

Part III		Statement of Program Service Accomplishments	
		Check if Schedule O contains a response or note to any line in this Part III ☒	
1	Briefly describe the organization’s mission:		
THE ATLANTIC COUNCIL, THROUGH ITS RESEARCH AND ANALYSIS, PROMOTES CONSTRUCTIVE LEADERSHIP AND ENGAGEMENT IN INTERNATIONAL AFFAIRS BASED ON THE CENTRAL ROLE OF THE ATLANTIC COMMUNITY IN MEETING GLOBAL CHALLENGES.			
2	Did the organization undertake any significant program services during the year which were not listed on the prior Form 990 or 990-EZ? ☐ Yes ☒ No		
If "Yes," describe these new services on Schedule O.			
3	Did the organization cease conducting, or make significant changes in how it conducts, any program services? ☐ Yes ☒ No		
If "Yes," describe these changes on Schedule O.			
4	Describe the organization’s program service accomplishments for each of its three largest program services, as measured by expenses. Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to others, the total expenses, and revenue, if any, for each program service reported.		
4a	(Code:) (Expenses \$ 10,431,155 including grants of \$ 503,900) (Revenue \$ 167,860)	ACTECH: THE ATLANTIC COUNCIL TECHNOLOGY PROGRAMS (ACTECH) WORK TOGETHER TO ADDRESS THE GEOPOLITICAL IMPLICATIONS OF TECHNOLOGY AND PROVIDE POLICYMAKERS AND GLOBAL STAKEHOLDERS NECESSARY RESEARCH, INSIGHTS, AND CONVENINGS TO ADDRESS THE CHALLENGES OF GLOBAL TECHNOLOGY AND ENSURE ITS RESPONSIBLE ADVANCEMENT.	
4b	(Code:) (Expenses \$ 8,268,629 including grants of \$ 117,892) (Revenue \$ 7,453)	RAFIK HARIRI CENTER AND MIDDLE EAST PROGRAMS: THE RAFIK HARIRI CENTER AND MIDDLE EAST PROGRAMS ARE LEADING THE WAY IN PROVIDING A FORUM FOR INFORMING AND GALVANIZING THE TRANSATLANTIC COMMUNITY TO SHAPE A STABLE AND PROSPEROUS MIDDLE EAST AND NORTH AFRICA.	
4c	(Code:) (Expenses \$ 7,813,273 including grants of \$ 0) (Revenue \$ 256,928)	SCOWCROFT CENTER FOR STRATEGY AND SECURITY: THE SCOWCROFT CENTER WORKS TO DEVELOP SUSTAINABLE, NONPARTISAN STRATEGIES TO ADDRESS THE MOST IMPORTANT SECURITY CHALLENGES FACING THE U.S. AND ITS ALLIES AND PARTNERS. THE CENTER HONORS THE LEGACY OF SERVICE OF GENERAL BRENT SCOWCROFT, INCLUDING HIS ETHOS OF NONPARTISAN COMMITMENT TO THE CAUSE OF SECURITY, SUPPORT FOR US LEADERSHIP IN COOPERATION WITH ALLIES AND PARTNERS, AND DEDICATION TO THE MENTORSHIP OF THE NEXT GENERATION OF LEADERS.	
	(Code:) (Expenses \$ 6,071,037 including grants of \$ 0) (Revenue \$ 0)	GLOBAL ENERGY CENTER: THE GLOBAL ENERGY CENTER DEVELOPS AND PROMOTES PRAGMATIC AND NONPARTISAN POLICY SOLUTIONS DESIGNED TO ADVANCE GLOBAL ENERGY SECURITY, ENHANCE ECONOMIC OPPORTUNITY, AND ACCELERATE PATHWAYS TO NET-ZERO EMISSIONS.	
	(Code:) (Expenses \$ 4,000,915 including grants of \$ 175,000) (Revenue \$ 0)	GEOECONOMICS CENTER: THE GEOECONOMICS CENTER DEVELOPS DATA-DRIVEN PROGRAMS, PUBLICATIONS, AND THOUGHT LEADERSHIP AT THE NEXUS OF ECONOMICS, FINANCE, AND FOREIGN POLICY. THE CENTER'S WORK IS BUILT ON THE IDEA THAT THE US MUST LEAD WITH ALLIES OR RISK BECOMING A BYSTANDER IN A RESHAPED INTERNATIONAL FINANCIAL SYSTEM.	
	(Code:) (Expenses \$ 3,753,361 including grants of \$ 205,369) (Revenue \$ 0)	EUROPE CENTER: THE EUROPE CENTER PROVIDES EXPERTISE AND BUILDING COMMUNITIES TO PROMOTE TRANSATLANTIC LEADERSHIP AND A STRONG EUROPE IN TURBULENT TIMES. THE CENTER'S CONVENING POWER AND NETWORK COMBINE WITH ITS EXTENSIVE RESEARCH AND REAL-TIME ANALYSIS TO PROMOTE DIALOGUE, BUILD A FORWARD-LOOKING AGENDA FOR THE TRANSATLANTIC PARTNERSHIP, AND FIND SOLUTIONS TO THE GEOPOLITICAL, ECONOMIC, AND TECHNOLOGICAL CHALLENGES FACING THE UNITED STATES AND ITS EUROPEAN ALLIES.	
	(Code:) (Expenses \$ 3,493,364 including grants of \$ 0) (Revenue \$ 0)	ADRIENNE ARSHT LATIN AMERICA CENTER: THE ATLANTIC COUNCIL'S ADRIENNE ARSHT LATIN AMERICA CENTER (AALAC) BROADENS UNDERSTANDING OF REGIONAL TRANSFORMATIONS WHILE DEMONSTRATING THE SIGNIFICANCE OF LATIN AMERICA AND THE CARIBBEAN IN A RAPIDLY CHANGING WORLD. THE CENTER FOCUSES ON PRESSING POLITICAL, ECONOMIC, AND STRATEGIC ISSUES THAT DEFINE THE REGION'S TRAJECTORY. THE CENTER PROPOSES CONSTRUCTIVE, RESULTS-ORIENTED, NONPARTISAN SOLUTIONS TO INFORM PUBLIC-SECTOR, BUSINESS, AND MULTILATERAL ACTION BASED ON A SHARED VISION FOR A MORE PROSPEROUS, INCLUSIVE, AND SUSTAINABLE FUTURE.	
	(Code:) (Expenses \$ 3,154,529 including grants of \$ 271,722) (Revenue \$ 0)	CLIMATE RESILIENCE CENTER: THE ATLANTIC COUNCIL'S CLIMATE RESILIENCE CENTER WAS FORMED TO REACH ONE BILLION PEOPLE WITH RESILIENCE SOLUTIONS TO CLIMATE CHANGE, MIGRATION, AND SECURITY CHALLENGES.	
	(Code:) (Expenses \$ 2,405,487 including grants of \$ 486,900) (Revenue \$ 0)	FREEDOM AND PROSPERITY CENTER: THE FREEDOM AND PROSPERITY CENTER AIMS TO INCREASE THE WELL-BEING OF PEOPLE EVERYWHERE, AND ESPECIALLY THE POOR AND MARGINALIZED IN DEVELOPING COUNTRIES, THROUGH UNBIASED, DATA-BASED RESEARCH ON THE RELATIONSHIP BETWEEN PROSPERITY AND ECONOMIC, POLITICAL, AND LEGAL FREEDOMS, IN SUPPORT OF SOUND POLICY CHOICES.	
	(Code:) (Expenses \$ 2,218,997 including grants of \$ 0) (Revenue \$ 0)	EURASIA CENTER: THE EURASIA CENTER'S MISSION IS TO PROMOTE POLICIES THAT ENCOURAGE STABILITY, DEMOCRATIC VALUES, AND PROSPERITY IN EURASIA. A DEMOCRATIC, PROSPEROUS, AND STABLE EURASIA IS A CORE INTEREST FOR THE UNITED STATES AND PLAYS INTO THE ATLANTIC COUNCIL'S FOCUS ON GREAT POWER COMPETITION.	
	(Code:) (Expenses \$ 1,708,776 including grants of \$ 0) (Revenue \$ 0)	GLOBAL CHINA HUB: THE ATLANTIC COUNCIL'S GLOBAL CHINA HUB RESEARCHES AND DEVISES SOLUTIONS FOR THE U.S. AND ITS ALLIES TO THE GREATEST CHALLENGES POSED BY CHINA'S RISE, LEVERAGING THE ATLANTIC COUNCIL'S WORK ON CHINA ACROSS ITS SIXTEEN PROGRAMS AND CENTERS.	
	(Code:) (Expenses \$ 1,296,463 including grants of \$ 0) (Revenue \$ 0)	AFRICA CENTER: THE AFRICA CENTER EMPHASIZES THE BUILDING OF STRONG PARTNERSHIPS AMONG AFRICAN STATES, THE U.S. AND EUROPE, AND STRENGTHENING ECONOMIC GROWTH AND PROSPERITY ON THE CONTINENT THROUGH SUSTAINED MULTILATERAL INTERACTIONS AND LEADING ISSUE ANALYSIS.	
	(Code:) (Expenses \$ 1,114,913 including grants of \$ 0) (Revenue \$ 0)	ATLANTIC COUNCIL TURKEY PROGRAM: THE ATLANTIC COUNCIL TURKEY PROGRAM AIMS TO SUPPORT TRANSATLANTIC RELATIONS BY STRENGTHENING DIALOGUE BETWEEN THE UNITED STATES AND REGIONAL NATO ALLIES, PRIMARILY TURKEY. IN LINE WITH THE ATLANTIC COUNCIL'S MISSION OF PROMOTING CONSTRUCTIVE US LEADERSHIP AND ENGAGEMENT IN INTERNATIONAL AFFAIRS AND IN FACING GLOBAL CHALLENGES, THIS PROGRAM WORKS TO BOLSTER TRANSATLANTIC ENGAGEMENT WITH TURKEY AND ITS SURROUNDING REGION THROUGH FORWARD-LOOKING RESEARCH AND HIGH-IMPACT, HIGH-LEVEL CONVENINGS COVERING ENERGY, ECONOMICS, BUSINESS, TECHNOLOGY, DEFENSE, AND SECURITY.	
	(Code:) (Expenses \$ 1,001,171 including grants of \$ 0) (Revenue \$ 0)	MILLENNIUM LEADERSHIP PROGRAM: THE ATLANTIC COUNCIL'S MILLENNIUM LEADERSHIP PROGRAM (MLP) WORKS TO CONNECT AND EMPOWER NEXT-GENERATION INTERNATIONAL CHANGEMAKERS WHO WILL SHAPE THE TWENTY-FIRST CENTURY, TO ADDRESS OUR WORLD'S MOST PRESSING CHALLENGES.	
	(Code:) (Expenses \$ 368,058 including grants of \$ 0) (Revenue \$ 0)	SOUTH ASIA CENTER: THE ATLANTIC COUNCIL'S SOUTH ASIA CENTER (SAC) IS THE FOCAL POINT FOR THE ATLANTIC COUNCIL'S ANALYSIS OF ISSUES CONCERNING THE POLITICAL, SOCIAL, GEOGRAPHICAL, AND CULTURAL DIVERSITY OF THE REGION. AT THE INTERSECTION OF SOUTH ASIA AND ITS GEOPOLITICS, SAC FACILITATES CONSTRUCTIVE DIALOGUE TO SHAPE POLICY AND FORGE TIES BETWEEN THE REGION AND THE GLOBAL COMMUNITY BY PRODUCING CUTTING-EDGE ANALYSIS, CONVENING KEY STAKEHOLDERS, AND AMPLIFYING POLICY CONVERSATIONS.	
4d	Other program services (Describe in Schedule O.) (Expenses \$ 30,587,071 including grants of \$ 1,138,991) (Revenue \$ 0)		
4e	Total program service expenses 57,100,128		

Part IV

Checklist of Required Schedules

	Yes	No
1 Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? If "Yes," complete Schedule A	1 Yes	
2 Is the organization required to complete Schedule B, Schedule of Contributors? See instructions.	2 Yes	
3 Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for public office? If "Yes," complete Schedule C, Part I	3	No
4 Section 501(c)(3) organizations. Did the organization engage in lobbying activities, or have a section 501(h) election in effect during the tax year? If "Yes," complete Schedule C, Part II	4	No
5 Is the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization that receives membership dues, assessments, or similar amounts as defined in Rev. Proc. 98-19? If "Yes," complete Schedule C, Part III	5	No
6 Did the organization maintain any donor advised funds or any similar funds or accounts for which donors have the right to provide advice on the distribution or investment of amounts in such funds or accounts? If "Yes," complete Schedule D, Part I	6	No
7 Did the organization receive or hold a conservation easement, including easements to preserve open space, the environment, historic land areas, or historic structures? If "Yes," complete Schedule D, Part II	7	No
8 Did the organization maintain collections of works of art, historical treasures, or other similar assets? If "Yes," complete Schedule D, Part III	8	No
9 Did the organization report an amount in Part X, line 21 for escrow or custodial account liability; serve as a custodian for amounts not listed in Part X; or provide credit counseling, debt management, credit repair, or debt negotiation services? If "Yes," complete Schedule D, Part IV	9 Yes	
10 Did the organization, directly or through a related organization, hold assets in temporarily restricted endowments, permanent endowments, or quasi endowments? If "Yes," complete Schedule D, Part V	10 Yes	
11 If the organization's answer to any of the following questions is "Yes," then complete Schedule D, Parts VI, VII, VIII, IX, or X, as applicable.		
a Did the organization report an amount for land, buildings, and equipment in Part X, line 10? If "Yes," complete Schedule D, Part VI	11a Yes	
b Did the organization report an amount for investments—other securities in Part X, line 12 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VII	11b	No
c Did the organization report an amount for investments—program related in Part X, line 13 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VIII	11c	No
d Did the organization report an amount for other assets in Part X, line 15 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part IX	11d Yes	
e Did the organization report an amount for other liabilities in Part X, line 25? If "Yes," complete Schedule D, Part X	11e Yes	
f Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses the organization's liability for uncertain tax positions under FIN 48 (ASC 740)?	11f Yes	
12a If "Yes," complete Schedule D, Part X. Did the organization obtain separate, independent audited financial statements for the tax year? If "Yes," complete Schedule D, Parts XI and XII	12a Yes	
b Was the organization included in consolidated, independent audited financial statements for the tax year? If "Yes," and if the organization answered "No" to line 12a, then completing Schedule D, Parts XI and XII is optional	12b	No
13 Is the organization a school described in section 170(b)(1)(A)(ii)? If "Yes," complete Schedule E	13	No
14a Did the organization maintain an office, employees, or agents outside of the United States?	14a Yes	
b Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking, fundraising, business, investment, and program service activities outside the United States, or aggregate foreign investments valued at \$100,000 or more? If "Yes," complete Schedule F, Parts I and IV	14b Yes	
15 Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or other assistance to or for any foreign organization? If "Yes," complete Schedule F, Parts II and IV	15 Yes	
16 Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or other assistance to or for foreign individuals? If "Yes," complete Schedule F, Parts III and IV	16	No
17 Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on Part IX, column (A), lines 6 and 11e? If "Yes," complete Schedule G, Part I. See instructions.	17	No
18 Did the organization report more than \$15,000 total of fundraising event gross income and contributions on Part VIII, lines 1c and 8a? If "Yes," complete Schedule G, Part II	18 Yes	
19 Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a? If "Yes," complete Schedule G, Part III	19	No
20a Did the organization operate one or more hospital facilities? If "Yes," complete Schedule H	20a	No
b If "Yes" to line 20a, did the organization attach a copy of its audited financial statements to this return?	20b	
21 Did the organization report more than \$5,000 of grants or other assistance to any domestic organization or domestic government on Part IX, column (A), line 1? If "Yes," complete Schedule I, Parts I and II	21 Yes	

Part IV

Checklist of Required Schedules (continued)

