you are a non-profit organization. Assigning an EIN does not grant tax-exempt status to non-profit organizations. Publication 557, Tax-Exempt Status for Your Organization, has details on the application process, as well as information on returns you may need to file. To apply for recognition of tax-exempt status under Internal Revenue Code Section 501(c)(3), organizations must complete a Form 1023-series application for recognition. All other entities should file Form 1024 if they want to request recognition under Section 501(a).

Nearly all organizations claiming tax-exempt status must file a Form 990-series annual information return (Form 990, 990-EZ, or 990-PF) or notice (Form 990-N) beginning with the year they legally form, even if they have not yet applied for or received recognition of tax-exempt status.

Unless a filing exception applies to you (search [www.irs.gov](http://www.irs.gov) for Annual Exempt Organization Return: Who Must File), you will lose your tax-exempt status if you fail to file a required return or notice for three consecutive years. We start calculating this three-year period from the tax year we assigned the EIN to you. If that first tax year isn't a full twelve months, you're still responsible for submitting a return for that year. If you didn't legally form in the same tax year in which you obtained your EIN, contact us at the phone number or address listed at the top of this letter.

For the most current information on your filing requirements and other important information, visit [www.irs.gov/charities](http://www.irs.gov/charities).

## IMPORTANT REMINDERS:

- \* Keep a copy of this notice in your permanent records. **This notice is issued only one time and the IRS will not be able to generate a duplicate copy for you.** You may give a copy of this document to anyone asking for proof of your EIN.
- \* Use this EIN and your name exactly as they appear at the top of this notice on all your federal tax forms.
- \* Refer to this EIN on your tax-related correspondence and documents.
- \* Provide future officers of your organization with a copy of this notice.

Your name control associated with this EIN is FREE. You will need to provide this information, along with your EIN, if you file your returns electronically.

If you have questions about your EIN, you can contact us at the phone number or address listed at the top of this notice. If you write, please tear off the stub at the bottom of this notice and include it with your letter. Thank you for your cooperation.

Keep this part for your records.

CP 575 E (Rev. 7-2007)

Return this part with any correspondence  
so we may identify your account. Please  
correct any errors in your name or address.

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**U.S. DEPARTMENT OF THE TREASURY ANTI-TERRORIST FINANCING GUIDELINES:  
VOLUNTARY BEST PRACTICES FOR U.S.-BASED CHARITIES<sup>1</sup>**

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<sup>1</sup> This document is a revised version of the original *Anti-Terrorist Financing Guidelines: Voluntary Best Practices for U.S.-Based Charities* released by the U.S. Department of the Treasury in November 2002. This revised version incorporates comments received in response to the issuance of the draft revised Guidelines released for public comment in December 2005.

These Guidelines are designed to assist charities that attempt in good faith to protect themselves from terrorist abuse and are not intended to address the problem of organizations that use the cover of charitable work, whether real or perceived, to provide support to terrorist groups or fronts operating on behalf of terrorist groups. Non-adherence to these Guidelines, in and of itself, does not constitute a violation of existing U.S. law. Conversely, adherence to these Guidelines does not excuse any person (individual or entity) from compliance with any local, state, or federal law or regulation, nor does it release any person from or constitute a legal defense against any civil or criminal liability for violating any such law or regulation. In particular, adherence to these Guidelines shall not be construed to preclude any criminal charge, civil fine, or other action by Treasury or the Department of Justice against persons who engage in prohibited transactions with persons designated pursuant to the Antiterrorism and Effective Death Penalty Act of 1996, as amended, or with those that are designated under the criteria defining prohibited persons in the relevant Executive orders issued pursuant to statute, such as the International Emergency Economic Powers Act, as amended. Please see Footnote 12 for an explanation of the master list of Specially Designated Nationals (the “SDN List”), which includes all such designated persons. These Guidelines are also separate and apart from requirements that apply to charitable organizations under the Internal Revenue Code (“IRC”).

## I. Introduction

Upon issuance of Executive Order 13224, President George W. Bush directed the U.S. Department of the Treasury ("Treasury") to work with other elements of the federal government and the international community to develop a comprehensive and sustained campaign against the sources and conduits of terrorist financing. Investigations have revealed terrorist abuse of charitable organizations, both in the United States and worldwide, to raise and move funds, provide logistical support, encourage terrorist recruitment or otherwise cultivate support for terrorist organizations and operations. This abuse threatens to undermine donor confidence and jeopardizes the integrity of the charitable sector, whose services are indispensable to both national and world communities.

In response to this threat, Treasury first released the *Anti-Terrorist Financing Guidelines: Voluntary Best Practices for U.S.-Based Charities* ("Guidelines") in November 2002. In December 2005, based on extensive review and comment by public and private sector interested parties, Treasury revised and released the Guidelines in draft form for further public comment. Based on the comments received, Treasury has further amended the Guidelines to improve their utility to the charitable sector in adopting practices that can better protect it from terrorists and their support networks.

The Guidelines are designed to enhance awareness in the donor and charitable communities of the kinds of practices that charities may adopt to reduce the risk of terrorist financing or abuse. These Guidelines are voluntary and do not create, supersede, or modify current or future legal requirements applicable to U.S. persons, including U.S. non-profit institutions. Adherence to these guidelines does not constitute a legal defense against any civil or criminal liability for violating any local, state, or federal law or regulations. In addition, these Guidelines do not represent an exhaustive or comprehensive compilation of best practices. Many charities, through their extensive experience and expertise in delivering international aid, have already developed effective internal controls and practices that lessen the risk of terrorist financing or abuse. In view of this fact, Treasury does not want charities to abandon proven internal controls and practices. Rather, the Guidelines are intended to assist charities in developing, re-evaluating, or strengthening a risk-based approach to guard against the threat of diversion of charitable funds or exploitation of charitable activity by terrorist organizations and their support networks.

