

	_			** PUBI	LIC DI: Sh	sclosure ort Form	COE	PY **				OM	IB No. 1545-0047
Forn	9	90-EZ	Return	•	nizatio	n Exemp	ot Fr						2021
			-					-			ations		
			Do not	enter social s	ecurity nun	nbers on this fo	orm, as	it may l	pe made pu	ıblic.		0	pen to Public
		of the Treasury enue Service	► Go to	www.irs.gov/	Form990EZ	for instruction	ns and	the lates	st informati	on.			Inspection
A	or th	e 2021 calendar	year, or tax year begin	ning	JUL 1	, 2021		and end	ling JU	JN 30), 2	022	
Ba	Check i pplical	f C Na	me of organization							D Emp	loyer id	entificatio	on number
	Add	ress change											
	Name change NCOE FOUNDATION Initial return Number and street (or P.O. box if mail is not delivered to street address) F							_		.3794	0		
			,		delivered to s	street address)			Room/suite	E Tele			6010
										-6810			
	-	373	\mathbf{PA} , \mathbf{CA} 94		ZIF UI IUIEIUI	i postal code					up Exem		
		nting Method:			er (specify) 🕨						nber ►		e organization is
			COE.ORG/AB										Schedule B
		· · ·	eck only one) $-$ X		501(c) () (insert no.)	49	947(a)(1)	or 527		m 990).		
		of organization:	X Corporation	Trust		ociation	Other	5 17 (u)(1)		1 (101	<u>III 000)</u> .		
		•	to line 9 to determine				-	or if total	assets (Part	II,			
		n (B)) are \$500,0	00 or more, file Form 9	90 instead of Fo	rm 990-EZ						▶ \$		36,388.
Pa	art I	Revenue	, Expenses, and	Changes i	n Net As	sets or Fund	l Bala	nces	(see the instr	ructions	for Part	1)	
		Check if the	organization used Schee	dule O to respon	d to any ques	tion in this Part I				<u></u>	<u></u>		
	1		gifts, grants, and simila								1		35,771.
	2		e revenue including gov								2		
		 3 Membership dues and assessments 4 Investment income 									3		617.
	4						1				4		017.
	5a		rom sale of assets othe				<u>5a</u> 5b						
	b c		her basis and sales exp rom sale of assets othe				50				5c		
	6	,	idraising events:	linali inventory		JD ITOITI IIITE Ja)					50		
_	a	-	rom gaming (attach Scl	nedule G if great	er than								
Revenue	Ĩ			5			6a						
eve	b	. , ,	rom fundraising events				of co	ntribution	S				
ñ		from fundraisir	g events reported on lir	ne 1) (attach Sch	nedule G if the	sum of such	_						
		gross income a	nd contributions exceed	ds \$15,000)			6b						
	c	Less: direct exp	enses from gaming and	d fundraising eve	ents		6c						
	d		loss) from gaming and					ne 6c) 🛄			6d		
	7a		nventory, less returns a										
	b	Less: cost of go	oods sold				7b				_		
	C C		(loss) from sales of inv								70		
	8	Other revenue (describe in Schedule O)						····	8		36,388.
	9 10	Grants and sim	Add lines 1, 2, 3, 4, 5c, ilar amounts paid (list i	n Schedule ON			EE S	CHED	ULE O		9 10		134,776.
	11	Benefits naid to	or for members						-		11		,
Ś	12	Salaries, other	compensation, and emp	lovee benefits							12		
Expenses	13	Professional fe	es and other payments	to independent c	contractors						13		900.
tbei	14	Occupancy, ren	t, utilities, and maintena	ance							14		
ú	15	Printing, public	ations, postage, and shi	pping						[15		
	16	Other expenses	(describe in Schedule	D)		S	EE S	CHED	ULE O		16		1,468.
	17		. Add lines 10 through	16							17		137,144.
Ś	18		cit) for the year (subtrac								18		100,756.
Net Assets	19		ind balances at beginnir			,				-			101 000
t A₅			th end-of-year figure rep			`					19		<u>131,779.</u>
Ne	20	-	in net assets or fund ba							. I	20		<u>0.</u> 31,023.
	21		Ind balances at end of y			II ZU					21	F ewer	<u>990-F7 (2021)</u>

LHA For Paperwork Reduction Act Notice, see the separate instructions.

Form **990-EZ** (2021)

