

990

Return of Organization Exempt From Income Tax

OMB No. 1545-

0047 2023

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations) Do not enter social security numbers on this form as it may be made public.

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

Open to Public Inspection

Department of the Treasury Internal Revenue Service

A For the 2023 calendar year, or tax year beginning 09-01-2023, and ending 08-31-2024

- B Check if applicable: Address change, Name change, Initial return, Final return/terminated, Amended return, Application pending

C Name of organization: ACCOUNTABLE JUSTICE ACTION FUND. Doing business as: JUST IMPACT ADVISORS. Number and street (or P.O. box if mail is not delivered to street address): 418 BROADWAY 5040. Room/suite: . City or town, state or province, country, and ZIP or foreign postal code: ALBANY, NY 12207

D Employer identification number: 82-3247136. E Telephone number: (802) 823-2911. G Gross receipts \$ 3,389,900

F Name and address of principal officer: CHLOE COCKBURN, 418 BROADWAY 5040, ALBANY, NY 12207

H(a) Is this a group return for subordinates? No. H(b) Are all subordinates included? No. H(c) Group exemption number

I Tax-exempt status: 501(c)(3) [checked], 501(c)(4) (insert no.), 4947(a)(1) or 527

J Website: WWW.JUSTIMPACTADVISORS.ORG

K Form of organization: Corporation [checked], Trust, Association, Other

L Year of formation: 2017. M State of legal domicile: DE

Part I Summary

Table with 3 main sections: 1. Briefly describe the organization's mission or most significant activities: SEE PART III, LINE 1. 2. Check this box if the organization discontinued its operations or disposed of more than 25% of its net assets. 3-7a: Summary statistics (voting members, employees, volunteers, revenue). 7b: Net unrelated business taxable income. 8-12: Revenue (Contributions, program service, investment, other). 13-19: Expenses (Grants, benefits, salaries, fundraising, other). 20-22: Net Assets or Fund Balances (Total assets, liabilities, net assets).

Part II Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here: Signature of officer CHLOE COCKBURN CEO/PRESIDENT, Date 2025-07-15. Paid Preparer Use Only: Print/Type preparer's name, Preparer's signature, Date, Check if self-employed, PTIN P00288314, Firm's name GELMAN ROSENBERG & FREEDMAN, Firm's EIN 52-1392008, Firm's address 4550 MONTGOMERY AVE SUITE 800N, BETHESDA, MD 208142930, Phone no. (301) 951-9090

May the IRS discuss this return with the preparer shown above? See Instructions. [checked] Yes [] No

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 ASSOCIATION SUPPORTS AND PROMOTES CRIMINAL JUSTICE REFORM VIA PUBLIC EDUCATION, ADVOCACY, DONOR ADVISING AND GRANT MAKING. OUR CORE PROGRAMMATIC AREAS ARE GRANTS AND DONOR ADVISING.

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 \$ **5,277,722** including grants of \$ **4,998,000**) (Revenue \$)

GRANTS: THE ASSOCIATION PROVIDES GRANTS TO A VARIETY OF ORGANIZATIONS THAT ARE FOCUSED ON REFORMING THE CRIMINAL LEGAL SYSTEM AND SHRINKING THE NUMBER OF PEOPLE WHO ARE INCARCERATED IN THE UNITED STATES. HISTORICALLY, GRANTS HAVE SUPPORTED COMMUNITY ORGANIZING, LEADERSHIP DEVELOPMENT, DIRECT ADVOCACY, JOURNALISM, NARRATIVE CHANGE, AND POLICY REFORM. WE SEEK TO FUND INNOVATIVE LEADERS AND ORGANIZATIONS DEPLOYING DYNAMIC STRATEGIES TO REDUCE INCARCERATION AND TO FORGE SOLUTIONS AND ALTERNATIVES TO INCARCERATION THAT ARE EFFECTIVE IN KEEPING COMMUNITIES SAFE. IN FY24, GRANTS WERE PROVIDED TO 12 ORGANIZATIONS FOR A TOTAL OF ROUGHLY \$5 MILLION. WE PROVIDE HOLISTIC SUPPORT TO GRANTEEES AND THEIR PEER MOVEMENT LEADERS WHICH CAN INCLUDE FUNDRAISING, OPERATIONAL, PARTNERSHIP BUILDING, AND STRATEGIC PLANNING ASSISTANCE. IN FY24, WE ENGAGED WITH INDEPENDENT MANAGEMENT CONSULTING FIRMS TO PROVIDE MULTIPLE WORKSHOPS AND 40+ COACHING HOURS WORKING 1-1 WITH GRANTEEES ON THESE TOPICS, AT NO COST TO GRANTEEES.

