

COMMUNITIES FOUNDATION OF OKLAHOMA

FISCAL SPONSORSHIP & TAX EXEMPT CERTIFICATION

The Institute for Character Enrichment, Inc. ("ICE") was organized with a mission to promote a universal understanding of our common moral values and is dedicated to character education and enrichment throughout our society and to the scientific study of the psychology of character education and moral behavior. To accomplish these goals, a fiscal sponsorship fund was established at the Communities Foundation of Oklahoma on October 23, 2003.


The Institute for Character Enrichment, Inc. Fiscal Sponsorship Fund is a restricted fund for the sole support of stated purposes in formal fund agreements and donations to the Institute for Character Enrichment Fund qualify as charitable donations under IRS 501(c)(3) guidelines for community foundations. Expenditures from the fund are made at the request of the Institute for Character Enrichment Executive Committee and approved by the Trustee Board of the Communities Foundation of Oklahoma.

The following are conditions contained in the Institute for Character Enrichment Fiscal Sponsorship Fund Agreement:

CONTRIBUTIONS TO FUND: contributions may be made to the Fund, and will be subject to the terms of this agreement. The Donor acknowledges that contributions to the Fund shall be subject to the Certificate of Incorporation, Bylaws and attached Policies of CFO's Board ("CFO Policies") attached as Exhibit B, as they exist now and as they may be amended, and that contributions to the Fund shall be controlled by CFO and used in furtherance of its charitable purposes.

DISTRIBUTIONS FROM FUND: CFO shall make distributions in accordance with the CFO Policies in effect at the time a distribution is made, giving consideration to the purposes set forth by the Donor in this agreement. No benefit shall be received by any contributor to the Fund, or anyone related to contributors to this Fund, from any distribution made from the Fund. All distributions will be identified by the Fund name, unless the Donor otherwise requests.

MANAGEMENT OF FUND: The Fund shall be invested as part of the Cash Equivalents as defined in the CFO Investment Policy and shall receive a proportionate share of the earnings thereon. CFO shall charge to the Fund an administrative fee in accordance with CFO Policies.

Certified by: 
Susan R. Graves, Executive Director
Communities Foundation of Oklahoma
CFO Tax ID #: 73-1396320

Date: 10-23-03

Internal Revenue Service

Department of the Treasury

**P. O. Box 2508
Cincinnati, OH 45201**

Date: March 24, 2001

**Communities Foundation of Oklahoma, Inc.
101 N Broadway Ave. Ste. 920
Oklahoma City, OK 73102-8404**

Person to Contact:
Dalphene Naegle 31-04012
Customer Service Specialist
Toll Free Telephone Number:
8:00 a.m. to 9:30 p.m. EST
877-829-6500
Fax Number:
513-263-3756
Federal Identification Number:
73-1396320

Dear Sir or Madam:

This letter is in response to your request for a name change for your organization. We have added your Amended Articles of Incorporation to our System to reflect this change as shown in the heading of this letter.

Our records indicate that a determination letter issued in August 1994 granted your organization exemption from federal income tax under section 501(c)(3) of the Internal Revenue Code. That letter is still in effect.

Based on information subsequently submitted, we classified your organization as one that is not a private foundation within the meaning of section 509(a) of the Code because it is an organization described in sections 509(a)(1) and 170(b)(1)(A)(vi).

This classification was based on the assumption that your organization's operations would continue as stated in the application. If your organization's sources of support, or its character, method of operations, or purposes have changed, please let us know so we can consider the effect of the change on the exempt status and foundation status of your organization.

Your organization is required to file Form 990, Return of Organization Exempt from Income Tax, only if its gross receipts each year are normally more than \$25,000. If a return is required, it must be filed by the 15th day of the fifth month after the end of the organization's annual accounting period. The law imposes a penalty of \$20 a day, up to a maximum of \$10,000, when a return is filed late, unless there is reasonable cause for the delay.

All exempt organizations (unless specifically excluded) are liable for taxes under the Federal Insurance Contributions Act (social security taxes) on remuneration of \$100 or more paid to each employee during a calendar year. Your organization is not liable for the tax imposed under the Federal Unemployment Tax Act (FUTA).

Organizations that are not private foundations are not subject to the excise taxes under Chapter 42 of the Code. However, these organizations are not automatically exempt from other federal excise taxes.

Donors may deduct contributions to your organization as provided in section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to your organization or for its use are deductible for federal estate and gift tax purposes if they meet the applicable provisions of sections 2055, 2106, and 2522 of the Code.

Communities Foundation of Oklahoma, Inc.
73-1396320

Your organization is not required to file federal income tax returns unless it is subject to the tax on unrelated business income under section 511 of the Code. If your organization is subject to this tax, it must file an income tax return on the Form 990-T, Exempt Organization Business Income Tax Return. In this letter, we are not determining whether any of your organization's present or proposed activities are unrelated trade or business as defined in section 513 of the Code.

The law requires you to make your organization's annual return available for public inspection without charge for three years after the due date of the return. You are also required to make available for public inspection a copy of your organization's exemption application, any supporting documents and the exemption letter to any individual who requests such documents in person or in writing. You can charge only a reasonable fee for reproduction and actual postage costs for the copied materials. The law does not require you to provide copies of public inspection documents that are widely available, such as by posting them on the Internet (World Wide Web). You may be liable for a penalty of \$20 a day for each day you do not make these documents available for public inspection (up to a maximum of \$10,000 in the case of an annual return).

Because this letter could help resolve any questions about your organization's exempt status and foundation status, you should keep it with the organization's permanent records.

If you have any questions, please call us at the telephone number shown in the heading of this letter.

This letter affirms your organization's exempt status.

Sincerely,



John E. Ricketts, Director, TE/GE
Customer Account Services