		Yes	No
22	Did the organization report more than \$5,000 of grants or other assistance to or for domestic individuals on Part IX, column (A), line 2? If "Yes," complete Schedule I, Parts I and III	22	No
23	Did the organization answer "Yes" to Part VII, Section A, line 3, 4, or 5, about compensation of the organization's current and former officers, directors, trustees, key employees, and highest compensated employees? If "Yes," complete Schedule J	23	Yes
24a	Did the organization have a tax-exempt bond issue with an outstanding principal amount of more than \$100,000 as of the last day of the year, that was issued after December 31, 2002? If "Yes," answer lines 24b through 24d and complete Schedule K. If "No," go to line 25a	24a	No
b	Did the organization invest any proceeds of tax-exempt bonds beyond a temporary period exception?	24b	
c	Did the organization maintain an escrow account other than a refunding escrow at any time during the year to defease any tax-exempt bonds?	24c	
d	Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year?	24d	
25a	Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations. Did the organization engage in an excess benefit transaction with a disqualified person during the year? If "Yes," complete Schedule L, Part I	25a	No
b	Is the organization aware that it engaged in an excess benefit transaction with a disqualified person in a prior year, and that the transaction has not been reported on any of the organization's prior Forms 990 or 990-EZ? If "Yes," complete Schedule L, Part I	25b	No
26	Did the organization report any amount on Part X, line 5 or 22 for receivables from or payables to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons?	26	No
27	Did the organization provide a grant or other assistance to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or employee thereof, a grant selection committee member, or to a 35% controlled entity (including an employee thereof) or family member of any of these persons? If "Yes," complete Schedule L, Part III	27	No
28	Was the organization a party to a business transaction with one of the following parties (see the Schedule L, Part IV instructions for applicable filing thresholds, conditions, and exceptions):		
a	A current or former officer, director, trustee, key employee, creator or founder, or substantial contributor? If "Yes," complete Schedule L, Part IV	28a	No
b	A family member of any individual described in line 28a? If "Yes," complete Schedule L, Part IV	28b	No
c	A 35% controlled entity of one or more individuals and/or organizations described in line 28a or 28b? If "Yes," complete Schedule L, Part IV	28c	No
29	Did the organization receive more than \$25,000 in non-cash contributions? If "Yes," complete Schedule M	29	Yes
30	Did the organization receive contributions of art, historical treasures, or other similar assets, or qualified conservation contributions?	30	No
31	Did the organization reorganize, terminate, or dissolve and cease operations? If "Yes," complete Schedule N, Part I	31	No
32	Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? If "Yes," complete Schedule N, Part II	32	No
33	Did the organization own 100% of an entity disregarded as separate from the organization under Regulations sections 301.7701-2 and 301.7701-3?	33	No
34	Was the organization related to any tax-exempt or taxable entity? If "Yes," complete Schedule R, Part II, III, or IV, and Part V, line 1	34	Yes
35a	Did the organization have a controlled entity within the meaning of section 512(b)(13)?	35a	Yes
b	If "Yes" to line 35a, did the organization receive any payment from or engage in any transaction with a controlled entity within the meaning of section 512(b)(13)? If "Yes," complete Schedule R, Part V, line 2	35b	No
36	Section 501(c)(3) organizations. Did the organization make any transfers to an exempt non-charitable related organization? If "Yes," complete Schedule R, Part V, line 2	36	No
37	Did the organization conduct more than 5% of its activities through an entity that is not a related organization and that is treated as a partnership for federal income tax purposes? If "Yes," complete Schedule R, Part VI	37	No
38	Did the organization complete Schedule O and provide explanations on Schedule O for Part VI, lines 11b and 19? Note. All Form 990 filers are required to complete Schedule O.	38	Yes

Part V

Statements Regarding Other IRS Filings and Tax Compliance

Check if Schedule O contains a response or note to any line in this Part V

		Yes	No
1a	Enter the number reported in box 3 of Form 1096. Enter -0- if not applicable	1a	254
b	Enter the number of Forms W-2G included on line 1a. Enter -0- if not applicable	1b	0
c	Did the organization comply with backup withholding rules for reportable payments to vendors and reportable gaming (gambling) winnings to prize winners?	1c	

Part V	Statements Regarding Other IRS Filings and Tax Compliance (continued)					
2a Enter the number of employees reported on Form W-3, Transmittal of Wage and Tax Statements, filed for the calendar year ending with or within the year covered by this return		2a	370			
b If at least one is reported on line 2a, did the organization file all required federal employment tax returns?		2b	Yes			
3a Did the organization have unrelated business gross income of \$1,000 or more during the year?		3a			No	
b If "Yes," has it filed a Form 990-T for this year? If "No" to line 3b, provide an explanation in Schedule O		3b				
4a At any time during the calendar year, did the organization have an interest in, or a signature or other authority over, a financial account in a foreign country (such as a bank account, securities account, or other financial account)?		4a			No	
b If "Yes," enter the name of the foreign country: _____ See instructions for filing requirements for FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR)						
5a Was the organization a party to a prohibited tax shelter transaction at any time during the tax year? . . .		5a			No	
b Did any taxable party notify the organization that it was or is a party to a prohibited tax shelter transaction?		5b			No	
c If "Yes," to line 5a or 5b, did the organization file Form 8886-T?		5c				
6a Does the organization have annual gross receipts that are normally greater than \$100,000, and did the organization solicit any contributions that were not tax deductible as charitable contributions?		6a			No	
b If "Yes," did the organization include with every solicitation an express statement that such contributions or gifts were not tax deductible?		6b				
7 Organizations that may receive deductible contributions under section 170(c).						
a Did the organization receive a payment in excess of \$75 made partly as a contribution and partly for goods and services provided to the payor?		7a	Yes			
b If "Yes," did the organization notify the donor of the value of the goods or services provided?		7b	Yes			
c Did the organization sell, exchange, or otherwise dispose of tangible personal property for which it was required to file Form 8282?		7c			No	
d If "Yes," indicate the number of Forms 8282 filed during the year		7d				
e Did the organization receive any funds, directly or indirectly, to pay premiums on a personal benefit contract?		7e			No	
f Did the organization, during the year, pay premiums, directly or indirectly, on a personal benefit contract?		7f			No	
g If the organization received a contribution of qualified intellectual property, did the organization file Form 8899 as required?		7g				
h If the organization received a contribution of cars, boats, airplanes, or other vehicles, did the organization file a Form 1098-C?		7h				
8 Sponsoring organizations maintaining donor advised funds. Did a donor advised fund maintained by the sponsoring organization have excess business holdings at any time during the year?						
9 Sponsoring organizations maintaining donor advised funds.						
a Did the sponsoring organization make any taxable distributions under section 4966?		9a				
b Did the sponsoring organization make a distribution to a donor, donor advisor, or related person?		9b				
10 Section 501(c)(7) organizations. Enter:						
a Initiation fees and capital contributions included on Part VIII, line 12		10a				
b Gross receipts, included on Form 990, Part VIII, line 12, for public use of club facilities		10b				
11 Section 501(c)(12) organizations. Enter:						
a Gross income from members or shareholders		11a				
b Gross income from other sources. (Do not net amounts due or paid to other sources against amounts due or received from them.)		11b				
12a Section 4947(a)(1) non-exempt charitable trusts. Is the organization filing Form 990 in lieu of Form 1041?						
b If "Yes," enter the amount of tax-exempt interest received or accrued during the year.		12b				
13 Section 501(c)(29) qualified nonprofit health insurance issuers.						
a Is the organization licensed to issue qualified health plans in more than one state?		13a				
Note. See the instructions for additional information the organization must report on Schedule O.						
b Enter the amount of reserves the organization is required to maintain by the states in which the organization is licensed to issue qualified health plans		13b				
c Enter the amount of reserves on hand		13c				
14a Did the organization receive any payments for indoor tanning services during the tax year?		14a			No	
b If "Yes," has it filed a Form 720 to report these payments? If "No," provide an explanation in Schedule O		14b				
15 Is the organization subject to the section 4960 tax on payment(s) of more than \$1,000,000 in remuneration or excess parachute payment(s) during the year?		15			No	
16 Is the organization subject to the section 4968 excise tax on net investment income?		16			No	
17 Section 501(c)(21) organizations. Did the trust, or any disqualified or other person engage in any activities that would result in the imposition of an excise tax under section 4951, 4952, or 4953?		17				
If "Yes," complete Form 6069.						

Part VI

Governance, Management, and Disclosure. For each "Yes" response to lines 2 through 7b below, and for a "No" response to lines 8a, 8b, or 10b below, describe the circumstances, processes, or changes in Schedule O. See instructions.
Check if Schedule O contains a response or note to any line in this Part VI ☒

Section A. Governing Body and Management

		Yes	No
1a	Enter the number of voting members of the governing body at the end of the tax year. If there are material differences in voting rights among members of the governing body, or if the governing body delegated broad authority to an executive committee or similar committee, explain in Schedule O.		
1b	Enter the number of voting members included in line 1a, above, who are independent		
2	Did any officer, director, trustee, or key employee have a family relationship or a business relationship with any other officer, director, trustee, or key employee?	2	No
3	Did the organization delegate control over management duties customarily performed by or under the direct supervision of officers, directors or trustees, or key employees to a management company or other person?	3	No
4	Did the organization make any significant changes to its governing documents since the prior Form 990 was filed?	4	No
5	Did the organization become aware during the year of a significant diversion of the organization's assets?	5	No
6	Did the organization have members or stockholders?	6	No
7a	Did the organization have members, stockholders, or other persons who had the power to elect or appoint one or more members of the governing body?	7a	No
7b	Are any governance decisions of the organization reserved to (or subject to approval by) members, stockholders, or persons other than the governing body?	7b	No
8	Did the organization contemporaneously document the meetings held or written actions undertaken during the year by the following:		
8a	The governing body?	8a	Yes
8b	Each committee with authority to act on behalf of the governing body?	8b	Yes
9	Is there any officer, director, trustee, or key employee listed in Part VII, Section A, who cannot be reached at the organization's mailing address? If "Yes," provide the names and addresses in Schedule O	9	No

Section B. Policies (This Section B requests information about policies not required by the Internal Revenue Code.)

	Yes	No	
10a	Did the organization have local chapters, branches, or affiliates?	10a	No
10b	If "Yes," did the organization have written policies and procedures governing the activities of such chapters, affiliates, and branches to ensure their operations are consistent with the organization's exempt purposes?	10b	
11a	Has the organization provided a complete copy of this Form 990 to all members of its governing body before filing the form?	11a	Yes
11b	Describe on Schedule O the process, if any, used by the organization to review this Form 990.		
12a	Did the organization have a written conflict of interest policy? If "No," go to line 13	12a	Yes
12b	Were officers, directors, or trustees, and key employees required to disclose annually interests that could give rise to conflicts?	12b	Yes
12c	Did the organization regularly and consistently monitor and enforce compliance with the policy? If "Yes," describe on Schedule O how this was done	12c	Yes
13	Did the organization have a written whistleblower policy?	13	Yes
14	Did the organization have a written document retention and destruction policy?	14	Yes
15	Did the process for determining compensation of the following persons include a review and approval by independent persons, comparability data, and contemporaneous substantiation of the deliberation and decision?		
15a	The organization's CEO, Executive Director, or top management official	15a	Yes
15b	Other officers or key employees of the organization	15b	Yes
15c	If "Yes" to line 15a or 15b, describe the process on Schedule O. See instructions.		
16a	Did the organization invest in, contribute assets to, or participate in a joint venture or similar arrangement with a taxable entity during the year?	16a	No
16b	If "Yes," did the organization follow a written policy or procedure requiring the organization to evaluate its participation in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization's exempt status with respect to such arrangements?	16b	

Section C. Disclosure

17	List the states with which a copy of this Form 990 is required to be filed	AL, AR, CA, CO, CT, FL, GA, HI, IL, KS, KY, MD, MA, ME, MI, MN, MS, NH, NJ, NM, NY, NC, NV, ND, OR, OK, PA, RI, SC, TN, UT, VA, WV, WI, WA
18	Section 6104 requires an organization to make its Form 1023 (1024 or 1024-A, if applicable), 990, and 990-T (section 501(c)(3)s only) available for public inspection. Indicate how you made these available. Check all that apply. ☐ Own website ☐ Another's website ☒ Upon request ☐ Other (explain in Schedule O)	
19	Describe in Schedule O whether (and if so, how) the organization made its governing documents, conflict of interest policy, and financial statements available to the public during the tax year.	
20	State the name, address, and telephone number of the person who possesses the organization's books and records: RACHEL KLEMMER VP OF FINANCE & ADMINISTRATION 1400 L STREET NW FL 11 WASHINGTON, DC 20005 (202) 778-4952	

Part VII

Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors

Check if Schedule O contains a response or note to any line in this Part VII

Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees

- 1a** Complete this table for all persons required to be listed. Report compensation for the calendar year ending with or within the organization’s tax year.
- List all of the organization’s **current** officers, directors, trustees (whether individuals or organizations), regardless of amount of compensation. Enter -0- in columns (D), (E), and (F) if no compensation was paid.
 - List all of the organization’s **current** key employees, if any. See the instructions for definition of "key employee."
 - List the organization’s five **current** highest compensated employees (other than an officer, director, trustee or key employee) who received reportable compensation (box 5 of Form W-2, box 6 of Form 1099-MISC, and/or box 1 of Form 1099-NEC) of more than \$100,000 from the organization and any related organizations.
 - List all of the organization’s **former** officers, key employees, or highest compensated employees who received more than \$100,000 of reportable compensation from the organization and any related organizations.
 - List all of the organization’s **former directors or trustees** that received, in the capacity as a former director or trustee of the organization, more than \$10,000 of reportable compensation from the organization and any related organizations.
- See the instructions for the order in which to list the persons above.

☐ Check this box if neither the organization nor any related organization compensated any current officer, director, or trustee.

(A) Name and title	(B) Average hours per week (list any hours for related organizations below dotted line)	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)						(D) Reportable compensation from the organization (W-2/1099-MISC/1099-NEC)	(E) Reportable compensation from related organizations (W-2/1099-MISC/1099-NEC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional Trustee;	Officer	Key employee	Highest compensated employee	Former			
(1) FREDERICK KEMPE PRESIDENT AND CEO	40.00 0.00	X		X				662,808	0	122,799
(2) JOHN FW ROGERS CHAIR	1.00 0.00	X		X				0	0	0
(3) JAMES L JONES EXECUTIVE CHAIR EMERITUS	1.00 0.00	X		X				0	0	0
(4) ADRIENNE ARSHT EXECUTIVE VICE CHAIR	1.00 0.00	X		X				0	0	0
(5) STEPHEN J HADLEY EXECUTIVE VICE CHAIR	1.00 0.00	X		X				0	0	0
(6) ALEXANDER V MIRTCHEV VICE CHAIR	1.00 0.00	X		X				0	0	0
(7) ROBERT J ABERNETHY VICE CHAIR	1.00 0.00	X		X				0	0	0
(8) GEORGE LUND TREASURER	1.00 0.00	X		X				0	0	0
(9) AL WILLIAMS DIRECTOR	1.00 0.00	X						0	0	0
(10) ALAN H FLEISCHMANN DIRECTOR	1.00 0.00	X						0	0	0
(11) ANKIT N DESAI DIRECTOR	1.00 0.00	X						0	0	0
(12) AHMET M OREN DIRECTOR	1.00 0.00	X						0	0	0
(13) C JEFFREY KNITTEL DIRECTOR	1.00 0.00	X						0	0	0
(14) DINA H POWELL DIRECTOR	1.00 0.00	X						0	0	0
(15) FRANCES F TOWNSEND DIRECTOR	1.00 0.00	X						0	0	0
(16) GEORGE CHOPIVSKY DIRECTOR	1.00 0.00	X						0	0	0
(17) GIL TENZER DIRECTOR	1.00 0.00	X						0	0	0

Part VII

Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees (continued)

(A) Name and title	(B) Average hours per week (list any hours for related organizations below dotted line)	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)						(D) Reportable compensation from the organization (W-2/1099-MISC/1099-NEC)	(E) Reportable compensation from related organizations (W-2/1099-MISC/1099-NEC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional Trustee;	Officer	Key employee	Highest compensated employee	Former			
(18) GINA F ADAMS DIRECTOR	1.00 0.00	X						0	0	0
(19) HELIMA CROFT DIRECTOR	1.00 0.00	X						0	0	0
(20) JAMES E CARTWRIGHT DIRECTOR	1.00 0.00	X						0	0	0
(21) JENNY WOOD DIRECTOR	1.00 0.00	X						0	0	0
(22) JOIA M JOHNSON DIRECTOR	1.00 0.00	X						0	0	0
(23) JUDITH A MILLER DIRECTOR	1.00 0.00	X						0	0	0
(24) KARL V HOPKINS DIRECTOR	1.00 0.00	X						0	0	0
(25) KOSTAS PANTAZOPOULOS DIRECTOR	1.00 0.00	X						0	0	0
(26) LINDEN P BLUE DIRECTOR	1.00 0.00	X						0	0	0
(27) LAWRENCE DI RITA DIRECTOR	1.00 0.00	X						0	0	0
(28) LISA POLLINA DIRECTOR	1.00 0.00	X						0	0	0
(29) MEG GENTLE DIRECTOR	1.00 0.00	X						0	0	0
(30) MICHAEL ANDERSSON DIRECTOR	1.00 0.00	X						0	0	0
(31) MICHAEL FISCH DIRECTOR	1.00 0.00	X						0	0	0
(32) PAULA J DOBRIANSKY DIRECTOR	1.00 0.00	X						0	0	0
(33) RICHARD MORNINGSTAR DIRECTOR	1.00 0.00	X						0	0	0
(34) SAFI KALO DIRECTOR	1.00 0.00	X						0	0	0
(35) SHERRI W GOODMAN DIRECTOR	1.00 0.00	X						0	0	0
(36) TERESA CARLSON DIRECTOR	1.00 0.00	X						0	0	0
(37) JULIE VARGHESE CHIEF OPERATING OFFICER	40.00 0.00			X				378,548	0	52,913
(38) GRETCHEN EHLE CHIEF FINANCIAL OFFICER	40.00 0.00			X				352,500	0	33,456
(39) JENNA BEN-YEHUDA EXECUTIVE VICE PRESIDENT	40.00 0.00			X				369,974	0	14,208
(40) ROMESH RATNESAR SENIOR VICE PRESIDENT	40.00 0.00				X			169,193	0	3,372
(41) MATTHEW KROENIG VP & SR. DIR - SCOWCROFT CENTER	40.00 0.00				X			320,308	0	25,042
(42) GRAHAM BROOKIE VP AND SENIOR DIRECTOR - DFRL	40.00 0.00				X			320,308	0	31,237
(43) KADIATOU CESAIRE SENIOR VICE PRESIDENT	40.00 0.00				X			312,500	0	31,393
(44) WILLIAM WECHSLER SENIOR DIRECTOR	40.00 0.00				X			290,558	0	31,989
(45) JOSHUA LIPSKY SENIOR DIRECTOR	40.00 0.00					X		313,658	0	18,878
(46) JORGE GASTELUMENDI SENIOR DIRECTOR	40.00 0.00					X		293,425	0	18,674
(47) JOHN HERBST SENIOR DIRECTOR	40.00 0.00					X		287,058	0	27,958
(48) LONDON RYAN DERENTZ SENIOR DIRECTOR	40.00 0.00					X		281,250	0	12,328
(49) ROBERT HERR DIRECTOR	40.00 0.00					X		278,333	0	23,285
1b Sub-Total										
c Total from continuation sheets to Part VII, Section A . . .										
d Total (add lines 1b and 1c)							4,630,421	0	447,532	