4b (Code:) (Expenses \$ **1,032,638** including grants of \$) (Revenue \$)

DONOR ADVISING: THE ASSOCIATION SPENDS THE MAJORITY OF ITS TIME FOCUSED ON PROVIDING ADVISORY ASSISTANCE, GRANT RECOMMENDATIONS, AND THOUGHT LEADERSHIP TO DONORS WHO ON OUR ADVICE HAVE INVESTED IN TRANSFORMING CRIMINAL JUSTICE. IN FY24, WE RECOMMENDED OVER \$5 MILLION TO DOZENS OF ORGANIZATIONS THROUGH A DONOR-ADVISED-FUND. IN ADDITION, WE CREATED BESPOKE GRANTMAKING RECOMMENDATIONS FOR OTHER FUNDERS. IN 2023, WE CALCULATE THAT OVER \$5,000,000 IN MULTI-YEAR FUNDING COMMITMENTS WERE MADE BASED ON OUR RECOMMENDATIONS TO OTHER FUNDERS. EACH MONTH, THE ASSOCIATION COMPOSES AND DISTRIBUTES MEMORANDA ON CURRENT AFFAIRS, RECENT NEWS, BEST FUNDING PRACTICES, AND PHILANTHROPIC OPPORTUNITIES IN THE CRIMINAL JUSTICE REFORM SPACE, REACHING A WIDE RANGE OF DONORS AND DONOR ADVISORS. WE REGULARLY HOST DONOR BRIEFINGS AND WORKSHOPS TO GIVE GUIDANCE TO FUNDERS WHO ARE INTERESTED IN GRANTMAKING TO THE CRIMINAL JUSTICE REFORM FIELD. IN FY24, WE HOSTED GATHERINGS EDUCATING OVER 100 DONORS, DONOR ADVISORS, AND OTHER PROFESSIONALS ON THE IMPORTANCE OF CRIMINAL JUSTICE REFORM. WE WERE INVITED TO LEAD A WORKSHOP AT A GLOBAL CONVENING THAT REPRESENTED OVER 400 PHILANTHROPISTS AND SOCIAL INVESTORS FROM MORE THAN 30 COUNTRIES. WE WERE ALSO INVITED TO GIVE A KEYNOTE LECTURE ON FUNDING MOVEMENT ECOSYSTEMS TO A PRESTIGIOUS DONOR ADVISOR COMMUNITY.

4c (Code:) (Expenses \$ including grants of \$) (Revenue \$)

4d Other program services (Describe in Schedule O.)

(Expenses \$ including grants of \$) (Revenue \$)

4e **Total program service expenses** **6,310,360**

Part IV Checklist of Required Schedules

Table with 3 columns: Question ID, Question Text, Yes, No. Rows include questions 1 through 21 regarding organizational requirements and reporting.

Part IV Checklist of Required Schedules (continued)

Table with 3 columns: Question ID, Question Text, and Yes/No columns. Rows include questions 22 through 38 regarding tax-exempt bond issues, excess benefit transactions, and related party transactions.

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

Table with 3 columns: Question ID, Question Text, and Yes/No columns. Rows include questions 1a, 1b, and 1c regarding Form 1096, Forms W-2G, and gaming winnings.

Part V Statements Regarding Other IRS Filings and Tax Compliance (continued)

Main form area containing questions 2a through 17, including sub-questions a-e for various sections, and corresponding input fields and checkboxes.

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

Table with 3 columns: Question, Yes, No. Rows include: 1a (5), 1b (4), 2, 3, 4, 5, 6, 7a, 7b, 8, 8a, 8b, 9.

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

Table with 3 columns: Question, Yes, No. Rows include: 10a, 10b, 11a, 12a, 12b, 12c, 13, 14, 15a, 15b, 16a, 16b.

Section C. Disclosure

- 17 List the states with which a copy of this Form 990 is required to be filed DE
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.
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: CHLOE COCKBURN 418 BROADWAY ALBANY, NY 12207 (802) 823-2911

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			
(1) CHLOE COCKBURN CEO/PRESIDENT/SECRETARY	60.00	X		X			482,389	0	62,940
(2) TIM SILARD TREASURER	0.20	X		X			0	0	0
(3) MICHAEL KIESCHNICK DIRECTOR	0.20	X					0	0	0
(4) MICHELLE CRENTSIL DIRECTOR	0.20	X					0	0	0
(5) RASHAD ROBINSON DIRECTOR	0.20	X					0	0	0
(6) ZACHARY CARPENTER SENIOR ADVISOR	40.00			X			175,500	0	62,940
(7) JASSON PEREZ PROGRAM LEAD	40.00					X	110,471	0	16,075

Part VIII Statement of Revenue

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

Table with 5 columns: (A) Total revenue, (B) Related or exempt function revenue, (C) Unrelated business revenue, (D) Revenue excluded from tax under sections 512 - 514. Rows include Contributions, Gifts, Grants, and Other Amt Similar Amounts, and Federated campaigns through Total.

