NYC H2O

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EIN: 45-3860014
Report Generated on: 07/20/2020

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MISSION

NYC H2O’s mission is to inspire and educate New Yorkers of all ages to learn about, enjoy and protect their city’s local water ecology. Through providing public and school programs at historic reservoirs, parklands, watersheds, bays, rivers and wetlands, we encourage diverse citizens to advocate for responsible public policy. Our activities promote science-based knowledge of New York’s local ecosystems and of what is needed for urban water resilience in a time when climate change impact continues to escalate.

EIN
45-3860014

RULING YEAR
2012

IRS SUBSECTION
501(c)(3) Public Charity

FOUNDING YEAR
2009

MAIN ADDRESS
410 East 6th Street 21 F
New York, NY
10009

AFFILIATION TYPE
Independent Organization

CONTACT
Mr. Matt Malina, Founder,
Executive Director
(917) 656-2984
matt@nych2o.org

FOUNDER, EXECUTIVE DIRECTOR
Matt Malina

BOARD CHAIR
Matt Malina

CAUSE AREAS
Environmental Education and Outdoor Survival Programs (C60)
Environmental Quality, Protection, and Beautification N.E.C. (C99)
Adult, Continuing Education (B60)

NAICS CODE
712190 Nature Parks and Other Similar Institutions

SIC CODE
7999 AMUSEMENT AND RECREATION, NEC
8422 BOTANICAL AND ZOOLOGICAL GARDENS
PROGRAMS

1. Water Ecology & Engineering Field Trips
   Population(s) served: Children and youth (0-19 years)
   Budget: $105,000

2. Advocacy & Sustainability Planning for the Ridgewood Reservoir
   Population(s) served: General/Unspecified, Economically disadvantaged, low-income, and poor people

COMPLIANCE

- IRS Pub 78 Verified as of July 2020
- IRS BMF 509(a) (1) as of July 13, 2020
- A-133 Audit Required/Performed?
- Conflict of Interest Policy
- Written whistleblower policy

Section 509(a)(1) organization as referred to in Section 170(b)(1)(A)(vi)

TRANSPARENCY MEASURES

- Board Practices Reported?
- Diversity Data Reported?
- Number of Independent Board Members: 6
Programs & Results

PROGRAMS

Source: Self-Reported by Organization, August 2019

Water Ecology & Engineering Field Trips

Population(s) Served:
Children and youth (0-19 years)

Budget: $105,000

NYC H2O’s Water Ecology and Engineering Field Trips bring classes to NYC’s historic reservoirs and wetlands located in City Parks in all five boroughs. We teach students about the environment and the complexity and elegance of NYC’s water system by engaging them in fun educational games and healthy physical activity.

Our overarching goal is to connect New Yorkers to nature by helping them become informed citizens and stewards of New York City’s spectacular water system. Our Water Ecology & Engineering Field Trips for school groups are designed to make students and teachers consider how nature, when abetted by sensible human interventions, maintains a clean and reliable source of tap water.

Our main objective for field trips is that students learn in an active way about the basic principles of the NYC water system. Specifically, we help students understand that: nature and forests help keep the water clean in the watershed; multiple aqueducts have been engineered into the system; water flows from upstate NY by gravity, making New York’s water supply system economical, efficient, and stable (very little outside energy is required to "power" the system); past generations’ stewardship towards designing for future urban population growth (primarily from immigration) allows the city to exist today; and, sustainable choices today regarding forests and water use/water supply have an important impact on the future of New Yorkers.

We provide students with a first-hand experience of nature in NYC, and help them to develop a recreational relationship with NYC’s parks. Given that the majority of our audience represents underserved populations, our programs are particularly important in fostering a healthy appreciation of nature among all of NYC’s residents. Our goals are that students will explore the natural wonders of NYC facilitated by skilled guides.

Participants will:
- play interactive nature-games, such as "Tree Races" in which students run from tree to tree to identify and learn about at least five local tree species and their role in the ecosystem (and a variety of other plant and animal species) appreciate the historical importance of NYC Parks by learning about the in-service and historic reservoirs that many of the parks contain
- be encouraged to make greater use of NYC Parks which will, in turn, encourage park visits by their parents, extended families, and friends.