2Total number of individuals (including but not limited to those listed above) who received more than \$100,000 of reportable compensation from the organization 96

	Yes	No
3Did the organization list any former officer, director or trustee, key employee, or highest compensated employee on line 1a? If "Yes," complete Schedule J for such individual	3	No
4For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000? If "Yes," complete Schedule J for such individual	4	Yes
5Did any person listed on line 1a receive or accrue compensation from any unrelated organization or individual for services rendered to the organization?If "Yes," complete Schedule J for such person	5	No

Section B. Independent Contractors		
1Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization. Report compensation for the calendar year ending with or within the organization’s tax year.		
(A) Name and business address	(B) Description of services	(C) Compensation
RSM US LLP 5155 PAYSPIRE CIRCLE CHICAGO, IL 60674	ACCOUNTING SERVICES	1,577,930
RHODIUM GROUP LLC 5 COLUMBUS CIRCLE SUITE 1801 NEW YORK, NY 10019	CONSULTING SERVICES	525,000
WALDORF ASTORIA WASHINGTON DC 1100 PENNSYLVANIA AVENUE NORTHWEST WASHINGTON, DC 20004	EVENT VENUE & SERVICES	429,513
VELOCITY GLOBAL LLC 3858 WALNUT ST SUITE 107 DENVER, CO 80205	PROFESSIONAL EMPLOYER ORGANIZATION SERVI	366,012
CORE Z OPERATIONS LLC 1356 BROADWAY NEW YORK, NY 10018	EVENT VENUE & SERVICES	219,306
2Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 of compensation from the organization 13		

Part VIII

Statement of Revenue

Check if Schedule O contains a response or note to any line in this Part VIII

	(A) Total revenue	(B) Related or exempt function revenue	(C) Unrelated business revenue	(D) Revenue excluded from tax under sections 512 - 514	
Contributions, Gifts, Grants, and Other	1a Federated campaigns . . . b Membership dues . . . c Fundraising events . . . d Related organizations e Government grants (contributions) f All other contributions, gifts, grants, and similar amounts not included above g Noncash contributions included in lines 1a - 1f:\$ h Total. Add lines 1a-1f . . .	1a			
Amt Similar Amounts		1b			
		1c	3,531,351		
		1d			
		1e	9,908,972		
		1f	56,516,094		
		1g	2,176,687		
		69,956,417			
Program Service Revenue	2a EXCHANGE CONTRACTS	Business Code			
		900099	432,241	432,241	
	b				
	c				
	d				
	e				
	f All other program service revenue.				
	g Total. Add lines 2a-2f.	432,241			

Other Revenue	3 Investment income (including dividends, interest, and other similar amounts)		964,655			964,655	
	4 Income from investment of tax-exempt bond proceeds						
	5 Royalties		1,295			1,295	
	6a Gross rents	(i) Real	(ii) Personal				
		6a					
		b Less: rental expenses	6b				
	c Rental income or (loss)	6c					
	d Net rental income or (loss)						
	7a Gross amount from sales of assets other than inventory	(i) Securities	(ii) Other				
		7a	11,657,326				1,189,878
		b Less: cost or other basis and sales expenses	7b				12,697,624
	c Gain or (loss)	7c	-1,040,298	1,189,878			
	d Net gain or (loss)		149,580			149,580	
	8a Gross income from fundraising events (not including \$ 3,531,351 of contributions reported on line 1c). See Part IV, line 18	8a	312,500				
		b Less: direct expenses	8b				1,920,294
	c Net income or (loss) from fundraising events		-1,607,794			-1,607,794	
	9a Gross income from gaming activities. See Part IV, line 19	9a					
		b Less: direct expenses	9b				
	c Net income or (loss) from gaming activities						
	10a Gross sales of inventory, less returns and allowances	10a					
b Less: cost of goods sold		10b					
c Net income or (loss) from sales of inventory							
Other Revenue Miscellaneous	11a MISCELLANEOUS REVENUE	Business Code					
		900099	5,239		5,239		
	b						
	c						
	d All other revenue						
	e Total. Add lines 11a-11d		5,239				
	12 Total revenue. See instructions		69,901,633	432,241	0	-487,025	

Part IX

Statement of Functional Expenses

Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A).

Check if Schedule O contains a response or note to any line in this Part IX ☒

Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII.	(A) Total expenses	(B) Program service expenses	(C) Management and general expenses	(D) Fundraising expenses
1 Grants and other assistance to domestic organizations and domestic governments. See Part IV, line 21	1,387,769	1,387,769		
2 Grants and other assistance to domestic individuals. See Part IV, line 22	4,800	4,800		
3 Grants and other assistance to foreign organizations, foreign governments, and foreign individuals. See Part IV, lines 15 and 16.	368,214	368,214		
4 Benefits paid to or for members				
5 Compensation of current officers, directors, trustees, and key employees	3,549,571	2,728,439	542,614	278,518
6 Compensation not included above, to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B)				
7 Other salaries and wages	27,568,102	24,252,481	2,746,262	569,359
8 Pension plan accruals and contributions (include section 401(k) and 403(b) employer contributions)	1,478,007	966,725	366,197	145,085
9 Other employee benefits	2,298,511	1,554,463	538,770	205,278
10 Payroll taxes	2,215,560	1,905,382	221,556	88,622
11 Fees for services (non-employees):				
a Management				
b Legal	649,422	530,426	118,996	
c Accounting	2,029,433	35,626	1,993,807	
d Lobbying				
e Professional fundraising services. See Part IV, line 17				
f Investment management fees	134,191		134,191	
g Other (If line 11g amount exceeds 10% of line 25, column (A) amount, list line 11g expenses on Schedule O)	8,446,830	7,487,361	783,719	175,750
12 Advertising and promotion	10,214	9,779	435	
13 Office expenses	839,229	732,503	87,584	19,142
14 Information technology	2,295,666	1,929,206	324,827	41,633
15 Royalties				
16 Occupancy	4,863,712	4,066,336	571,268	226,108
17 Travel	4,342,629	4,027,770	188,133	126,726
18 Payments of travel or entertainment expenses for any federal, state, or local public officials				
19 Conferences, conventions, and meetings	3,221,341	2,753,642	291,282	176,417
20 Interest	697,519	613,628	69,485	14,406
21 Payments to affiliates				
22 Depreciation, depletion, and amortization	1,304,456	1,147,569	129,946	26,941
23 Insurance	309,315	276,396	27,219	5,700
24 Other expenses. Itemize expenses not covered above (List miscellaneous expenses in line 24e. If line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O.)				
a DUES & SUBSCRIPTIONS	275,404	246,959	27,141	1,304
b STAFF DEVELOPMENT	137,813	64,383	73,430	
c OFFICE SECURITY	11,675	10,271	1,163	241
d				
e All other expenses				
25 Total functional expenses. Add lines 1 through 24e	68,439,383	57,100,128	9,238,025	2,101,230
26 Joint costs. Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation. Check here ☐ if following SOP 98-2 (ASC 958-720).				

Part X

Balance Sheet

Check if Schedule O contains a response or note to any line in this Part IX

☐

				(A)		(B)	
				Beginning of year		End of year	
Assets	1	Cash—non-interest-bearing		4,365,634	1	5,113,432	
	2	Savings and temporary cash investments		210,827	2	113,955	
	3	Pledges and grants receivable, net		29,550,898	3	34,910,913	
	4	Accounts receivable, net		11,443	4	8,966	
	5	Loans and other receivables from any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons			5		
	6	Loans and other receivables from other disqualified persons (as defined under section 4958(f)(1)), and persons described in section 4958(c)(3)(B)			6		
	7	Notes and loans receivable, net			7		
	8	Inventories for sale or use			8		
	9	Prepaid expenses and deferred charges		1,883,830	9	1,974,240	
	10a	Land, buildings, and equipment: cost or other basis. Complete Part VI of Schedule D	10a	29,545,890			
	b	Less: accumulated depreciation	10b	1,230,669	4,335,897	10c	28,315,221
	11	Investments—publicly traded securities		38,561,121	11	30,811,755	
	12	Investments—other securities. See Part IV, line 11			12		
	13	Investments—program-related. See Part IV, line 11			13		
	14	Intangible assets			14		
	15	Other assets. See Part IV, line 11		10,825,434	15	34,667,028	
16	Total assets. Add lines 1 through 15 (must equal line 33)		89,745,084	16	135,915,510		
Liabilities	17	Accounts payable and accrued expenses		5,373,239	17	7,482,051	
	18	Grants payable			18		
	19	Deferred revenue		1,635,513	19	1,683,051	
	20	Tax-exempt bond liabilities			20		
	21	Escrow or custodial account liability. Complete Part IV of Schedule D		32,177	21		
	22	Loans and other payables to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons			22		
	23	Secured mortgages and notes payable to unrelated third parties			23		
	24	Unsecured notes and loans payable to unrelated third parties			24		
	25	Other liabilities (including federal income tax, payables to related third parties, and other liabilities not included on lines 17 - 24). Complete Part X of Schedule D		21,032,725	25	60,160,448	
	26	Total liabilities. Add lines 17 through 25		28,073,654	26	69,325,550	
	Net Assets or Fund Balances	Organizations that follow FASB ASC 958, check here ☒ and complete lines 27, 28, 32, and 33.					
27		Net assets without donor restrictions		3,764,825	27	16,259,823	
28		Net assets with donor restrictions		57,906,605	28	50,330,137	
Organizations that do not follow FASB ASC 958, check here ☐ and complete lines 29 through 33.							
29		Capital stock or trust principal, or current funds			29		
30		Paid-in or capital surplus, or land, building or equipment fund			30		
31		Retained earnings, endowment, accumulated income, or other funds			31		
32		Total net assets or fund balances		61,671,430	32	66,589,960	
33		Total liabilities and net assets/fund balances		89,745,084	33	135,915,510	

Part XI

Reconciliation of Net Assets

Check if Schedule O contains a response or note to any line in this Part XI

1	Total revenue (must equal Part VIII, column (A), line 12)	1	69,901,633
2	Total expenses (must equal Part IX, column (A), line 25)	2	68,439,383
3	Revenue less expenses. Subtract line 2 from line 1	3	1,462,250
4	Net assets or fund balances at beginning of year (must equal Part X, line 32, column (A))	4	61,671,430
5	Net unrealized gains (losses) on investments	5	4,862,708
6	Donated services and use of facilities	6	
7	Investment expenses	7	
8	Prior period adjustments	8	
9	Other changes in net assets or fund balances (explain in Schedule O)	9	-1,406,428
10	Net assets or fund balances at end of year. Combine lines 3 through 9 (must equal Part X, line 32, column (A))	10	66,589,960

Part XII

Financial Statements and Reporting

Check if Schedule O contains a response or note to any line in this Part XII

	Yes	No
1 Accounting method used to prepare the Form 990: ☐ Cash ☒ Accrual ☐ Other _____ If the organization changed its method of accounting from a prior year or checked "Other," explain on Schedule O.		
2a Were the organization's financial statements compiled or reviewed by an independent accountant? If 'Yes,' check a box below to indicate whether the financial statements for the year were compiled or reviewed on a separate basis, consolidated basis, or both: ☐ Separate basis ☐ Consolidated basis ☐ Both consolidated and separate basis		No
b Were the organization's financial statements audited by an independent accountant? If 'Yes,' check a box below to indicate whether the financial statements for the year were audited on a separate basis, consolidated basis, or both: ☒ Separate basis ☐ Consolidated basis ☐ Both consolidated and separate basis	Yes	
c If "Yes," to line 2a or 2b, does the organization have a committee that assumes responsibility for oversight of the audit, review, or compilation of its financial statements and selection of an independent accountant? If the organization changed either its oversight process or selection process during the tax year, explain in Schedule O.	Yes	
3a As a result of a federal award, was the organization required to undergo an audit or audits as set forth in the Uniform Guidance, 2 C.F.R. Part 200, Subpart F?	Yes	
b If "Yes," did the organization undergo the required audit or audits? If the organization did not undergo the required audit or audits, explain why in Schedule O and describe any steps taken to undergo such audits.	Yes	

Additional Data

Return to Form

Software ID:

Software Version:

Form 990, Special Condition Description:

Special Condition Description

Name of the organization ATLANTIC COUNCIL OF THE UNITED STATES INC	Employer identification number 52-0742294
--	--

Part I Reason for Public Charity Status (All organizations must complete this part.) See instructions.

The organization is not a private foundation because it is: (For lines 1 through 12, check only one box.)

- 1

☐

A church, convention of churches, or association of churches described in **section 170(b)(1)(A)(i).**
- 2

☐

A school described in **section 170(b)(1)(A)(ii).** (Attach Schedule E (Form 990).)
- 3

☐

A hospital or a cooperative hospital service organization described in **section 170(b)(1)(A)(iii).**
- 4

☐

A medical research organization operated in conjunction with a hospital described in **section 170(b)(1)(A)(iii).** Enter the hospital's name, city, and state:
- 5

☐

An organization operated for the benefit of a college or university owned or operated by a governmental unit described in **section 170(b)(1)(A)(iv).** (Complete Part II.)
- 6

☐

A federal, state, or local government or governmental unit described in **section 170(b)(1)(A)(v).**
- 7

☒

An organization that normally receives a substantial part of its support from a governmental unit or from the general public described in **section 170(b)(1)(A)(vi).** (Complete Part II.)
- 8

☐

A community trust described in **section 170(b)(1)(A)(vi).** (Complete Part II.)
- 9

☐

An agricultural research organization described in **170(b)(1)(A)(ix)** operated in conjunction with a land-grant college or university or a non-land grant college of agriculture. See instructions. Enter the name, city, and state of the college or university:
- 10

☐

An organization that normally receives: (1) more than 33 1/3% of its support from contributions, membership fees, and gross receipts from activities related to its exempt functions—subject to certain exceptions, and (2) no more than 33 1/3% of its support from gross investment income and unrelated business taxable income (less section 511 tax) from businesses acquired by the organization after June 30, 1975. See **section 509(a)(2).** (Complete Part III.)
- 11

☐

An organization organized and operated exclusively to test for public safety. See **section 509(a)(4).**
- 12

☐

An organization organized and operated exclusively for the benefit of, to perform the functions of, or to carry out the purposes of one or more publicly supported organizations described in **section 509(a)(1)** or **section 509(a)(2).** See **section 509(a)(3).** Check the box on lines 12a through 12d that describes the type of supporting organization and complete lines 12e, 12f, and 12g.
- a

☐

Type I. A supporting organization operated, supervised, or controlled by its supported organization(s), typically by giving the supported organization(s) the power to regularly appoint or elect a majority of the directors or trustees of the supporting organization. **You must complete Part IV, Sections A and B.**
- b

☐

Type II. A supporting organization supervised or controlled in connection with its supported organization(s), by having control or management of the supporting organization vested in the same persons that control or manage the supported organization(s). **You must complete Part IV, Sections A and C.**
- c

☐

Type III functionally integrated. A supporting organization operated in connection with, and functionally integrated with, its supported organization(s) (see instructions). **You must complete Part IV, Sections A, D, and E.**
- d

☐

Type III non-functionally integrated. A supporting organization operated in connection with its supported organization(s) that is not functionally integrated. The organization generally must satisfy a distribution requirement and an attentiveness requirement (see instructions). **You must complete Part IV, Sections A and D, and Part V.**
- e

☐

Check this box if the organization received a written determination from the IRS that it is a Type I, Type II, Type III functionally integrated, or Type III non-functionally integrated supporting organization.
- f

Enter the number of supported organizations
- g

Provide the following information about the supported organization(s).