Forr	n 990-EZ (2021) NCOE FOUNDATION		8	33-	11379	40 Page 2
Pa	art II Balance Sheets (see the instructions for Part II)					
	Check if the organization used Schedule O to resp	oond to any question	in this Part II			
		(/	A) Beginning of year		(B) E	nd of year
22	Cash, savings, and investments		131,779.	22		31,023.
23	Land and buildings			23		
24	Other assets (describe in Schedule O)			24		
25	Total assets		131,779.			31,023.
26	Total liabilities (describe in Schedule 0)		0.			0.
_27	Net assets or fund balances (line 27 of column (B) must agree with line 21)		131,779.	27		31,023.
Pa	art III Statement of Program Service Accomplishmen	N	,			penses
	Check if the organization used Schedule O to resp					for section and 501(c)(4)
Wha	at is the organization's primary exempt purpose? CHARITABLE & E	DUCATIONAL AC	TIVITIES.			ons; optional for
	ribe the organization's program service accomplishments for each of its three largest program s		In a clear and concise		others.)	
	ner, describe the services provided, the number of persons benefited, and other relevant information					
28	THE NCOE FOUNDATION IS RAISING FUNDS		THE			
	PROGRAMS OF THE NAPA COUNTY OFFICE (OF EDUCATION				
	(Grants \$ 134,776.) If this amount includes foreign g	rants, check here			28a	134,776.
29						
	(Grants \$) If this amount includes foreign g	rants, check here			29a	
30						
	(Grants \$) If this amount includes foreign g	rants, check here			30a	
31	Other program services (describe in Schedule O)					
	(Grants \$) If this amount includes foreign g	rants, check here			31a	
32	Total program service expenses (add lines 28a through 31a)			. 🕨	32	134,776.
Pa	art IV List of Officers, Directors, Trustees, and Key E			e the i	nstructions for	Part IV)
	Check if the organization used Schedule O to resp	ond to any question	in this Part IV			
		(b) Average hours	(C) Reportable compensation (Forms		alth benefits, ibutions to	(e) Estimated
	(a) Name and title	per week devoted to	W-2/1099-MISC/	emplo	byee benefit and deferred	amount of other
		position	(if not paid, enter -0-)		pensation	compensation
CA	ROLINE WILSON					
	MBER	1.00	0.		0.	0.
<u>C</u> C	NNIE SILVA					
	MBER	1.00	0.		0.	0.
SA	RA SITCH					
	MBER	1.00	0.		0.	0.
LΥ	'NNE VAUGHAN					
	MBER	1.00	0.		0.	0.
GI	LLIE MILLER					
	MBER	1.00	0.		0.	0.
KE	LSEY PETITHOMME					
	MBER	1.00	0.		0.	0.
TC	NY APOLLONI					
CH	IAIR	1.00	0.		0.	0.
JO	SHUA SCHULTZ					
TR	EASURER	1.00	0.		0.	0.
JU	LIE MCCLURE					
SE	CRETARY	1.00	0.		0.	0.
]				
		1				

Form	990-EZ (2021) NCOE FOUNDATION 83-1137	940		Page 3
Pa	rt V Other Information (Note the Schedule A and personal benefit contract statement requirements		;	
	instructions for Part V.) Check if the organization used Sch. O to respond to any question in this	Part '	V	X
			Yes	
33	Did the organization engage in any significant activity not previously reported to the IRS? If "Yes," provide a detailed description of each			
	activity in Schedule 0	33		x
34	Were any significant changes made to the organizing or governing documents? If "Yes," attach a conformed copy of the amended			
	documents if they reflect a change to the organization's name. Otherwise, explain the change on Schedule O. See instructions	34		x
35 a	Did the organization have unrelated business gross income of \$1,000 or more during the year from business activities (such as those reported			
	on lines 2, 6a, and 7a, among others)?	35a		x
b	If "Yes" to line 35a, has the organization filed a Form 990-T for the year? If "No," provide an explanation in Schedule O	35b	N/	A
	Was the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization subject to section 6033(e) notice, reporting, and proxy tax			
	requirements during the year? If "Yes," complete Schedule C, Part III	35c		x
36	Did the organization undergo a liquidation, dissolution, termination, or significant disposition of net assets during the year? If "Yes,"			
	complete applicable parts of Schedule N	36		x
37 a	Enter amount of political expenditures, direct or indirect, as described in the instructions			
b	Did the organization file Form 1120-POL for this year?	37b		Х
	Did the organization borrow from, or make any loans to, any officer, director, trustee, or key employee; or were any such loans made			
	in a prior year and still outstanding at the end of the tax year covered by this return?	38a		Х
b	If "Yes," complete Schedule L, Part II, and enter the total amount involved 38b N/A			
39	Section 501(c)(7) organizations. Enter:			
a	Initiation fees and capital contributions included on line 9 39a N/A			
	Gross receipts, included on line 9, for public use of club facilities 39b N/A			
40 a	Section 501(c)(3) organizations. Enter amount of tax imposed on the organization during the year under:			
	section 4911 ▶ 0 • ; section 4912 ▶ 0 • ; section 4955 ▶ 0 •			
b	Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations. Did the organization engage in any section 4958 excess benefit			
	transaction during the year, or did it engage in an excess benefit transaction in a prior year that has not been reported on any			
	of its prior Forms 990 or 990-EZ? If "Yes," complete Schedule L, Part I	40b		X
C	Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations. Enter amount of tax imposed on			
	organization managers or disqualified persons during the year under sections 4912, 4955, and 4958 🕨 0.			
d	Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations. Enter amount of tax on line 40c reimbursed			
	by the organization 0.			
е	All organizations. At any time during the tax year, was the organization a party to a prohibited tax shelter			
	transaction? If "Yes," complete Form 8886-T	40e		X
41	List the states with which a copy of this return is filed \blacktriangleright CA			
42 a	The organization's books are in care of \blacktriangleright NAPA COUNTY OFFICE OF EDUCAT Telephone no. \blacktriangleright (707)			10
	Located at \triangleright 2121 IMOLA AVE, NAPA, CA ZIP+4 \triangleright 9	455	9	
b	At any time during the calendar year, did the organization have an interest in or a signature or other authority	1	X	
	over a financial account in a foreign country (such as a bank account, securities account, or other financial		Yes	
	account)?	42b		X
	If "Yes," enter the name of the foreign country			
	See the instructions for exceptions and filing requirements for FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR).			v
C	At any time during the calendar year, did the organization maintain an office outside the United States?	42c		X
40	If "Yes," enter the name of the foreign country		•	
43	Section 4947(a)(1) nonexempt charitable trusts filing Form 990-EZ in lieu of Form 1041 - Check here		🕨	
	and enter the amount of tax-exempt interest received or accrued during the tax year	N/A		
		1	Yes	No
44-	Did the organization maintain any denor adviced funde during the year? If "Vee " Form 000 must be completed instead of		103	
44 a	Did the organization maintain any donor advised funds during the year? If "Yes," Form 990 must be completed instead of	44a		X
Ь	Form 990-EZ Did the organization operate one or more hospital facilities during the year? If "Yes," Form 990 must be completed instead	44a		
U		44b		X
-	of Form 990-EZ	440 44c		X
	Did the organization receive any payments for indoor tanning services during the year?	440		
d	If "Yes" to line 44c, has the organization filed a Form 720 to report these payments? If "No," provide an explanation	44d		
<u> </u>	in Schedule 0 Did the organization have a controlled entity within the meaning of section 512(b)(13)?	440 45a		x
	Did the organization have a controlled entity within the meaning of section 512(b)(13)?	408		
U	512(b)(13)? If "Yes," Form 990 and Schedule R may need to be completed instead of Form 990-EZ. See instructions	45b		
	יובנטא וסו: ווי דוס, דוסוווו ששט מווע שטובעעוב ה ווומץ ווכבע נט שב טטוועובובע וווגובמע טו דטוווו ששט-בב. שבב ווגע ענוטוג	1 400		