Table for Program Service Revenue with columns for Business Code and revenue amounts. Rows include lines 2a through 2f and a total line 2g.

Main revenue table with columns for Business Code and revenue amounts. Rows include Investment income, Income from investment of tax-exempt bond proceeds, Royalties, Rental income, Net gain or loss from sales of assets, Fundraising events, Gaming activities, and Sales of inventory.

OtherRevenueMiscAmt

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	4,998,000	4,998,000		
2 Grants and other assistance to domestic individuals. See Part IV, line 22				
3 Grants and other assistance to foreign organizations, foreign governments, and foreign individuals. See Part IV, lines 15 and 16.				
4 Benefits paid to or for members				
5 Compensation of current officers, directors, trustees, and key employees	874,848	782,750	92,098	
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	206,847	121,021	85,826	
8 Pension plan accruals and contributions (include section 401(k) and 403(b) employer contributions)	9,448	4,543	4,905	
9 Other employee benefits	115,162	89,956	25,206	
10 Payroll taxes	60,168	49,906	10,262	
11 Fees for services (non-employees):				
a Management				
b Legal	12,181		12,181	
c Accounting	29,961		29,961	
d Lobbying				
e Professional fundraising services. See Part IV, line 17				
f Investment management fees	26,615		26,615	
g Other (If line 11g amount exceeds 10% of line 25, column (A) amount, list line 11g expenses on Schedule O)	223,066	111,829	111,237	
12 Advertising and promotion				
13 Office expenses	3,300	34	3,266	
14 Information technology	8,134		8,134	
15 Royalties				
16 Occupancy				
17 Travel	71,826	68,596	3,230	
18 Payments of travel or entertainment expenses for any federal, state, or local public officials	1,092	1,092		
19 Conferences, conventions, and meetings	85,531	81,743	3,788	
20 Interest				
21 Payments to affiliates				
22 Depreciation, depletion, and amortization				
23 Insurance	62,558		62,558	
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 FED. FOR. & STATE TAXES	119,697	0	119,697	
b DUES & SUBSCRIPTIONS	6,464	329	6,135	
c PAYROLL PROCESSING FEE	5,590	285	5,305	
d HONORARIUMS AND SPEAKER	530	265	265	
e All other expenses	208	11	197	
25 Total functional expenses. Add lines 1 through 24e	6,921,226	6,310,360	610,866	0
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 <input type="checkbox"/> 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) Beginning of year		(B) End of year
Assets	1 Cash-non-interest-bearing		1	
	2 Savings and temporary cash investments	21,224,946	2	18,395,497
	3 Pledges and grants receivable, net		3	
	4 Accounts receivable, net		4	
	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	40,442	9	28,289
	10a Land, buildings, and equipment: cost or other basis. Complete Part VI of Schedule D	10a		
	b Less: accumulated depreciation	10b		10c
	11 Investments—publicly traded securities		11	
	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	39,113	15	32,617
16 Total assets: Add lines 1 through 15 (must equal line 33)	21,304,501	16	18,456,403	
Liabilities	17 Accounts payable and accrued expenses	10,363	17	28,192
	18 Grants payable	100,000	18	1,065,000
	19 Deferred revenue		19	
	20 Tax-exempt bond liabilities		20	
	21 Escrow or custodial account liability. Complete Part IV of Schedule D		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		25	
	26 Total liabilities. Add lines 17 through 25	110,363	26	1,093,192
Net Assets or Fund Balances	Organizations that follow FASB ASC 958, check here <input checked="" type="checkbox"/> and complete lines 27, 28, 32, and 33.			
	27 Net assets without donor restrictions	21,194,138	27	17,363,211
	28 Net assets with donor restrictions		28	
	Organizations that do not follow FASB ASC 958, check here <input type="checkbox"/> 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	21,194,138	32	17,363,211
33 Total liabilities and net assets/fund balances	21,304,501	33	18,456,403	

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	3,101,859
2	Total expenses (must equal Part IX, column (A), line 25)	2	6,921,226
3	Revenue less expenses. Subtract line 2 from line 1	3	-3,819,367
4	Net assets or fund balances at beginning of year (must equal Part X, line 32, column (A))	4	21,194,138
5	Net unrealized gains (losses) on investments	5	-57,172
6	Donated services and use of facilities	6	
7	Investment expenses	7	
8	Prior period adjustments	8	45,612
9	Other changes in net assets or fund balances (explain in Schedule O)	9	0
10	Net assets or fund balances at end of year. Combine lines 3 through 9 (must equal Part X, line 32, column (A))	10	17,363,211

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: <input type="checkbox"/> Cash <input checked="" type="checkbox"/> Accrual <input type="checkbox"/> 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: <input type="checkbox"/> Separate basis <input type="checkbox"/> Consolidated basis <input type="checkbox"/> Both consolidated and separate basis		No
2b	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: <input type="checkbox"/> Separate basis <input type="checkbox"/> Consolidated basis <input type="checkbox"/> Both consolidated and separate basis		No
2c	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.		
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?		No
3b	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.		

Additional Data

Return to Form

Software ID:

Software Version:

Form 990, Special Condition Description:

Special Condition Description

Schedule B

Schedule of Contributors

OMB No. 1545-0047

2023

(Form 990)
Department of the Treasury
Internal Revenue Service

▶ Attach to Form 990, 990-EZ, or 990-PF.
▶ Go to www.irs.gov/Form990 for the latest information.

Name of the organization ACCOUNTABLE JUSTICE ACTION FUND	Employer identification number 82-3247136
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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
ACCOUNTABLE JUSTICE ACTION FUND

Employer identification number
82-3247136

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	<input type="checkbox"/> Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash (Complete Part II for noncash contributions.)
-		\$	<input type="checkbox"/> Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash (Complete Part II for noncash contributions.)
-		\$	<input type="checkbox"/> Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash (Complete Part II for noncash contributions.)
-		\$	<input type="checkbox"/> Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash (Complete Part II for noncash contributions.)
-		\$	<input type="checkbox"/> Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash (Complete Part II for noncash contributions.)
-		\$	<input type="checkbox"/> Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash (Complete Part II for noncash contributions.)

Name of organization
ACCOUNTABLE JUSTICE ACTION FUND

Employer identification number
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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
-	_____ _____ _____	_____ \$	_____
-	_____ _____ _____	_____ \$	_____
-	_____ _____ _____	_____ \$	_____
-	_____ _____ _____	_____ \$	_____
-	_____ _____ _____	_____ \$	_____
-	_____ _____ _____	_____ \$	_____
-	_____ _____ _____	_____ \$	_____
-	_____ _____ _____	_____ \$	_____
-	_____ _____ _____	_____ \$	_____
-	_____ _____ _____	_____ \$	_____

Name of organization ACCOUNTABLE JUSTICE ACTION FUND	Employer identification number 82-3247136
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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	
	_____	_____	
	_____	_____	
(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	
	_____	_____	
	_____	_____	
(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	
	_____	_____	
	_____	_____	
(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	
	_____	_____	
	_____	_____	

Additional Data

Return to Form

Software ID:

Software Version:

Political Campaign and Lobbying Activities
For Organizations Exempt From Income Tax Under section 501(c) and section 527

▶ **Complete if the organization is described below.** ▶ **Attach to Form 990 or Form 990-EZ.**
▶ **Go to www.irs.gov/Form990 for instructions and the latest information.**

If the organization answered "Yes" on Form 990, Part IV, Line 3, or Form 990-EZ, Part V, line 46 (Political Campaign Activities), then

- Section 501(c)(3) organizations: Complete Parts I-A and B. Do not complete Part I-C.
- Section 501(c) (other than section 501(c)(3)) organizations: Complete Parts I-A and C below. Do not complete Part I-B.
- Section 527 organizations: Complete Part I-A only.

If the organization answered "Yes" on Form 990, Part IV, Line 4, or Form 990-EZ, Part VI, line 47 (Lobbying Activities), then

- Section 501(c)(3) organizations that have filed Form 5768 (election under section 501(h)): Complete Part II-A. Do not complete Part II-B.
- Section 501(c)(3) organizations that have NOT filed Form 5768 (election under section 501(h)): Complete Part II-B. Do not complete Part II-A.

If the organization answered "Yes" on Form 990, Part IV, Line 5 (Proxy Tax) (see separate instructions) or Form 990-EZ, Part V, line 35c (Proxy Tax) (see separate instructions), then

- Section 501(c)(4), (5), or (6) organizations: Complete Part III.

Name of the organization ACCOUNTABLE JUSTICE ACTION FUND	Employer identification number 82-3247136
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Part I-A Complete if the organization is exempt under section 501(c) or is a section 527 organization.

1 Provide a description of the organization's direct and indirect political campaign activities in Part IV. See instructions for definition of "political campaign activities."

2 Political campaign activity expenditures. See instructions ▶ \$ 194,123

3 Volunteer hours for political campaign activities. See instructions 0

Part I-B Complete if the organization is exempt under section 501(c)(3).

1 Enter the amount of any excise tax incurred by the organization under section 4955 \$ _____

2 Enter the amount of any excise tax incurred by organization managers under section 4955 \$ _____

3 If the organization incurred a section 4955 tax, did it file Form 4720 for this year? Yes No

4a Was a correction made? Yes No

b If "Yes," describe in Part IV.

Part I-C Complete if the organization is exempt under section 501(c), except section 501(c)(3).

1 Enter the amount directly expended by the filing organization for section 527 exempt function activities \$ 144,123

2 Enter the amount of the filing organization's funds contributed to other organizations for section 527 exempt function activities ▶ \$ 50,000

3 Total exempt function expenditures. Add lines 1 and 2. Enter here and on Form 1120-POL, line 17b..... \$ 194,123

4 Did the filing organization file **Form 1120-POL** for this year? Yes No

5 Enter the names, addresses and employer identification number (EIN) of all section 527 political organizations to which the filing organization made payments. For each organization listed, enter the amount paid from the filing organization's funds. Also enter the amount of political contributions received that were promptly and directly delivered to a separate political organization, such as a separate segregated fund or a political action committee (PAC). If additional space is needed, provide information in Part IV.

(a) Name	(b) Address	(c) EIN	(d) Amount paid from filing organization's funds. If none, enter -0-.	(e) Amount of political contributions received and promptly and directly delivered to a separate political organization. If none, enter -0-.
(1) THE PEOPLE'S LOBBY PAC	PO BOX 15123 CHICAGO,IL 60615	47-1963015	27,400	
2				
3				
4				
5				
6				

Part II-A Complete if the organization is exempt under section 501(c)(3) and filed Form 5768 (election under section 501(h)).

- A** Check if the filing organization belongs to an affiliated group (and list in Part IV each affiliated group member's name, address, EIN, expenses, and share of excess lobbying expenditures).
- B** Check if the filing organization checked box A and "limited control" provisions apply.

Limits on Lobbying Expenditures (The term "expenditures" means amounts paid or incurred.)	(a) Filing organization's totals	(b) Affiliated group totals												
1a Total lobbying expenditures to influence public opinion (grass roots lobbying)														
b Total lobbying expenditures to influence a legislative body (direct lobbying)														
c Total lobbying expenditures (add lines 1a and 1b)														
d Other exempt purpose expenditures														
e Total exempt purpose expenditures (add lines 1c and 1d)														
f Lobbying nontaxable amount. Enter the amount from the following table in both columns.														
<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:35%; text-align:left;">If the amount on line 1e, column (a) or (b) is:</th> <th style="width:65%; text-align:left;">The lobbying nontaxable amount is:</th> </tr> </thead> <tbody> <tr> <td>Not over \$500,000</td> <td>20% of the amount on line 1e.</td> </tr> <tr> <td>Over \$500,000 but not over \$1,000,000</td> <td>\$100,000 plus 15% of the excess over \$500,000.</td> </tr> <tr> <td>Over \$1,000,000 but not over \$1,500,000</td> <td>\$175,000 plus 10% of the excess over \$1,000,000.</td> </tr> <tr> <td>Over \$1,500,000 but not over \$17,000,000</td> <td>\$225,000 plus 5% of the excess over \$1,500,000.</td> </tr> <tr> <td>Over \$17,000,000</td> <td>\$1,000,000.</td> </tr> </tbody> </table>	If the amount on line 1e, column (a) or (b) is:	The lobbying nontaxable amount is:	Not over \$500,000	20% of the amount on line 1e.	Over \$500,000 but not over \$1,000,000	\$100,000 plus 15% of the excess over \$500,000.	Over \$1,000,000 but not over \$1,500,000	\$175,000 plus 10% of the excess over \$1,000,000.	Over \$1,500,000 but not over \$17,000,000	\$225,000 plus 5% of the excess over \$1,500,000.	Over \$17,000,000	\$1,000,000.		
If the amount on line 1e, column (a) or (b) is:	The lobbying nontaxable amount is:													
Not over \$500,000	20% of the amount on line 1e.													
Over \$500,000 but not over \$1,000,000	\$100,000 plus 15% of the excess over \$500,000.													
Over \$1,000,000 but not over \$1,500,000	\$175,000 plus 10% of the excess over \$1,000,000.													
Over \$1,500,000 but not over \$17,000,000	\$225,000 plus 5% of the excess over \$1,500,000.													
Over \$17,000,000	\$1,000,000.													
g Grassroots nontaxable amount (enter 25% of line 1f)														
h Subtract line 1g from line 1a. If zero or less, enter -0-														
i Subtract line 1f from line 1c. If zero or less, enter -0-														
j If there is an amount other than zero on either line 1h or line 1i, did the organization file Form 4720 reporting section 4911 tax for this year?	<input type="checkbox"/> Yes <input type="checkbox"/> No													

4-Year Averaging Period Under Section 501(h)
(Some organizations that made a section 501(h) election do not have to complete all of the five columns below. See the separate instructions for lines 2a through 2f.)

Lobbying Expenditures During 4-Year Averaging Period					
Calendar year (or fiscal year beginning in)	(a) 2019	(b) 2020	(c) 2021	(d) 2022	(e) Total
2a Lobbying nontaxable amount					
b Lobbying ceiling amount (150% of line 2a, column(e))					
c Total lobbying expenditures					
d Grassroots nontaxable amount					
e Grassroots ceiling amount (150% of line 2d, column (e))					
f Grassroots lobbying expenditures					

Part II-B Complete if the organization is exempt under section 501(c)(3) and has NOT filed Form 5768 (election under section 501(h)).

For each "Yes" response on lines 1a through 1i below, provide in Part IV a detailed description of the lobbying activity.

Table with 3 main columns: Question (1, a-j, 2a-d), (a) Yes/No, and (b) Amount. Contains questions about lobbying activities like volunteers, staff, media, mailings, etc.

Part III-A Complete if the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6).

Table with 3 rows of questions and 3 columns: Question (1-3), Yes, No. Questions about dues, lobbying expenditures, and carryover.

Part III-B Complete if the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6) and if either (a) BOTH Part III-A, lines 1 and 2, are answered "No" OR (b) Part III-A, line 3, is answered "Yes."

Table with 5 rows of questions and 2 columns: Question (1-5), Amount. Questions about dues, lobbying expenditures, and carryover.

Part IV Supplemental Information

Provide the descriptions required for Part I-A, line 1; Part I-B, line 4; Part I-C, line 5; Part II-A (affiliated group list); Part II-A, lines 1 and 2 (see instructions), and Part II-B, line 1. Also, complete this part for any additional information.

Table with 2 columns: Return Reference, Explanation. Row 1: PART I-A, LINE 1: THE ORGANIZATION FUNDS SOME PROJECT-SPECIFIC GRANTS AND ENGAGES CERTAIN CONTRACTORS...

Additional Data

Return to Form

Software ID:

Software Version:

**Schedule I
(Form 990)**

**Grants and Other Assistance to Organizations,
Governments and Individuals in the United States**

OMB No. 1545-0047

2023

**Open to Public
Inspection**

Department of the
Treasury
Internal Revenue Service

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 the latest information.

Name of the organization
ACCOUNTABLE JUSTICE ACTION FUND

Employer identification number
82-3247136

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) WORKING FAMILIES ORGANIZATION INC 77 SANDS STREET 6 BROOKLYN, NY 11201	20-4994004	501 (C)(4)	2,200,000	0			CRIMINAL JUSTICE REFORM
(2) COLOROFCHANGEORG 1714 FRANKLIN STREET SUITE 100-136 OAKLAND, CA 94612	20-4496889	501 (C)(4)	750,000	0			GENERAL SUPPORT AND CRIMINAL JUSTICE REFORM
(3) STRAIGHT AHEAD ORGANIZATION PO BOX 8654 PITTSBURG, PA 15221	85-3392795	501 (C)(4)	700,000	0			GENERAL SUPPORT
(4) JUSTICE RESEARCH GROUP 1912 SE 12TH AVE PORTLAND, OR 97214	87-1366666	501 (C)(4)	400,000	0			GENERAL SUPPORT
(5) VOTERS ORGANIZED TO EDUCATE 4930 WASHINGTON AVENUE SUITE D NEW ORLEANS, LA 70125	27-1370327	501 (C)(4)	300,000	0			GENERAL SUPPORT
(6) SHOWING UP FOR RACIAL JUSTICE ACTION INC PO BOX 1376 BUFFALO, NY 14205	81-2081153	501 (C)(4)	200,000	0			CRIMINAL JUSTICE REFORM
(7) THE PEOPLE'S LOBBY PO BOX 15123 CHICAGO, IL 60615	46-1465650	501 (C)(4)	125,000	0			CRIMINAL JUSTICE REFORM
(8) STEP UP FOR ACTION 2022 ST BERNARD AVE 124B NEW ORLEANS, LA 70116	81-5237259	501 (C)(4)	90,000	0			LOUISIANANS FOR PRISON ALTERNATIVES
(9) MEMPHIS FOR ALL 1000 S COOPER MEMPHIS, TN 38104	82-3438677	501 (C)(4)	80,000	0			JUSTICE AND SAFETY ALLIANCE COALITION
(10) NEW YORK STATE IMMIGRANT ACTION FUND INCORPORATED 131 W 33RD ST STE 610 NEW YORK, NY 10001	61-1613175	501 (C)(4)	53,000	0			QUEENS ORGANIZING ALLIANCE
(11) STARTING OVER STRONG 1390 W 6TH STREET SUITE 100 CORONA, CA 92882	32-0682473	501 (C)(4)	50,000	0			CRIMINAL JUSTICE REFORM
(12) THE PEOPLE'S LOBBY PAC PO BOX 15123 CHICAGO, IL 60615	47-1963015	527 POLITICAL ORGANI	27,400	0			CRIMINAL JUSTICE REFORM
(13) THE PEOPLE'S LOBBY PO BOX 15123 CHICAGO, IL 60615	46-1465650	501 (C)(4)	22,600	0			POLITICAL ACTIVITY RELATED TO CRIMINAL JUSTICE REFORM

- 2** Enter total number of section 501(c)(3) and government organizations listed in the line 1 table 0
- 3** Enter total number of other organizations listed in the line 1 table 12

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:	OUTSIDE LEGAL COUNSEL REVIEWS ALL POTENTIAL GRANTS FOR GRANTEE'S ELIGIBILITY BASED ON TAX EXEMPTION AND TYPE OF ORGANIZATION. ALL GRANTS ARE ANALYZED TO DETERMINE WHETHER THEY ARE FOR ELECTORAL OR ADVOCACY PURPOSES. SOME GRANTS, AS ADVISED BY LEGAL COUNSEL, ARE COMPLETED USING A FORMAL GRANT AGREEMENT; FOR ALL OTHER GRANTS, A RECEIPT OR WRITTEN EXCHANGE IS RECEIVED. WE KEEP INTERNAL DOCUMENTATION OF OUR GRANT SELECTION PROCESS, EXPECTATIONS AND EXPECTED IMPACT. WE CONDUCT REGULAR GRANT PROGRESS REVIEWS WITH GRANTEE'S, AND WE GENERATE INTERNAL REPORTS AT REGULAR INTERVALS, TYPICALLY AT 6 MONTHS, 1 YEAR AND UPON GRANT CLOSURE OR RENEWAL.

Additional Data

[Return to Form](#)

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Schedule J
(Form 990)

Compensation Information

OMB No. 1545-0047

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.**

2023

Open to Public Inspection

Department of the Treasury
Internal Revenue Service

Name of the organization
ACCOUNTABLE JUSTICE ACTION FUND

Employer identification number

82-3247136

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.

- | | |
|---|--|
| <input type="checkbox"/> First-class or charter travel | <input type="checkbox"/> Housing allowance or residence for personal use |
| <input type="checkbox"/> Travel for companions | <input type="checkbox"/> Payments for business use of personal residence |
| <input type="checkbox"/> Tax idemnification and gross-up payments | <input type="checkbox"/> Health or social club dues or initiation fees |
| <input type="checkbox"/> Discretionary spending account | <input type="checkbox"/> 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.

- | | |
|--|---|
| <input type="checkbox"/> Compensation committee | <input type="checkbox"/> Written employment contract |
| <input type="checkbox"/> Independent compensation consultant | <input checked="" type="checkbox"/> Compensation survey or study |
| <input type="checkbox"/> Form 990 of other organizations | <input checked="" type="checkbox"/> 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
1a		
1b		
2		
4a		No
4b		No
4c		No
5a		No
5b		No
6a		No
6b		No
7		No
8		No
9		

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
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Additional Data

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SCHEDULE O
(Form 990)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 the latest information.

OMB No. 1545-0047

2023**Open to Public
Inspection**Name of the organization
ACCOUNTABLE JUSTICE ACTION FUND**Employer identification number**

82-3247136

Return Reference	Explanation
FORM 990, PART VI, SECTION A, LINE 6	THE DIRECTORS OF THE ASSOCIATION ARE THE MEMBERS OF THE CORPORATION FOR ALL PURPOSES.
FORM 990, PART VI, SECTION A, LINE 7A	MEMBERS OF THE BOARD OF DIRECTORS, AS MEMBERS OF THE ASSOCIATION HAVE THE POWER TO ELECT BOARD MEMBERS BY A MAJORITY VOTE OF THE DIRECTORS IN OFFICE.
FORM 990, PART VI, SECTION B, LINE 11B	THE FORM 990 WAS PREPARED BY OUTSIDE ACCOUNTANTS AND REVIEWED BY LEGAL COUNSEL. IT WAS THEN DISTRIBUTED TO THE BOARD OF DIRECTORS PRIOR TO FILING.
FORM 990, PART VI, SECTION B, LINE 12C	THE CONFLICT OF INTEREST POLICY COVERS DIRECTORS, OFFICERS, KEY EMPLOYEES, COMMITTEE MEMBERS, SPOUSES OR DOMESTIC PARTNERS OF ANY OF THE LISTED PEOPLE, AND FORMER OFFICERS, DIRECTORS OR KEY EMPLOYEES WHO SERVED IN SUCH CAPACITY WITHIN THE FIVE PREVIOUS YEARS. IN CONNECTION WITH ANY ACTUAL OR POSSIBLE CONFLICT OF INTEREST, A COVERED PERSON MUST IMMEDIATELY DISCLOSE TO THE BOARD, COMMITTEE OR BOARD DESIGNEE THE EXISTENCE AND NATURE OF HIS OR HER FINANCIAL INTEREST OR ANY DISCLOSABLE RELATIONSHIPS. ALL NEWLY APPOINTED OR ELECTED BOARD MEMBERS OR OFFICERS SHALL DISCLOSE ALL KNOWN CONFLICTS OF INTEREST AND DISCLOSABLE RELATIONSHIPS UPON ASSUMPTION OF THEIR DUTIES AND, SHOULD A CONFLICT OF INTEREST OR DISCLOSABLE RELATIONSHIP DEVELOP, MUST IMMEDIATELY DISCLOSE TO THE BOARD, COMMITTEE OR BOARD DESIGNEE SUCH ACTUAL OR POSSIBLE CONFLICT OF INTEREST OR DISCLOSABLE RELATIONSHIP. AFTER A POTENTIAL CONFLICT HAS BEEN DISCLOSED, THE BOARD OR COMMITTEE DETERMINES IF A CONFLICT OF INTEREST EXISTS. IF THE BOARD OR COMMITTEE DETERMINES THAT A COVERED PERSON HAS A FINANCIAL INTEREST, THEN IT WILL BE INVESTIGATED AND DETERMINED BY A MAJORITY VOTE OF THE DISINTERESTED BOARD MEMBERS WHETHER THE TRANSACTION OR ARRANGEMENT IS IN THE ORGANIZATION'S BEST INTERESTS.
FORM 990, PART VI, SECTION B, LINE 15	CERTAIN INDEPENDENT DIRECTORS SURVEYED THE MARKETPLACE AND GATHERED MARKET DATA ON THE COMPENSATION OF THE ACTING DIRECTOR (THE CEO/EXECUTIVE DIRECTOR) AND OTHER TOP MANAGEMENT POSITIONS. THE ACTING DIRECTOR POSITION AND OTHER TOP MANAGEMENT POSITIONS WERE MATCHED WITH OTHER SIMILAR POSITIONS IN ORGANIZATIONS MANAGING COMPARABLY SIZED GRANT FUNDS, STRUCTURES, AND SCOPE. FOR THE ACTING DIRECTOR POSITIONS AND OTHER TOP MANAGEMENT POSITIONS, BOTH BASE PAY AND TOTAL COMPENSATION PAY WERE COMPARED. TOTAL COMPENSATION INCLUDES BASE PAY AND BONUS PAY. BOARD MEMBERS MONITOR THE PERFORMANCE OF THE ACTING DIRECTOR AND OTHER TOP MANAGEMENT POSITIONS. THE LAST COMPENSATION REVIEW TOOK PLACE IN DECEMBER 2021.
FORM 990, PART VI, SECTION C, LINE 19	THE ASSOCIATION'S GOVERNING DOCUMENTS, CONFLICT OF INTEREST POLICY AND FINANCIAL STATEMENTS ARE MADE AVAILABLE TO THE PUBLIC UPON REQUEST WHEN REQUIRED BY FEDERAL AND STATE LAW.

Additional Data

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