We will try to save your time and logically develop your understanding of the material by following a general outline. If you see that some immediate question you have will be covered later in the seminar, you might write the question out and save it for that time. If we don't answer your question in the course of discussion please ask it then. Here is the outline, would you glance at it for a few minutes and then we will begin.

DISTRIBUTE EXHIBIT #1

Federal Requirements of Creation of a Foundation

Tax-exemption of a non-profit organization is based upon two things:

1. That you are organized expressly for certain purposes
2. That you are operating exclusively for these same purposes.

Basically this is a simple test, as the words indicate. Starting with your purpose you must be recognized under Section 501 (c) (3) of the Internal Revenue Code as being organized exclusively for one