Form	990-E2	Z (2021)	NCOE	FOUNDATION					83-11379	940		Page 4
									-		Yes	No
46	Did the	e organizati	on engage, dii	rectly or indirectly, in pol	itical campaign activitie	s on behalf of o	or in oppositio	on to candidates for pu	ublic office?			
			Schedule C, F							46		Х
Pa	rt VI	Section Section	on 501(c)((3) Organizations	Only							
		All sect	ion 501(c)(3)	organizations must a	nswer questions 47-	49b and 52, a	nd complet	e the tables for lines	s 50 and 51.			
		Check i	if the organiz	zation used Schedule	O to respond to any	question in th	is Part VI					
									r		Yes	No
		-		lobbying activities or hav	()							
	If "Yes	," complete	Sch. C, Part I	I						47		X
				described in section 170						48		X
				transfers to an exempt no						49a		X
D	If "Yes	," was the r	elated organiz	ation a section 527 organ					L	49b	· .	
50			-	inization's five highest co			cers, director	s, trustees, and key er	nployees) who ea	ch rec	eived r	nore
	than \$	100,000 of		n from the organization. I	r there is none, enter "N			(2) -	(d) Health benefits		\ F ating	
			(a) Name and	d title of each employee		(b) Avera per week c		(C) Reportable compensation (Forms	contributions to	1 1) Estim ount of	
				NON	Γ	posi		W-2/1099-MISC/ 1099-NEC)	employee benefit plans, and deferred		mpens	
				NON	6				compensation	-	-	
										+		
										+		
						1						
f	Total r	number of o	ther employee	es paid over \$100,000		•	►	•	•	-		
				inization's five highest co			ho each rece	ived more than \$100,0)00 of compensat	ion fro	om the	
			ere is none, ei									
	(a	a) Name and	d business ad	dress of each independer	it contractor		(b) Type of service	(c)	Compe	ensatio	ı
			-	lent contractors each rec	-			🕨				
		-	-	Schedule A? Note: All see							_	_
_		eted Schedu							· -	X Ye		<u>No</u>
	•			hat I have examined this	· •					je and	belief,	it is
true,	correct	, and comp	lete. Declarati	on of preparer (other tha	n officer) is based on a	II Information of	r which prepa	irer nas any knowledg	e. T			
Sig	n	Signatu	re of officer						Date			
Her			CHIIA CO	CHULTZ, TRE	ASURER							
	_	Type or	print name and	title	ASOKER							
		Print/	Type preparer'	's name	Preparer's signature		Date	Check	if PTIN			
	_		ι γρο ριοραιοί	Shame	i roparor o orginataro		Dato	self- emplo				
Paie		MAD	CY KEAI	NEV					P02	370	487	
	pare	Eirm'o		HRISTY WHIT		ES		Eirmia ElA	►27-295			
Use	Only			348 OLIVE S		50			(-82:	22
		"""		SAN DIEGO,				Phone no.	. (013) 4	<u> </u>	04	
Maxia	the IDO	discuss the		the preparer shown abov						X Ye		No
ividy	IIIE IKO	ง นเธยนธร เปป	is return with	the preparer Shown abov					🕨 🖌	.⊾_ T(50 L	

SCHEDULE A	١
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Department of the Treasury Internal Revenue Service

(Form 990)

Public Charity Status and Public Support

Complete if the organization is a section 501(c)(3) organization or a section

4947(a)(1) nonexempt charitable trust. Attach to Form 990 or Form 990-EZ.

