

## **Addendum to Form 1023 for 02-0677819**

### **Part I Applicant Identification**

10. There have been no substantial contributions to the Trust and none are expected until the death of the first custodian, Brian Carr. This is not anticipated to be in the next decade. Until there are substantial contributions to the Trust, no Form 990 will be required as the trust receipts will be below the minimum of \$25,000 required for the filing of Form 990.

### **Part II Organizational Structure**

- 1a. The trust document specifies the manner in which trust officers are selected on Page 3 in Article 7.

### **Part IV Narrative Description of Activities**

The purpose of this Fund is to fund education and research over time and to develop investments to permit increased funding of education and research. Initially the primary use of contributions will be as investments so that larger contributions can be made to education and research when the investments are of more substantial value. Investments will be of a long term nature and intrinsically should benefit all members of society by providing more capital investments. Further, it is hoped that the investments will be socially responsible such that customers, employees, and suppliers are treated well and competitors are treated fairly as this is the very nature of truly long term investments.

The growth of the investments is sped by insuring the maintenance of a tax free charitable status and minimizing the cost of managing the investments. As the custodian is restricted to at most 0.1% in remuneration for managing the trust, it is expected the custodian will simply choose the appropriate investment strategy and allow others to directly manage the investments through, for example, investing in mutual funds. The conflict of interest clauses requires the custodian to choose investments based on expected return and to avoid investments which would be of improper benefit to the custodian.

The limitation on remuneration for the custodian is also expected to require the custodian to make a limited number of grants to tax deductible charitable organizations as the custodian won't have the resources to have much involvement in the distribution of the charitable contributions to individuals. As these recipient organizations are required to maintain their charitable status to receive grants / contributions, it is sufficient to require that the custodian not improperly benefit from the grants / contributions.

As the investments reach a substantial value, the rate at which contributions are made from the trust increases until the value of the trust stabilizes.

### **Part V Compensation**

- 1a. The trust document specifies that under certain circumstances the Custodian will be remunerated a fixed amount of 0.1% of the current value of the fund (see Trust Document, page 2, paragraph C). However, there are several conditions on this remuneration and it is

- not expected that any remuneration will be paid for several years.
- 2a. Brian Carr, the current Custodian, is the father of the current Trustee, David Carr.
  - 3a. It is hoped that over time the hours required of the Custodian and Trustee will be minimal once the initial procedures are established. This is important as the compensation provided to officers will be minimal for the imminent future (next several decades). The primary qualification of the officers is a desire that the purpose of the trust be fulfilled and to provide for mandated requirements in a complete and thorough fashion.
  - 4g. The compensation for the custodian is specified in the trust document to insure that trust expenses remain nominal and do not unreasonably interfere with the growth of the trust over time.
  - 5a. The attached Conflict of Interest Policy was adopted at the board meeting of September 19, 2009.
  - 6a. All compensation is based on the value of the Trust at the end of the previous year and is specified in the trust document, Page 2, Paragraph C. No other compensation is permitted.

### **Part VI Beneficiaries of Trust**

1. It is not anticipated that the Trust will have sufficient assets to make contributions in the near future. While the Custodian is not specifically precluded from making contributions to individuals as long as the contributions meet the current requirements for tax-exempt charitable contributions, the restriction on the compensation of the Custodian make it most likely that all contributions will be in the form of funds contributed to organizations whose tax-exempt status has been verified by the Custodian.

### **Part VII History**

1. A previous trust of the same name and using the same tax exempt ID but established five years earlier was folded into this trust as the previous trust agreement did not appear to meet the income restrictions for a tax exempt organization. As such a revised Declaration of Trust was implemented to address those concerns while maintaining the focus and direction of the prior trust.
2. If the revision of the Declaration of Trust is not considered to have formed a different trust, but simply revised the trust document, then this application has been submitted more than 27 months after the Trust was legally formed.

### **Part VIII Specific Activities**

10. While the Custodian is not specifically forbidden from investing the trust assets in intellectual property, no such investments are anticipated and such investments would not generally make sense given the low rate of remuneration provided to the Custodian.
11. While the Custodian is not specifically forbidden from accepting such contributions, none are anticipated at this time. Further, no donor is permitted to impose conditions which violate the trust document or which impair the tax exempt status of the trust.
12. While the trust document encourages the Custodian to maintain investments and make charitable contributions in every country where its tax exempt status can be maintained, there are no such investments at this time and none are anticipated in the immediate future. The trust document specifies that every such activity in any foreign country must fully comply with the trust document and the tax and other laws of each such country.

13. No charitable contributions are anticipated in the immediate future as the trust is not large enough to justify such contributions. However, it is required that future charitable contributions be made to charitable organizations which meet the requirements of the trust document as well as being a tax exempt charitable organization. It is the responsibility of the Custodian to make these contributions which includes choosing recipient organizations and documenting that they do in fact meet the requirements of the trust document which implicitly requires verifying their tax exempt charitable status in the area of education or research. The conflict of interest requirements insure that the selection does not benefit the Custodian. The Trustees verify that the contributions are adequately documented to meet the requirements of the trust document.
14. As there are currently no investments in foreign countries, no contributions in foreign countries are anticipated in the immediate future. When such contributions are made, there will be the same requirements insuring that said contributions meet the requirements of the trust document as stated in the previous paragraph.
22. While the Custodian is not specifically forbidden from making contributions to individuals, the extremely limited remuneration for the Custodian makes it unlikely that the Custodian would be able to adequately document such contributions to insure that they met the requirements of the trust document.

### **Part X Public Charity Status**

- 1b. Article 5 of the trust document which starts on page 1 requires that the distributions from the Trust meet the requirements to maintain the federal income tax exemption status of the Trust pursuant to section 501(c)(3) of the Internal Revenue Code, or the corresponding section of any future federal tax code or other national or state tax code which are applicable to this trust.

### **Schedule G Successor Organization**

2. A previous trust of the same name and using the same tax exempt ID but established five years earlier was folded into this trust as the previous trust agreement did not appear to meet the income restrictions for a tax exempt organization. As such a revised Declaration of Trust was implemented to address those concerns while maintaining the focus and direction of the prior trust.
5. The officers of the previous organization have retained their previous functions.
6. All of the assets of the previous organization were cash deposits worth \$111 which were transferred to the new organization. The requirement that the funds be used for tax exempt charitable contributions related to education and research was maintained.