A number of interconnected concerns have inspired the creation of this program, including current water issues and environmental challenges, low student engagement in civics and science, and limited physical activity for youth in school settings. Current events - such as high levels of lead in NYC school water pipes and the water crisis in Flint, MI - show the need for citizens to better understand where their water comes from, as well as what's involved in watershed protection, infrastructure maintenance, and investment. Our goal is to foster a generation of concerned and active environmental advocates through concretely learning about the water cycle in New York City. The interactive school tours we provide encourage students to productively engage in discussions on natural resource management, such as sewage runoff and watershed maintenance.

NYC H2O believes that experiencing water infrastructure in spectacular settings like reservoir parks helps advance students’ engagement in school and the world around them.

Our target population is comprised of NYC public school students grades 2 through 12, in all five boroughs. Our focus is on Title I and Title III schools, with high numbers of children from poorer populations and immigrant families. These students are generally underserved and have little or no experience with exploring natural settings. A Title I school receives this designation if more than 35% or the students qualify for free or reduced lunch. A Title III school receives this designation if it has a significant proportion of students who are English Language Learners.

There are few opportunities for outdoor environmental education that engage students in healthy physical exercise. Our Water Ecology & Engineering Field Trips program also provides the much-needed physical activity for students who are often sedentary. On a typical tour, students walk/run about a mile around the reservoirs and parks over a two-hour period.

Advocacy & Sustainability Planning for the Ridgewood Reservoir

Population(s) Served:
General/Unspecified
Economically disadvantaged, low-income, and poor people

Budget: n/a

Over the last two years, NYC H2O has been working to address the lack of access and equity in New York City Parks, most particularly at the Ridgewood Reservoir in Highland Park. We have become the main advocate for the historic Ridgewood Reservoir: we have worked with a wide range of community groups to help empower them to...
advocate for the preservation and use of a neglected unique cultural and ecological treasure. We use the site (which is located on the Queens/ Brooklyn border) for student field trips. We offer community tours and workshop envisioning meetings for nearby residents of underserved communities such as East New York to encourage active participation in shaping the future of this hitherto endangered and neglected resource. Our ultimate goal is to influence the Parks Department to build a nature center at the site so that we can bring more students on field trips. In addition, we plan to train local youth to be nature stewards as guides to lead trips.
RESULTS

Number of students educated through field trips

Population(s) Served: Children and youth (0-19 years)
Related program: Water Ecology & Engineering Field Trips
Notes: NYC H2O's interactive field trips delve into the history, ecology, and engineering of New York City's watersheds and water infrastructure.

Number of public lectures

Population(s) Served: General/Unspecified
Notes: NYC H2O offers a series of free public lectures with local scientists and historians. These events cover a range of topics related to our urban water system.

Number of walking and biking tours for adults

Population(s) Served: General/Unspecified
Notes: NYC H2O offers walking and biking tours that illuminate New York's ecology and history, with a focus on the city's historic water supply system and infrastructure.

Total number of fields trips

Population(s) Served: Children and youth (0-19 years)
Related program: Water Ecology & Engineering Field Trips
Notes: NYC H2O's interactive field trips delve into the history, ecology, and engineering of New York City's watersheds and water infrastructure.

Number of public lecture attendees

Population(s) Served: General/Unspecified
Notes: NYC H2O offers a series of free public lectures with local scientists and historians. These events cover a range of topics related to our urban water system.

Number of attendees at walking and biking tours

Population(s) Served: General/Unspecified
Notes: NYC H2O offers walking and biking tours that illuminate New York's ecology and history, with a focus on the city's historic water supply system and infrastructure.

Total dollars received in contributions
### Population(s) Served:

- No target populations selected

### Notes:

- Includes both grants and individual donations

### Number of Title I schools served by field trips

#### TOTALS BY YEAR

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<th>Year</th>
<th>Number of Schools</th>
</tr>
</thead>
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<td>2016</td>
<td>62</td>
</tr>
<tr>
<td>2015</td>
<td>51</td>
</tr>
<tr>
<td>2014</td>
<td>35</td>
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</tbody>
</table>

#### Population(s) Served:

- Children and youth (0-19 years), Economically disadvantaged, low-income, and poor people

#### Related program:

- Water Ecology & Engineering Field Trips

#### Notes:

- NYC H2O is proud to provide field trips to public schools in all five New York city boroughs.