In addition, these Guidelines are intended to assist charities in understanding and facilitating compliance with preexisting U.S. legal requirements related to combating terrorist financing, which include, but are not limited to, various sanctions programs administered by the Office of Foreign Assets Control ("OFAC"). These preexisting legal requirements are clearly marked in the text of the Guidelines.

The risk-based nature of these Guidelines reflects Treasury's recognition that a "one-size-fits-all" approach is untenable and inappropriate due to the diversity of the charitable sector and its operations. Accordingly, certain aspects of the Guidelines will not be applicable to every charity, charitable activity, or circumstance. Moreover, Treasury acknowledges that certain exigent circumstances (such as catastrophic disasters) may make application of the Guidelines difficult. In such cases, charities should maintain a risk-based approach that includes all prudent and reasonable measures that are feasible under the circumstances. Charities and

donors are encouraged to consult these Guidelines when considering protective measures to prevent infiltration, exploitation, or abuse by terrorists. Although adherence to these Guidelines does not guarantee protection from terrorist abuse, effective internal controls which incorporate the principles and practices set forth in these Guidelines can prevent the diversion of charitable resources from their proper uses, as well as identify situations involving terrorist financing or abuse.

Treasury recognizes the vital importance of the charitable community in providing essential services around the world. Treasury also understands the difficulty of providing assistance to those in need, often in remote and inaccessible regions, and applauds the efforts of the charitable community to meet such needs. The goal of these Guidelines is to facilitate legitimate charitable efforts and protect the integrity of the charitable sector and good faith donors by offering the sector ways to prevent terrorist organizations from exploiting charitable activities for their own benefit.

## **II. Fundamental Principles of Good Charitable Practice**

- A. Charities are independent entities and are not part of the U.S. Government. Like all U.S. persons, charitable organizations must comply with the laws of the United States, which include, but are not limited to, all OFAC-administered sanctions programs.<sup>2</sup>

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<sup>2</sup> OFAC sanctions programs include those relating to particular countries or regimes (country-based programs), as well as those relating to groups, individuals, or entities engaged in specific activities (list-based programs). Sanctions programs normally: (i) prohibit U.S. persons from engaging in certain transactions, such as trade in goods and services and financial transactions, and/or (ii) require U.S. persons to block the assets and property of persons designated under the relevant Executive order or law. The particular prohibitions and/or obligations of U.S. persons vary by program. OFAC can issue licenses to U.S. persons to engage in transactions that would otherwise be prohibited, if there is a policy-permissible reason to do so, and if permitted by statute. Further information on how to apply for specific licenses is available at <http://www.treas.gov/offices/enforcement/ofac/faq/index.shtml#license>.

For further information on OFAC-administered sanctions programs and general licensing under these programs, please see <http://www.treas.gov/offices/enforcement/ofac>.

OFAC guidelines for non-governmental organizations wishing to undertake humanitarian activities in sanctioned countries are available at [http://www.treas.gov/offices/enforcement/ofac/regulations/ngo\\_reg.pdf](http://www.treas.gov/offices/enforcement/ofac/regulations/ngo_reg.pdf).

Other helpful guidance materials for charities relating to protection from terrorist abuse may be found at <http://www.treas.gov/offices/enforcement/key-issues/protecting/index.shtml>.

The United States relies on a wide array of federal criminal statutes in fighting the threat of terrorist financing. Charities should be particularly aware that in its efforts against the financing of terrorism, the U.S. relies on, among others, the federal statutes that prohibit:

- the financing of terrorism (18 U.S.C. § 2339C),
- providing material support or resources to terrorists (18 U.S.C. § 2339A), and
- providing material support or resources to designated terrorist organizations (18 U.S.C. § 2339B).

In that effort, the U.S. also particularly relies upon the federal statutes which criminalize:

- B. Charitable organizations are encouraged to adopt practices in addition to those required by law that provide additional assurances that all assets<sup>3</sup> are used exclusively for charitable or other legitimate purposes.<sup>4</sup>
- C. Individuals acting in a fiduciary capacity for any charitable organization should exercise due care in the performance of their responsibilities, consistent with applicable common law as well as local, state, and federal statutes and regulations.
- D. Governance, fiscal and programmatic responsibility and accountability are essential components of charitable work and must be reflected at every level of a charitable organization and its operations.

### III. Governance Accountability and Transparency

- A. Governing Instruments: Charitable organizations should operate in accordance with governing instruments, *e.g.*, charter, articles of incorporation, bylaws, *etc.* The governing instruments should:
  - 1. delineate the charity's basic goal(s) and purpose(s);
  - 2. define the structure of the charity, including the composition of its governing body, how such body is selected and replaced, and the authority and responsibilities of the body;
  - 3. set forth requirements concerning financial reporting, accountability, and practices for solicitation and distribution of funds; and
  - 4. state that the charity shall comply with all applicable local, state, and federal laws and regulations.
- B. Independent Oversight: It is important for charitable organizations to have independent oversight of charitable operations, and each charitable organization should determine what oversight structure best suits that organization and will provide for unbiased scrutiny of its operations. The following provisions set forth

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- the laundering of monetary instruments (18 U.S.C. § 1956), and
  - engaging in monetary transactions in property derived from specified unlawful activity (18 U.S.C. § 1957).

<sup>3</sup> An asset is any item of value, including, but not limited to, services, resources, business, equitable holdings, real estate, stocks, bonds, mutual funds, currency, certificates of deposit, bank accounts, trust funds, and the property and investments placed therein.

<sup>4</sup> A charitable organization may never use charitable assets for illegal purposes; however, a charitable organization may accrue unrelated business taxable income in the course of legitimately doing business as a charitable organization. Even though an organization is recognized as tax exempt, it still may be liable for tax on its unrelated business taxable income.

basic principles for the creation of a transparent and accountable oversight body (the “governing board”).