(i) Name of supported organization	(ii) EIN	(iii) Type of organization (described on lines 1- 10 above (see instructions))	(iv) Is the organization listed in your governing document?		(v) Amount of monetary support (see instructions)	(vi) Amount of other support (see instructions)
			Yes	No		
Total						

Part II

Support Schedule for Organizations Described in Sections 170(b)(1)(A)(iv) and 170(b)(1)(A)(vi)
(Complete only if you checked the box on line 5, 7, or 8 of Part I or if the organization failed to qualify under Part III. If the organization failed to qualify under the tests listed below, please complete Part III.)

Section A. Public Support

Calendar year (or fiscal year beginning in) ►	(a) 2020	(b) 2021	(c) 2022	(d) 2023	(e) 2024	(f) Total
1 Gifts, grants, contributions, and membership fees received. (Do not include any "unusual grant.") . . .	37,223,707	42,320,335	54,494,126	63,529,507	69,956,417	267,524,092
2 Tax revenues levied for the organization's benefit and either paid to or expended on its behalf						
3 The value of services or facilities furnished by a governmental unit to the organization without charge..						
4 Total. Add lines 1 through 3	37,223,707	42,320,335	54,494,126	63,529,507	69,956,417	267,524,092
5 The portion of total contributions by each person (other than a governmental unit or publicly supported organization) included on line 1 that exceeds 2% of the amount shown on line 11, column (f) . . .						8,860,923
6 Public support. Subtract line 5 from line 4.						258,663,169

Section B. Total Support

Calendar year (or fiscal year beginning in) ►	(a) 2020	(b) 2021	(c) 2022	(d) 2023	(e) 2024	(f) Total
7 Amounts from line 4. . .	37,223,707	42,320,335	54,494,126	63,529,507	69,956,417	267,524,092
8 Gross income from interest, dividends, payments received on securities loans, rents, royalties and income from similar sources	665,333	1,266,630	1,364,220	1,034,471	965,950	5,296,604
9 Net income from unrelated business activities, whether or not the business is regularly carried on. . .						
10 Other income. Do not include gain or loss from the sale of capital assets (Explain in Part VI.). . .	17,323	72	55	17,040	5,239	39,729
11 Total support. Add lines 7 through 10						272,860,425

12 Gross receipts from related activities, etc. (see instructions)

121,365,492

13 First 5 years. If the Form 990 is for the organization's first, second, third, fourth, or fifth tax year as a section 501(c)(3) organization, check this box and **stop here**

☐

Section C. Computation of Public Support Percentage

14 Public support percentage for 2024 (line 6, column (f) divided by line 11, column (f))	14	94.800 %
15 Public support percentage for 2023 Schedule A, Part II, line 14	15	85.730 %

16a **33 1/3% support test—2024.** If the organization did not check the box on line 13, and line 14 is 33 1/3% or more, check this box and **stop here.** The organization qualifies as a publicly supported organization

☒

b **33 1/3% support test—2023.** If the organization did not check a box on line 13 or 16a, and line 15 is 33 1/3% or more, check this box and **stop here.** The organization qualifies as a publicly supported organization

☐

17a **10%-facts-and-circumstances test—2024.** If the organization did not check a box on line 13, 16a, or 16b, and line 14 is 10% or more, and if the organization meets the "facts-and-circumstances" test, check this box and **stop here.** Explain in Part VI how the organization meets the "facts-and-circumstances" test. The organization qualifies as a publicly supported organization

☐

b **10%-facts-and-circumstances test—2023.** If the organization did not check a box on line 13, 16a, 16b, or 17a, and line 15 is 10% or more, and if the organization meets the "facts-and-circumstances" test, check this box and **stop here.** Explain in Part VI how the organization meets the "facts-and-circumstances" test. The organization qualifies as a publicly supported organization

☐

18 **Private foundation.** If the organization did not check a box on line 13, 16a, 16b, 17a, or 17b, check this box and see instructions

☐

Part IIISupport Schedule for Organizations Described in Section 509(a)(2)
(Complete only if you checked the box on line 10 of Part I or if the organization failed to qualify under Part II. If the organization fails to qualify under the tests listed below, please complete Part II.)

Section A. Public Support						
Calendar year (or fiscal year beginning in) ▶	(a) 2020	(b) 2021	(c) 2022	(d) 2023	(e) 2024	(f) Total
1 Gifts, grants, contributions, and membership fees received. (Do not include any "unusual grants.") .						
2 Gross receipts from admissions, merchandise sold or services performed, or facilities furnished in any activity that is related to the organization's tax-exempt purpose						
3 Gross receipts from activities that are not an unrelated trade or business under section 513						
4 Tax revenues levied for the organization's benefit and either paid to or expended on its behalf						
5 The value of services or facilities furnished by a governmental unit to the organization without charge						
6 Total. Add lines 1 through 5						
7a Amounts included on lines 1, 2, and 3 received from disqualified persons						
b Amounts included on lines 2 and 3 received from other than disqualified persons that exceed the greater of \$5,000 or 1% of the amount on line 13 for the year.						
c Add lines 7a and 7b. .						
8 Public support. (Subtract line 7c from line 6.)						

Section B. Total Support						
Calendar year (or fiscal year beginning in) ▶	(a) 2020	(b) 2021	(c) 2022	(d) 2023	(e) 2024	(f) Total
9 Amounts from line 6. . .						
10a Gross income from interest, dividends, payments received on securities loans, rents, royalties and income from similar sources . .						
b Unrelated business taxable income (less section 511 taxes) from businesses acquired after June 30, 1975.						
c Add lines 10a and 10b.						
11 Net income from unrelated business activities not included on line 10b, whether or not the business is regularly carried on.						
12 Other income. Do not include gain or loss from the sale of capital assets (Explain in Part VI.) . .						
13 Total support. (Add lines 9, 10c, 11, and 12.) .						
14 First 5 years. If the Form 990 is for the organization's first, second, third, fourth, or fifth tax year as a section 501(c)(3) organization, check this box and stop here						☐

Section C. Computation of Public Support Percentage		
15 Public support percentage for 2024 (line 8, column (f) divided by line 13, column (f))	15	
16 Public support percentage from 2023 Schedule A, Part III, line 15	16	

Section D. Computation of Investment Income Percentage		
17 Investment income percentage for 2024 (line 10c, column (f) divided by line 13, column (f))	17	
18 Investment income percentage from 2023 Schedule A, Part III, line 17	18	
19a 33 1/3% support tests—2024. If the organization did not check the box on line 14, and line 15 is more than 33 1/3%, and line 17 is not more than 33 1/3%, check this box and stop here . The organization qualifies as a publicly supported organization		☐
b 33 1/3% support tests—2023. If the organization did not check a box on line 14 or line 19a, and line 16 is more than 33 1/3% and line 18 is not more than 33 1/3%, check this box and stop here . The organization qualifies as a publicly supported organization		☐
20 Private foundation. If the organization did not check a box on line 14, 19a, or 19b, check this box and see instructions		☐

Part IV Supporting Organizations

(Complete only if you checked a box on line 12 of Part I. If you checked box 12a, of Part I, complete Sections A and B. If you checked box 12b, of Part I, complete Sections A and C. If you checked box 12c, of Part I, complete Sections A, D, and E. If you checked box 12d, of Part I, complete Sections A and D, and complete Part V.)

Section A. All Supporting Organizations

		Yes	No
1	Are all of the organization's supported organizations listed by name in the organization's governing documents? <i>If "No," describe in Part VI how the supported organizations are designated. If designated by class or purpose, describe the designation. If historic and continuing relationship, explain.</i>		
2	Did the organization have any supported organization that does not have an IRS determination of status under section 509(a)(1) or (2)? <i>If "Yes," explain in Part VI how the organization determined that the supported organization was described in section 509(a)(1) or (2).</i>		
3a	Did the organization have a supported organization described in section 501(c)(4), (5), or (6)? <i>If "Yes," answer lines 3b and 3c below.</i>		
b	Did the organization confirm that each supported organization qualified under section 501(c)(4), (5), or (6) and satisfied the public support tests under section 509(a)(2)? <i>If "Yes," describe in Part VI when and how the organization made the determination.</i>		
c	Did the organization ensure that all support to such organizations was used exclusively for section 170(c)(2)(B) purposes? <i>If "Yes," explain in Part VI what controls the organization put in place to ensure such use.</i>		
4a	Was any supported organization not organized in the United States ("foreign supported organization")? <i>If "Yes" and if you checked box 12a or 12b in Part I, answer lines 4b and 4c below.</i>		
b	Did the organization have ultimate control and discretion in deciding whether to make grants to the foreign supported organization? <i>If "Yes," describe in Part VI how the organization had such control and discretion despite being controlled or supervised by or in connection with its supported organizations.</i>		
c	Did the organization support any foreign supported organization that does not have an IRS determination under sections 501(c)(3) and 509(a)(1) or (2)? <i>If "Yes," explain in Part VI what controls the organization used to ensure that all support to the foreign supported organization was used exclusively for section 170(c)(2)(B) purposes.</i>		
5a	Did the organization add, substitute, or remove any supported organizations during the tax year? <i>If "Yes," answer lines 5b and 5c below (if applicable). Also, provide detail in Part VI, including (i) the names and EIN numbers of the supported organizations added, substituted, or removed; (ii) the reasons for each such action; (iii) the authority under the organization's organizing document authorizing such action; and (iv) how the action was accomplished (such as by amendment to the organizing document).</i>		
b	Type I or Type II only. Was any added or substituted supported organization part of a class already designated in the organization's organizing document?		
c	Substitutions only. Was the substitution the result of an event beyond the organization's control?		
6	Did the organization provide support (whether in the form of grants or the provision of services or facilities) to anyone other than (i) its supported organizations, (ii) individuals that are part of the charitable class benefited by one or more of its supported organizations, or (iii) other supporting organizations that also support or benefit one or more of the filing organization's supported organizations? <i>If "Yes," provide detail in Part VI.</i>		
7	Did the organization provide a grant, loan, compensation, or other similar payment to a substantial contributor (defined in section 4958(c)(3)(C)), a family member of a substantial contributor, or a 35% controlled entity with regard to a substantial contributor? <i>If "Yes," complete Part I of Schedule L (Form 990) .</i>		
8	Did the organization make a loan to a disqualified person (as defined in section 4958) not described on line 7? <i>If "Yes," complete Part I of Schedule L (Form 990).</i>		
9a	Was the organization controlled directly or indirectly at any time during the tax year by one or more disqualified persons, as defined in section 4946 (other than foundation managers and organizations described in section 509(a)(1) or (2))? <i>If "Yes," provide detail in Part VI.</i>		
b	Did one or more disqualified persons (as defined on line 9a) hold a controlling interest in any entity in which the supporting organization had an interest? <i>If "Yes," provide detail in Part VI.</i>		
c	Did a disqualified person (as defined on line 9a) have an ownership interest in, or derive any personal benefit from, assets in which the supporting organization also had an interest? <i>If "Yes," provide detail in Part VI.</i>		
10a	Was the organization subject to the excess business holdings rules of section 4943 because of section 4943(f) (regarding certain Type II supporting organizations, and all Type III non-functionally integrated supporting organizations)? <i>If "Yes," answer line 10b below.</i>		
b	Did the organization have any excess business holdings in the tax year? <i>(Use Schedule C, Form 4720, to determine whether the organization had excess business holdings).</i>		

Part IV Supporting Organizations (continued)

		Yes	No
11	Has the organization accepted a gift or contribution from any of the following persons?		
a	A person who directly or indirectly controls, either alone or together with persons described on lines 11b and 11c below, the governing body of a supported organization?		
b	A family member of a person described on 11a above?		
c	A 35% controlled entity of a person described on line 11a or 11b above? <i>If "Yes" to 11a, 11b, or 11c, provide detail in Part VI.</i>		

Section B. Type I Supporting Organizations

		Yes	No
1	Did the officers, directors, trustees, or membership of one or more supported organizations have the power to regularly appoint or elect at least a majority of the organization's directors or trustees at all times during the tax year? <i>If "No," describe in Part VI how the supported organization(s) effectively operated, supervised, or controlled the organization's activities. If the organization had more than one supported organization, describe how the powers to appoint and/or remove directors or trustees were allocated among the supported organizations and what conditions or restrictions, if any, applied to such powers during the tax year.</i>		
2	Did the organization operate for the benefit of any supported organization other than the supported organization(s) that operated, supervised, or controlled the supporting organization? <i>If "Yes," explain in Part VI how providing such benefit carried out the purposes of the supported organization(s) that operated, supervised or controlled the supporting organization.</i>		

Section C. Type II Supporting Organizations

		Yes	No
1	Were a majority of the organization's directors or trustees during the tax year also a majority of the directors or trustees of each of the organization's supported organization(s)? <i>If "No," describe in Part VI how control or management of the supporting organization was vested in the same persons that controlled or managed the supported organization(s).</i>		

Section D. All Type III Supporting Organizations

		Yes	No
1	Did the organization provide to each of its supported organizations, by the last day of the fifth month of the organization's tax year, (i) a written notice describing the type and amount of support provided during the prior tax year, (ii) a copy of the Form 990 that was most recently filed as of the date of notification, and (iii) copies of the organization's governing documents in effect on the date of notification, to the extent not previously provided?		
2	Were any of the organization's officers, directors, or trustees either (i) appointed or elected by the supported organization(s) or (ii) serving on the governing body of a supported organization? <i>If "No," explain in Part VI how the organization maintained a close and continuous working relationship with the supported organization(s).</i>		
3	By reason of the relationship described in line 2 above, did the organization's supported organizations have a significant voice in the organization's investment policies and in directing the use of the organization's income or assets at all times during the tax year? <i>If "Yes," describe in Part VI the role the organization's supported organizations played in this regard.</i>		

Section E. Type III Functionally-Integrated Supporting Organizations

1	Check the box next to the method that the organization used to satisfy the Integral Part Test during the year (see instructions):		
a	☐ The organization satisfied the Activities Test. Complete line 2 below.		
b	☐ The organization is the parent of each of its supported organizations. Complete line 3 below.		
c	☐ The organization supported a governmental entity. Describe in Part VI how you supported a government entity (see instructions)		
2	Activities Test. Answer lines 2a and 2b below.		
a	Did substantially all of the organization's activities during the tax year directly further the exempt purposes of the supported organization(s) to which the organization was responsive? <i>If "Yes," then in Part VI identify those supported organizations and explain how these activities directly furthered their exempt purposes, how the organization was responsive to those supported organizations, and how the organization determined that these activities constituted substantially all of its activities.</i>	Yes	No
b	Did the activities described on line 2a, above constitute activities that, but for the organization's involvement, one or more of the organization's supported organization(s) would have been engaged in? <i>If "Yes," explain in Part VI the reasons for the organization's position that its supported organization(s) would have engaged in these activities but for the organization's involvement.</i>		
3	Parent of Supported Organizations. Answer lines 3a and 3b below.		
a	Did the organization have the power to regularly appoint or elect a majority of the officers, directors, or trustees of each of the supported organizations? <i>If "Yes" or "No", provide details in Part VI.</i>	Yes	No
b	Did the organization exercise a substantial degree of direction over the policies, programs and activities of each of its supported organizations? <i>If "Yes," describe in Part VI. the role played by the organization in this regard.</i>		

Part V

Type III Non-Functionally Integrated 509(a)(3) Supporting Organizations

1

☐

Check here if the organization satisfied the Integral Part Test as a qualifying trust on Nov. 20, 1970 (*explain in **Part VI***). See instructions. All other Type III non-functionally integrated supporting organizations must complete Sections A through E.