### Number of grants received

#### TOTALS BY YEAR

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<th>Year</th>
<th>Number of Grants</th>
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<td>2015</td>
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<td>2014</td>
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#### Population(s) Served:

- No target populations selected

### Number of beach cleanups organized and held

#### TOTALS BY YEAR

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<th>Year</th>
<th>Number of Beach Cleanups</th>
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<tr>
<td>2015</td>
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</tr>
<tr>
<td>2014</td>
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</table>

#### Population(s) Served:

- General/Unspecified

#### Notes:

- NYC H2O organizes beach cleanups at natural sites across New York City including Plumb Beach, Conference House Park, and Lemon Creek Beach.

### Number of volunteers attending our environmental stewardship events

#### TOTALS BY YEAR

<table>
<thead>
<tr>
<th>Year</th>
<th>Number of Volunteers</th>
</tr>
</thead>
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<tr>
<td>2017</td>
<td>643</td>
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<tr>
<td>2016</td>
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<tr>
<td>2015</td>
<td>269</td>
</tr>
<tr>
<td>2014</td>
<td>132</td>
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</tbody>
</table>

#### Population(s) Served:

- No target populations selected

#### Related program:

- Advocacy & Sustainability Planning for the Ridgewood Reservoir

#### Notes:

- NYC H2O's stewardship events include volunteer landscaping at the Ridgewood Reservoir and beach cleanups. At landscaping events, volunteers remove invasive plants such as mugwort from the Reservoir.
Total pounds of debris collected

**Population(s) Served:** No target populations selected

**Notes:** At NYC H2O beach cleanups, volunteers have collected debris including tractor tires, plastic bottles, cans, candy wrappers, and even a small boat!
CHARTING IMPACT

What is the organization aiming to accomplish?

NYC H2O’s Field Trips program helps to remedy the challenges inherent in teaching urban water ecology and environmental issues; low student engagement in civics, science and nature as well as limited physical activity for youth in school settings. Our goal is to foster a new generation of concerned, knowledgeable and active urban environmental advocates and water stewards. As we continue to increase our impact every year, our goal in 2017 is to offer 180 tours directly benefitting 5,000 students.

NYC H2O is also working to address the lack of access and equity in New York City Parks, most particularly at the Ridgewood Reservoir in Highland Park. Over the last two years, we have led a coalition of community groups to address these issues and have made significant progress in highlighting its importance in addressing its preservation. Our ultimate goal is to influence the Parks Department to build a nature center at the site so that we can bring more students on field trips. In addition, we plan to train local youth to be nature stewards as guides to lead trips.

What are the organization’s key strategies for making this happen?

STEM education is a critical resource for lifting children out of poverty. Outdoor education is, particularly, correlated with social, recreational, developmental, educational and therapeutic benefits for children. NYC H2O’s Water Ecology & Engineering Field Trips program hones in on the power of STEM and outdoor learning to equip children with the necessary tools to succeed in school. Every field trip helps students meet explicit curricula goals set by the New York’s Department of Education, and State Board of Regents by providing an in depth experience that makes students likelier to learn about water ecology, ecological succession and other subjects they are tested on.

With our initiative at the Ridgewood Reservoir, our strategy is to influence local community leaders and youth to support building a nature center at the site. This would allow bringing more local students on field trips and training local youth as nature stewards to lead field trips. Job creation in environmental protection and education for nearby residents would have a significant local impact in the community’s economic well-being.

What are the organization’s capabilities for doing this?

NYC H2O has been mobilizing water stewardship since 2009. Our hands-on interactive approach to environmental education and water advocacy is uniquely changing education by introducing students to historic reservoirs and wetlands located in city parks through engaging activities.