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

OMB No. 1545-0047
2021
Open to Public Inspection

Nan	ie of t	ne organization		_					dentification number
-			E FOUNDATION						3-1137940
Ра	rtl	Reason for Public	Charity Status.	(All organizations must c	complete th	nis part.) S	ee instruction	S.	
The	organi	ization is not a private found	dation because it is: (F	For lines 1 through 12, c	heck only	one box.)			
1		A church, convention of ch	nurches, or associatio	n of churches described	l in sectio	n 170(b)(1	I)(A)(i).		
2		A school described in sect	tion 170(b)(1)(A)(ii). (Attach Schedule E (Forn	n 990).)				
3		A hospital or a cooperative	hospital service orga	nization described in so	ection 170	(b)(1)(A)(ii	ii).		
4		A medical research organiz	zation operated in cor	njunction with a hospital	described	in sectio	n 170(b)(1)(A)	(iii). Enter	the hospital's name,
		city, and state:							
5		An organization operated f	or the benefit of a col	lege or university owned	l or operat	ed by a go	vernmental u	nit describe	ed in
		section 170(b)(1)(A)(iv).	Complete Part II.)						
6		A federal, state, or local go	overnment or governm	nental unit described in	section 17	70(b)(1)(A)	(v).		
7	\square	An organization that norma	-					e general i	oublic described in
		section 170(b)(1)(A)(vi). (C	•		5			5	
8		A community trust describ		1)(A)(vi). (Complete Par	t II.)				
9	F	An agricultural research or				ed in coniu	unction with a	land-grant	college
-		or university or a non-land-	-			-		-	•
		university:	grant conogo or agrici			lamo, ony	, and state of	une conege	
10		An organization that norma	ally receives (1) more t	than 33 1/3% of its supr	ort from c	ontribution	ns membersh	in fees and	d aross receipts from
10		activities related to its exer	•					-	•
		income and unrelated busi							-
		See section 509(a)(2). (Co				500 2040			
11		An organization organized		vely to test for public sa	fety See	section 5(19(a)(4)		
	X	An organization organized	•		•			rry out the	nurnoses of one or
		more publicly supported or	-	-	-			•	
		lines 12a through 12d that	-						
а	X		• •					-	aivina
u		the supported organizati		-	• • • •	-			
		organization. You must			i majonty c				apporting
b		Type II. A supporting or	-		tion with it	e cupporto	d organizatio	a(c) by bay	up a
D							-		•
		control or management o			ame perso	ns that co	ntroi or manaç	je i le supp	Joned
		organization(s). You mus	-		in connoct	ion with	and functional	lu intograto	d with
С		J Type III functionally inte						ly integrate	a with,
		its supported organizatio		-					
d		J Type III non-functional						-	
		that is not functionally in			•		-	an attentiv	/eness
_	X	requirement (see instruct	,	• •	,				
е	Δ						турет, туре	ii, Type iii	
	F ists	functionally integrated, o		<i>y</i> o 11	0 0				1
		er the number of supported							L
g		vide the following informatio i) Name of supported	(ii) EIN	(iii) Type of organization	(iv) Is the orga	nization listed	(v) Amount of	monetarv	(vi) Amount of other
	•	organization		(described on lines 1-10	Yes	ng document? No	support (see ir		support (see instructions)
NTA .		COUNTY OFFICE		above (see instructions))	163				
		UCATION	94-6002406	2	x		110	,550.	15,429.
	БD	UCATION	94-0002400	<u> </u>				, 550.	15,425.
			+						
.							110	550	15 / 20
Tota	U						I 119	,550.	15,429.

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Schedule A (Form 990) 2021

NCOE	FOUNDATI	ON
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83-1137940 Page 2

Support Schedule for Organizations Described in Sections 170(b)(1)(A)(iv) and 170(b)(1)(A)(vi) Part II (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 fails to qualify under the tests listed below, please complete Part III.)

Calendar year (of fiscal year beginning in)	<u>Sec</u>	ction A. Public Support		-			-	_
membership fees received. (Bo not include any 'unusual grants.') image: constraint of the organization's benefit and either paid to or expended on its behalt 2 Tax revenues levide for the organization's benefit and either paid to or expended on its behalt image: constraint on the organization's benefit and the organization's benefit and either paid to or expended on its behalt 3 The value of services or facilities furnished by a governmental unit to the organization without charge image: constraint organization's behalt and the organization's behalt and the organization's behalt and the constraint of the organization's behalt and the organization's behalt and the constraint of the organization's behalt and the organization's beh	Cale	ndar year (or fiscal year beginning in) 🕨	(a) 2017	(b) 2018	(c) 2019	(d) 2020	(e) 2021	(f) Total
include any "unusual grants.") 2 2 Tax revenues levied for the organization is breaking and there pad to or expended on its behalf	1	Gifts, grants, contributions, and						
2 Tar versues levid for the organization is behalf and there paid to or expended on its behalf and there paid to or expended on its behalf and there paid to or expended on its behalf and there paid to or expended on its behalf and there paid to the organization without charge 4 Total. Add lines 1 through 3 5 The portion of fold contributions by each person (other than a governmental unit or publicly supported organization included and the contributions by each person (other than a governmental unit or publicly supported organization included and the contributions by each person (other than a governmental unit or publicly supported organization included and the contributions by each person (other than a governmental unit or publicly supported organization included and the contributions by each person (other than a governmental unit or publicly support deverties them text governmental unit or publicly support deverties them text by each person (other than a governmental unit or publicly support deverties them text dividends, payments received on succurities tors, rents, royatius, and income from interest, dividends, payments received on succurities tors, rents, royatius, and income from interest, dividends, payments received on succurities tors, rents, royatius, and income from interest, dividends, payments received on succurities tors, rents, royatius, and income from interest, dividends, payments received on succurities tors, rents, royatius, and income from interest, dividends, payments received on succurities tors, rents, royatius, and income from interest, dividends, payments received on succurities tors, rowatius, and income from interest, dividends, payments received on succurities tors, rowatius, and income from interest, dividends, payments received on succurities tors, rowatius, and income from interest, dividends, payments received on succurities tors, rowatius, and income from interest, dividends, payments received on succurities tors, rowatius, and income from interest, dividends, payments received		membership fees received. (Do not						
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are expended on its behalf are expended on its behalf 3 The value of services or facilities brown of the services or facilities timished by a governmental unit to the organization without charge brown of total contributions by each person (other than a governmental unit to publicly supported organization) included content to the organization without charge column (f) brown on line 11, column (f) column (f) column (f) column (f) column (f) <	2	Tax revenues levied for the organ-						
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		more, and if the organization meets the	ne facts-and-circur	nstances test, che	eck this box and s	stop here. Explain i	in Part VI how the	
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		organization meets the facts-and-circu	umstances test. Th	ne organization qu	alifies as a publicly	y supported organi	zation	►
	18	Private foundation. If the organization	on did not check a	box on line 13, 16	a, 16b, 17a, or 17	b, check this box a	and see instruction	ns 🕨 🗌

Schedule A (Form 990) 2021

NCOE FOUNDATION

Part III Support 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.)

Sec	ction A. Public Support						
Cale	ndar year (or fiscal year beginning in) 🕨	(a) 2017	(b) 2018	(c) 2019	(d) 2020	(e) 202	21 (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 per- formed, 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 bus-						
	iness under section 513						
4	Tax revenues levied for the organ-						
	ization's benefit and either paid to or expended on its behalf						
5	The value of services or facilities						
5	furnished by a governmental unit to the organization without charge						
6	Total. Add lines 1 through 5						
	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						
	Add lines 7a and 7b						
	Public support. (Subtract line 7c from line 6.)						
	ndar year (or fiscal year beginning in)	(a) 2017	(b) 0019	(a) 2010	(4) 2020	(a) 000	
		(a) 2017	(b) 2018	(c) 2019	(d) 2020	(e) 202	21 (f) Total
	Amounts from line 6 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						
~	Add lines 10a and 10b						
	Net income from unrelated business activities not included on line 10b, whether or not the business is regularly carried on						
	Other income. Do not include gain or loss from the sale of capital assets (Explain in Part VI.)						
	Total support. (Add lines 9, 10c, 11, and 12.)		L				
14	First 5 years. If the Form 990 is for th	e organization's fi	rst, second, third,	tourth, or fifth tax	year as a section 5	001(c)(3) orga	anization,
<u> </u>	check this box and stop here						
	ction C. Computation of Public						
	Public support percentage for 2021 (li			column (f))		15	%
	Public support percentage from 2020					16	%
	ction D. Computation of Inves					<u> </u>	
17						17	%
18	Investment income percentage from 2					18	%
19a	1 33 1/3% support tests - 2021. If the	organization did r	not check the box	on line 14, and line	e 15 is more than 3	3 1/3%, and	l line 17 is not
	more than 33 1/3%, check this box an	id stop here. The	organization quali	fies as a publicly s	supported organiza	tion	▶□
b	33 1/3% support tests - 2020. If the	organization did r	not check a box or	line 14 or line 19a	a, and line 16 is mo	ore than 33 1	/3%, and
	line 18 is not more than 33 1/3%, chec	ck this box and st	t op here. The orga	nization qualifies	as a publicly suppo	orted organiz	zation
20	Private foundation. If the organization	<u>n did not check a</u>	box on line 14, 19	a, or 19b, check th	his box and see ins	tructions	

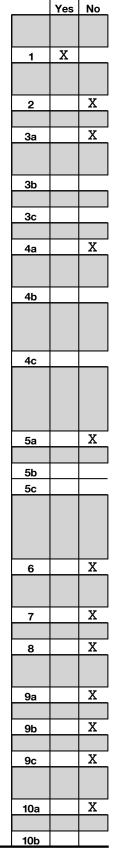
NCOE FOUNDATION

Part IV Supporting Organizations

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

Section A. All Supporting Organizations

- 1 Are all of the organization's supported organizations listed by name in the organization's governing documents? 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.
- 2 Did the organization have any supported organization that does not have an IRS determination of status under section 509(a)(1) or (2)? If "Yes," explain in **Part VI** how the organization determined that the supported organization was described in section 509(a)(1) or (2).
- **3a** Did the organization have a supported organization described in section 501(c)(4), (5), or (6)? If "Yes," answer lines 3b and 3c below.
- **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)? If "Yes," describe in **Part VI** when and how the organization made the determination.
- c Did the organization ensure that all support to such organizations was used exclusively for section 170(c)(2)(B) purposes? If "Yes," explain in **Part VI** what controls the organization put in place to ensure such use.
- **4a** Was any supported organization not organized in the United States ("foreign supported organization")? *If* "Yes," and if you checked box 12a or 12b in Part I, answer lines 4b and 4c below.
- **b** Did the organization have ultimate control and discretion in deciding whether to make grants to the foreign supported organization? *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.*
- **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)? *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.*
- 5a Did the organization add, substitute, or remove any supported organizations during the tax year? 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).
- **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? *If "Yes," provide detail in* **Part VI.**
- 7 Did the organization provide a grant, loan, compensation, or other similar payment to a substantial contributor (as 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? If "Yes," complete Part I of Schedule L (Form 990).
- 8 Did the organization make a loan to a disqualified person (as defined in section 4958) not described on line 7? *If* "Yes," *complete Part I of Schedule L (Form 990).*
- **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))? *If* "Yes," *provide detail in* **Part VI.**
- **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? *If* "Yes," *provide detail in* **Part VI.**
- 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? If "Yes," provide detail in **Part VI.**
- **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)? *If* "Yes," *answer line 10b below.*
 - **b** Did the organization have any excess business holdings in the tax year? (Use Schedule C, Form 4720, to determine whether the organization had excess business holdings.)



1	Check the box next to the method that the organization used to satisfy the Integral Part Test dur
Sec	ction E. Type III Functionally Integrated Supporting Organizations
	supported organizations played in this regard.
	income or assets at all times during the tax year? If "Yes," describe in Part VI the role the orga
	significant voice in the organization's investment policies and in directing the use of the organiz

- ng the year (see instructions).
- The organization satisfied the Activities Test. Complete line 2 below. а
- h The organization is the parent of each of its supported organizations. Complete line 3 below.
- The organization supported a governmental entity. Describe in Part VI how you supported a governmental entity (see instructions) С
- 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? 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.
- 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? 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.
- Parent of Supported Organizations. Answer lines 3a and 3b below. 3
- 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? If "Yes" or "No" provide details in Part VI.
- b Did the organization exercise a substantial degree of direction over the policies, programs, and activities of each of its supported organizations? If "Yes," describe in Part VI the role played by the organization in this regard.

2a

2b

3a

Yes No

а	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 line 11a above?

Has the organization accepted a gift or contribution from any of the following persons?

c A 35% controlled entity of a person described on line 11a or 11b above? If "Yes" to line 11a, 11b, or 11c, provide <u>detail in Part VI</u>

Section B. Type I Supporting Organizations

11

- Did the governing body, members of the governing body, officers acting in their official capacity, or membership of one or 1 more supported organizations have the power to regularly appoint or elect at least a majority of the organization's officers, directors, or trustees at all times during the tax year? 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 sup organization, describe how the powers to appoint and/or remove officers, directors, or trustees were allocated amor supported organizations and what conditions or restrictions, if any, applied to such powers during the tax year.
- 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? If "Yes," explain in Part VI how providing such benefit carried out the purposes of the supported organization(s) that operated,

upervised. or controlled the supporting organization. Section C. Type II Supporting Organizations

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

the sup	ported organ	nization(s).	
Section D	All Type	III Supportin	g 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?	1		
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? If "No," explain in Part VI how			
	the organization maintained a close and continuous working relationship with the supported organization(s).	2		
3	By reason of the relationship described on 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? If "Yes," describe in Part VI the role the organization's			
	supported organizations played in this regard.	3		

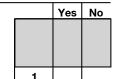
NCOE FOUNDATION Schedule A (Form 990) 2021 Part IV Supporting Organizations (continued

Yes No х 11a Х 11b Х 11c

Yes

No

s) pported ing the			
ing the	1	Х	
	2		Х
		Yes	No



Part	V Type III Non-Functionally Integrated 509(a)(3) Support	ting Organi	zations	
1	Check here if the organization satisfied the Integral Part Test as a qualif	ying trust on N	lov. 20, 1970 (<i>explain in</i>	Part VI). See instructions.
	All other Type III non-functionally integrated supporting organizations m			
Sectio	n A - Adjusted Net Income		(A) Prior Year	(B) Current Year (optional)
1 N	Net short-term capital gain	1		
2 F	Recoveries of prior-year distributions	2		
3 (Other gross income (see instructions)	3		
4 A	Add lines 1 through 3.	4		
5 D	Depreciation and depletion	5		
6 F	Portion of operating expenses paid or incurred for production or			
с	collection of gross income or for management, conservation, or			
n	naintenance of property held for production of income (see instructions)	6		
	Other expenses (see instructions)	7		
8 A	Adjusted Net Income (subtract lines 5, 6, and 7 from line 4)	8		
	n B - Minimum Asset Amount	·	(A) Prior Year	(B) Current Year (optional)
1 A	Aggregate fair market value of all non-exempt-use assets (see			
ir	nstructions for short tax year or assets held for part of year):			
a A	Average monthly value of securities	1a		
bΑ	Average monthly cash balances	1b		
сF	air market value of other non-exempt-use assets	1c		
dΤ	Fotal (add lines 1a, 1b, and 1c)	1d		
еD	Discount claimed for blockage or other factors			
(6	explain in detail in Part VI):			
2 A	Acquisition indebtedness applicable to non-exempt-use assets	2		
3 S	Subtract line 2 from line 1d.	3		
4 C	Cash deemed held for exempt use. Enter 0.015 of line 3 (for greater amount,			
s	see instructions).	4		
5 N	Net value of non-exempt-use assets (subtract line 4 from line 3)	5		
6 N	Multiply line 5 by 0.035.	6		
7 F	Recoveries of prior-year distributions	7		
8 N	Minimum Asset Amount (add line 7 to line 6)	8		
Sectio	n C - Distributable Amount			Current Year
1 A	Adjusted net income for prior year (from Section A, line 8, column A)	1		
2 E	Enter 0.85 of line 1.	2		
3 N	Ninimum asset amount for prior year (from Section B, line 8, column A)	3		
	Enter greater of line 2 or line 3.	4		
5 Ir	ncome tax imposed in prior year	5		
	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-functio	nally integrate	d Type III supporting orga	nization (see

instructions).

Schedule A (Form 990) 2021

NCOE FOUNDATION

Schedule A (Form 990) 2021

b Excess from 2018 c Excess from 2019 d Excess from 2020 e Excess from 2021

Cala	dule A (Form 990) 2021 NCOE FOUNDATI	ОN		g	3-1137940 Page 7
	dule A (Form 990) 2021 NCOE FOUNDATIO		anizations (continu		5-115/940 Page/
				Jeu)	Current Year
	on D - Distributions	matauraaaa		1	Current rear
 2	Amounts paid to supported organizations to accomplish exer				
2	Amounts paid to perform activity that directly furthers exemp	i purposes or supported		2	
3	organizations, in excess of income from activity	o of our ported or appization	<u> </u>	3	
	Administrative expenses paid to accomplish exempt purpose	s of supported organizations	5	4	
<u>4</u> 5	Amounts paid to acquire exempt-use assets	Dort VI		5	
_ <u>5</u> 6	Qualified set-aside amounts (prior IRS approval required - pro Other distributions (<i>describe in</i> Part VI). See instructions.	ovide details in Part VI)		6	
7	Total annual distributions. Add lines 1 through 6.			7	
8	Distributions to attentive supported organizations to which the	o organization is responsive	<u>,</u>	- '	
0	(provide details in Part VI). See instructions.	le organization is responsive	;	8	
9	Distributable amount for 2021 from Section C, line 6			9	
10	Line 8 amount divided by line 9 amount			10	
10		(i)	(ii)		(iii)
Sect	on E - Distribution Allocations (see instructions)	Excess Distributions	Underdistribution Pre-2021	าร	Distributable Amount for 2021
1	Distributable amount for 2021 from Section C, line 6				
2	Underdistributions, if any, for years prior to 2021 (reason-				
	able cause required - explain in Part VI). See instructions.				
_3	Excess distributions carryover, if any, to 2021				
a	From 2016				
b	From 2017				
C	From 2018				
d	From 2019				
e	From 2020				
f	Total of lines 3a through 3e				
g	Applied to underdistributions of prior years				
h	Applied to 2021 distributable amount				
i	Carryover from 2016 not applied (see instructions)				
j	Remainder. Subtract lines 3g, 3h, and 3i from line 3f.				
4	Distributions for 2021 from Section D,				
	line 7: \$				
a	Applied to underdistributions of prior years				
b	Applied to 2021 distributable amount				
C	Remainder. Subtract lines 4a and 4b from line 4.				
5	Remaining underdistributions for years prior to 2021, if				
	any. Subtract lines 3g and 4a from line 2. For result greater				
	than zero, explain in Part VI. See instructions.				
6	Remaining underdistributions for 2021. Subtract lines 3h				
	and 4b from line 1. For result greater than zero, explain in				
	Part VI. See instructions.				
7	Excess distributions carryover to 2022. Add lines 3j				
	and 4c.				
8	Breakdown of line 7:				
а	Excess from 2017				

Schedule A (Form 990) 2021

Schedule A		FOUNDATION	83-1137940 Page 8
Part VI	Part IV, Section A, lines 1, 2, 3b, 3c line 1; Part IV, Section D, lines 2 an	Provide the explanations required by Part II, line 10; Part II, line 17a , 4b, 4c, 5a, 6, 9a, 9b, 9c, 11a, 11b, and 11c; Part IV, Section B, lines d 3; Part IV, Section E, lines 1c, 2a, 2b, 3a, and 3b; Part V, line 1; Par t V, Section E, lines 2, 5, and 6. Also complete this part for any addit	s 1 and 2; Part IV, Section C, t V, Section B, line 1e; Part V,

Schedule B

(Form 990)

Department of the Treasury Internal Revenue Service

Name of the organization

** PUBLIC DISCLOSURE COPY *

Schedule of Contributors

► Attach to Form 990 or Form 990-PF. Go to www.irs.gov/Form990 for the latest information. OMB No. 1545-0047

2021

Employer identification number

83-1137940

NCOE	FOUNDATION

Drganization type (check one):			
Filers of:	Section:		
Form 990 or 990-EZ	\fbox 501(c)(3) (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

X 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 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 33 1/3% support test of the regulations under sections 509(a)(1) and 170(b)(1)(A)(vi), that checked Schedule A (Form 990), 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 (entering "N/A" in column (b) instead of the contributor name and address), 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 for an *exclusively* set is 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., *purpose*. Don't complete any of the parts unless the **General Rule** applies to this organization because it received *nonexclusively* 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., *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 **for an state set of the set set o**

Caution: An organization that isn't covered by the General Rule and/or the Special Rules doesn't file Schedule B (Form 990), 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 990-PF, Part I, line 2, to certify that it doesn't meet the filing requirements of Schedule B (Form 990).

LHA For Paperwork Reduction Act Notice, see the instructions for Form 990, 990-EZ, or 990-PF.

Schedule B (Form 990) (2021)

Part I	Contributors (see instructions). Use duplicate copies of Part I if addition	al space is needed.	
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
1		\$ <u>10,700.</u>	PersonXPayrollXNoncash(Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
2		\$5,000.	Person X Payroll Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
3		\$10,000.	Person X 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 Ocomplete 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.)

Employer identification number

83-1137940

Schedule B (Form 990) (2021) Name of organization

NCOE FOUNDATION

Schedule B (Form 990) (2021)

NCOE E	FOUNDATION		83-1137940
Part II	Noncash Property (see instructions). Use duplicate copies of Pa	rt 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

Employer identification number

123453 11-11-21

Schedule B (Form 990) (2021)

Name of or	rganization	Employer ider	ntification number	
	FOUNDATION		83-113	
Part III	Exclusively religious, charitable, etc., contribution from any one contributor. Complete columns (a) completing Part III, enter the total of exclusively religious, of Use duplicate copies of Part III if additional s	through (e) and the following line e charitable, etc., contributions of \$1,000 c	entry. For organizations	ın \$1,000 for the year
(a) No. from Part I	(b) Purpose of gift	(c) Use of gift	(d) Description of how	gift is held
		(e) Transfer of g	jift	
-	Transferee's name, address, an	ad ZIP + 4	Relationship of transferor to trans	sferee
(a) No. from Part I	(b) Purpose of gift	(c) Use of gift	(d) Description of how	gift is held
-		(e) Transfer of g	ift	
-	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 g	ift	
-	Transferee's name, address, and ZIP + 4 Relationship or		Relationship of transferor to trans	sferee
(-) [1				
(a) No. from Part I	(b) Purpose of gift	(c) Use of gift	(d) Description of how	gift is held
ľ		(e) Transfer of g	ift	
-	Transferee's name, address, an	nd ZIP + 4	Relationship of transferor to trans	sferee

SCHEDULE O (Form 990)

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 Form 990-EZ.

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

Employer identification number

AMOUNT:

617.

134,776.

1,418.

1,468.

50.

AMOUNT:

OMB No. 1545-0047

83-1137940

FORM 990-EZ, PART I, LINE 4, OTHER INVESTMENT INCOME:

NCOE FOUNDATION

DESCRIPTION OF PROPERTY:

INTEREST INCOME

FORM 990-EZ, PART I, LINE 10, GRANTS AND SIMILAR AMOUNTS PAID:

ACTIVITY CLASSIFICATION:

GRANTEE NAME: NAPA COUNTY OFFICE OF EDUCATION

GRANTEE ADDRESS: 2121 IMOLA AVE NAPA, CA 94559

GRANTEE RELATIONSHIP: SUPPORTING ORGANIZATION

AMOUNT GIVEN:

FORM 990-EZ, PART I, LINE 16, OTHER EXPENSES:

DESCRIPTION OF OTHER EXPENSES:

LIABILITY INSURANCE

BANK AND OTHER FEES

TOTAL TO FORM 990-EZ, LINE 16

FORM 990-EZ, PART V, INFORMATION REGARDING PERSONAL BENEFIT CONTRACTS:

THE ORGANIZATION DID NOT, DURING THE YEAR, RECEIVE ANY FUNDS, DIRECTLY,

OR INDIRECTLY, TO PAY PREMIUMS ON A PERSONAL BENEFIT CONTRACT.

THE ORGANIZATION, DID NOT, DURING THE YEAR, PAY ANY PREMIUMS, DIRECTLY,

OR INDIRECTLY, ON A PERSONAL BENEFIT CONTRACT.