Section A - Adjusted Net Income		(A) Prior Year	(B) Current Year (optional)
1	Net short-term capital gain	1	
2	Recoveries of prior-year distributions	2	
3	Other gross income (see instructions)	3	
4	Add lines 1 through 3	4	
5	Depreciation and depletion	5	
6	Portion of operating expenses paid or incurred for production or collection of gross income or for management, conservation, or maintenance of property held for production of income (see instructions)	6	
7	Other expenses (see instructions)	7	
8	Adjusted Net Income (subtract lines 5, 6 and 7 from line 4)	8	

Section B - Minimum Asset Amount		(A) Prior Year	(B) Current Year (optional)
1	Aggregate fair market value of all non-exempt-use assets (see instructions for short tax year or assets held for part of year):	1	
a	Average monthly value of securities	1a	
b	Average monthly cash balances	1b	
c	Fair market value of other non-exempt-use assets	1c	
d	Total (add lines 1a, 1b, and 1c)	1d	
e	Discount claimed for blockage or other factors (<i>explain in detail in Part VI</i>):		
2	Acquisition indebtedness applicable to non-exempt use assets	2	
3	Subtract line 2 from line 1d	3	
4	Cash deemed held for exempt use. Enter 0.015 of line 3 (for greater amount, see instructions).	4	
5	Net value of non-exempt-use assets (subtract line 4 from line 3)	5	
6	Multiply line 5 by 0.035	6	
7	Recoveries of prior-year distributions	7	
8	Minimum Asset Amount (add line 7 to line 6)	8	

Section C - Distributable Amount			Current Year
1	Adjusted net income for prior year (from Section A, line 8, Column A)	1	
2	Enter 85% of line 1	2	
3	Minimum asset amount for prior year (from Section B, line 8, Column A)	3	
4	Enter greater of line 2 or line 3	4	
5	Income tax imposed in prior year	5	
6	Distributable Amount. Subtract line 5 from line 4, unless subject to emergency temporary reduction (see instructions)	6	

7

☐

Check here if the current year is the organization's first as a non-functionally-integrated Type III supporting organization (see instructions)

Part V Type III Non-Functionally Integrated 509(a)(3) Supporting Organizations (continued)		
Section D Distributions		Current Year
1	Amounts paid to supported organizations to accomplish exempt purposes	1
2	Amounts paid to perform activity that directly furthers exempt purposes of supported organizations, in excess of income from activity	2
3	Administrative expenses paid to accomplish exempt purposes of supported organizations	3
4	Amounts paid to acquire exempt-use assets	4
5	Qualified set-aside amounts (prior IRS approval required - provide details in Part VI)	5
6	Other distributions (describe in Part VI). See instructions	6
7	Total annual distributions. Add lines 1 through 6.	7
8	Distributions to attentive supported organizations to which the organization is responsive (provide details in Part VI). See instructions	8
9	Distributable amount for 2024 from Section C, line 6	9
10	Line 8 amount divided by Line 9 amount	10

Section E - Distribution Allocations (see instructions)	(i) Excess Distributions	(ii) Underdistributions Pre-2024	(iii) Distributable Amount for 2024
1	Distributable amount for 2024 from Section C, line 6		
2	Underdistributions, if any, for years prior to 2024 (reasonable cause required-- explain in Part VI). See instructions.		
3	Excess distributions carryover, if any, to 2024:		
a	From 2019.		
b	From 2020.		
c	From 2021.		
d	From 2022.		
e	From 2023.		
f	Total of lines 3a through e		
g	Applied to underdistributions of prior years		
h	Applied to 2024 distributable amount		
i	Carryover from 2019 not applied (see instructions)		
j	Remainder. Subtract lines 3g, 3h, and 3i from line 3f.		
4	Distributions for 2024 from Section D, line 7: \$		
a	Applied to underdistributions of prior years		
b	Applied to 2024 distributable amount		
c	Remainder. Subtract lines 4a and 4b from line 4.		
5	Remaining underdistributions for years prior to 2024, if any. Subtract lines 3g and 4a from line 2. If the amount is greater than zero, explain in Part VI . See instructions.		
6	Remaining underdistributions for 2024. Subtract lines 3h and 4b from line 1. If the amount is greater than zero, explain in Part VI. See instructions.		
7	Excess distributions carryover to 2025. Add lines 3j and 4c.		
8	Breakdown of line 7:		
a	Excess from 2020.		
b	Excess from 2021.		
c	Excess from 2022.		
d	Excess from 2023.		
e	Excess from 2024.		

Part VI **Supplemental Information.** Provide the explanations required by Part II, line 10; Part II, line 17a or 17b; Part III, line 12; Part IV, Section A, lines 1, 2, 3b, 3c, 4b, 4c, 5a, 6, 9a, 9b, 9c, 11a, 11b, and 11c; Part IV, Section B, lines 1 and 2; Part IV, Section C, line 1; Part IV, Section D, lines 2 and 3; Part IV, Section E, lines 1c, 2a, 2b, 3a and 3b; Part V, line 1; Part V, Section B, line 1e; Part V Section D, lines 5, 6, and 8; and Part V, Section E, lines 2, 5, and 6. Also complete this part for any additional information. (See instructions).

Facts And Circumstances Test	
Return Reference	Explanation
SCHEDULE A, PART II, LINE 10, EXPLANATION OF OTHER INCOME:	MISCELLANEOUS REVENUE - 2020 AMOUNT: \$ 17,323. 2021 AMOUNT: \$ 72. 2022 AMOUNT: \$ 55. 2023 AMOUNT: \$ 17,040. 2024 AMOUNT: \$ 5,239.

Additional Data

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Schedule B (Form 990) (Rev. January 2025) Department of the Treasury Internal Revenue Service	Schedule of Contributors ▶ Attach to Form 990, 990-EZ, or 990-PF. ▶ Go to www.irs.gov/Form990 for the latest information.	OMB No. 1545-0047
Name of the organization ATLANTIC COUNCIL OF THE UNITED STATES INC		Employer identification number 52-0742294

Organization type (check one):

Filers of:	Section:
Form 990 or 990-EZ	☐ 501(c)() (enter number) organization
	☐ 4947(a)(1) nonexempt charitable trust not treated as a private foundation
	☐ 527 political organization
Form 990-PF	☐ 501(c)(3) exempt private foundation
	☐ 4947(a)(1) nonexempt charitable trust treated as a private foundation
	☐ 501(c)(3) taxable private foundation

Check if your organization is covered by the **General Rule** or a **Special Rule**.
Note: Only a section 501(c)(7), (8), or (10) organization can check boxes for both the General Rule and a Special Rule. See instructions.

General Rule

☐ For an organization filing Form 990, 990-EZ, or 990-PF that received, during the year, contributions totaling \$5,000 or more (in money or other property) from any one contributor. Complete Parts I and II. See instructions for determining a contributor's total contributions.

Special Rules

☐ For an organization described in section 501(c)(3) filing Form 990 or 990-EZ that met the 33¹/₃% support test of the regulations under sections 509(a)(1) and 170(b)(1)(A)(vi), that checked Schedule A (Form 990 or 990-EZ), Part II, line 13, 16a, or 16b, and that received from any one contributor, during the year, total contributions of the greater of (1) \$5,000 or (2) 2% of the amount on (i) Form 990, Part VIII, line 1h, or (ii) Form 990-EZ, line 1. Complete Parts I and II.

☐ For an organization described in section 501(c)(7), (8), or (10) filing Form 990 or 990-EZ that received from any one contributor, during the year, total contributions of more than \$1,000 *exclusively* for religious, charitable, scientific, literary, or educational purposes, or for the prevention of cruelty to children or animals. Complete Parts I, II, and III.

☐ For an organization described in section 501(c)(7), (8), or (10) filing Form 990 or 990-EZ that received from any one contributor, during the year, contributions *exclusively* for religious, charitable, etc., purposes, but no such contributions totaled more than \$1,000. If this box is checked, enter here the total contributions that were received during the year for an *exclusively* religious, charitable, etc., purpose. Don't complete any of the parts unless the **General Rule** applies to this organization because it received *nonexclusively* religious, charitable, etc., contributions totaling \$5,000 or more during the year ▶ \$ _____

Caution: An organization that isn't covered by the General Rule and/or the Special Rules doesn't file Schedule B (Form 990, 990-EZ, or 990-PF), but it **must** answer "No" on Part IV, line 2, of its Form 990; or check the box on line H of its Form 990-EZ or on its Form 990PF, Part I, line 2, to certify that it doesn't meet the filing requirements of Schedule B (Form 990, 990-EZ, or 990-PF).

Name of organization ATLANTIC COUNCIL OF THE UNITED STATES INC	Employer identification number 52-0742294
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Part I

Contributors (see instructions). Use duplicate copies of Part I if additional space is needed.

(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
RESTRICTED		\$ RESTRICTED	☐ Person
			☐ Payroll
			☐ Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
-		\$	☐ Person
			☐ Payroll
			☐ Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
-		\$	☐ Person
			☐ Payroll
			☐ Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
-		\$	☐ Person
			☐ Payroll
			☐ Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
-		\$	☐ Person
			☐ Payroll
			☐ Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
-		\$	☐ Person
			☐ Payroll
			☐ Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
-		\$	☐ Person
			☐ Payroll
			☐ Noncash (Complete Part II for noncash contributions.)

Name of organization
ATLANTIC COUNCIL OF THE UNITED STATES
INC

Employer identification number
52-0742294

Part II **Noncash Property** (see instructions). Use duplicate copies of Part II if additional space is needed.

(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions)	(d) Date received
-		\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions)	(d) Date received
-		\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions)	(d) Date received
-		\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions)	(d) Date received
-		\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions)	(d) Date received
-		\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions)	(d) Date received
-		\$	

Name of organization ATLANTIC COUNCIL OF THE UNITED STATES INC	Employer identification number 52-0742294
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Part III

Exclusively religious, charitable, etc., contributions to organizations described in section 501(c) (7), (8), or (10) that total more than \$1,000 for the year from any one contributor. Complete columns (a) through (e) and the following line entry. For organizations completing Part III, enter the total of exclusively religious, charitable, etc., contributions of \$1,000 or less for the year. (Enter this information once. See instructions.) \$

Use duplicate copies of Part III if additional space is needed.

(a) No. from Part I	(b) Purpose of gift	(c) Use of gift	(d) Description of how gift is held
	(e) Transfer of gift		
	Transferee's name, address, and ZIP 4	Relationship of transferor to transferee	
	(e) Transfer of gift		
	Transferee's name, address, and ZIP 4	Relationship of transferor to transferee	
	(e) Transfer of gift		
	Transferee's name, address, and ZIP 4	Relationship of transferor to transferee	
	(e) Transfer of gift		
	Transferee's name, address, and ZIP 4	Relationship of transferor to transferee	

Additional Data

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Name of the organization ATLANTIC COUNCIL OF THE UNITED STATES INC	Employer identification number 52-0742294
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Part I Organizations Maintaining Donor Advised Funds or Other Similar Funds or Accounts.
Complete if the organization answered "Yes" on Form 990, Part IV, line 6.

	(a) Donor advised funds	(b) Funds and other accounts
1 Total number at end of year		
2 Aggregate value of contributions to (during year)		
3 Aggregate value of grants from (during year)		
4 Aggregate value at end of year		
5 Did the organization inform all donors and donor advisors in writing that the assets held in donor advised funds are the organization's property, subject to the organization's exclusive legal control? ☐ Yes ☐ No		
6 Did the organization inform all grantees, donors, and donor advisors in writing that grant funds can be used only for charitable purposes and not for the benefit of the donor or donor advisor, or for any other purpose conferring impermissible private benefit? ☐ Yes ☐ No		

Part II Conservation Easements.
Complete if the organization answered "Yes" on Form 990, Part IV, line 7.

1 Purpose(s) of conservation easements held by the organization (check all that apply). ☐ Preservation of land for public use (e.g., recreation or education) ☐ Preservation of an historically important land area ☐ Protection of natural habitat ☐ Preservation of a certified historic structure ☐ Preservation of open space											
2 Complete lines 2a through 2d if the organization held a qualified conservation contribution in the form of a conservation easement on the last day of the tax year.	<table><tr><td></td><td>Held at the End of the Year</td></tr><tr><td>a Total number of conservation easements</td><td>2a</td></tr><tr><td>b Total acreage restricted by conservation easements</td><td>2b</td></tr><tr><td>c Number of conservation easements on a certified historic structure included in (a)</td><td>2c</td></tr><tr><td>d Number of conservation easements included in (c) acquired after July 25, 2006, and not on a historic structure listed in the National Register</td><td>2d</td></tr></table>		Held at the End of the Year	a Total number of conservation easements	2a	b Total acreage restricted by conservation easements	2b	c Number of conservation easements on a certified historic structure included in (a)	2c	d Number of conservation easements included in (c) acquired after July 25, 2006, and not on a historic structure listed in the National Register	2d
	Held at the End of the Year										
a Total number of conservation easements	2a										
b Total acreage restricted by conservation easements	2b										
c Number of conservation easements on a certified historic structure included in (a)	2c										
d Number of conservation easements included in (c) acquired after July 25, 2006, and not on a historic structure listed in the National Register	2d										
3 Number of conservation easements modified, transferred, released, extinguished, or terminated by the organization during the tax year ▶ _____											
4 Number of states where property subject to conservation easement is located ▶ _____											
5 Does the organization have a written policy regarding the periodic monitoring, inspection, handling of violations, and enforcement of the conservation easements it holds? ☐ Yes ☐ No											
6 Staff and volunteer hours devoted to monitoring, inspecting, handling of violations, and enforcing conservation easements during the year ▶ _____											
7 Amount of expenses incurred in monitoring, inspecting, handling of violations, and enforcing conservation easements during the year ▶ \$ _____											
8 Does each conservation easement reported on line 2(d) above satisfy the requirements of section 170(h)(4)(B)(i) and section 170(h)(4)(B)(ii)? ☐ Yes ☐ No											
9 In Part XIII, describe how the organization reports conservation easements in its revenue and expense statement, and balance sheet, and include, if applicable, the text of the footnote to the organization's financial statements that describes the organization's accounting for conservation easements.											

Part III Organizations Maintaining Collections of Art, Historical Treasures, or Other Similar Assets.
Complete if the organization answered "Yes" on Form 990, Part IV, line 8.

1a If the organization elected, as permitted under FASB ASC 958, not to report in its revenue statement and balance sheet works of art, historical treasures, or other similar assets held for public exhibition, education, or research in furtherance of public service, provide, in Part XIII, the text of the footnote to its financial statements that describes these items.	
b If the organization elected, as permitted under FASB ASC 958, to report in its revenue statement and balance sheet works of art, historical treasures, or other similar assets held for public exhibition, education, or research in furtherance of public service, provide the following amounts relating to these items: (i) Revenue included on Form 990, Part VIII, line 1 ▶ \$ _____ (ii) Assets included in Form 990, Part X ▶ \$ _____	
2 If the organization received or held works of art, historical treasures, or other similar assets for financial gain, provide the following amounts required to be reported under FASB ASC 958 relating to these items: a Revenue included on Form 990, Part VIII, line 1 ▶ \$ _____ b Assets included in Form 990, Part X ▶ \$ _____	

Part III

Organizations Maintaining Collections of Art, Historical Treasures, or Other Similar Assets (continued)

- 3
- Using the organization's acquisition, accession, and other records, check any of the following that are a significant use of its collection items (check all that apply):
- a

☐ Public exhibition
- d

☐ Loan or exchange programs
- b

☐ Scholarly research
- e

☐ Other
- c

☐ Preservation for future generations
- 4
- Provide a description of the organization's collections and explain how they further the organization's exempt purpose in Part XIII.
- 5
- During the year, did the organization solicit or receive donations of art, historical treasures or other similar assets to be sold to raise funds rather than to be maintained as part of the organization's collection? . . .
- ☐ Yes

☐ No

Part IV

Escrow and Custodial Arrangements.

Complete if the organization answered "Yes" on Form 990, Part IV, line 9, or reported an amount on Form 990, Part X, line 21.

- 1a
- Is the organization an agent, trustee, custodian or other intermediary for contributions or other assets not included on Form 990, Part X?
- ☐ Yes

☒ No
- b
- If "Yes," explain the arrangement in Part XIII and complete the following table:
- | | Amount |
|----|--------|
| 1c | 0 |
| 1d | |
| 1e | |
| 1f | 0 |
- c
- Beginning balance
- d
- Additions during the year
- e
- Distributions during the year
- f
- Ending balance
- 2a
- Did the organization include an amount on Form 990, Part X, line 21, for escrow or custodial account liability? ☒ Yes ☐ No
- b
- If "Yes," explain the arrangement in Part XIII. Check here if the explanation has been provided in Part XIII ☒

Part V

Endowment Funds.

Complete if the organization answered "Yes" on Form 990, Part IV, line 10.

- | | (a) Current year | (b) Prior year | (c) Two years back | (d) Three years back | (e) Four years back | |
|----|--|----------------|--------------------|----------------------|---------------------|-----------|
| 1a | Beginning of year balance | 1,260,715 | 1,085,627 | 1,379,896 | 1,206,564 | 1,295,659 |
| b | Contributions | | | | | |
| c | Net investment earnings, gains, and losses | 153,354 | 175,088 | -194,269 | 173,332 | 168,113 |
| d | Grants or scholarships | | | | | |
| e | Other expenditures for facilities and programs | 396,105 | | 100,000 | | 257,208 |
| f | Administrative expenses | | | | | |
| g | End of year balance | 1,017,964 | 1,260,715 | 1,085,627 | 1,379,896 | 1,206,564 |
- 2
- Provide the estimated percentage of the current year end balance (line 1g, column (a)) held as:
- a
- Board designated or quasi-endowment ▶ 100.000 %
- b
- Permanent endowment ▶ 0 %
- c
- Term endowment ▶ 0 %
- The percentages on lines 2a, 2b, and 2c should equal 100%.
- 3a
- Are there endowment funds not in the possession of the organization that are held and administered for the organization by:
- (i) Unrelated organizations

(ii) Related organizations
- b
- If "Yes" on 3a(ii), are the related organizations listed as required on Schedule R?
- | | Yes | No |
|--------|-----|----|
| 3a(i) | | No |
| 3a(ii) | | No |
| 3b | | |
- 4
- Describe in Part XIII the intended uses of the organization's endowment funds.