1. Members of the governing board ordinarily should not have an active role in the day-to-day management of the charitable organization.<sup>5</sup> The charity should establish a conflict of interest policy for both members of the governing board and employees. That policy should establish procedures to be followed if a member of the governing board or employee has a conflict of interest or a perceived conflict of interest relating to the management or operations of the charity.
2. The governing board should be responsible for the charitable organization’s compliance with relevant laws, its finances and accounting practices and for the adoption, implementation, and oversight of practices, including financial recordkeeping that will safeguard charitable assets effectively.
3. The governing board should maintain records of its decisions.
4. Charities should maintain and make publicly available a current list of members of the governing board, their salaries and their affiliation with any subsidiary or affiliate of the charitable organization.
5. While fully respecting individual privacy rights, charities should maintain records of additional identifying information about the members of the governing board, such as available home, email and URL addresses, social security number, citizenship, *etc.*
6. While fully respecting individual privacy rights, charities should maintain records of identifying information for the members of the governing boards of any subsidiaries or affiliates<sup>6</sup> receiving funds from them.
7. When served with process or when other appropriate authorization exists, charities should produce requested records maintained in accordance with these Guidelines to the appropriate regulatory/supervisory and law enforcement authorities in a timely fashion.

#### C. Key Employees<sup>7</sup>

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<sup>5</sup> Certain charitable organizations, such as houses of worship, certain trusts, and corporations sole, may not be able to apply this practice due to their varying organizational and operational structures.

<sup>6</sup> Subsidiaries or affiliates are organizations that are subject to the general supervision or control of a parent or central organization.

<sup>7</sup> Key employees include not only highly compensated employees but employees who have responsibilities, powers, or influence similar to those of officials, directors, or trustees. Key employees also include chief management and administrative officials of a charitable organization, including those involved in the disbursement of funds.

1. Charities should maintain and make publicly available a current list of their five highest paid or most influential employees (the key employees) and the salaries and direct or indirect benefits they receive.
2. While fully respecting individual privacy rights, charities should maintain records containing identifying information (such as available home, email and URL addresses, social security or other identification number – *e.g.*, taxpayer identification number, national identity, or passport number – citizenship, *etc.*) about their key, non-U.S. employees working abroad. Such information should be similar to that maintained by charities in the normal course of operations about all U.S. employees, wherever employed, and foreign employees working in the United States.
3. While fully respecting individual privacy rights, charities should maintain records containing identifying information for the key employees of any subsidiaries or affiliates receiving funds from them.

#### IV. Financial Accountability and Transparency

- A. The charity should have a budget, adopted in advance on an annual basis and approved and overseen by the governing board.
- B. The governing board should appoint one individual to serve as the financial/accounting officer who should be responsible for day-to-day control over the charity's assets.
- C. If the charity's total annual gross income exceeds \$250,000,<sup>8</sup> the governing board should select an independent certified public accounting firm to audit the finances of the charity and to issue a publicly available, audited financial statement on an annual basis.
- D. Solicitations for Funds
  1. The charity should clearly state its goals for and purposes of soliciting funds so that anyone examining the charity's disbursement of funds can determine whether the charity is adhering to those goals.
  2. Solicitations for donations should accurately and transparently tell donors how and where their donations are going to be expended.
  3. The charity should substantiate on request that solicitations and

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<sup>8</sup> The \$250,000 figure is drawn from the June 2005 final report to Congress of the Panel on the Nonprofit Sector, convened by Independent Sector. This report, which offers a comprehensive approach to improving oversight and governance of charitable organizations, recommends independent financial audits for charities that have more than \$250,000 in total annual revenue. This report is available at <http://www.nonprofitpanel.org/final/>.

informational materials, distributed by any means, are accurate, truthful, and not misleading, in whole or in part.

4. The charity should fully, immediately, and publicly disclose if it makes a determination that circumstances justify applying funds for a charitable purpose different from the purpose for which such funds were contributed or solicited.

E. Receipt and Disbursement of Funds

1. The charity should account for all funds received and disbursed in accordance with generally accepted accounting principles and the requirements of the Internal Revenue Code. The charity should maintain records of the salaries it pays and the expenses it incurs (domestically and internationally).
2. The charity should include in its accounting of all charitable disbursements the name of each grantee,<sup>9</sup> the amount disbursed, the date, and form of payment for each disbursement.
3. The charity, after recording, should promptly deposit all received funds into an account maintained by the charity at a financial institution. In particular, all currency donated should be promptly deposited into the charity's financial institution account.
4. The charity should make disbursements by check or wire transfer rather than in currency whenever such financial arrangements are reasonably available. Where these financial services do not exist or other exigencies require making disbursements in currency (as in the case of humanitarian assistance provided in rural areas of many developing countries, or in remote areas afflicted by natural disasters), the charity should disburse the currency in the smallest increments sufficient to meet immediate and short-term needs or specific projects/initiatives rather than in large sums intended to cover needs over an extended time frame, and it should exercise oversight regarding the use of the currency for the intended charitable purposes, including keeping detailed internal records of such currency disbursements.

F. Mechanisms for Public Disclosure of Distribution of Resources and Services

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<sup>9</sup> The term "grantee," as it is used throughout these Guidelines, means an immediate grantee of charitable resources or services. To the extent reasonably practicable, charitable organizations should also apply or ensure the existence of applicable safeguards (as described in Sections III, IV, V, and VI) in any downstream sub-grantees or recipients to protect charitable resources from exploitation by terrorists, terrorist organizations, or terrorist supporters. Charities should not enter into a relationship with a grantee where any doubts exist about the grantee's ability to ensure safe delivery of charitable resources independent of influence by or association with any terrorist organization.