Our “listen first” attitude is present in our reservoir tours, which were designed with specific input and insights from NYC teachers. We responded to their key concerns of needing to save public schools both money and time – two real issues for the education system. Paired with free yellow bus transportation offered by the city to schools, our field trips offer an affordable and accessible option for schools across the five boroughs.

Accountability is strongly linked to our organizational values. We solicit feedback from participants before, during, and after all of our programs. This outreach has been a major factor in our speedy organizational growth over the past five years.

What makes NYC H2O’s approach to environmental education and water advocacy so effective is the hands-on and interactive approach we take at every event, regardless of the age of our audience. Knowledge is imparted through active learning, immediate connections to spectacular environments in which a question and answer approach is encouraged. We have found that adults and children alike are deeply touched by participating in our activities; resulting teacher interest and word of mouth have rapidly expanded the demand for our school tours.

NYC H2O has gained an extensive network of experts in the fields of engineering, history, geography and city planning with whom we work. Our partnerships connect us to a vast base of knowledge about the water system and the latest developments in the city’s
infrastructure, keeping our programs up-to-date. Furthermore, many of the people who attend NYC H2O programs are engineers and city planners which allow us to further extend our network. Not least, NYC H2O has reached out to over NYC 2,000 teachers, enabling us to effectively market tours to schools.

How will they know if they are making progress?

Quantitatively, we assess our outcomes of the Field Trips program by the number of students we reach, and guides we recruit.

Qualitatively, there are two components to our Field Trips program evaluation plan. The first part is to gauge how effectively we train our guides and the quality of the tours that they lead. Our senior guides observe new guides leading a tour, offer help along the way (if needed) and offer post-tour feedback.

The second part of our qualitative evaluation component is through tracking feedback from teachers via a post-field trip evaluation form. We have found that educators and students alike respond deeply to hands-on experience with the natural environment.

Lastly, our field trips are designed to match New York City and State curricula standards so that educators are able to integrate materials that we provide into classroom activities. Thus, by building ongoing relationships with teachers and supporting their professional development, NYC H2O works to continuously improve water and engineering/infrastructure education both in nature and in classrooms.

What have and haven't they accomplished so far?

Since 2014, NYC H2O has served 10,000 students citywide at 142 schools. Our STEM education programs continue to provide a scientific and historical understanding of New York City's water cycle and infrastructure. From March through June of this year, we provided 90 field trips reaching 2,600 students. Our immediate goal is to hire and train 7 new guides to guarantee our availability to engage 5,000 students in 2017.

To protect and preserve the Ridgewood Reservoir, NYC H2O has been leading a coalition of community groups since 2015. In 2017, we advanced the cause or health of Ridgewood in the following ways:

1. NYC H2O wrote and submitted the application to place the Ridgewood Reservoir on the National Register of Historic Places and received support letters from local elected officials and community stakeholders;
2. Advocated to designate the Reservoir as a Critical Environmental Area and Wetland;
3. Organized a volunteer landscaping event at the reservoir on April 23;
4. Led 5 free community tours; and
5. Organized two community listening sessions about the Reservoir in Queens and Brooklyn on May 23 and June 1 respectively, with 75 in attendance.
Financials

FISCAL YEAR START: 01/01
FISCAL YEAR END: 12/31

Financial Trends Analysis

Business Model Indicators

<table>
<thead>
<tr>
<th>Profitability</th>
<th>2018</th>
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<tbody>
<tr>
<td>Unrestricted surplus (deficit) before depreciation</td>
<td>$13,212</td>
</tr>
<tr>
<td>As a % of expenses</td>
<td>5.6%</td>
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<tr>
<td>Unrestricted surplus (deficit) after depreciation</td>
<td>$13,212</td>
</tr>
<tr>
<td>As a % of expenses</td>
<td>5.6%</td>
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</tbody>
</table>

Revenue Composition

Total revenue (unrestricted & restricted) | $251,960 |
Total revenue, % change over prior year | 0.0% |
Program services revenue | 15.0% |
Membership dues | 0.0% |
Investment income | 0.0% |
Government grants | 69.6% |
All other grants and contributions | 15.4% |
Other revenue | 0.0% |