Part VI

Land, Buildings, and Equipment.

Complete if the organization answered "Yes" on Form 990, Part IV, line 11a. See Form 990, Part X, line 10.

- | Description of property | (a) Cost or other basis (investment) | (b) Cost or other basis (other) | (c) Accumulated depreciation | (d) Book value |
|-------------------------|--|---------------------------------|------------------------------|----------------|
| 1a | Land | | | |
| b | Buildings | | | |
| c | Leasehold improvements | 23,359,038 | 220,342 | 23,138,696 |
| d | Equipment | 5,807,022 | 630,497 | 5,176,525 |
| e | Other | 379,830 | 379,830 | 0 |
| Total. | Add lines 1a through 1e. (Column (d) must equal Form 990, Part X, column (B), line 10(c).) . . . ▶ | | | 28,315,221 |

Part VII

Investments - Other Securities.
Complete if the organization answered "Yes" on Form 990, Part IV, line 11b. See Form 990, Part X, line 12.

(a) Description of security or category (including name of security)	(b) Book value	(c) Method of valuation: Cost or end-of-year market value
(1) Financial derivatives		
(2) Closely-held equity interests		
(3) Other _____		
(A)		
(B)		
(C)		
(D)		
(E)		
(F)		
(G)		
(H)		
Total. (Column (b) must equal Form 990, Part X, col. (B) line 12.)		

Part VIII

Investments - Program Related.
Complete if the organization answered 'Yes' on Form 990, Part IV, line 11c. See Form 990, Part X, line 13.

Part IX

Other Assets.
Complete if the organization answered 'Yes' on Form 990, Part IV, line 11d. See Form 990, Part X, line 15.

Part X

Other Liabilities.
Complete if the organization answered 'Yes' on Form 990, Part IV, line 11e or 11f. See Form 990, Part X, line 25.

2. Liability for uncertain tax positions. In Part XIII, provide the text of the footnote to the organization's financial statements that reports the organization's liability for uncertain tax positions under FIN 48 (ASC 740). Check here if the text of the footnote has been provided in Part XIII ☒

Part XI

Reconciliation of Revenue per Audited Financial Statements With Revenue per Return.

Complete if the organization answered 'Yes' on Form 990, Part IV, line 12a.

1	Total revenue, gains, and other support per audited financial statements		1	77,602,359
2	Amounts included on line 1 but not on Form 990, Part VIII, line 12:			
a	Net unrealized gains (losses) on investments	2a	4,862,708	
b	Donated services and use of facilities	2b	1,095,704	
c	Recoveries of prior year grants	2c		
d	Other (Describe in Part XIII.)	2d	1,876,504	
e	Add lines 2a through 2d	2e		7,834,916
3	Subtract line 2e from line 1	3		69,767,443
4	Amounts included on Form 990, Part VIII, line 12, but not on line 1:			
a	Investment expenses not included on Form 990, Part VIII, line 7b	4a	134,190	
b	Other (Describe in Part XIII.)	4b		
c	Add lines 4a and 4b	4c		134,190
5	Total revenue. Add lines 3 and 4c. (This must equal Form 990, Part I, line 12.)	5		69,901,633

Part XII

Reconciliation of Expenses per Audited Financial Statements With Expenses per Return.

Complete if the organization answered 'Yes' on Form 990, Part IV, line 12a.

1	Total expenses and losses per audited financial statements		1	72,606,508
2	Amounts included on line 1 but not on Form 990, Part IX, line 25:			
a	Donated services and use of facilities	2a	1,095,704	
b	Prior year adjustments	2b	-77,321	
c	Other losses	2c		
d	Other (Describe in Part XIII.)	2d	3,282,932	
e	Add lines 2a through 2d	2e		4,301,315
3	Subtract line 2e from line 1	3		68,305,193
4	Amounts included on Form 990, Part IX, line 25, but not on line 1:			
a	Investment expenses not included on Form 990, Part VIII, line 7b	4a	134,190	
b	Other (Describe in Part XIII.)	4b		
c	Add lines 4a and 4b	4c		134,190
5	Total expenses. Add lines 3 and 4c. (This must equal Form 990, Part I, line 18.)	5		68,439,383

Part XIII

Supplemental Information

Provide the descriptions required for Part II, lines 3, 5, and 9; Part III, lines 1a and 4; Part IV, lines 1b and 2b; Part V, line 4; Part X, line 2; Part XI, lines 2d and 4b; and Part XII, lines 2d and 4b. Also complete this part to provide any additional information.

Return Reference	Explanation
PART IV, LINE 1B:	THE COUNCIL ACTS AS AN AGENT FOR CERTAIN GRANTS AND AWARDS. THE COUNCIL DOES NOT HAVE VARIANCE POWER OVER THE FUNDS. ACCORDINGLY, THESE FUNDS ARE RECORDED AS LIABILITIES UNTIL DISBURSED. AT DECEMBER 31, 2024 AND 2023, \$0 AND \$32,177, RESPECTIVELY, WERE RECORDED AS PASS-THROUGH LIABILITIES WITHIN THE STATEMENTS OF FINANCIAL POSITION.
PART IV, LINE 2B:	THE COUNCIL ACTS AS AN AGENT FOR CERTAIN GRANTS AND AWARDS. THE COUNCIL DOES NOT HAVE VARIANCE POWER OVER THE FUNDS. ACCORDINGLY, THESE FUNDS ARE RECORDED AS LIABILITIES UNTIL DISBURSED. AT DECEMBER 31, 2024 AND 2023, \$0 AND \$32,177, RESPECTIVELY, WERE RECORDED AS PASS-THROUGH LIABILITIES WITHIN THE STATEMENTS OF FINANCIAL POSITION.
PART V, LINE 4:	NET ASSETS WITHOUT DONOR RESTRICTIONS CONSIST OF UNDESIGNATED NET ASSETS, BOARD-DESIGNATED NET ASSETS, AND THE ATLANTIC COUNCIL FUND. THE ATLANTIC COUNCIL FUND IS A RESERVE FUND USED FOR SUPPLEMENTING OPERATIONS AND PROVIDING INITIAL FUNDING FOR NEW PROGRAMS, CENTERS, AND PROJECTS.
PART X, LINE 2:	THE COUNCIL IS EXEMPT FROM FEDERAL INCOME TAXES UNDER SECTION 501(C)(3) OF THE INTERNAL REVENUE CODE AND IS ONLY SUBJECT TO TAX ON UNRELATED BUSINESS INCOME. THE ORGANIZATION IS NOT A PRIVATE FOUNDATION. FOR THE YEAR ENDED DECEMBER 31, 2024, THE COUNCIL HAS DOCUMENTED ITS CONSIDERATION OF FINANCIAL ACCOUNTING STANDARDS BOARD (FASB) ACCOUNTING STANDARDS CODIFICATION (ASC) 740-10, INCOME TAXES, THAT PROVIDES GUIDANCE FOR REPORTING UNCERTAINTY IN INCOME TAXES AND HAS DETERMINED THAT NO MATERIAL UNCERTAIN TAX POSITIONS QUALIFY FOR EITHER RECOGNITION OR DISCLOSURE IN THE FINANCIAL STATEMENTS.
PART XI, LINE 2D - OTHER ADJUSTMENTS:	SPECIAL EVENTS EXPENSES 1,920,294. FOREIGN CURRENCY LOSS -43,790.
PART XII, LINE 2D - OTHER ADJUSTMENTS:	SPECIAL EVENTS EXPENSES 1,920,294. UNCOLLECTABLE PLEDGES 1,362,638.

Additional Data

[Return to Form](#)

Software ID:

Software Version:

Name of the organization
ATLANTIC COUNCIL OF THE UNITED STATES
INC

Employer identification number
52-0742294

Part I

General Information on Activities Outside the United States. Complete if the organization answered "Yes" on Form 990, Part IV, line 14b.

- 1

For grantmakers. Does the organization maintain records to substantiate the amount of its grants or assistance, the grantees’ eligibility for the grants or assistance, and the selection criteria used to award the grants or assistance?

Yes

No
- 2

For grantmakers. Describe in Part V the organization’s procedures for monitoring the use of its grants and other assistance outside the United States.

3

Activites per Region. (The following Part I, line 3 table can be duplicated if additional space is needed.)

(a) Region	(b) Number of offices in the region	(c) Number of employees, agents, and independent contractors in the region	(d) Activities conducted in region (by type) (such as, fundraising, program services, investments, grants to recipients located in the region)	(e) If activity listed in (d) is a program service, describe specific type of service(s) in the region	(f) Total expenditures for and investments in the region
(1) EUROPE	2	13	PROGRAM SERVICES	ATLANTIC COUNCIL IN TURKEY, STOCKHOLM OFFICE, CYBER 9/12, DIGITAL FORENSIC RESEARCH AND TRAINING	4,107,414
(2) MIDDLE EAST AND NORTH AFRICA	0	2	PROGRAM SERVICES	GLOBAL ENERGY FORUM, DIGITAL FORENSIC RESEARCH AND TRAINING	908,098
(3) EAST ASIA AND THE PACIFIC	0	0	PROGRAM SERVICES	DIGITAL FORENSIC RESEARCH LAB	171,122
(4) RUSSIA AND NEIGHBORING STATES	0	0	PROGRAM SERVICES	DIGITAL FORENSIC RESEARCH AND TRAINING	394,273
(5) SOUTH AMERICA	0	0	PROGRAM SERVICES	DIGITAL FORENSIC RESEARCH AND TRAINING	78,781
(6) SUB-SAHARAN AFRICA	0	0	PROGRAM SERVICES	DIGITAL FORENSIC RESEARCH AND TRAINING	1,176
(7) EUROPE	0	0	GRANTS TO RECIPIENTS LOCATED IN THE REGION		205,369
(8) EUROPE	0	0	GRANTS TO RECIPIENTS LOCATED IN THE REGION		61,153
(9) EUROPE	0	0	GRANTS TO RECIPIENTS LOCATED IN THE REGION		30,300
(10) SOUTH AMERICA	0	0	GRANTS TO RECIPIENTS LOCATED IN THE REGION		26,620
(11) SOUTH ASIA	0	0	GRANTS TO RECIPIENTS LOCATED IN THE REGION		15,000
(12) EUROPE	0	0	GRANTS TO RECIPIENTS LOCATED IN THE REGION		10,000
(13) EUROPE	0	0	GRANTS TO RECIPIENTS LOCATED IN THE REGION		10,000
(14)					
(15)					
(16)					
(17)					
3a Sub-total	2	15			5,927,386
b Total from continuation sheets to Part I	0	0			91,920
c Totals (add lines 3a and 3b)	2	15			6,019,306

Part II

Grants and Other Assistance to Organizations or Entities Outside the United States. Complete if the organization answered "Yes" on Form 990, Part IV, line 15, for any recipient who received more than \$5,000. Part II can be duplicated if additional space is needed.

1	(a) Name of organization	(b) IRS code section and EIN (if applicable)	(c) Region	(d) Purpose of grant	(e) Amount of cash grant	(f) Manner of cash disbursement	(g) Amount of noncash assistance	(h) Description of noncash assistance	(i) Method of valuation (book, FMV, appraisal, other)
(1)			EUROPE	SUPPORTING WORK ON TRANSATLANTIC AND GLOBAL DEVELOPMENT	205,369	WIRE TRANSFER	0	N/A	N/A
(2)			EUROPE	SUPPORTING WORK ON CLIMATE CHANGE, MIGRATION, AND SECURITY.	61,153	WIRE TRANSFER	0	N/A	N/A
(3)			EUROPE	SUPPORTING WORK ON CLIMATE CHANGE, MIGRATION, AND SECURITY.	30,300	WIRE TRANSFER	0	N/A	N/A
(4)			SOUTH AMERICA	SUPPORTING WORK ON CLIMATE CHANGE, MIGRATION, AND SECURITY.	26,620	WIRE TRANSFER	0	N/A	N/A
(5)			SOUTH ASIA	SUPPORTING WORK ON CLIMATE CHANGE, MIGRATION, AND SECURITY.	15,000	WIRE TRANSFER	0	N/A	N/A
(6)			EUROPE	SUPPORTING WORK ON DIGITAL FORENSIC RESEARCH AND TRAINING	10,000	WIRE TRANSFER	0	N/A	N/A
(7)			EUROPE	SUPPORTING WORK ON DIGITAL FORENSIC RESEARCH AND TRAINING	10,000	WIRE TRANSFER	0	N/A	N/A
(8)									
(9)									
(10)									
(11)									
(12)									
(13)									
(14)									
(15)									
(16)									

2 Enter total number of recipient organizations listed above that are recognized as charities by the foreign country, recognized as tax-exempt by the IRS, or for which the grantee or counsel has provided a section 501(c)(3) equivalency letter

3 Enter total number of other organizations or entities

Part III

Grants and Other Assistance to Individuals Outside the United States. Complete if the organization answered "Yes" on Form 990, Part IV, line 16.
Part III can be duplicated if additional space is needed.

(a) Type of grant or assistance	(b) Region	(c) Number of recipients	(d) Amount of cash grant	(e) Manner of cash disbursement	(f) Amount of noncash assistance	(g) Description of noncash assistance	(h) Method of valuation (book, FMV, appraisal, other)
(1)							
(2)							
(3)							
(4)							
(5)							
(6)							
(7)							
(8)							
(9)							
(10)							
(11)							
(12)							
(13)							
(14)							
(15)							
(16)							
(17)							
(18)							

Part IV Foreign Forms

- 1

Was the organization a U.S. transferor of property to a foreign corporation during the tax year? *If "Yes," the organization may be required to file Form 926, Return by a U.S. Transferor of Property to a Foreign Corporation (see Instructions for Form 926)*

☐ Yes

☒ No
- 2

Did the organization have an interest in a foreign trust during the tax year? *If "Yes," the organization may be required to separately file Form 3520, Annual Return to Report Transactions with Foreign Trusts and Receipt of Certain Foreign Gifts, and/or Form 3520-A, Annual Information Return of Foreign Trust With a U.S. Owner (see Instructions for Forms 3520 and 3520-A; don't file with Form 990)*

☐ Yes

☒ No
- 3

Did the organization have an ownership interest in a foreign corporation during the tax year? *If "Yes," the organization may be required to file Form 5471, Information Return of U.S. Persons with Respect to Certain Foreign Corporations. (see Instructions for Form 5471)*

☐ Yes

☒ No
- 4

Was the organization a direct or indirect shareholder of a passive foreign investment company or a qualified electing fund during the tax year? *If "Yes," the organization may be required to file Form 8621, Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund. (see Instructions for Form 8621)*

☐ Yes

☒ No
- 5

Did the organization have an ownership interest in a foreign partnership during the tax year? *If "Yes," the organization may be required to file Form 8865, Return of U.S. Persons with Respect to Certain Foreign Partnerships (see Instructions for Form 8865)*

☐ Yes

☒ No
- 6

Did the organization have any operations in or related to any boycotting countries during the tax year? *If "Yes," the organization may be required to separately file Form 5713, International Boycott Report (see Instructions for Form 5713; don't file with Form 990).*

☐ Yes

☒ No

Supplemental Information

Provide the information required by Part I, line 2 (monitoring of funds); Part I, line 3, column (f) (accounting method; amounts of investments vs. expenditures per region); Part II, line 1 (accounting method); Part III (accounting method); and Part III, column (c) (estimated number of recipients), as applicable. Also complete this part to provide any additional information. See instructions.

[illegible]

Additional Data

Software ID:

Software Version:

SCHEDULE G
(Form 990)
(Rev. January 2025)

Department of the Treasury
Internal Revenue Service

Supplemental Information Regarding
Fundraising or Gaming Activities

Complete if the organization answered "Yes" on Form 990, Part IV, lines 17, 18, or 19, or if the organization entered more than \$15,000 on Form 990-EZ, line 6a.
▶ Attach to Form 990 or Form 990-EZ.
▶ Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No. 1545-0047

Open to Public Inspection

Name of the organization
ATLANTIC COUNCIL OF THE UNITED STATES
INC

Employer identification number
52-0742294

Part I Fundraising Activities. Complete if the organization answered "Yes" on Form 990, Part IV, line 17.
Form 990-EZ filers are not required to complete this part.

- 1 Indicate whether the organization raised funds through any of the following activities. Check all that apply.
- a ☐ Mail solicitations

e ☐ Solicitation of non-government grants

b ☐ Internet and email solicitations

f ☐ Solicitation of government grants

c ☐ Phone solicitations

g ☐ Special fundraising events

d ☐ In-person solicitations
- 2a Did the organization have a written or oral agreement with any individual (including officers, directors, trustees or key employees listed in Form 990, Part VII) or entity in connection with professional fundraising services? ☐ Yes ☐ No
- b If "Yes," list the 10 highest paid individuals or entities (fundraisers) pursuant to agreements under which the fundraiser is to be compensated at least \$5,000 by the organization.