1. The charity should maintain and make publicly available a current list of any branches, subsidiaries, and/or affiliates that receive resources and/or services from the charity.
2. The charity should make publicly available or provide to any member of the general public, upon request, an annual report. The annual report should describe the charity's purpose(s), programs, activities, tax exempt status, the structure and responsibility of the governing board of the charity, and financial information.
3. The charity should make publicly available or provide to any member of the general public, upon request, complete annual financial statements, including a summary of the results of the charity's most recent audit. The financial statements should present the overall financial condition of the charity and its financial activities in accordance with generally accepted accounting principles and reporting practices.

## **V. Programmatic Verification**

### **A. Supplying Resources**

When supplying charitable *resources* (monetary and in-kind contributions), fiscal responsibility on the part of a charity should include:

1. determining that the potential grantee of monetary or in-kind contributions has the ability to both accomplish the charitable purpose of the grant and protect the resources from diversion to non-charitable purposes or exploitation by terrorist organizations and/or their support networks;
2. reducing the terms of the grant to a written agreement signed by both the charity and the grantee;
3. ongoing monitoring of the grantee and the activities funded under the grant for the term of the grant; and
4. correcting any misuse of resources by the grantee and terminating the relationship should misuse continue.

### **B. Supplying Services**

When supplying charitable *services*, fiscal responsibility on the part of a charity should include:

1. appropriate measures to reduce the risk that its assets would be used for non-charitable purposes or exploitation by terrorist organizations and/or their support networks; and

2. sufficient auditing or accounting controls to trace services or commodities between delivery by the charity and/or service provider and use by the grantee.

C. Programmatic Review

The charity should review the programmatic and financial operations of each grantee as follows:

1. The charity should require periodic reports from grantees on their operational activities and their use of the disbursed funds;
2. The charity should require grantees to take reasonable steps to ensure that funds provided by the charity are neither distributed to terrorists or their support networks nor used for activities that support terrorism or terrorist organizations. Periodically, a grantee should apprise the charity of the steps it has taken to meet this goal; and
3. The charity should perform routine, on-site audits of grantees to the extent reasonable – consistent with the size of the disbursement, the cost of the audit, and the risks of diversion or abuse of charitable resources – to ensure that the grantee has taken adequate measures to protect its charitable resources from diversion to, or abuse or influence by, terrorists or their support networks.

## VI. Anti-Terrorist Financing Best Practices

Charities should consider taking the following steps before distributing any charitable funds (and in-kind contributions). As explained in Section I, these suggested steps are voluntary. The purpose of these steps is to enable charities to better protect themselves from the risk of terrorist abuse and to facilitate compliance with U.S. laws, statutes, and regulations, with which all U.S. persons, including U.S. charities, must comply. Depending upon the risk profile of an individual charitable organization, adopting all of these steps may not be applicable or appropriate. When taking these steps, charities should apply a risk-based approach, particularly with respect to engagement with foreign grantees due to the increased risks associated with overseas charitable activity.

A. The charity should collect the following basic information about grantees:

1. The grantee's name in English, in the language of origin, and any acronym or other names used to identify the grantee;<sup>10</sup>

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<sup>10</sup> Charities should also be mindful of the possibility that a grantee may have changed its name or transformed its organizational structure to avoid being associated with prior questionable activity. If a charity has any reason to believe that the grantee is operating under a different identity or has used a different name in the past, the charity should undertake reasonable efforts to uncover any such prior identity or name.

2. The jurisdictions in which a grantee maintains a physical presence;
3. Any reasonably available historical information about the grantee that assures the charity of the grantee's identity and integrity, including: (i) the jurisdiction in which a grantee organization is incorporated or formed; (ii) copies of incorporating or other governing instruments; (iii) information on the individuals who formed and operate the organization; and (iv) information relating to the grantee's operating history;
4. The available postal, email and URL addresses and phone number of each place of business of a grantee;
5. A statement of the principal purpose of the grantee, including a detailed report of the grantee's projects and goals;
6. The names and available postal, email and URL addresses of individuals, entities, or organizations to which the grantee currently provides or proposes to provide funding, services, or material support, to the extent reasonably discoverable;
7. The names and available postal, email and URL addresses of any subcontracting organizations utilized by the grantee;
8. Copies of any public filings or releases made by the grantee, including the most recent official registry documents, annual reports, and annual filings with the pertinent government, as applicable; and
9. The grantee's sources of income, such as official grants, private endowments, and commercial activities.

B. The charity should conduct basic vetting of grantees as follows:

1. The charity should conduct a reasonable search of publicly available information to determine whether the grantee is suspected of activity relating to terrorism, including terrorist financing or other support. Charities should not enter into a relationship with a grantee where any terrorist-related suspicions exist;<sup>11</sup>

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<sup>11</sup> List-checking alone (as described throughout this section) does not guarantee the safe and secure delivery of charitable funds and services in high-risk areas. For this reason, the Guidelines encourage charities to employ all reasonably available resources both when determining the level of risk in a particular charitable operation and when engaging in appropriate vetting procedures. One example of publicly available information of which charities should be aware is the Terrorist Exclusion List (the "TEL"). The TEL was created pursuant to the USA PATRIOT Act, which authorizes the Secretary of State to designate organizations or groups for inclusion on the TEL in consultation with or upon the request of the Attorney General. Inclusion on the TEL allows the U.S. Government to exclude or deport aliens who provide material assistance to, or solicit assistance for, designated TEL organizations. Although many of the organizations included on the TEL are also included on the Office of Foreign Assets Control ("OFAC") SDN List, several TEL organizations are not listed on the SDN List because of the different purposes and legal criteria associated with these lists.

2. The charity should assure itself that grantees do not appear on OFAC's master list of Specially Designated Nationals (the "SDN List"), maintained on OFAC's website at [www.treas.gov/offices/enforcement/ofac/sdn/](http://www.treas.gov/offices/enforcement/ofac/sdn/),<sup>12</sup> and are not otherwise subject to OFAC sanctions.<sup>13</sup>
3. With respect to key employees, members of the governing board, or other senior management at a grantee's principal place of business, and for key employees at the grantee's other business locations, the charity should, to the extent reasonable, obtain the full name in English, in the language of origin, and any acronym or other names used; nationality; citizenship;

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TEL designations do not trigger any legal obligations for U.S. persons; however, the TEL does provide charities with additional terrorist-related information that may assist charities in making well-informed decisions on how best to protect themselves from terrorist abuse or association. For further information regarding the TEL, including access to the list containing all TEL designees, please refer to the U.S. Department of State's website at <http://www.state.gov/s/ct/rls/fs/2004/32678.htm>.

<sup>12</sup> The master SDN List is an integrated listing of designated parties with whom U.S. persons are prohibited from providing services or conducting transactions and whose assets are blocked. OFAC's designations are available in a variety of formats and can easily be broken down into subsets of the master list by program, by country of residency, individuals vs. entities, and other variations for appropriate use in a charity's risk-based approach. Each charity should determine which OFAC listings align with the specific risks the charity faces in its operations and should check grantees accordingly.

OFAC routinely updates information on its targets, including persons designated under country-based and list-based economic sanctions programs, such as individuals and entities designated under the various Executive orders and statutes aimed at terrorism. OFAC offers a free email subscription service that enables subscribers to keep current with these updates. With respect to terrorism-related OFAC sanctions programs, SDN listings include persons designated under Executive Order 13224, Executive Order 12947, or the Antiterrorism and Effective Death Penalty Act of 1996, as amended; such persons are called "Specially Designated Global Terrorists" or "SDGTs", "Specially Designated Terrorists" or "SDTs", or "Foreign Terrorist Organizations" or "FTOs", respectively. SDN listings also include parties subject to OFAC sanctions pursuant to other list-based programs (such as counter-WMD proliferation and counter-narcotics) and country-based programs.

In addition to checking appropriate SDN listings, charities should consult OFAC's website for other information relating to sanctioned activities or countries that may implicate their operations.

<sup>13</sup> As discussed in Footnote 12, the SDN List is an integrated list of individuals, organizations, and entities that the U.S. Government has designated pursuant to both country-based and list-based OFAC administered sanctions programs. U.S. persons, including U.S.-based charities, are prohibited from dealing with any of the parties included on the SDN List. A charity wishing to engage in activity in a country subject to economic sanctions should contact OFAC directly about any authorizations necessary to engage in such activity. Although the SDN List includes persons meeting the criteria established in the authorities or Executive orders that define certain OFAC sanctions programs, transactions with actors not named on the SDN List may nevertheless violate U.S. sanctions due to interests of designated parties in such transactions or prohibitions owing to country-based OFAC administered sanctions programs. For example, if a charity engages in a particular transaction with a party not on the SDN List that involves the property or interests in property of a designated actor, the transaction may be subject to OFAC sanctions. This underscores the importance of charities knowing their grantees and monitoring their programs and transactions through the use of appropriate due diligence measures. Therefore, while the SDN List is a critically important compliance tool that can assist charities in meeting their legal obligations under the variety of sanctions programs that OFAC administers, it should only form one part of a charitable organization's broader risk-based approach to protect against the risks of terrorist abuse.

current country of residence; and place and date of birth. The charity should assure itself that none of these individuals is subject to OFAC sanctions.

4. Charities should be aware that other nations may have their own lists of designated terrorist-related individuals, entities, or organizations pursuant to national obligations arising from United Nations Security Council Resolution 1373 (2001).<sup>14</sup>
5. With respect to the key employees, members of the governing board, or other senior management described in the preceding paragraph, the charity should also consider consulting publicly available information to ensure that such parties are not reasonably suspected of activity relating to terrorism, including terrorist financing or other support; and
6. As a pre-condition to the issuance of a charitable grant, the charity should require grantees to certify that they are in compliance with all laws, statutes, and regulations restricting U.S. persons from dealing with any individuals, entities, or groups subject to OFAC sanctions, or, in the case of foreign grantees, that they do not deal with any individuals, entities, or groups subject to OFAC sanctions or any other persons known to the foreign grantee to support terrorism or to have violated OFAC sanctions.

C. The charity should conduct basic vetting of its own key employees as follows:

1. The charity should conduct a reasonable search of publicly available information to determine whether any of its key employees is suspected of activity relating to terrorism, including terrorist financing or other support. Charities should not employ a person where any terrorist-related suspicions exist; and

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<sup>14</sup> Under United Nations Security Council Resolution 1373 (2001) (UNSCR 1373), UN Member States must generally freeze without delay the funds and other financial assets or economic resources of persons financing or otherwise supporting terrorist activity or terrorist-related individuals, entities, or organizations. In addition, UN Member States must generally prohibit their nationals from engaging in transactions with such parties. In order to implement these obligations under UNSCR 1373, each UN member state should, as a practical matter, develop its own list of parties sanctioned under the criteria of UNSCR 1373. For example, the SDN List incorporates those parties designated by the United States pursuant to its national obligations under UNSCR 1373.

The Guidelines do not legitimize or endorse the UNSCR 1373 lists adopted by foreign jurisdictions. Rather, this information is intended to assist charities in developing their own risk-based programs based upon a full understanding of the law in those jurisdictions in which they may operate. Charities operating in a foreign jurisdiction may choose to take the additional precautionary measures of determining whether that jurisdiction maintains a national list under UNSCR 1373 and screening the identities of grantee organizations (including their directors and key employees) against any such list. Such precautionary measures may protect charities from potential sanctions or other consequences to which they might be subject from foreign jurisdictions as a result of engaging in transactions with individuals, entities, or organizations deemed to be financing or otherwise supportive of terrorist activity under the laws of those jurisdictions.

2. The charity should assure itself that none of its key employees is subject to OFAC sanctions or have violated OFAC sanctions.
- D. Should a charity's vetting practices lead to a finding that any of its own key employees, any of its grantees, or any of the key employees, members of the governing board, or other senior management of its grantees is suspected of activity relating to terrorism, including terrorist financing or other support, there are a number of available mechanisms and resources that a charity may utilize:
1. If the charity believes there is a match between the name of one of the individuals or organizations listed above and a name on the SDN List, the charity should take appropriate due diligence steps to ascertain whether the match is valid. These steps and further guidance are available on OFAC's Web site at <http://www.treas.gov/offices/enforcement/ofac/faq/answer.shtml#hotline>; and
  2. The charity should provide information on any suspicious activity relating to terrorism, including terrorist financing or other support, which does not directly involve an OFAC match, through a referral form available on Treasury's Web site at <http://www.treas.gov/offices/enforcement/key-issues/protecting/index.shtml>. In addition, the Federal Bureau of Investigation maintains local field offices to which charities should provide such suspicious information. A list of the locations and phone numbers of the FBI's field offices is available at <http://www.fbi.gov/contact/fo/fo.htm>.

## ANNEX TO GUIDELINES

The risk of terrorist abuse facing charitable organizations is ongoing and significant and cannot be measured from the important but relatively narrow perspective of terrorist diversion of charitable funds to support terrorist acts. Rather, terrorist abuse also includes the exploitation of charitable services and activities to radicalize vulnerable populations and cultivate support for terrorist organizations and activities. As reported through a wide range of media sources, terrorist organizations deliberately establish, infiltrate, or otherwise exploit charitable organizations to build terrorist support networks.<sup>15</sup> Recent developments – such as the exploitation by Lashkar e Tayyiba (a.k.a. Jamaat-ud-Dawa) and other terrorist entities/charitable fronts of relief efforts following the October 2005 earthquake in South Asia, the critical role of Hamas-associated charities in building popular support in the Palestinian territories for the terrorist organization, and Hezbollah's substantial control of charitable distribution networks in southern Lebanon – demonstrate the ongoing intent and effectiveness of terrorist organizations in exploiting charitable organizations and relief efforts.

Treasury, together with other Departments across the U.S. Government, is continuing to combat such terrorist abuse of the charitable sector by: (i) administratively sanctioning terrorist-related charities and charitable officials through terrorist financing designations; (ii) contributing financial information and investigative resources and expertise to advance criminal investigations and prosecutions of charities and charitable officials providing material support for designated terrorist organizations or activities; (iii) facilitating international action to address these abuses; and (iv) conducting comprehensive outreach to the charitable sector to raise awareness of terrorist exploitation and the steps charities can take protect themselves from such abuse.

U.S. designations of charities and charitable officials demonstrate the breadth of the problem of terrorist infiltration and exploitation of the charitable sector. To date, the United States has designated forty-three charities worldwide and twenty-nine associated individuals for their support of terrorist organizations and operations. These seventy-two charities and individuals

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<sup>15</sup> See, e.g., Matthew Levitt, *HAMAS: Politics, Charity and Terrorism in the Service of Jihad*; New Haven, CT: Yale Univ. Press, 2006 (documenting the logistical and financial support Hamas charities provide for the group's political and terrorist activities); Heather Timmons, *British Study Charitable Organizations for Links to Plot*, N.Y. TIMES, Aug. 25, 2006 (describing the risks inherent in delivering charitable aid and resources to high-risk areas where terrorist organizations are known to operate); Robert F. Worth & Hassan M. Fattah, *Relief Agencies Find Hezbollah Hard to Avoid*, N.Y. TIMES, Aug. 23, 2006 (describing Hezbollah's efforts to cultivate support by controlling the provision of charitable resources and services across southern Lebanon); Laila Bokhair, *Political Struggle Over Earthquake Victims*, Norwegian Defense Research Establishment, Nov. 23, 2005 (documenting terrorist organizations such as Lashkar-e-Taiba and Jaish-e-Mohammed efforts to provide humanitarian aid to affected areas in the months following the earthquake in South Asia); Christopher Kremmer, *Charities Linked to Extremists Lead Quake Relief*, Age, Nov. 21, 2005 (reporting that in addition to providing relief in South Asia, terrorist organizations are recruiting and indoctrinating orphan children in their extensive network of orphanages); Evan Kohlmann, *The Role of Islamic Charities in International Terrorist Recruitment and Financing* (2006), Danish Institute for International Studies: available at <http://www.diiis.dk/graphics/Publications/WP2006/DIIS%20WP%202006-7.web.pdf> (tracing the historical link between charitable organizations and terrorist activities from the Soviet-Afghan war through to the present); BBC News, *Faith, hate and charity: Transcript*, BBC One, Recorded from Transmission, July 30, 2006 (reporting on one of Britain's leading Islamic charities, Interpal, and illustrating Interpal's use of a network of charities in Gaza and the West Bank to support and fund Hamas, a terrorist organization designated by the U.S. Government and the European Union).

comprise over fifteen percent of all U.S.-designated terrorist supporters or financiers, indicating the primary importance of charities as a critical means of support for terrorist organizations and activities. Treasury maintains a summary of all designated charities, including unclassified background information summarizing the basis of each designation, to assist the donor and charitable communities in identifying those charities associated with terrorist financing and support. Further information and press releases relating to these designations are available on the Treasury Web site at [http://www.treas.gov/offices/enforcement/key-issues/protecting/charities\\_exec-orders.shtml](http://www.treas.gov/offices/enforcement/key-issues/protecting/charities_exec-orders.shtml).

In addition to these ongoing efforts by Treasury and the U.S. Government, other countries and organizations from around the world have recognized and helped curb abuse of the charitable sector by terrorist organizations. The Financial Action Task Force (FATF) – the premier inter-governmental organization responsible for developing and promoting global policies to combat money laundering and terrorist financing – has studied the problem of terrorist financing and abuse across the charitable sector globally and has published typologies of such abuse. The FATF has also published Best Practices for Non-Profit Organizations and more recently issued interpretive guidance strengthening the international standard for combating terrorist abuse of non-profit organizations. Additionally, FATF style regional bodies (FSRBs) such as the Asia Pacific Group (APG), Eurasian Group (EAG) and the Middle East and North Africa Financial Action Task Force (MENA FATF) are developing typologies and studies on the active threat of terrorist financing and support through charities that operate within their regions.<sup>16</sup> These organizations and their member countries are implementing measures to actively combat this threat through the development and application of supervisory, investigative, and financial authorities to identify and dismantle charities engaged in terrorist financing or support. Many of these documents, which underscore the threat that terrorist organizations and operations pose to the charitable sector, are available on the Treasury Web site at <http://www.treas.gov/offices/enforcement/key-issues/protecting/index.shtml>.

Treasury continually engages in outreach and updates its Web site to communicate useful information regarding: (i) the ongoing risks of terrorist abuse in the charitable sector; (ii) ongoing U.S. and other governmental efforts to mitigate these risks and combat terrorist abuse, and (iii) steps the sector can take to protect against such abuse. Treasury's Guidelines represent one essential component and product of the ongoing outreach that Treasury is conducting with the charitable sector to empower and protect the sector from terrorist abuse. Another example of available resources is Treasury's December 2005 advisory paper, which provides information to charities delivering relief in areas affected by the 2005 South Asia earthquake by detailing typologies of terrorist abuse of charities and reports on activity by militant and terrorist groups in those areas. This paper also shows, through media reports, the extent to which terrorist organizations pose a risk to charities trying to deliver aid in unstable areas, where terrorist

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<sup>16</sup> The efforts of the MENA FATF are particularly exemplary of international efforts to combat terrorist abuse of charities. MENA FATF Member States have issued a best practices paper, based on the FATF's international standard for combating terrorist abuse of the non-profit sector, tailored to the specific religious, social, and economic values of the region. The comprehensive framework, crafted by the MENA FATF, outlines legislative, regulatory, and procedural measures to ensure that the charitable sector is not misused or abused by terrorist financiers. The MENA FATF charities best practices paper is an indispensable tool for the Middle East and North Africa region in helping to protect against terrorist abuse of charities by offering guidance to promote transparency and accountability in the charitable sector.

organizations themselves and/or their charitable fronts are often engaged in delivering relief as an effective recruitment mechanism in building broader support for their organizations.

Treasury will continue its outreach and informational efforts as part of its larger mission to combat terrorist financing and safeguard the charitable sector from terrorist abuse.

**Application – Individual Fellowship**



The Freedom of Form Foundation (FFF) is interested in extending the accessibility of safe and customizable physical alteration to as many people as possible. Enabling true morphological freedom, to let people outwardly express their sense of identity, has the potential to improve the lives and happiness of tens of thousands of people.

And this is where you come in - thanks for your interest in applying for research funding! This document explains everything you need to do for your application, and all the benefits you can expect if your application is accepted.

We know that you may just now be beginning in your current research laboratory, or that you might even be applying in advance of beginning work (such as matriculating into graduate school, or applying as a senior graduate student before beginning postdoctoral work). If those match your situation, don't worry – we've been there too. Just be honest and convince us you're likely to succeed as you're in the process of that career transition.

## **Deadline:**

We must receive your complete application by March 1, July 1, or November 1 to be considered for that respective application period.

## **Areas of research:**

The FFF is interested in the following areas, though this list is not intended to be exclusive:

- **Neuroprosthetic demonstrations**
  - Limb neuroprosthetics
  - Soft neuroprosthetics, e.g. craniofacial and/or emotive
- **Biological demonstrations**
  - Tails and/or wings achieved in a model, such as organotypic tissue culture
  - Craniofacial and/or dermal changes achieved in a model, such as organotypic tissue culture
- **Neuroprosthetic components and platforms**
  - Multipurpose neural interface strategies for recording and/or stimulation
  - Electrical engineering and low-level software/firmware design for these components

- Biological components and platforms
  - High-content, efficient gene therapy vectors and production tools
  - Stem cell and tissue engineering, including bioprinting
- Software tools
  - Development of software, e.g. simulators and CAD environments, supporting the above
  - Usage or extension of existing software towards the same goals

## The process:

The application process, which is similar for graduate student or postdoc applicants, will go as follows:

1. You send an **application package** to [freedom.of.form.foundation@gmail.com](mailto:freedom.of.form.foundation@gmail.com) containing:
  - Your **answers to the question prompts**
  - Your **CV**
  - Your **specific aims** that outline your research proposal. Please keep this to 1 page or less, formatted as an outline. Incomplete or brief sentences are encouraged.
  - Your **research proposal**. Please provide 3 to 7 pages of content, single-spaced. We suggest an approximately standard format of abstract, background, preliminary results (if any), experimental approach (divided by specific aim), interim conclusions, and outlook/impact. Include any figures you like. Append your references to this document – this won't count towards your page count. We will not accept auxiliary documents for your proposal.
  - Your most recent **unofficial school transcript**.
2. Your **letters of recommendation** must be emailed to [freedom.of.form.foundation@gmail.com](mailto:freedom.of.form.foundation@gmail.com) directly by your references. We require at least 2, and prefer 3 letters. One letter must come from your principal investigator, professor, or manager, who is in charge of the lab where the work will be performed. All letters must indicate familiarity with, and support for, your research interests, in addition to speaking to your personal and investigative qualities.
3. **We respond**, indicating that your application is complete including letters of recommendation, and has been received by the deadline. This is not a sign of acceptance.
4. Within four weeks after the deadline, **we return our decision**.
5. If you are accepted, then **we'll additionally require the following** sent to [freedom.of.form.foundation@gmail.com](mailto:freedom.of.form.foundation@gmail.com) before we can provide actual funding:
  - A requested timeline for your start of funding
  - Contact information for your institution's financial officer.
  - Letter of employment, support, or good standing from your research institution.
  - **Official approval by your institutional regulatory bodies** for all protocols involving laboratory work, animal models, clinical or psychological research, etc, that your research proposal uses. We take regulatory approvals seriously, and will not provide any funding if we have concerns that your research does not have institutional approval. Furthermore, **we will not allow the usage of non-human primate models or newly extracted NHP tissues**. Tissues that are purely for histological purposes and derived from an existing tissue bio-bank of deceased animals will be permitted.

6. **If your research involves human volunteers for any reason**, we additionally impose these restrictions:

- We require that your Institutional Review Board emails [freedom.of.form.foundation@gmail.com](mailto:freedom.of.form.foundation@gmail.com) directly to indicate your approval, and fully describe all procedures that have been approved.
- Any discrepancies between your IRB approval, and your funding application, will cause immediate and irrevocable cancelation of your application.
- Severe IRB protocol discrepancies that indicate negligence or intentional misrepresentation of approved procedures will result in a lifetime ban of the applicant from any future relationship with the FFF.
- We reserve the right to conduct a site visit as a condition before initializing your funding.
- We will maintain contact with your Institutional Review Board to ensure that your regulatory approval remains in good standing
- We may request an unannounced inspection of your laboratory for any reason.

## Your benefits will be:

1. A full stipend or salary.
  - a. If you're already getting that from your school or institution, we'll cover that expense at the same level, as appropriate for your position as graduate student or postdoc, etc.
  - b. If you're not being given a stipend already, we'll use the NIH NRSA guidelines as a starting point: around \$25,000 per year for a predoctoral student, or around \$45,000 to \$55,000 per year for a postdoc.
2. A bonus of \$5,000 per year on top of guidelines or your existing stipend.
3. Travel expenses of \$1,000 per year, allowed to carry over year-to-year.
4. The possibility of flexible additional expenses. We may be able to help defray costs of publishing, of purchasing technology and software, of laboratory equipment and reagents, etc.
5. Access to popularizing your research to increase measures of impact, such as Altmetric scores, through a passionate community of active social media users.
6. Negligible administrative overhead once you're approved for funding – no quarterly progress reports, no formal class or educational requirements, no explicit performance thresholds.

## Your requirements:

1. You'll renew yearly with *brief* checkups. We'll contact you a few months in advance of the renewal date to check in. You can renew up to 4 times, for a total of a 5 year fellowship.
2. You must acknowledge us as a funding source, in any publications, posters, or presentations, and reference your fellowship number.
3. You cannot accept any other fellowship at the same time.
4. All 'big data' or other non-commercial digital assets arising from your research must be uploaded to public repositories, such as the Gene Expression Omnibus, GitHub, etc, as appropriate.
5. You'll let us know as soon as you present a talk or a poster, or publish a paper – we'd love to know! Our funders will love it, too.

6. You'll let us know as soon as you start going through a patent application or invention disclosure. We don't need to know the details, we just want to hear the good news! We don't make any claims to your intellectual property – we leave that to your research institution's existing policies.

### **Additional suggested activities:**

1. You're urged to attend a scientific conference the first 12 months of your fellowship. It's important to get calibrated with the work of your peers.
2. You'll share your findings via a poster or presentation at a scientific conference (not necessarily during the first year of your fellowship).
3. You will present to laypersons for at least one public outreach event (not necessarily during the first year of your fellowship).
4. You'll publish in open-access journals, or ensure that your publications are free-to-read if they are accepted by a paid-access journal.

Name of applicant: \_\_\_\_\_

Application – Individual Fellowship



## Question prompts:

You can refer to content on your CV, research proposal, transcript, etc, if necessary – we'll read your responses here with all the other documents in front of us.

Please be **honest**. We're not looking for whitewashed responses.

Please be **concise**. If a question can be answered with a just a sentence or two, *do it*.

1. What type of fellow will you be? Master's or PhD student, postdoc, etc?
2. In terms of the laboratory in which you will work on proposed research, are you applying (1) in advance of starting work in your lab, (2) while you are new to your lab, or (3) have you been in your lab a while?
3. Tell us about how your career is going, and where you want it to go.
4. Please describe how you think your research will push us closer to a reality of morphological freedom.

5. Tell us about your laboratory where the work will take place. What are its research interests? How is its publication record? How do you get along with your colleagues?
6. Tell us about your research expertise and interests. What do you have expertise in? What do you enjoy learning about?
7. If you are accepted, you will be one of the first researchers who is visibly working on morphological freedom research. We know you're excited about that. But, what challenges do you anticipate, and how will you react to them?
8. How are your presentation skills currently? Are you actively finding opportunities to present, whether they are poster sessions, lab meetings, or larger presentations to academics or laypersons?

*Optional personal and feedback questions. These questions are just so that we can get to know you better, and/or to improve as an organization. Your answers won't affect our decision.*

9. Do you feel that the above questions have been helpful, or not helpful? Would you suggest any changes?

10. How did you learn about us?

11. Do you feel that our benefits and requirements for fellows need any changes?

12. Do you have any personal connection to our research goals, through your own interest, or the interests of friends or family?

13. Do you have anything else you wish to add?