Expense Composition

Total expenses before depreciation | $237,267 |
Total expenses, % change over prior year | 0.0% |
Personnel | 73.1% |
Professional Fees | 23.6% |
Occupancy | 0.0% |
Interest | 0.0% |
Pass-Through | 0.0% |
All other expenses | 3.3% |
Financial Trends Analysis, continued

Moving Toward Full Cost Coverage

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<thead>
<tr>
<th>Full Cost Components (estimated)</th>
<th>2018</th>
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<tbody>
<tr>
<td>Total Expenses (after depreciation)</td>
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<tr>
<td>One Month of Savings</td>
<td>$19,772</td>
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<tr>
<td>Debt Principal Repayment</td>
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<td>Fixed Asset Additions</td>
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<td>Total Full Costs (estimated)</td>
<td>$257,039</td>
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Capital Structure Indicators

Liquidity

| Months of cash | 1.2 |
| Months of cash and investments | 1.6 |
| Months of estimated liquid unrestricted net assets | 1.6 |

Balance Sheet Composition

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<td>Total net assets</td>
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Key Data Checks

Material Data Errors

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Note: This issue is relevant to a small number of organizations: The nonprofit subject(s) of this report may have affiliates. The Form 990 data may not include information about any or all potential affiliates. If an organization does have affiliates and these affiliates have substantial financial activity, the financial data in this report may not present a comprehensive picture of the nonprofit's financial condition. Please consult the 990s of any potentially related affiliates for additional information.
Operations

Source: Self-Reported by Organization, August 2019

FOUNDER, EXECUTIVE DIRECTOR

Mr. Matt Malina

Matthew Malina founded NYC H2O in 2009. As Executive Director of NYC H2O, he initiated its tour, lecture, field trip and beach cleanup programs.

Malina is a native New Yorker and studied engineering at the University of Virginia, graduating with a Bachelor’s and Master’s in Applied Math. He was a public school math teacher and since 2006, a math tutor. Malina is a founding member of InTandem, a tandem cycling program that enables blind athletes to ride by pairing them with sighted athletes. He served as its Operations Manager for 3 years.

Under Malina’s leadership, NYC H2O has attracted experts in engineering, city planning, natural sciences, and public health as well as hundreds of volunteers to participate in a wealth of water-related experiential, activist and educational events from reservoir walking and paddle tours, public lectures on infrastructure and water conservation, sewage plant tours, and beach cleanups.

NUMBER OF EMPLOYEES

Source: IRS Form 990

BOARD CHAIR

Matt Malina
NYC H2O
Term: 2012 -

BOARD MEMBERS

Chad Berkowitz
USAID
Damian Griffin
Bedford Park Elementary School
Kimberly Worsham
Safe Water Network
Mitchell Goldstein
Skanska
Arcilia Derenzo
PS 249
OFFICERS, DIRECTORS, TRUSTEES, AND KEY EMPLOYEES
FISCAL YEAR 2018

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Compensation</th>
<th>Other</th>
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<td>Chad Berkowitz</td>
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<tr>
<td>Froma Harrop</td>
<td>Director</td>
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<tr>
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<td>Arcilia Derenzo</td>
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### Officers Directors, Trustees, Key Employees

**FISCAL YEAR 2017**

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<th>Name</th>
<th>Title</th>
<th>Compensation</th>
<th>Benefits/Deferred Compensation</th>
<th>Expense Account, Other</th>
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# Officers Directors, Trustees, Key Employees

## FISCAL YEAR 2016

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## Officers Directors, Trustees, Key Employees

FISCAL YEAR 2015

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</table>
## Officers Directors, Trustees, Key Employees

**FISCAL YEAR 2014**

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Compensation</th>
<th>Benefits/Deferred Compensation</th>
<th>Expense Account, Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>Matthew Malina</td>
<td>President</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Damian Griffin</td>
<td>Treasurer</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Phil Gates</td>
<td>Secretary</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Kimberly Worsham</td>
<td>Advisor</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
</tbody>
</table>
## HIGHEST PAID EMPLOYEES

**FISCAL YEAR 2018**

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Compensation</th>
<th>Other</th>
<th>Related</th>
</tr>
</thead>
<tbody>
<tr>
<td>Matthew Malina</td>
<td>Director</td>
<td>$60,000</td>
<td>$0</td>
<td>$0</td>
</tr>
</tbody>
</table>
BOARD LEADERSHIP PRACTICES
GuideStar worked with BoardSource, the national leader in nonprofit board leadership and governance, to create this section, which enables organizations and donors to transparently share information about essential board leadership practices.

BOARD ORIENTATION & EDUCATION
Does the board conduct a formal orientation for new board members and require all board members to sign a written agreement regarding their roles, responsibilities, and expectations? 

No

CEO OVERSIGHT
Has the board conducted a formal, written assessment of the chief executive within the past year?

No

ETHICS & TRANSPARENCY
Have the board and senior staff reviewed the conflict-of-interest policy and completed and signed disclosure statements in the past year?

Yes

BOARD COMPOSITION
Does the board ensure an inclusive board member recruitment process that results in diversity of thought and leadership?

Yes

BOARD PERFORMANCE
Has the board conducted a formal, written self-assessment of its performance within the past three years?

Yes
Organizational Demographics

Who works and leads organizations that serve our diverse communities? This organization has voluntarily shared information to answer this important question and to support sector-wide learning. GuideStar partnered on this section with CHANGE Philanthropy and Equity in the Center.

Leadership

The organization’s leader identifies as:

No data

Race & Ethnicity

No data

Gender Identity

No data

Sexual Orientation

No data

Disability

No data.
## Appendix

### Key Documents

<table>
<thead>
<tr>
<th>IRS Forms 990</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>2018 990</td>
<td></td>
</tr>
<tr>
<td>2017 990</td>
<td></td>
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<tr>
<td>2016 990</td>
<td></td>
</tr>
<tr>
<td>2015 990</td>
<td></td>
</tr>
<tr>
<td>2014 990</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>IRS Forms 990T</th>
<th>Not Available</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Audited Financial Statements</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>2018 Audited Financial Statement</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Key Organization Documents</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Letter of Determination</td>
<td></td>
</tr>
<tr>
<td>Key Revenue &amp; Expense Data from Form 990</td>
<td></td>
</tr>
<tr>
<td>Key Balance Sheet Data from Form 990</td>
<td></td>
</tr>
</tbody>
</table>
On September 8, 2011, the IRS issued regulations which eliminated the advance ruling process for a section 501(c)(3) organization. Learn more

The Foundation Status Code is the code that foundations are required to provide for each grantee annually on part XV of Form 990PF. Note that this code cannot be derived in some cases (e.g., supporting organizations for which ‘type’ can’t be determined).

IRS Revenue Procedure 2011-33 allows grantors to rely on third-party resources, such as GuideStar Charity Check, to obtain required Business Master File (BMF) data concerning a potential grantee’s public charity classification under section 509(a)(1), (2) or (3).

GuideStar Charity Check Data Sources
- GuideStar acquires all IRS data directly from the Internal Revenue Service.
- IRS Publication 78 (Cumulative List of Organizations) lists organizations that have been recognized by the Internal Revenue Service as eligible to receive tax-deductible contributions.
- The IRS Internal Revenue Bulletin (IRB) lists changes in charitable status since the last Publication 78 release. Between the release of IRS Publication 78 and the subsequent IRS Internal Revenue Bulletin, the IRB date will reflect the most recent release date of IRS Publication 78.
- The IRS Business Master File lists approximately 1.7 million nonprofits registered with the IRS as tax-exempt organizations.
- The IRS Automatic Revocation of Exemption List contains organizations that have had their federal tax-exempt status automatically revoked for failing to file an annual return or notice with the IRS for three consecutive years.
- The Foundation Status Code is a value derived by mapping the codes found on the 990PF filing instructions to the corresponding codes in the IRS BMF. Note that not all codes are able to be mapped due to insufficient data.
- The Office of Foreign Assets Control (OFAC) Specially Designated Nationals (SDN) list organizations that are owned or controlled by targeted individuals, groups, and entities, such as terrorists or narcotics traffickers. Their assets are blocked and U.S. persons are generally prohibited from dealing with them.

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