(i) Name and address of individual or entity (fundraiser)	(ii) Activity	(iii) Did fundraiser have custody or control of contributions?		(iv) Gross receipts from activity	(v) Amount paid to (or retained by) fundraiser listed in col. (i)	(vi) Amount paid to (or retained by) organization
		Yes	No			
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
Total ▶						

3 List all states in which the organization is registered or licensed to solicit contributions or has been notified it is exempt from registration or licensing.

Part II Fundraising Events. Complete if the organization answered "Yes" on Form 990, Part IV, line 18, or reported more than \$15,000 of fundraising event contributions and gross income on Form 990-EZ, lines 1 and 6b. List events with gross receipts greater than \$5,000.

Revenue		(a) Event #1	(b) Event #2	(c) Other events	(d) Total events
		LEADERSHIP AWARDS (event type)	CITIZEN AWARDS (event type)	(total number)	(add col. (a) through col. (c))
Revenue	1 Gross receipts	1,967,753	1,876,098		3,843,851
	2 Less: Contributions	1,795,253	1,736,098		3,531,351
	3 Gross income (line 1 minus line 2)	172,500	140,000		312,500
Direct Expenses	4 Cash prizes				
	5 Noncash prizes				
	6 Rent/facility costs	620,617	524,897		1,145,514
	7 Food and beverages				
	8 Entertainment				
	9 Other direct expenses	396,909	377,871		774,780
	10 Direct expense summary. Add lines 4 through 9 in column (d) ▶				1,920,294
	11 Net income summary. Subtract line 10 from line 3, column (d) ▶				-1,607,794

Part III Gaming. Complete if the organization answered "Yes" on Form 990, Part IV, line 19, or reported more than \$15,000 on Form 990-EZ, line 6a.

Revenue		(a) Bingo	(b) Pull tabs/Instant bingo/progressive bingo	(c) Other gaming	(d) Total gaming (add col.(a) through col.(c))
Direct Expenses	1 Gross revenue				
	2 Cash prizes				
	3 Noncash prizes				
	4 Rent/facility costs				
	5 Other direct expenses				
	6 Volunteer labor	☐ Yes _____ % .. ☐ No	☐ Yes _____ % .. ☐ No	☐ Yes _____ % .. ☐ No	
	7 Direct expense summary. Add lines 2 through 5 in column (d) ▶				
	8 Net gaming income summary. Subtract line 7 from line 1, column (d) ▶				

9 Enter the state(s) in which the organization conducts gaming activities:

a Is the organization licensed to conduct gaming activities in each of these states? ☐ Yes ☐ No

b If "No," explain: _____

10a Were any of the organization's gaming licenses revoked, suspended or terminated during the tax year? . . . ☐ Yes ☐ No

b If "Yes," explain: _____

11

Does the organization conduct gaming activities with nonmembers?

☐ Yes ☐ No

12

Is the organization a grantor, beneficiary or trustee of a trust or a member of a partnership or other entity formed to administer charitable gaming?

☐ Yes ☐ No

13

Indicate the percentage of gaming activity conducted in:

a	The organization's facility	13a	%
b	An outside facility	13b	%

14

Enter the name and address of the person who prepares the organization's gaming/special events books and records:

Name ▶ -----

Address ▶ -----

15a

Does the organization have a contract with a third party from whom the organization receives gaming revenue?

☐ Yes ☐ No

b

If "Yes," enter the amount of gaming revenue received by the organization ▶ \$ _____ and the amount of gaming revenue retained by the third party ▶ \$ _____.

c

If "Yes," enter name and address of the third party:

Name ▶ -----

Address ▶ -----

16 Gaming manager information:

Name ▶ -----

Gaming manager compensation ▶ \$ -----

Description of services provided ▶ -----

☐ Director/officer

☐ Employee

☐ Independent contractor

17 Mandatory distributions:

a

Is the organization required under state law to make charitable distributions from the gaming proceeds to retain the state gaming license?

☐ Yes ☐ No

b

Enter the amount of distributions required under state law distributed to other exempt organizations or spent in the organization's own exempt activities during the tax year ▶ \$ _____

Part IV Supplemental Information. Provide the explanations required by Part I, line 2b, columns (iii) and (v); and Part III, lines 9, 9b, 10b, 15b, 15c, 16, and 17b, as applicable. Also provide any additional information. See Instructions.

Return Reference	Explanation
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Schedule I (Form 990) (Rev. January 2025) Department of the Treasury Internal Revenue Service	Grants and Other Assistance to Organizations, Governments and Individuals in the United States Complete if the organization answered "Yes," on Form 990, Part IV, line 21 or 22. ▶ Attach to Form 990. ▶ Go to www.irs.gov/Form990 for instructions and the latest information.	OMB No. 1545-0047 Open to Public Inspection
Name of the organization ATLANTIC COUNCIL OF THE UNITED STATES INC		Employer identification number 52-0742294

Part I	General Information on Grants and Assistance
1	Does the organization maintain records to substantiate the amount of the grants or assistance, the grantees' eligibility for the grants or assistance, and the selection criteria used to award the grants or assistance? ☒ Yes ☐ No
2	Describe in Part IV the organization's procedures for monitoring the use of grant funds in the United States.

Part II Grants and Other Assistance to Domestic Organizations and Domestic Governments. Complete if the organization answered "Yes" on Form 990, Part IV, line 21, for any recipient that received more than \$5,000. Part II can be duplicated if additional space is needed.

(a) Name and address of organization or government	(b) EIN	(c) IRC section (if applicable)	(d) Amount of cash grant	(e) Amount of non-cash assistance	(f) Method of valuation (book, FMV, appraisal, other)	(g) Description of noncash assistance	(h) Purpose of grant or assistance
(1) ACTON INSTITUTE 98 E FULTON STREET GRAND RAPIDS, MI 49503	38-2926822	501(C)(3)	282,520	0	N/A	N/A	SUPPORTING THE WORK OF INDEPENDENT NGOS/THINK TANKS WORKING ON FREEDOM AND PROSPERITY THEMES.
(2) ATLAS NETWORK 4075 WILSON BOULEVARD SUITE 310 ARLINGTON, VA 22203	94-2463845	501(C)(3)	204,380	0	N/A	N/A	SUPPORTING THE WORK OF INDEPENDENT NGOS/THINK TANKS WORKING ON FREEDOM AND PROSPERITY THEMES.
(3) JACOBS ENGINEERING GROUP INC 1999 BRYAN STREET DALLAS, TX 75201	95-4081636	C CORPORATION	102,155	0	N/A	N/A	SUPPORTING WORK ON CLIMATE CHANGE, MIGRATION, AND SECURITY.
(4) TECHSOUP GLOBAL 435 BRANNAN STREET SUITE 100 SAN FRANCISCO, CA 94107	94-3070617	501(C)(3)	399,481	0	N/A	N/A	SUPPORTING WORK TO BUILD RESILIENCE TO RUSSIAN DISINFORMATION
(5) THE GAME CONSULTANT LLC 2304 CARIBBEAN CT ORLANDO, FL 32805	85-0711121	SINGLE-MEMBER LLC	17,922	0	N/A	N/A	SUPPORTING WORK ON CLIMATE CHANGE, MIGRATION, AND SECURITY.
(6) REWRITE MEDIA INC 438 RIVER KNOLL DRIVE CLAYTON, NC 27527	83-2759231	S CORPORATION	19,000	0	N/A	N/A	SUPPORTING WORK ON CLIMATE CHANGE, MIGRATION, AND SECURITY.
(7) GEORGETOWN UNIVERSITY 37TH AND O STREETS NW WASHINGTON, DC 20057	53-0196603	501(C)(3)	81,345	0	N/A	N/A	SUPPORTING WORK ON FELLOWSHIP PROGRAMS FOR WOMEN ENTREPRENEURS.
(8) RHODIUM GROUP LLC 5 COLUMBUS CIR NEW YORK, NY 10019	20-1237721	PARTNERSHIP	175,000	0	N/A	N/A	SUPPORTING WORK ON ECONOMICS, FINANCE, AND FOREIGN POLICY
(9) AMERICAN UNIVERSITY 4400 MASSACHUSETTS AVENUE NW WASHINGTON, DC 20016	53-0196549	501(C)(3)	69,419	0	N/A	N/A	SUPPORTING WORK ON GEOPOLITICS, TECHNOLOGY, AND SECURITY
(10) MIDDLE EAST INSTITUTE 606 W 122ND ST STE 301 NEW YORK, NY 10027	53-0204608	501(C)(3)	32,227	0	N/A	N/A	SUPPORTING WORK ON SYRIA STRATEGY PROJECT

2	Enter total number of section 501(c)(3) and government organizations listed in the line 1 table ▶	6
3	Enter total number of other organizations listed in the line 1 table ▶	4

Part III

Grants and Other Assistance to Domestic Individuals. Complete if the organization answered "Yes" on Form 990, Part IV, line 22.
Part III can be duplicated if additional space is needed.

(a) Type of grant or assistance	(b) Number of recipients	(c) Amount of cash grant	(d) Amount of noncash assistance	(e) Method of valuation (book, FMV, appraisal, other)	(f) Description of noncash assistance
(1)					
(2)					
(3)					
(4)					
(5)					
(6)					
(7)					

Part IV

Supplemental Information. Provide the information required in Part I, line 2; Part III, column (b); and any other additional information.

Return Reference	Explanation
PART I, LINE 2:	TO MONITOR THE USE OF GRANTS, THE COUNCIL REQUIRES GRANTEES TO SUBMIT NARRATIVE REPORTS AND BUDGETS TO ILLUSTRATE GRANT USAGE.

Additional Data

Return to Form

Software ID:
Software Version:

Schedule J
(Form 990)

(Rev. January 2025)

Department of the Treasury
Internal Revenue Service

Compensation Information

For certain Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees
▶ Complete if the organization answered "Yes" on Form 990, Part IV, line 23.
▶ Attach to Form 990.
▶ Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No. 1545-0047

Open to Public Inspection

Name of the organization
ATLANTIC COUNCIL OF THE UNITED STATES
INC

Employer identification number

52-0742294

Part I

Questions Regarding Compensation

1a

Check the appropriate box(es) if the organization provided any of the following to or for a person listed on Form 990, Part VII, Section A, line 1a. Complete Part III to provide any relevant information regarding these items.

☐ First-class or charter travel

☐ Travel for companions

☐ Tax idemnification and gross-up payments

☐ Discretionary spending account

☐ Housing allowance or residence for personal use

☐ Payments for business use of personal residence

☐ Health or social club dues or initiation fees

☐ Personal services (e.g., maid, chauffeur, chef)

b

If any of the boxes on Line 1a are checked, did the organization follow a written policy regarding payment or reimbursement or provision of all of the expenses described above? If "No," complete Part III to explain

2

Did the organization require substantiation prior to reimbursing or allowing expenses incurred by all directors, trustees, officers, including the CEO/Executive Director, regarding the items checked on Line 1a?

3

Indicate which, if any, of the following the filing organization used to establish the compensation of the organization's CEO/Executive Director. Check all that apply. Do not check any boxes for methods used by a related organization to establish compensation of the CEO/Executive Director, but explain in Part III.

☒ Compensation committee

☒ Independent compensation consultant

☐ Form 990 of other organizations

☐ Written employment contract

☐ Compensation survey or study

☒ Approval by the board or compensation committee

4

During the year, did any person listed on Form 990, Part VII, Section A, line 1a, with respect to the filing organization or a related organization:

a

Receive a severance payment or change-of-control payment?

b

Participate in, or receive payment from, a supplemental nonqualified retirement plan?

c

Participate in, or receive payment from, an equity-based compensation arrangement?

If "Yes" to any of lines 4a-c, list the persons and provide the applicable amounts for each item in Part III.

Only 501(c)(3), 501(c)(4), and 501(c)(29) organizations must complete lines 5-9.

5

For persons listed on Form 990, Part VII, Section A, line 1a, did the organization pay or accrue any compensation contingent on the revenues of:

a

The organization?

b

Any related organization?

If "Yes," on line 5a or 5b, describe in Part III.

6

For persons listed on Form 990, Part VII, Section A, line 1a, did the organization pay or accrue any compensation contingent on the net earnings of:

a

The organization?

b

Any related organization?

If "Yes," on line 6a or 6b, describe in Part III.

7

For persons listed on Form 990, Part VII, Section A, line 1a, did the organization provide any nonfixed payments not described in lines 5 and 6? If "Yes," describe in Part III

8

Were any amounts reported on Form 990, Part VII, paid or accrued pursuant to a contract that was subject to the initial contract exception described in Regulations section 53.4958-4(a)(3)? If "Yes," describe in Part III

9

If "Yes" on line 8, did the organization also follow the rebuttable presumption procedure described in Regulations section 53.4958-6(c)?

Yes

No

1b

2

4a

4b

4c

5a

5b

6a

6b

7

8

9

No

Yes

No

Yes

No

No

No

No

No

No

No

For Paperwork Reduction Act Notice, see the Instructions for Form 990.

Cat. No. 50053T

Schedule J (Form 990) (Rev. 1-2025)

Part II

Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees. Use duplicate copies if additional space is needed.

For each individual whose compensation must be reported on Schedule J, report compensation from the organization on row (i) and from related organizations, described in the instructions, on row (ii). Do not list any individuals that are not listed on Form 990, Part VII.

Note. The sum of columns (B)(i)-(iii) for each listed individual must equal the total amount of Form 990, Part VII, Section A, line 1a, applicable column (D) and (E) amounts for that individual.

(A) Name and Title		(B) Breakdown of W-2, 1099-MISC compensation, and/or 1099-NEC			(C) Retirement and other deferred compensation	(D) Nontaxable benefits	(E) Total of columns (B)(i)-(D)	(F) Compensation in column (B) reported as deferred on prior Form 990
		(i) Base compensation	(ii) Bonus & incentive compensation	(iii) Other reportable compensation				
1 FREDERICK KEMPE PRESIDENT AND CEO	(i)	662,808	0	0	98,900	23,899	785,607	0
	(ii)	0	0	0	0	0	0	0
2 JULIE VARGHESE CHIEF OPERATING OFFICER	(i)	362,048	16,500	0	42,917	9,996	431,461	0
	(ii)	0	0	0	0	0	0	0
3 GRETCHEN EHLE CHIEF FINANCIAL OFFICER	(i)	337,500	15,000	0	26,063	7,393	385,956	0
	(ii)	0	0	0	0	0	0	0
4 JENNA BEN-YEHUDA EXECUTIVE VICE PRESIDENT	(i)	364,141	5,833	0	13,458	750	384,182	0
	(ii)	0	0	0	0	0	0	0
5 GRAHAM BROOKIE VP AND SENIOR DIRECTOR - DFRL	(i)	284,308	36,000	0	24,667	6,570	351,545	0
	(ii)	0	0	0	0	0	0	0
6 MATTHEW KROENIG VP & SR. DIR - SCOWCROFT CENTER	(i)	284,308	36,000	0	24,667	375	345,350	0
	(ii)	0	0	0	0	0	0	0
7 KADIATOU CESAIRE SENIOR VICE PRESIDENT	(i)	300,000	12,500	0	24,375	7,018	343,893	0
	(ii)	0	0	0	0	0	0	0
8 JOSHUA LIPSKY SENIOR DIRECTOR	(i)	278,858	34,800	0	18,150	728	332,536	0
	(ii)	0	0	0	0	0	0	0
9 WILLIAM WECHSLER SENIOR DIRECTOR	(i)	257,558	33,000	0	22,333	9,656	322,547	0
	(ii)	0	0	0	0	0	0	0
10 JOHN HERBST SENIOR DIRECTOR	(i)	254,808	32,250	0	27,625	333	315,016	0
	(ii)	0	0	0	0	0	0	0
11 JORGE GASTELUMENDI SENIOR DIRECTOR	(i)	260,425	33,000	0	17,185	1,489	312,099	0
	(ii)	0	0	0	0	0	0	0
12 ROBERT HERR DIRECTOR	(i)	238,333	40,000	0	16,000	7,285	301,618	0
	(ii)	0	0	0	0	0	0	0
13 LANDON RYAN DERENTZ SENIOR DIRECTOR	(i)	249,750	31,500	0	10,867	1,461	293,578	0
	(ii)	0	0	0	0	0	0	0
14 ROMESH RATNESAR SENIOR VICE PRESIDENT	(i)	169,193	0	0	0	3,372	172,565	0
	(ii)	0	0	0	0	0	0	0

Part III **Supplemental Information**

Provide the information, explanation, or descriptions required for Part I, lines 1a, 1b, 3, 4a, 4b, 4c, 5a, 5b, 6a, 6b, 7, and 8, and for Part II. Also complete this part for any additional information.

Return Reference	Explanation
PART I, LINE 4B	THE FOLLOWING INDIVIDUALS PARTICIPATED IN THE 457(F) PLAN: FREDERICK KEMPE - \$33,275 CONTRIBUTION
PART I, LINE 5	THE ORGANIZATION HAS A BONUS STRUCTURE BASED ON FINANCIAL PERFORMANCE. HOWEVER, THE FINAL DECISIONS ON BONUSES ARE MADE BY THE COMPENSATION COMMITTEE.

Additional Data

Return to Form

Software ID:
Software Version:

Name of the organization
ATLANTIC COUNCIL OF THE UNITED STATES
INC

Employer identification number
52-0742294

Part I

Types of Property

	(a) Check if applicable	(b) Number of contributions or items contributed	(c) Noncash contribution amounts reported on Form 990, Part VIII, line 1g	(d) Method of determining noncash contribution amounts
1 Art—Works of art				
2 Art—Historical treasures				
3 Art—Fractional interests				
4 Books and publications				
5 Clothing and household goods				
6 Cars and other vehicles				
7 Boats and planes				
8 Intellectual property				
9 Securities—Publicly traded	X	6	2,176,687	AVERAGE MARKET PRICE
10 Securities—Closely held stock				
11 Securities—Partnership, LLC, or trust interests				
12 Securities—Miscellaneous				
13 Qualified conservation contribution—Historic structures				
14 Qualified conservation contribution—Other				
15 Real estate—Residential				
16 Real estate—Commercial				
17 Real estate—Other				
18 Collectibles				
19 Food inventory				
20 Drugs and medical supplies				
21 Taxidermy				
22 Historical artifacts				
23 Scientific specimens				
24 Archeological artifacts				
25 Other ► ()				
26 Other ► ()				
27 Other ► ()				
28 Other ► ()				

29 Number of Forms 8283 received by the organization during the tax year for contributions for which the organization completed Form 8283, Part IV, Donee Acknowledgement

290

30a During the year, did the organization receive by contribution any property reported in Part I, lines 1 through 28, that it must hold for at least three years from the date of the initial contribution, and which isn't required to be used for exempt purposes for the entire holding period?

30a

No

b If "Yes," describe the arrangement in Part II.

31 Does the organization have a gift acceptance policy that requires the review of any nonstandard contributions?

31

Yes

32a Does the organization hire or use third parties or related organizations to solicit, process, or sell noncash contributions?

32a

Yes

b If "Yes," describe in Part II.

33 If the organization didn't report an amount in column (c) for a type of property for which column (a) is checked, describe in Part II.

Part II **Supplemental Information.** Provide the information required by Part I, lines 30b, 32b, and 33, and whether the organization is reporting in Part I, column (b), the number of contributions, the number of items received, or a combination of both. Also complete this part for any additional information.

Return Reference	Explanation
PART I, COLUMN (B):	REPRESENTS NUMBER OF CONTRIBUTIONS
PART I, LINE 32B:	CITIBANK PROCESSES AND SELLS STOCK CONTRIBUTIONS UPON RECEIPT.

Additional Data

[Return to Form](#)

Software ID:

Software Version:

SCHEDULE O

(Form 990)

(Rev. January 2025)

Department of the Treasury

Internal Revenue Service

Supplemental Information to Form 990 or 990-EZ

Complete to provide information for responses to specific questions on Form 990 or 990-EZ or to provide any additional information.

Attach to Form 990 or 990-EZ.

Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No. 1545-0047

Open to Public Inspection

Name of the organization

ATLANTIC COUNCIL OF THE UNITED STATES

INC

Employer identification number

52-0742294

Return Reference	Explanation
FORM 990, PART VI, SECTION A, LINE 1A	THE EXECUTIVE COMMITTEE SHALL CONSIST OF EX OFFICIO MEMBERS AND CLASS MEMBERS, NOT TO EXCEED 36 IN TOTAL NUMBER, EACH OF WHOM SHALL HAVE ONE VOTE. THE NUMBER OF MEMBERS OF THE EXECUTIVE COMMITTEE MAY BE CHANGED BY AMENDMENT TO THE BYLAWS, BUT NO SUCH CHANGE SHALL HAVE THE EFFECT OF SHORTENING THE TERM OF ANY MEMBER OF THE EXECUTIVE COMMITTEE IN OFFICE AT THE TIME OF THE CHANGE. A) THE EX OFFICIO MEMBERS SHALL BE: THE CHAIR OF THE CORPORATION, THE PRESIDENT OF THE CORPORATION, THE CHAIRS (INCLUDING CO-CHAIRS) OF BOARD COMMITTEES, THE EXECUTIVE VICE CHAIRS, THOSE CHAIRS EMERITUS WHO HAVE CHOSEN TO BE MEMBERS OF THE EXECUTIVE COMMITTEE, THE TREASURER, AND THE SECRETARY. B) THE CLASS MEMBERS SHALL BE THOSE PERSONS ELECTED BY THE BOARD FROM AMONG THE DIRECTORS OF THE CORPORATION. THE CLASS MEMBERS SHALL BE ASSIGNED TO ONE OF THREE CLASSES, APPROXIMATELY EQUAL IN NUMBER, WITH THE TERM OF OFFICE OF ONE CLASS EXPIRING EACH YEAR. THE TERM OF EACH CLASS MEMBER SHALL BE THREE YEARS. A CLASS MEMBER SHALL NOT BE ELIGIBLE FOR ELECTION TO MORE THAN TWO SUCCESSIVE THREE-YEAR TERMS UNLESS THE CHAIR RECOMMENDS THAT THE ROTATION OF THE INDIVIDUAL WOULD MATERIALLY HARM THE ATLANTIC COUNCIL FINANCIALLY OR OPERATIONALLY. GENERAL RULES: MEMBERS OF THE EXECUTIVE COMMITTEE SHALL HOLD OFFICE FOR THE TERM FOR WHICH ELECTED AND UNTIL A SUCCESSOR IS ELECTED AND QUALIFIED. A VACANCY ON THE EXECUTIVE COMMITTEE CAUSED BY THE DEATH, RESIGNATION OR ANY OTHER CAUSE, OF A CLASS MEMBER MAY BE FILLED FOR THE UNEXPIRED TERM BY THE BOARD.
FORM 990, PART VI, SECTION B, LINE 11B	MANAGEMENT PROVIDES THE AUDIT & RISK COMMITTEE AND THE EXECUTIVE COMMITTEE A COPY OF THE FORM 990 BEFORE IT IS FILED. THE EXECUTIVE COMMITTEE IS DESIGNATED AS THE AUTHORIZED GOVERNING BODY OF THE BOARD.
FORM 990, PART VI, SECTION B, LINE 12C	BOARD MEMBERS ARE ANNUALLY REQUIRED TO REVIEW THE POLICY, CONFIRM THEIR UNDERSTANDING, AND DISCLOSE ANY POTENTIAL CONFLICTS. THESE RELATIONSHIPS ARE REVIEWED AND DETERMINATIONS ARE BASED ON A CASE-BY-CASE BASIS. THIS PROCESS IS MAINTAINED BY THE EXECUTIVE OFFICE. EMPLOYEES AND VISITING FELLOWS ARE REQUIRED TO COMPLETE A COI FORM ANNUALLY MAINTAINED BY HR. IF THERE IS A CONFLICT DISCLOSED DURING THE YEAR, MANAGEMENT DISCUSSES THE CONFLICT AND A DETERMINATION IS MADE. AT THE TIME OF OFFERING THE FELLOWSHIP TO THE FELLOW, THEY MUST COMPLETE A COI. IF THE FELLOW CANNOT CLEAR THE CONFLICT, THEY ARE NOT OFFERED THE FELLOWSHIP.
FORM 990, PART VI, SECTION B, LINE 15	THE ATLANTIC COUNCIL'S GOVERNING BODY, THE EXECUTIVE COMMITTEE, HAS AUTHORIZED THE COMPENSATION COMMITTEE TO REVIEW AND DECIDE ON THE COMPENSATION PACKAGES OF SENIOR STAFF WITH COMPENSATION AT OR ABOVE \$150,000. THE COMPENSATION COMMITTEE ALSO REVIEWS THE PERFORMANCE AND COMPENSATION FOR THE PRESIDENT AND CEO, WITH THE PROVISION THAT THE COMMITTEE'S ACTION IS SUBJECT TO APPROVAL BY THE EXECUTIVE COMMITTEE. THE LAST COMPENSATION REVIEW TOOK PLACE IN MARCH 2024 DURING AN EXECUTIVE SESSION OF THE EXECUTIVE COMMITTEE IN WHICH NEITHER THE PRESIDENT AND CEO NOR OTHER ATLANTIC COUNCIL STAFF VOTED OR PARTICIPATED. THE CHAIR OF THE COMPENSATION COMMITTEE PRESENTED THE COMMITTEE'S REVIEW OF THE PRESIDENT AND CEO'S PERFORMANCE. THE COMMITTEE'S REVIEW OF THE PRESIDENT AND CEO'S COMPENSATION IS BASED ON AN EVALUATION OF THE QUALITY AND VALUE TO THE COUNCIL OF HIS PERFORMANCE. IN 2021, THE COUNCIL CONTRACTED AN OUTSIDE FIRM WITH EXPERIENCE IN THE FIELD PERFORMED AN ASSESSMENT ON COMPENSATION PAID TO COMPARABLE PERSONNEL BY NON-PROFIT ORGANIZATIONS SIMILAR TO THE COUNCIL. THE DETAILED DOCUMENTATION SUPPORTING THE COMMITTEE'S RECOMMENDATIONS IS RETAINED IN THE COMMITTEE'S CONFIDENTIAL ARCHIVES AND IS VIEWED BY THE COMMITTEE AS REASONABLE, ACCURATE, AND COMPLETE. COMPENSATION FOR EXECUTIVE LEADERSHIP AND KEY EMPLOYEES IS APPROVED BY THE EXECUTIVE COMMITTEE OF THE BOARD OF DIRECTORS, AFTER RECOMMENDATIONS FROM THE COMPENSATION AND HUMAN RESOURCES COMMITTEE. SUCH DECISIONS ARE RECORDED AND IMPLEMENTED BY THE ATLANTIC COUNCIL'S HUMAN RESOURCES DEPARTMENT. THIS PROCESS RECENTLY TOOK PLACE IN 2024.
FORM 990, PART VI, SECTION C, LINE 19	THE ATLANTIC COUNCIL MAKES ITS GOVERNING DOCUMENTS, CONFLICT OF INTEREST POLICY AND FINANCIAL STATEMENTS AVAILABLE TO THE PUBLIC ON REQUEST.
FORM 990, PART IX, LINE 11G	PROGRAM CONSULTANTS: PROGRAM SERVICE EXPENSES 6,599,922. MANAGEMENT AND GENERAL EXPENSES 370,411. FUNDRAISING EXPENSES 57,371. TOTAL EXPENSES 7,027,704. NON-RESIDENT SENIOR FELLOW: PROGRAM SERVICE EXPENSES 534,255. MANAGEMENT AND GENERAL EXPENSES 0. FUNDRAISING EXPENSES 0. TOTAL EXPENSES 534,255. STAFF CONSULTANTS: PROGRAM SERVICE EXPENSES 0. MANAGEMENT AND GENERAL EXPENSES 33,040. FUNDRAISING EXPENSES 0. TOTAL EXPENSES 33,040. EVENT CONSULTANTS: PROGRAM SERVICE EXPENSES 9,309. MANAGEMENT AND GENERAL EXPENSES -56. FUNDRAISING EXPENSES 118,379. TOTAL EXPENSES 127,632. OTHER PROFESSIONAL FEES: PROGRAM SERVICE EXPENSES 343,875. MANAGEMENT AND GENERAL EXPENSES 380,324. FUNDRAISING EXPENSES 0. TOTAL EXPENSES 724,199.
FORM 990, PART XI, LINE 9:	FOREIGN CURRENCY LOSS -43,790. UNCOLLECTABLE PLEDGES -1,362,638.

For Paperwork Reduction Act Notice, see the Instructions for Form 990 or 990-EZ.

Cat. No. 51056K

Schedule O (Form 990) (Rev. 1-2025)

Additional Data

[Return to Form](#)

Software ID:

Software Version:

SCHEDULE R
(Form 990)
(Rev. January 2025)

Department of the Treasury
Internal Revenue Service

Name of the organization
ATLANTIC COUNCIL OF THE UNITED STATES
INC

Related Organizations and Unrelated Partnerships

Complete if the organization answered "Yes" on Form 990, Part IV, line 33, 34, 35b, 36, or 37.
Attach to Form 990.
Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No. 1545-0047

Open to Public
Inspection

Employer identification number
52-0742294

Part I Identification of Disregarded Entities. Complete if the organization answered "Yes" on Form 990, Part IV, line 33.

(a) Name, address, and EIN (if applicable) of disregarded entity	(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Total income	(e) End-of-year assets	(f) Direct controlling entity

Part II Identification of Related Tax-Exempt Organizations. Complete if the organization answered "Yes" on Form 990, Part IV, line 34 because it had one or more related tax-exempt organizations during the tax year.

(a) Name, address, and EIN of related organization	(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Exempt Code section	(e) Public charity status (if section 501(c)(3))	(f) Direct controlling entity	(g) Section 512(b)(13) controlled entity?	
						Yes	No
(1)FUNDACJA ATLANTIC COUNCIL IN EUROPE WYSTAWOMA 1 51-618 PL	PLANNING, ORG. & SECURING FINANCIAL RESOURCES FOR THE WROCLAW GLOBAL FORUM	PL	N/A	N/A	THE ATLANTIC COUNCIL OF THE UNITED STATES	Yes	

Part III Identification of Related Organizations Taxable as a Partnership. Complete if the organization answered "Yes" on Form 990, Part IV, line 34, because it had one or more related organizations treated as a partnership during the tax year.

(a) Name, address, and EIN of related organization	(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Direct controlling entity	(e) Predominant income(related, unrelated, excluded from tax under sections 512-514)	(f) Share of total income	(g) Share of end-of- year assets	(h) Disproprrtionate allocations?		(i) Code V-UBI amount in box 20 of Schedule K- 1 (Form 1065)	(j) General or managing partner?		(k) Percentage ownership
							Yes	No		Yes	No	

Part IV Identification of Related Organizations Taxable as a Corporation or Trust. Complete if the organization answered "Yes" on Form 990, Part IV, line 34 because it had one or more related organizations treated as a corporation or trust during the tax year.

(a) Name, address, and EIN of related organization	(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Direct controlling entity	(e) Type of entity (C corp, S corp, or trust)	(f) Share of total income	(g) Share of end- of-year assets	(h) Percentage ownership	(i) Section 512(b)(13) controlled entity?	
								Yes	No

Part V Transactions With Related Organizations. Complete if the organization answered "Yes" on Form 990, Part IV, line 34, 35b, or 36.

Note. Complete line 1 if any entity is listed in Parts II, III, or IV of this schedule.

1 During the tax year, did the organization engage in any of the following transactions with one or more related organizations listed in Parts II-IV?

a Receipt of **(i)** interest, **(ii)** annuities, **(iii)** royalties, or **(iv)** rent from a controlled entity

b Gift, grant, or capital contribution to related organization(s)

c Gift, grant, or capital contribution from related organization(s)

d Loans or loan guarantees to or for related organization(s)

e Loans or loan guarantees by related organization(s)

f Dividends from related organization(s)

g Sale of assets to related organization(s)

h Purchase of assets from related organization(s)

i Exchange of assets with related organization(s)

j Lease of facilities, equipment, or other assets to related organization(s)

k Lease of facilities, equipment, or other assets from related organization(s)

l Performance of services or membership or fundraising solicitations for related organization(s)

m Performance of services or membership or fundraising solicitations by related organization(s)

n Sharing of facilities, equipment, mailing lists, or other assets with related organization(s)

o Sharing of paid employees with related organization(s)

p Reimbursement paid to related organization(s) for expenses

q Reimbursement paid by related organization(s) for expenses

r Other transfer of cash or property to related organization(s)

s Other transfer of cash or property from related organization(s)

	Yes	No
1a		No
1b		No
1c		No
1d		No
1e		No
1f		No
1g		No
1h		No
1i		No
1j		No
1k		No
1l		No
1m		No
1n		No
1o		No
1p		No
1q		No
1r		No
1s		No

2 If the answer to any of the above is "Yes," see the instructions for information on who must complete this line, including covered relationships and transaction thresholds.

(a) Name of related organization	(b) Transaction type (a-s)	(c) Amount involved	(d) Method of determining amount involved

Provide the following information for each entity taxed as a partnership through which the organization conducted more than five percent of its activities (measured by total assets or gross revenue) that was not a related organization. See instructions regarding exclusion for certain investment partnerships.

[illegible]

Part VII

Supplemental Information

Provide additional information for responses to questions on Schedule R. See instructions.

Return Reference	Explanation
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Additional Data

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Software ID:
Software Version: