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8	BEFORE THE					
9	ATTORNEY GENERAL					
10	STATE OF CALIFORNIA					
11						
12	In the Matter of the Order to Cease and Desist and Nation of Assessment of Boroltics, Assistation					
13	and Notice of Assessment of Penalties Against: ORDER TO CEASE AND DESIST; NOTICE OF ASSESSMENT OF					
14	PENALTIES					
15	Respondent.					
16						
17	AMERICAN VETERANS FOUNDATION is ordered to immediately CEASE AND					
18	DESIST from all California operations, including all solicitations for charitable purposes by any					
19	means, pursuant to Government Code section 12591.1, subdivision (b) and Code of Regulations,					
20	title 11, section 314, subdivision (a) and (b). This order applies to AMERICAN VETERANS					
21	FOUNDATION, its officers, directors, employees and all persons or entities acting on its behalf.					
22	<u>FINDINGS</u>					
23	The Attorney General makes the following findings:					
24	1. AMERICAN VETERANS FOUNDATION ("AVF") is a Florida not for profit					
25	corporation operating in California and is subject to the provisions of the Supervision of Trustees					
26	and Fundraisers for Charitable Purposes Act pursuant to Government Code section 12581. AVF					
27	was issued registration number CT0153623 by the Registry of Charitable Trusts.					
28						

Action by Michigan Department of Attorney General

- 2. The Michigan Department of Attorney General regulates soliciting charitable organizations and their fundraisers under the Michigan Charitable Organizations and Solicitations Act. (Mich. Comp. Laws Ann. § 400.271, et seq.)
- 3. The Michigan Department of Attorney General issued a Notice of Intended Action and Cease and Desist Order against AVF, Attorney General File No. 2017-0193709-A on or about September 25, 2017. A true and correct copy of the Notice of Intended Action and Cease and Desist Order is attached as Exhibit 1. The Cease and Desist Order states:
 - "VI. Cease and Desist Order
 - 60. The Attorney General **HEREBY ORDERS** American Veterans Foundation to *CEASE AND DESIST* all unlawful solicitations as described in the above violations. Within twenty-one (21) days, American Veterans Foundation must confirm in writing to the Attorney General its compliance with this order.
 - 61. Violations of this order may result in a civil action for restitution, civil fines, litigation costs, and injunctive relief. Continuing violations may also result in additional violations alleged in any civil action." (Exhibit 1, p. 39, emphasis in original.)
 - 4. The Michigan Cease and Desist Order alleges the following violations by AVF:
 - a. Diversion of contributions to purposes other than that for which the fund were contributed or solicited in violation of section 400.288(1)(j) and (o) of the Michigan Compiled Laws Annotated.
 - b. Misrepresentation of the purpose of the funds solicited in violation of section 400.288(1)(o).
 - c. Employed any scheme to obtain a donation in violation of MCL 400.288(1)(n) of the Michigan Compiled Laws Annotated.
 - d. Submitting financial statements that misrepresent AVF 's charitable activities in violation of section 400.288(1)(y) of the Michigan Compiled Laws Annotated.
- 5. The Michigan Cease and Desist Order constitutes an adverse action pursuant to California Code of Regulations, title 11, section 999.9, subdivision (g). AVF failed to notify the California Attorney General of the adverse action within 30 days or prior to renewing its

registration as required by California Code of Regulations, title 11, section 999.9.2, subdivision (b).

Filings with the Attorney General's Registry of Charitable Trusts 2016

- 6. Charities such as AVF must file an Annual Registration Renewal Fee Report (Form RRF-1) and a complete copy of the informational return filed with the Internal Revenue Service (IRS Form 990) with the Attorney General's Registry of Charitable Trusts pursuant to Government Code section 12586 and California Code of Regulations, title 11, sections 301 through 306. These are public documents and the Registry makes the documents available online to assist prospective donors in making informed decisions prior to donating. The omission of material information in a document required by law to be filed with a government agency constitutes a false or misleading statement pursuant to California Code of Regulations, title 11, section 999.9, subdivision (c).
- 7. AVF submitted a RRF-1 for the year ending December 31, 2016, on or about April 17, 2017. A true and correct copy of the relevant portion of the RRF-1 for the year ending December 31, 2016, is attached as Exhibit 2. Paul Monville, President, signed the report under penalty of perjury. AVF falsely answered "No" to Question 3:

"During this reporting period, did non-program expenditures exceed 50% of gross revenues?"

8. AVF's non-program expenditures significantly exceeded 50% of gross revenues. AVF reported in its IRS Form 990 for the fiscal year ending in December 31, 2016, that its gross revenue was \$2,111,654. AVF's program expenditures were \$180,294. These program expenses accounted for 9% of AVF's gross revenue. AVF reported that its non-program expenditures were \$1,874,543 which is 89% of gross revenue, well above the 50% threshold. AVF's non-program expenditures of \$1,874,543 constituted 91% of its total expenditures of \$2,054,837. Professional fundraising fees of \$1,536,618 account for 75% of all AVF's expenditures. Paul Monville, President, signed the IRS Form 990 under penalty of perjury. A true and correct copy of the

as Exhibit 4. Paul Monville, President, signed the report under penalty of perjury. AVF falsely answered "No" to Question 3:

"During this reporting period, did non-program expenditures exceed 50% of gross revenues?"

- 14. AVF's non-program expenditures significantly exceeded 50% of gross revenues. AVF reported in its IRS Form 990 for the fiscal year ending in December 31, 2015, that its gross revenue was \$935,032. AVF's program expenditures were \$72,621 which accounted for 8% of AVF's gross revenue. AVF reported that its non-program expenditures were \$844,703 which is 90% of gross revenue, well above the 50% threshold. AVF's non-program expenditures of \$844,703 constituted 92% of its total expenditures of \$917,324. Professional fundraising fees of \$762,172 account for 83% of all AVF's expenditures. Paul Monville, President, signed the IRS Form 990 under penalty of perjury. A true and correct copy of the relevant portions of IRS Form 990 for the fiscal year ending December 31, 2015, are attached as Exhibit 5.
 - 15. AVF falsely answered "No" to Question 5 on its RRF-1 for 2015:
 - "During this reporting period, were the services of a commercial fundraiser or fundraising counsel for charitable purposes used? If 'yes,' provide an attachment listing the name, address, and telephone number of the service provider."
- 16. Despite answering "No," in 2015 AVF spent \$762,172 (83% of its expenditures) on professional fundraising fees. (Exhibit 5.) AVF further confirmed use of professional fundraisers when it answered "yes" to Part IV, Question 17, on its 2015 IRS Form 990 Form which asks the following:

"Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on Part IX, column (A), lines 6 and 11e? If 'Yes,' complete Schedule G, Part I (see instructions)."

- 17. AVF failed to disclose the name, address and telephone number of its professional fundraisers in a required attachment to the RRF-1.
- 18. AVF answered "yes" to Part IV, Question 18 regarding fundraising events, but failed to complete Part II of Schedule G, as required.
- 19. The IRS Form 990 for 2015 contained other false and misleading statements. On or about May 30, 2017, as a result of the Michigan Department of Attorney General action, AVF

filed an amended IRS Form 990 for the year of 2015, but failed to notify the Registry that the information previously submitted contained inaccuracies, was misleading and/or false or that it had amended its IRS Form 990. AVF never provided the Registry a copy of the amended IRS Form 990 and allowed the IRS Form 990 that contained false and misleading statements to remain publicly posted on the Attorney General's website.

20. AVF submitted a RRF-1 for the year ending December 31, 2014, on or about April 17, 2015. A true and correct copy of the RRF-1 for the year ending December 31, 2014 is attached as Exhibit 6. Paul Monville, President, signed the report under penalty of perjury. AVF falsely answered "No" to Question 3:

"During this reporting period, did non-program expenditures exceed 50% of gross revenues?"

- 21. AVF's non-program expenditures significantly exceeded 50% of gross revenues. AVF reported in its IRS Form 990 for the fiscal year ending in December 31, 2014, that its gross revenue was \$777,577. AVF's program expenditures were \$53,710 which accounted for 7% of AVF's gross revenue. AVF reported that its non-program expenditures were \$715,500 which is 92% of gross revenue, well above the 50% threshold. AVF's non-program expenditures of \$715,500 constituted 93% of its total expenditures of \$769,210. Professional fundraising fees of \$638,412 account for 83% of all AVF's expenditures. Paul Monville, President, signed the IRS Form 990 under penalty of perjury. A true and correct copy of the relevant portions of IRS Form 990 for the fiscal year ending December 31, 2014 are attached as Exhibit 7.
 - 22. AVF falsely answered "No" to Question 5 on its RRF-1 for 2014:
 - "During this reporting period, were the services of a commercial fundraiser or fundraising counsel for charitable purposes used? If 'yes,' provide an attachment listing the name, address, and telephone number of the service provider."
- 23. Despite answering "No," in 2014 AVF spent \$638,412 (83% of its expenditures) on professional fundraising fees. (Exhibit 7.) AVF further confirmed use of professional fundraisers when it answered "yes" to Part IV, Question 17, on its 2014 IRS Form 990 which asks the following:

- "Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on Part IX, column (A), lines 6 and 11e? *If 'Yes,' complete Schedule G, Part I* (see instructions)."
- 24. AVF failed to disclose the name, address and telephone number of its professional fundraisers in a required attachment to the RRF-1.
- 25. In its IRS Form 990 for 2014, AVF answered "Yes" to Part IV, Question 18, regarding fundraising events, but failed to complete Part II of Schedule G, as required.
- 26. The IRS Form 990 for 2014 contained other false and misleading statements. On or about June 2017, as a result of the Michigan Department of Attorney General action, AVF filed an amended IRS Form 990 for the year of 2014, but failed to notify the Registry that the information previously submitted contained inaccuracies, was misleading and/or false or that it had amended its IRS Form 990. AVF never provided the Registry a copy of the amended IRS Form 990 and allowed the IRS Form 990 that contained false and misleading statements to remain publicly posted on the Attorney General's website.

- 27. AVF submitted a RRF-1 for the year ending December 31, 2013, on or about May 14, 2014. A true and correct copy of the RRF-1 for the year ending December 31, 2013, is attached as Exhibit 8. Paul Monville, President, signed the report under penalty of perjury. AVF falsely answered "No" to Question 3:
 - "During this reporting period, did non-program expenditures exceed 50% of gross revenues?"
- 28. AVF's non-program expenditures significantly exceeded 50% of gross revenues. AVF reported in its IRS Form 990 for the fiscal year ending in December 31, 2013, that its gross revenue was \$598,768. AVF's program expenditures were \$52,840. These program expenses accounted for 9% of AVF's gross revenue. AVF reported that its non-program expenditures were \$544,958 which is 91% of gross revenue, well above the 50% threshold. AVF's non-program expenditures of \$544,958 constituted 91% of its total expenditures of \$597,798. Professional fundraising fees of \$484,590 account for 81% of all AVF's expenditures. Paul Monville, President, signed the IRS Form 990 under penalty of perjury. A true and correct copy of the

fundraising fees of \$530,978 account for 81% of all AVF's expenditures. Paul Monville. President, signed the IRS Form 990 under penalty of perjury. A true and correct copy of the relevant portions of IRS Form 990 for the fiscal year ending December 31, 2012, are attached as

In its IRS Form 990 for 2012, AVF answered "yes" to Part IV, Question 18, regarding fundraising events, but failed to complete Part II of Schedule G as required.

- AVF submitted a RRF-1 for the year ending December 31, 2011, on or about May 25, 2012. A true and correct copy of the RRF-1 for the year ending December 31, 2011 is attached as Exhibit 12. Paul Monville, President, signed the report under penalty of perjury. AVF falsely
 - "During this reporting period, did non-program expenditures exceed 50% of gross
- AVF's non-program expenditures significantly exceeded 50% of gross revenue. AVF reported in its IRS Form 990 for the fiscal year ending in December 31, 2011, that its gross revenue was \$647,668. AVF's program expenditures were \$47,881. These program expenses accounted for 7% of AVF's gross revenue. AVF reported that its non-program expenditures were \$619,431 which is 96% of gross revenue, well above the 50% threshold. AVF's non-program expenditures of \$619,431 constituted 93% of its total expenditures of \$667,312. Professional fundraising fees of \$457,109 account for 69% of all AVF's expenditures. Paul Monville. President, signed the IRS Form 990 under penalty of perjury. A true and correct copy of the relevant portions of IRS Form 990 for the fiscal year ending December 31, 2011, is attached as
- AVF answered "Yes" to Question 5 on its RRF-1 for 2011, but failed to provide an attachment with the name, address and telephone number of the its professional fundraisers as

"During this reporting period, were the services of a commercial fundraiser or fundraising counsel for charitable purposes used? If 'yes,' provide an attachment listing the name, address, and telephone number of the service provider."

39. In its IRS Form 990 for 2011, AVF answered "yes" to Part IV, Question 18, regarding fundraising events, but failed to complete Part II of Schedule G, as required.

- 40. AVF submitted a RRF-1 for the year ending December 31, 2010, on or about May 9, 2011. A true and correct copy of the RRF-1 for the year ending December 31, 2010 is attached as Exhibit 14. Paul Monville, President, signed the report under penalty of perjury. AVF falsely answered "No" to Question 3:
 - "During this reporting period, did non-program expenditures exceed 50% of gross revenues?"
- 41. AVF's non-program expenditures significantly exceeded 50% of gross revenues. AVF reported in its IRS Form 990 for the fiscal year ending in December 31, 2010, that its gross revenue was \$590,378. AVF's program expenditures were \$17,953. These program expenses accounted for 3% of AVF's gross revenue. AVF reported that its non-program expenditures were \$548,253 which is 93% of gross revenue, well above the 50% threshold. AVF's non-program expenditures of \$548,253 constituted 97% of its total expenditures of \$566,206. Professional fundraising fees of \$412,984 account for 73% of all AVF's expenditures. Paul Monville, President, signed the IRS Form 990 under penalty of perjury. A true and correct copy of the relevant portions of the IRS Form 990 for the fiscal year ending December 31, 2010 are attached as Exhibit 15.
- 42. In its 990 for 2010, AVF answered "yes" to Part IV, Question 18, regarding fundraising events, but failed to complete Part II of Schedule G, as required.

- 43. AVF submitted a RRF-1 for the year ending December 31, 2009, on or about May 24, 2010. A true and correct copy of the RRF-1 for the year ending December 31, 2009, is attached as Exhibit 16. Paul Monville, President, signed the report under penalty of perjury. AVF falsely answered "No" to Question 3:
 - "During this reporting period, did non-program expenditures exceed 50% of gross revenues?"

- 44. AVF's non-program expenditures significantly exceeded 50% of gross revenues. AVF reported in its IRS Form 990 for the fiscal year ending in December 31, 2009 that its gross revenue was \$577,010. AVF's program expenditures were \$15,506. These program expenses accounted for 3% of AVF's gross revenue. AVF reported that its non-program expenditures were \$473,441 which is 82% of gross revenue, well above the 50% threshold. AVF's non-program expenditures of \$473,441 constituted 97% of its total expenditures of \$488,947. Professional fundraising fees of \$405,605 account for 83% of all AVF's expenditures. Paul Monville, President, signed the IRS Form 990 under penalty of perjury. A true and correct copy of the relevant portions of IRS Form 990 for the fiscal year ending December 31, 2009 are attached as Exhibit 17.
- 45. In its IRS Form 990 for 2009, AVF answered "yes" to Part IV, Question 18, regarding fundraising events, but failed to complete Part II of Schedule G, as required.

GROUNDS FOR ISSUANCE OF THE CEASE AND DESIST ORDER

- a. Grounds for the issuance of a cease and desist order exist pursuant to California Government Code section 12591.1, subdivision (b)(2) and (3) and California Code of Regulations, title 11, section 314, subdivisions (a)(2) and (3), because AVF made material false statements in a report required to be filed with the Registry and failed to fully complete the required financial forms, for the reasons stated in Paragraphs 2 through 45 above.
- b. Grounds for the issuance of a cease and desist order exist pursuant to California Government Code section 12591.1, subdivision (b)(3) and California Code of Regulations, title 11, section 314, subdivision (a)(3), for failure to disclose the adverse action by the Michigan Attorney General, information required to be disclosed pursuant to California Code of Regulations, title 11, section 999.9.2, subdivision (b), for the reasons stated in Paragraphs 2 through 5, above.

ASSESSMENT OF PENALTIES

c. The Attorney General may assess a penalty up to \$1,000 for each act or omission that constitutes a violation pursuant to Government Code section 12591.1, subdivision (c), and California Code of Regulations, title 11, sections 315 and 999.6, subdivision (a)(3). The

assessment of penalties is in addition to all other remedies available to the Attorney General and the Attorney General reserves the right to assert all other remedies. The Attorney General assesses the following penalties:

	VIOLATION	AMOUNT
a.	Failure to disclose the adverse action by the Michigan Attorney General in 2016 in violation of California Code of Regulations, title 11, section 999.9.2(b).	\$1,000.00
b.	Making a material false statement in Form RRF-1 for FYE 12/31/2016, through its answer "No" to Question No. 3: "During this reporting period, did non-program expenditures exceed 50% of gross revenues?" in violation of Government Code sections 12591.1(b)(2) and 12599.6(g); and California Code of Regulations section 999.9(c).	\$1,000.00
c.	Making a material false statement in Form RRF-1 for FYE 12/31/2015, through its answer "No" to the Question No. 3: "During this reporting period, did non-program expenditures exceed 50% of gross revenues?" in violation of Government Code sections 12591.1(b)(2) and 12599.6(g); and California Code of Regulations section 999.9(c).	\$1,000.00
d.	Making a material false statement in Form RRF-1 for FYE 12/31/2014, through its answer "No" to Question No. 3: "During this reporting period, did non-program expenditures exceed 50% of gross revenues?" in violation of Government Code sections 12591.1(b)(2) and 12599.6(g); and California Code of Regulations section 999.9(c).	\$1,000.00
e.	Making a material false statement in Form RRF-1 for FYE 12/31/2013, through its answer "No" to Question No. 3: "During this reporting period, did non-program expenditures exceed 50% of gross revenues?" in violation of Government Code sections 12591.1(b)(2) and 12599.6(g); and California Code of Regulations section 999.9(c).	\$1,000.00
f.	Making a material false statement in Form RRF-1 for FYE 12/31/2012, through its answer "No" to Question No. 3: "During this reporting period, did non-program expenditures exceed 50% of gross revenues?" in violation of Government Code sections 12591.1(b)(2) and 12599.6(g); and California Code of Regulations section 999.9(c).	\$1,000.00
g.	Making a material false statement in Form RRF-1 for FYE 12/31/2011, through its answer "No" to Question No. 3: "During this reporting period, did non-program expenditures exceed 50% of gross revenues?" in violation of Government Code sections 12591.1(b)(2)	\$1,000.00

	and 12599.6(g); and California Code of Regulations section 999.9(c).	
h.	Making a material false statement in Form RRF-1 for FYE 12/31/2010, through its answer "No" to Question No. 3: "During this reporting period, did non-program expenditures exceed 50% of gross revenues?" in violation of Government Code sections 12591.1(b)(2) and 12599.6(g); and California Code of Regulations section 999.9(c).	\$1,000.00
i.	Making a material false statement in Form RRF-1 for FYE 12/31/2009, through its answer "No" to Question No. 3: "During this reporting period, did non-program expenditures exceed 50% of gross revenues?" in violation of Government Code sections 12591.1(b)(2) and 12599.6(g); and California Code of Regulations section 999.9(c).	\$1,000.00
j.	Making a material false statement in IRS Form 990 for FYE 12/31/2016, by failing to report the information regarding its commercial fundraisers in Schedule G, in violation of Government Code sections 12591.1(b)(2) and 12599.6(g); and California Code of Regulations, title 11, section 999.9(c). The failure to disclose information for each of the 10 fundraisers required to be disclosed constitutes a separate violation.	\$10,000.00 (\$1,000 x 10)
k.	Making a material false statement in IRS Form 990 for FYE 12/31/2015, 12/31/2014, 12/31/2013, 12/31/2012, 12/31/2011, 12/31/2010, 12/31/2009, by failing to report the information required in Schedule G, Part II.	\$7,000.00 (\$1,000 x 7)
1.	Making a material false statement in Form RRF-1 for FYE 12/31/2016, through its answer "No" to Question No. 5: "During this reporting period, were the services of a commercial fundraiser or fundraising counsel for charitable purposes used? If "yes," provide an attachment listing the name, address, and telephone number of the service provider" in violation of Government Code sections 12591.1(b)(2) and 12599.6(g); and California Code of Regulations section 999.9(c).	\$1,000.00
m	Making a material false statement in Form RRF-1 for FYE 12/31/2015, through its answer "No" to Question No. 5: "During this reporting period, were the services of a commercial fundraiser or fundraising counsel for charitable purposes used? If "yes," provide an attachment listing the name, address, and telephone number of the service provider" in violation of Government Code sections 12591.1(b)(2) and 12599.6(g); and California Code of Regulations section 999.9(c).	\$1,000.00
n.	Making a material false statement in Form RRF-1 for FYE 12/31/2014, through its answer "No" to Question No. 5: "During this reporting period, were the services of a commercial fundraiser or fundraising counsel for charitable purposes used? If "yes," provide an	\$1,000.00

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	attachment listing the name, address, and telephone number of the service provider" in violation of Government Code sections 12591.1(b)(2) and 12599.6(g); and California Code of Regulations section 999.9(c).	
0.	Making a material false statement in Form RRF-1 for FYE 12/31/2013, through its answer "No" to Question No. 5: "During this reporting period, were the services of a commercial fundraiser or fundraising counsel for charitable purposes used? If "yes," provide an attachment listing the name, address, and telephone number of the service provider" in violation of Government Code sections 12591.1(b)(2) and 12599.6(g); and California Code of Regulations section 999.9(c).	\$1,000.00
p.	Failure to file amended IRS 990 Forms with the Registry for 2016, 2015, and 2014	\$3,000.00 (\$1,000 x 3)
	TOTAL PENALTY:	\$33,000.00

ORDER

- 1. AMERICAN VETERANS FOUNDATION shall immediately CEASE AND DESIST from all operations in California, including all solicitations for charitable purposes by any means. This order applies to AMERICAN VETERANS FOUNDATION, ("AVF"), its officers, directors, employees and all persons or entities acting on its behalf, including commercial fundraisers for charitable purposes soliciting on its behalf.
 - 2. Within 10 days from the date of this order, AVF will provide a copy of this order to:
 - a. Every commercial fundraiser for charitable purposes or fundraising counsel for charitable purposes with which it currently contracts.
 - b. Every officer, director and employee of AVF;
- 3. Every governmental entity with which AVF is required to register or report to conduct charitable solicitations; AVF will provide a copy of this order to every commercial

fundraiser for charitable purposes or fundraising counsel for charitable purposes prior to entering into a contract in the future.

- 4. Within 15 days from the date of this order, AVF shall:
 - a. Provide written confirmation that it is in compliance with this order, including proof of service of the order as required by Item No. 2.
 - b. Provide a copy of every adverse action against it by a governmental entity. This includes every notice of action, regardless of the outcome and all documents reflecting the resolution of the action.

"An adverse action by a governmental entity includes, but is not limited to, suspension, revocation or denial of registration, civil or criminal judgment, assessment of a fine, administrative or civil penalty, entry of assurance of voluntary compliance or enforceable settlement agreement or an equivalent action regardless of its title." (Cal. Code Regs., tit. 11, § 999.9.2(b).)

- c. For each of the following individuals, if the individual is or has in the last 5 years been an officer, director, employee or independent contractor of an entity other than AVF that holds or solicits charitable assets in California, provide a schedule including the name, address, phone number, website, Registry of Charitable Trusts Registration number, individual's title, beginning and end dates and description of the individual's duties and responsibilities:
 - 1. Paul Monville;
 - 2. Carol Monville;
 - 3. George Page:
 - 4. Lynne Troy-Meeks;
 - 5. Eric Waldron;
 - 6. Bryan Monville.
- d. Provide all documents related to every complaint and every request for refund, including recordings related to the solicitation resulting in the complaint or request for refund.

- e. An accounting of all solicitations for charitable purposes to California from January 1, 2008, through the date of the accounting, including all donations made in response to solicitations and all payments made to AVF.
- 5. Within 30 days of the date of this order, for all solicitations for charitable purposes to California since January 1, 2008, AVF shall provide:
 - a. All contracts with commercial fundraisers for charitable purposes, including all amendments;
 - b. All contracts with fundraising counsel for charitable purposes, including all amendments. This includes contracts with any company that provides caging or processing services;
 - c. All solicitation materials used in California, including telephone solicitations, solicitation scripts, training materials, question and answer sheets, advertising (whether print, radio, television or online), emails, letters, newsletters, audio recordings of fundraising solicitations, social media solicitations (e.g., Facebook, Twitter, Instagram), brochures, promotional and fulfillment materials used in connection with charitable solicitations.
 - d. All correspondence with commercial fundraisers for charitable purposes;
 - e. All information relied on by AVF to determine the accuracy of representations made in its solicitations.
 - f. All amendments to the Articles of Incorporation;
 - g. All revisions to the Bylaws;
 - h. IRS Form 1023 and all related communications with the IRS;
 - i. All filings with the California Secretary of State;
 - j. All filings with the California Franchise Tax Board;
 - k. Names, addresses, email addresses and telephone numbers of all members of the board of directors, officers and employees, identifying each person by their position and term and a summary of the person's duties and responsibilities;

- t. A schedule identifying all funds received through AVF's website and how the funds were used, including the date, amount, payee/recipient and a description of the purpose of the expenditure, along with all supporting documentation, including invoices, cancelled checks and correspondence.
- u. Records of all grant applications received and grants made, including:
 - 1. Written information regarding the policies or criteria used in selecting the grant recipients;
 - 2. Names, addresses, and telephone numbers of persons and organizations who have received grants;
- v. Reports or accountings made to or received from any other state agency, grantor or grantee, and fundraisers;
- w. A schedule of all self-dealing transactions, including all loans made by or to AVF. For each transaction identify the date, the amount, the parties to the transaction, a description of the nature and purpose of the transaction, the persons who approved the transaction, and provide all documents related to the transaction and its authorization. For loans, include a schedule of repayments and any amounts outstanding.
- x. A detailed description of all efforts made by AVF to reduce its fundraising expenses and all related documents.
- 6. Payment of the \$33,000 penalty is due within 30 days unless a timely written appeal of the assessment of penalty is received by the Attorney General. Payment shall be made payable to the California Attorney General.
- 7. Each person identified in Paragraph 4(c), must provide a copy of this order with any application for registration or renewal for any entity that holds or solicits charitable assets in California, with which that person is an officer, director, employee or independent contractor.
- 8. AVF is ordered to preserve and prevent destruction of all records including recordings of solicitations and communications with donors, communications with fundraisers and the representatives of the fundraisers and communications with officers, directors, employees and agents of AVF.

- 9. Within 10 days from the date of this order, AVF will provide proof to the Attorney General that it has instructed every professional fundraiser with which it has done business to preserve all records related to AVF, including all emails and electronically stored data.
 - 10. All responses shall be sent to:

Caroline K. Hughes, Deputy Attorney General California Department of Justice Office of the Attorney General 300 South Spring Street, Suite 1702 Los Angeles, CA 90013 (213) 269-6642 (213) 897-7605 (fax) Caroline.Hughes@doj.ca.gov

11. Failure to comply with the terms of this order constitutes disobedience or resistance to a lawful order pursuant to Government Code section 11455.10. The Attorney General may pursue a contempt sanction of violations pursuant to Government Code section 11455.20, in addition to all other remedies available to the Attorney General.

RIGHT TO APPEAL/REQUEST FOR HEARING

You have the opportunity to appeal this order and assessment of penalties by filing a written appeal and request for hearing within 30 calendar days of the date of this notice. Filing an appeal does not stay the effect of this order. The appeal procedures are found in California Code of Regulations, title 11, sections 999.6 through 999.8 and are available on the Attorney General's website at: oag.ca.gov/charities/laws.

Respectfully Submitted,

XAVIER BECERRA Attorney General of California

DAVID ELLER, Registrar Registry of Charitable Trusts

Dated: January 29, 2018

Exhibit "1."

STATE OF MICHIGAN DEPARTMENT OF ATTORNEY GENERAL CORPORATE OVERSIGHT DIVISION

In the Matter of:

Attorney General File No. 2017-0193709-A

American Veterans Foundation and Paul Monville

Respondents.

Notice of Intended Action and Cease and Desist Order

To: American Veterans Foundation

Paul Monville, President and Executive Director American Veterans Foundation 1950 Northgate Blvd., Suite D-1 Sarasota, FL 34234

Registered Agent
Debbie Lopez
4921 Grape Arbor Ln.
Lansing, MI 48917

Bill Schuette, Attorney General of the State of Michigan, under Section 20(4) of the Charitable Organizations and Solicitations Act, MCL 400.271 et seq., notifies American Veterans Foundation (AVF) of his intention to bring a civil action against AVF in Ingham County Circuit Court and orders AVF to cease and desist all unlawful solicitations as described below. Before bringing a civil action, the Attorney General will consider accepting an assurance of discontinuance or other appropriate settlement agreement. Concurrent with this Notice of Intended Action,

the Attorney General is also issuing a Notice of Intent to Deny AVF's charitable solicitation registration renewal.

I. Jurisdictional Allegations

- Respondent American Veterans Foundation (AVF) is a Delaware nonprofit
 corporation with 501(c)(3) tax-exempt status. Its address is 1950 Northgate
 Blvd., Suite D-1, Sarasota, Florida 34234. Respondent Paul Monville is AVF's
 President and Executive Director. AVF's Michigan-based resident agent is
 Debbie Lopez, 4921 Grape Arbor Ln., Lansing, Michigan 48917.
- 2. AVF incorporated in August 2008. It filed its initial registration in Michigan in November 2012 and has been registered to solicit in Michigan since December 2012 under Michigan's Charitable Organizations and Solicitations Act ("Solicitations Act"). AVF is registered under the Solicitations Act as #48890.
- As a registered charitable organization soliciting in Michigan, AVF is a
 person subject to the authority of the Attorney General under the
 Solicitations Act. MCL 400.271 et seq.; MCL 400.272(a) and (e).

II. Background Facts

4. In March 2017, the Attorney General's Charitable Trust Section began reviewing AVF's activities as reported on its IRS Forms 990 for 2014 and 2015. The 990s revealed large fundraising expenses, minimal charitable

- programs, insufficient detail regarding these charitable programs, and sections of the 990s that had been incorrectly completed.
- 5. On April 20, 2017, Charitable Trust Auditor Joe Kylman sent AVF a letter, via its President Paul Monville, questioning AVF's activities and its Form 990 discrepancies. Exhibit A, April 20, 2017 letter to AVF. In particular, the letter:
 - questioned AVF's two charitable programs—(1) "We Care" packages
 program and (2) assistance to homeless veterans program—and asked
 AVF to explain and document these programs;
 - requested AVF's solicitation materials; and
 - questioned discrepancies on AVF's 2014 and 2015 Forms 990 and audited financial statements.
- 6. AVF President Paul Monville responded on June 20, 2017 with a letter and accompanying documentation. Exhibit B, AVF Response Letter of June 20, 2017. Shortly thereafter, on June 22, 2017, AVF submitted its renewal registration form.
- 7. AVF's June 20, 2017 response included all solicitation materials AVF used in Michigan from 2013 through 2017. Exhibit C, Solicitation materials.
 - a. The solicitation materials were used by four separate professional fundraisers: Community Cares United, LLC; Donor Relations, LLC;
 Debbie Lopez; and Courtesy Call, Inc.

- b. AVF's solicitation materials informed potential donors that AVF provides immediate support to homeless veterans through grants of food, shelter, clothing, and medical supplies and provides "We Care" packages to deployed troops. (A detailed review of all AVF solicitation materials is included at the end of this section.) AVF's Forms 990 made similar representations regarding its programs and reported assisting.

 600 individual veterans with books, games, supplies, and cash grants.
- 8. AVF's June 20, 2017 response also advised that it had relied on its accountant Brian Palmer, CPA to prepare its 990s; and in response to our inquiry, AVF had amended its 2014, 2015, and 2016 IRS Forms 990 and included these amended 990s in its response. (Unless otherwise stated, all below references to AVF's 990s reference AVF's amended 990s.) Exhibit D, 2014 Amended Form 990; Exhibit E, 2015 Amended Form 990; Exhibit F, 2016 Amended Form 990.
- 9. The Charitable Trust Section's April 20, 2017 letter asked AVF to document its programs, thus allowing the Charitable Trust Section to compare AVF's true activities against its representations to donors and what it reported on its 990s. AVF's June 20, 2017 response included the requested documentation, including copies of requests for assistance from veterans, requests and receipts for purchases of "We Care" goods for currently deployed troops, and "Transaction Detail" printouts for its programs from its

accounting software. A review of AVF's Transaction Detail, Exhibit G, reveals a different picture of AVF's programs.

- 10.In contrast to AVF's 990s and solicitations, which describe AVF as providing immediate support or direct assistance to hundreds of veterans and active-duty troops, the Transaction Detail shows that AVF's main program activity is writing checks to veterans homes and other charities; it is these organizations—and not AVF—that directly serve veterans. For example:
 - In 2014, instead of assisting 600 individual veterans with toiletries, clothing and other items as reported on the Form 990, AVF wrote 33 checks for \$500 each to various veterans homes. Exhibit D, 2014 Amended Form 990, Schedule I, Part III; and Exhibit G, Transaction Detail for 2014, see category "Veteran's Homes." In fact, AVF only directly assisted I veteran in 2014 with a single grant as part of its homeless veterans assistance program. Id.
 - In 2015, AVF again reported on its 990 that it assisted 600 individuals in veterans homes. Exhibit E, 2015 Amended Form 990, Schedule I, Part III. But again, AVF's Transaction Detail confirms that these "grants to individuals" were, in fact, grants to third-party veterans homes. Exhibit G, Transaction Detail for 2015, see category "Veteran's Homes." This leaves just 11 AVF grants to individual veterans for 2015.

A. Analysis of Transaction Detail

11. Analysis of AVF's Transaction Detail, Exhibit G, for 2014, 2015, and 2016 shows that AVF's charitable programs are minimal and conflict with AVF's representations in its solicitation materials and in its IRS Forms 990. See also Exhibit J, Charitable Trust Auditor Joe Kylman's spreadsheet analysis of AVF's programs from 2014 – 2016.

12.AVF Programs in 2014 according to AVF's Transaction Detail.

- a. AVF's Transaction Detail for 2014 reported \$33,312.62 for total program services. This equals 4.3% of all funds raised (\$777,537) for the year. But of the \$33,312.62, roughly half (\$16,500) were grants to third-party veterans homes operated by various states.
- b. Total costs of AVF's "We Care" program equaled \$15,248 (2% of total funds raised.)
 - The category "homelessness" included just a single grant of \$1,565 to a single veteran to pay his rent. Apart from this single monetary grant, and despite raising \$777,537 in contributions, in 2014, AVF provided no other direct assistance or immediate support to veterans or homeless veterans, whether in the form of cash assistance or in the form of food, shelter, clothing, or medical supplies. And for purposes of comparison, the \$1,565 grant to a single veteran equals just 2.3% of AVF President Paul Monville's 2014 salary of \$68,750.

13.AVF Programs in 2015 according to AVF's Transaction Detail.

- a. AVF's Transaction Detail for 2015 reported \$52,638.89 for total program services. This equals 5.7% of all funds raised (\$929,963) for the year. But of the \$52,638.89, more than half (\$30,500) were grants to third-party veterans homes operated by various states.
- b. Total costs of AVF's "We Care" program equaled \$5,905 (0.6% of total funds raised.)
- the category "homelessness" recorded 19 transactions totaling \$16,233.85 (1.7% of total funds raised) assisting 11 veterans for items such as rent, utilities, and groceries. Apart from this monetary assistance, AVF recorded no direct assistance in the form of food, shelter, clothing, or medical supplies in its Transaction Detail. And for purposes of comparison, the \$16,233.85 in assistance to veterans again equaled just a fraction (21.5%) of Paul Monville's 2015 salary of \$75,570.

14.AVF Programs in 2016 according to AVF's Transaction Detail.

a. AVF's funds raised more than doubled in 2016 from \$929,963 to \$2,111,617. AVF's Transaction Detail for 2016 reported \$137,665.32 for total program services. This equals 6.5% of all funds raised (\$2,111,617) for the year. But nearly all (92%) of 2016's total program services were grants paid to third-party veterans homes (\$77,022.83)

- or grants to third-party charities (\$49,930), rather than services or grants administered directly by AVF.
- b. The category "homelessness" recorded 14 transactions totaling
 \$8,546.43 (0.4% of total funds raised) assisting just 6 veterans for
 items such as mortgage, utilities, rent, and clothing. Apart from this
 monetary assistance, AVF recorded no direct assistance in the form of
 food, shelter, clothing, or medical supplies in its Transaction Detail.
- c. Total costs of AVF's "We Care" program dropped to \$2,150—just 0.1% of total funds raised.
- d. AVF's "Veterans Home" program, in addition to the many grants to third-party organizations, did make 8 purchases of books from Barnes and Noble. These 8 transactions total just \$272.83, or 0.35%, of the Veterans Home program. Apart from these purchases of books for veterans in veterans homes, AVF identified no grants of toiletries, clothing, games, or other items either in 2016 or in any other year.
- 15.On July 13, 2017, Charitable Trust Auditor Joe Kylman sent a second letter to AVF requesting details regarding the number of AVF's solicitations and amounts raised by AVF in recent years. Exhibit H, July 13 letter to AVF.
- 16.On September 1, 2017, AVF responded with these details. Exhibit I, September 1, 2017 response from AVF.

B. Review of Solicitation Materials

17.A detailed review of AVF's solicitation materials compared to its programs follows. The solicitation materials are categorized by each of AVF's four professional fundraisers: Debbie Lopez; Courtesy Call, Inc.; Donor Relations, LLC; and Community Cares United, LLC.

Debbie Lopez

- 18.2014 Calls. In 2014, professional fundraiser Debbie Lopez made 5,400 calls into Michigan and obtained 1,723 donations totaling \$25,217. Exhibit H, July 13, 2017 letter to AVF; Exhibit I, September 1, 2017 AVF response.
- 19.2015 Calls. In 2015, Debbie Lopez made 3,537 calls into Michigan and obtained 1,122 donations totaling \$20,300. Exhibit H, July 13, 2017 letter to AVF; Exhibit I, September 1, 2017 AVF response.
- 20. 2016 Calls. In 2016, Debbie Lopez made 1,964 calls into Michigan and obtained 568 donations totaling \$9,790. Exhibit H, July 13, 2017 letter to AVF; Exhibit I, September 1, 2017 AVF response.
- 21. Totals. During the years 2014 to 2016, Debbie Lopez made a total of 10,901 calls into Michigan for AVF and obtained 3,413 donations totaling \$55,307.
- 22. Solicitation Materials. As Debbie Lopez's solicitation materials, AVF submitted an AVF pamphlet, a one-page telemarketing script, and a one-page letter that accompanies a payment pledge form. Exhibit C.1.

- a. Pamphlet. The two-page pamphlet discusses AVF's "We Care"

 packages program, includes a section on "homelessness," and describes

 the purposes of AVF as follows:
 - Increase public awareness of the plight of our nations veterans.
 - Assist veterans to the best of our abilities, using the full capacity of our services.
 - Counsel individual veterans when appropriate and/or refer them to agencies better suited to meet their needs.
 - > Assist veterans who are homeless or in jeopardy of becoming homeless in their time of need.
 - Provide patients in veterans homes with toiletries, clothing, books, games, and other items.
 - > Provide comfort and "We Care" packages to deployed troops. Comfort and Care packages could include but not be limited to personal hygiene products, books, magazines, sports equipment; power bars, breakfast bars, and other various sundries.
- b. Script. The script states that it was digitally signed by Paul Monville on January 5, 2013. It begins:

Hello, may I speak with Mr./Mrs			please?			
			with DEBB	in i Onivi	, 7	
Mr./Mrsa registered Pro:	this is fessional Fundrai					
American Vete	erans Foundatio		•			
afternoon, evenin	rg)?	1,			•	

American Veterans Foundation is dedicated to providing "We Care" packages to deployed military personnel. "We Care" packages can consist of hand-made blankets, snacks and everyday items we at home take for granted. It is very easy to saw "We Support Our Troops" but it is another thing to actually show your support for them.

American Veterans Foundation is also dedicated in helping prevent more homelessness among honorably discharged veterans by providing immediate support to veterans who are homeless or in jeopardy of becoming homeless and in desperate need of assistance in the form of food, shelter, clothing, medical

supplies and any other reasonable request. Statistics tell us that as many as 1/3rd of all homeless people in the US are American Veterans who served their country faithfully. With your assistance we offer these American Veterans the assistance they so desperately need.

Mr./Mrs._______, American Veterans
Foundation does not charge these veterans for services. The
Foundation does not receive any Federal or State aid. The
Foundation's efforts are supported solely by the generous
contributions of caring people like you. Nobody likes to get these
calls and it's not easy to make them, but I feel this is a
worthwhile cause. Do you think you could support our efforts
with a gift of \$75? (wait for the response) [Exhibit C.1]

If no, the script then requests a donation of \$50 or \$25 or something smaller.

- Pledge Form Letter. The letter, which appears to accompany the payment pledge form that donors are asked to return by mail, describes the importance of AVF's "We Care" packages and also reiterates the other purposes of the Foundation:
 - > Increase public awareness of the plight of our nations veterans.
 - > Assist veterans to the best of our abilities, using the full capacity of our services.
 - > Council [sic] individual veterans when appropriate and/or refer them to agencies better suited to meet their needs.
 - > Assist veterans who are homeless or in jeopardy of becoming homeless in their time of need.
 - > Provide patients in veterans homes with toiletries, clothing, books, games, and other items.

The letter concludes with the following paragraphs:

American Veterans Foundation is not funded by any local, state or federal agency. The Foundation is not affiliated with any other veterans' organization or association. We are supported solely by the generous contributions from families, friends and businesses. A portion of each contribution may be used to help

defray the expenses of public education, administration and the cost of this appeal.

To ensure success, the services of Debbie Lopez, a professional fundraiser, have been retained to assist with this project. Registration with a State agency does not constitute or imply endorsement, approval or recommendation by the State.

By fulfilling your pledge we hope that you will also be blessed with the satisfaction that you have helped those who fight the brave fight for all Americans.

Sincerely, The Board of Directors

Courtesy Call, Inc.

- 23.2014 Calls. In 2014, Courtesy Call made 59 calls into Michigan and obtained
 37 donations totaling \$705. Exhibit H, July 13, 2017 letter to AVF; Exhibit
 I, September 1, 2017 AVF response.
- 24.2015 Calls. In 2015, Courtesy Call made 741 calls into Michigan and obtained 512 donations totaling \$14,331. Exhibit H, July 13, 2017 letter to AVF; Exhibit I, September 1, 2017 AVF response.
- 25.2016 Calls. In 2016, Courtesy Call made 1,942 calls into Michigan and obtained 1,256 donations totaling \$33,155.05. Exhibit H, July 13, 2017 letter to AVF; Exhibit I, September 1, 2017 AVF response.
- 26. Totals. During the years 2014 to 2016, Courtesy Call made a total of 2,742 calls into Michigan for AVF and obtained 1,805 donations totaling \$48,191.
- 27. Solicitation Materials. As Courtesy Call's solicitation materials, AVF submitted an AVF pledge form, a one-page telemarketing script, and one page of telemarketing rebuttals. Exhibit C.2.

- a. Pledge Form. Courtesy Call's pledge form is nearly identical in substance to the pledge form letter used by professional fundraiser Debbie Lopez and described above.
- b. Script. The script states that it was digitally signed by Paul Monville on December 10, 2013. In substance, the script is identical to the script used by professional fundraiser Debbie Lopez.
- c. Rebuttal. The first question on Courtesy Call's one-page rebuttal addresses AVF's purposes:

Question: What is the American Veterans Foundation? The American Veterans Foundation is a publicly supported 501(c)(3) non-profit charitable organization whose mission is to assisting [sic] all honorably discharged veterans with financial support in their time of need by helping prevent homelessness among veterans and providing immediate support to veterans who are homeless, in jeopardy of becoming homeless or in desperate need of assistance. [Exhibit C.2]

Donor Relations, LLC

- 28.2016 Calls. In 2016, Donor Relations made 430 calls into Michigan and obtained 425 donations totaling \$11,785. Exhibit H, July 13, 2017 letter to AVF; Exhibit I, September 1, 2017 AVF response.
- 29. 2017 Calls. In 2017, Donor Relations made 849 calls into Michigan and obtained 627 donations totaling \$16,455.67. Exhibit H, July 13, 2017 letter to AVF; Exhibit I, September 1, 2017 AVF response.
- 30. Totals. During the years 2016 and 2017, Donor Relations made a total of 430 calls into Michigan for AVF and obtained 1,052 donations totaling \$28,240.

- 31. Solicitation Materials. As Donor Relations' solicitation materials, AVF submitted an AVF pledge form, a one-page telemarketing script, one page of telemarketing rebuttals, and a pamphlet. Exhibit C.3.
 - a. Pledge Form. Donor Relations' pledge form is nearly identical to the pledge form used by AVF's other professional fundraisers and as described above.
 - b. Script. The script states that it was digitally signed by Paul Monville on June 1, 2016. In substance, the script is identical to the script used by professional fundraisers Debbie Lopez and Courtesy Call.
 - c. Rebuttal. The Donor Relations rebuttal is identical to the Courtesy

 Call rebuttal.
 - d. Pamphlet. The pamphlet is substantially similar to the pamphlets used by AVF's other professional fundraisers, however, in a section titled "Accomplishments," the pamphlet adds the following additional details about AVF's programs:

We have sent over four (4) tons of sundries and hygiene products to over 700 deployed military service personnel and their units from "We Care" package requests.

We have spent over \$197,000.00 helping Veterans Homes in a number of states with purchases, varying from hospital beds, flat screen televisions, ipods for music therapy, card tables, reading materials, clothing, and other necessary items.

We spent over \$96,000.00 helping 47 different families of honorably discharged veterans who were in jeopardy of becoming homeless. [Exhibit C.3]

Community Cares United, LLC

- 32.2016 Calls. In 2016, Community Cares United made 65,000 calls into Michigan and obtained 1,551 donations totaling \$31,189. Exhibit H, July 13, 2017 letter to AVF; Exhibit I, September 1, 2017 AVF response.
- 33.2017 Calls. In 2017, Community Cares United made 175,000 calls into
 Michigan and obtained 4,683 donations totaling \$92,044. Exhibit H, July 13,
 2017 letter to AVF; Exhibit I, September 1, 2017 AVF response.
- 34. Totals. During the years 2016 and 2017, Community Cares made a total of 240,000 calls into Michigan for AVF and obtained 6,234 donations totaling \$123,183.
- 35. Solicitation Materials. AVF submitted three pages of solicitation materials for Community Cares United, LLC: script (1 page), rebuttals (1 page), and pledge form (1 page). Exhibit C.4.
 - e. Script. The script is signed by Paul Monville as being approved on November 9, 2016. The script beings:

Hello, Mr/Mrs _____ This is (callers full name) calling for the American Veterans Foundation!

How are you ... great!!

Mam/sir the reason for the recorded call is that the veterans have just started their yearly benefit drive and as a paid fundraiser for Community Cares United were [sic] sending out the new pledge kit to all supporting residents!

The goal of the drive is to provide food, shelter, clothing and medical supplies to our homeless veterans, care packages to our troops still deployed overseas, and financial assistance to veterans in need. [Exhibit C.4]

The script then requests a donation of \$75, \$50, or \$85. If still too much, the script requests a smaller donation.

f. Rebuttal. The first two questions on Community Care's one-page rebuttal address AVF's purposes:

Question: What is the American Veterans Foundation: The American Veterans Foundation, is a non-profit veterans organization dedicated in helping to prevent more homelessness among veterans and providing immediate support to veterans who are homeless, in jeopardy of becoming homeless or in desperate need of assistance.

Question: What does my donation go towards:
Well, the goal of the drive is to support our veterans in need.
The American Veterans Foundation helps to provide food, clothing, shelter and medical supplies to homeless veterans, financial assistance to veterans in need and care packages to our troops still deployed overseas. [Exhibit C.4]

g. Pledge Form. Community Care's pledge form is nearly identical to the pledge form used by AVF's other professional fundraisers and as described above.

C. Form 990 False Statements and Misrepresentations

- 36. Charitable Trust Auditor Joe Kylman's April 20, 2017 letter to AVF, Exhibit

 A, questioned numerous figures and inaccuracies on AVF's 2014 and 2015

 Form 990s.
- 37. On Schedule I, Part III, of both the 2014 and 2015 Form 990s, AVF reported making a cash grant of \$28,700 to 72 recipients. In response to the auditor's questions, AVF amended the 2014 Form 990 to state that it made cash grants of \$18,350 to 600 individuals. Exhibit D, 2014 Form 990, Schedule I, Part

III. AVF also amended its 2015 Form 990 to state that it made cash grants of \$30,500 to 600 recipients. Exhibit E, 2015 Form 990, Schedule I, Part III.

But these statements on both the original and amended 2014 and 2015

Forms 990 were false. In fact, in 2014, according to AVF's Transaction Detail submitted in response to the Attorney General's questions, Exhibit G, AVF made just 1 individual grant of \$1,565 to a single homeless veteran. And in 2015, AVF made just 11 grants totaling \$16,234 to 11 homeless veterans: The amounts AVF reported on Schedule I, Part III were actually grants to other organizations and should have been reported on Schedule I, Part II as grants to other organization. In this way, AVF exaggerated its own programs for veterans while concealing that its programs mostly consisted of writing checks to third-party veterans homes and charities.

- 38.AVF's 2014, 2015, and 2016 Forms 990 include numerous other false statements and misrepresentations. A few examples will suffice.
 - a. Schedule I, Part III, of AVF's 2014 Form 990 claims that it provided \$3,745 in non-cash assistance in the form of counseling and legal assistance. This amount is not supported by the Transaction Detail AVF submitted and appears to be allocated from indirect costs including legal fees and Paul Monville's compensation.
 - b. Schedule I, Part III of AVF's 2014 Form 990 states that AVF made \$30,500 in cash grants to individuals through its "We Care" program. However, AVF did not make cash payments to individual troops. Also,

- the dollar amount of items purchased in this program was actually \$12,128.
- c. Schedule I, Part III of AVF's 2015 Form 990 states that AVF made \$4,723 in noncash assistance to homeless individuals. The claim of \$4,723 in noncash grants is not supported by AVF's transaction detail and instead appears to be an allocation of indirect costs, not a noncash grant.
- d. Schedule I, Part III of AVF's 2015 Form 990 states that AVF provided noncash grants to "deployed veterans" in the amount of \$15,351.
 However, according to AVF's transaction detail, the dollar amount of purchased goods was actually \$5,521.
- e. Schedule I, Part III, states that AVF made \$4,723 in noncash grants to veterans in veterans homes. Except for \$150.32 in books and a computer, AVF's transaction detail does not report any noncash grants to individuals. It appears that the remainder of this item consists of allocated legal fees and Paul Monville's compensation.
- f. AVF's 2016 Form 990 reports \$76,750 in grants to other organizations on page 10, line 1. However, despite making more than \$5,000 in grants, AVF nevertheless checked "no" on Part IV, line 21 and failed to complete the required Schedule I detailing these grants. Exhibit F, 2016 Form 990. Again, this permitted AVF to conceal the true nature of its charitable programs.

III. Law

- 39. Section 18 of the Charitable Organizations and Solicitations Act (Solicitations Act) prohibits persons from engaging in a variety of acts. MCL 400.288. These prohibited acts include:
 - (j) Divert or misdirect contributions to a purpose or organization other than that for which the funds were contributed or solicited.
 - (n) Employ any device, scheme, or artifice to defraud or obtain money or property from a person by means of a false, deceptive, or misleading pretense, representation, or promise.
 - (o) Represent that funds solicited will be used for a particular charitable purpose if those funds are not used for the represented purpose.
 - (y) For a charitable organization, submit financial statements, including IRS form 990, 990-EZ, 990-PF, or other 990-series internal revenue service return, or any other financial report required under this act, that contain any misrepresentation with respect to the organization's activities, operations, or use of charitable assets.

IV. Alleged Violations

Debbie Lopez Solicitations

- 40. Common allegations.
 - During the years 2014 through 2016, AVF raised funds using professional fundraiser Debbie Lopez representing to donors that AVF was "dedicated to providing 'We Care' packages to deployed military personnel" and that AVF was "dedicated in helping prevent more homelessness among honorably discharged veterans by providing immediate support to veterans who are homeless or in jeopardy of becoming homeless and in desperate need of assistance in the form of

- food, shelter, clothing, medical supplies and any other reasonable request." (Emphasis added.)
- b. In fact, AVF was not dedicated to the "We Care" program or its program to assist homeless veterans, making only de minimis expenditures on these programs. And to the extent AVF had a charitable program to assist veterans, that program was not disclosed to donors in telemarketing scripts and consisted of writing checks to veterans homes and third-party charities rather than AVF itself providing immediate support to homeless veterans.
- c. During the years 2014 to 2016, AVF raised a total of \$3,819,117 in contributions, but spent just \$23,803—or 0.6% of funds raised—on its "We Care" program. And in 2015 and 2016, despite increasing its contributions from \$777,437 in 2014 to \$929,963 in 2015 and to \$2,111,617 in 2016, AVF's "We Care" expenditures decreased from \$15,248 (2% of annual contributions) in 2014 to \$5,905 (0.6% of annual contributions) in 2015 to \$2,150 (0.1% of annual contributions) in 2016.

AVF Total Contributions	"We Care" expenditures	Percent .
\$777,587	\$15,248	1.96%
\$929,963	\$5,905	0.63%
\$2,111,617	\$2,150	0.10%
\$3,819,117	\$23,803	0.61%
	\$777,537 \$929,963 \$2,111,617	\$777,537 \$15,248 \$929,963 \$5,905 \$2,111,617 \$2,150

- d. Nor was AVF dedicated to its program to provide immediate support to homeless veterans. In 2014, AVF provided immediate support to just one veteran with a single payment of \$1,565. During the years 2014 to 2016, AVF provided immediate support to just 18 veterans for a three-year total of \$26,361 (0.7% of total contributions during this period).
- e. Between 2014 and 2016, AVF spent 0.6% of funds raised on its "We Care" program and 0.7% of funds raised on providing immediate support to veterans, thus spending the remaining 98.7% of the funds raised on other activities, including fundraising, administrative costs, the salary of its President and Executive Director Paul Monville, other costs, and to support a program not disclosed to donors whereby AVF made grants to veterans homes and other charities rather than directly to homeless veterans.
- f. During the years 2014 through 2016, AVF also raised funds using professional fundraiser Debbie Lopez representing to donors that one of AVF's programs was to "Provide patients in veterans homes with toiletries, clothing, books, games, and other items." However, except for a few small purchases of books, AVF operated no program that directly provided these items to veteran home patients.

41. Diversion of Contributions to Other Purpose. MCL 400.288(1)(j).

a. As detailed in the above common allegations, instead of using the
 funds raised as represented to donors, AVF diverted nearly all of the

\$55,307 raised during 2014 to 2016 by professional fundraiser Debbie Lopez to purposes other than that for which the funds were contributed or solicited.

b. 3,413 Violations. The Attorney General alleges that, for each of the 3,413 donations obtained by professional fundraiser Debbie Lopez during 2014 to 2016, AVF diverted nearly all of each pledge to other purposes, thereby violating Section 18(1)(j) of the Solicitations Act.

42. Misrepresentation of Use of Funds Donated. MCL 400.288(1)(o).

- a. As detailed in the above common allegations, instead of using the funds raised for the programs represented to donors, AVF used nearly all the money raised for other purposes.
- b. 10,901 Violations. The Attorney General alleges that, for each of the 10,901 calls made into Michigan by professional fundraiser Debbie Lopez during 2014 to 2016, AVF misrepresented the purpose of the funds selicited and thereby violated Section 18(1)(o) of the Solicitations Act.

43. Employ Any Scheme to Obtain Donation. MCL 400.288(1)(n).

- a. As detailed in the above common allegations, instead of using the funds raised for the programs represented to donors, AVF used nearly all the money raised for other purposes.
- b. In this way, AVF used a false, deceptive, or misleading pretense, representation, or promise—that funds raised would support

particular programs providing direct support to veterans—as the means of employing a device, scheme, or artifice to defraud or obtain money from all 3,413 residents that donated to AVF through professional fundraiser Debbie Lopez.

c. 3,413 Violations. The Attorney General alleges that, for each of the 3,413 donations obtained by professional fundraiser Debbie Lopez during 2014 to 2016, AVF violated Section 18(1)(n) of the Solicitations Act.

Courtesy Call Solicitations

44. Common allegations.

- a. During the years 2014 through 2016, AVF raised funds using professional fundraiser Courtesy Call representing to donors that AVF was "dedicated to providing 'We Care' packages to deployed military personnel" and that AVF was "dedicated in helping prevent more homelessness among honorably discharged veterans by providing immediate support to veterans who are homeless or in jeopardy of becoming homeless and in desperate need of assistance in the form of food, shelter, clothing, medical supplies and any other reasonable request." (Emphasis added.)
- b. Courtesy Call solicitation materials also included a rebuttal describing AVF as follows: "The American Veterans Foundation is a publicly supported 501(c)(3) non-profit charitable organization whose mission is

to assisting [sic] all honorably discharged veterans with financial support in their time of need by helping prevent homelessness among veterans and providing immediate support to veterans who are homeless, in jeopardy of becoming homeless or in desperate need of assistance."

- c. In fact, AVF was not dedicated to the "We Care" program or its program to assist homeless veterans, making only de minimis expenditures on these programs. And to the extent AVF had a charitable program to assist veterans, that program was not disclosed to donors in telemarketing scripts and consisted of writing checks to veterans homes and third-party charities rather than AVF itself providing immediate support directly to homeless veterans.
- d. During the years 2014 to 2016, AVF raised a total of \$3,819,117 in contributions, but spent just \$23,303—or 0.6% of funds raised—on its "We Care" program. And in 2015 and 2016, despite increasing its contributions from \$777,437 in 2014 to \$929,963 in 2015 and to \$2,111,617 in 2016, AVF's "We Care" expenditures have decreased from \$15,248 (2% of annual contributions) in 2014 to \$5,905 (0.6% of annual contributions) in 2015 to \$2,150 (0.1% of annual contributions) in 2016.
- e. Nor was AVF dedicated to its program to provide immediate support to homeless veterans. In 2014, AVF provided immediate support to just

- one veteran with a single payment of \$1,565. During the years 2014 to 2016, AVF provided immediate support to just 18 veterans for a three-year total of \$26,361 (0.7% of total contributions during this period).
- f. Between 2014 and 2016, AVF spent 0.6% of funds raised on its "We Care" program and 0.7% of funds raised on providing immediate support to veterans, thus spending the remaining 98.7% of the funds raised on other activities, including fundraising, administrative costs, the salary of its President and Executive Director Paul Monville, other costs, and to support a program not disclosed to donors whereby AVF made grants to veterans homes and other charities rather than directly to homeless veterans.
- g. During the years 2014 through 2016, AVF also raised funds using professional fundraiser Courtesy Call representing to donors that one of AVF's programs was to "Provide patients in veterans homes with toiletries, clothing, books, games, and other items." However, except for a few small purchases of books, AVF operated no program that directly provided these items to veteran home patients.

45. Diversion of Contributions to Other Purpose. MCL 400.288(1)(j).

a. As detailed in the above common allegations, instead of using the funds raised as represented to donors, AVF diverted nearly the
 \$48,191.05 raised by professional fundraiser Courtesy Call during 2014

to 2016 to a purpose other than that for which the funds were contributed or solicited.

b. 1,805 Violations. The Attorney General alleges that, for each of the 1,805 donations obtained by professional fundraiser Courtesy Call during 2014 to 2016, AVF diverted nearly all of each pledge to other purposes, thereby violating Section 18(1)(j) of the Solicitations Act.

46. Misrepresentation of Use of Funds Donated. MCL 400.288(1)(o).

- a. As detailed in the above common allegations, instead of using the funds raised for the programs represented to donors, AVF used nearly all the money raised for other purposes.
- b. 2,742 Violations. The Attorney General alleges that, for each of the 2,742 calls made into Michigan by professional fundraiser Courtesy Call during 2014 to 2016, AVF misrepresented the purpose of the funds solicited and thereby violated Section 18(1)(o) of the Solicitations Act.

47. Employ Any Scheme to Obtain Donation. MCL 400.288(1)(n).

- a. As detailed in the above common allegations, instead of using the funds raised for the programs represented to donors, AVF used nearly all the money raised for other purposes.
- b. In this way, AVF used a false, deceptive, or misleading pretense, representation, or promise—that funds raised would support particular programs providing direct support to veterans—as the

means of employing a device, scheme, or artifice to defraud or obtain money from all 1,805 residents that donated to AVF through professional fundraiser Courtesy Call.

c. 1,805 Violations. The Attorney General alleges that, for each of the 1,805 donations obtained by professional fundraiser Courtesy Call during 2014 to 2016, AVF violated Section 18(1)(n) of the Solicitations Act.

Donor Relations Solicitations

48. Common allegations.

- a. During the years 2016 and 2017, AVF raised funds using professional fundraiser Donor Relations representing to donors that AVF was "dedicated to providing 'We Care' packages to deployed military personnel" and that AVF was "dedicated in helping prevent more homelessness among honorably discharged veterans by providing immediate support to veterans who are homeless or in jeopardy of becoming homeless and in desperate need of assistance in the form of food, shelter, clothing, medical supplies and any other reasonable request." (Emphasis added.)
- b. Donor Relations solicitation materials also included a rebuttal describing AVF as follows: "The American Veterans Foundation is a publicly supported 501(c)(3) non-profit charitable organization whose mission is to assisting [sic] all honorably discharged veterans with

financial support in their time of need by helping prevent
homelessness among veterans and providing immediate support to
veterans who are homeless, in jeopardy of becoming homeless or in
desperate need of assistance."

- c. In fact, AVF was not dedicated to the "We Care" program or its program to assist homeless veterans, making only de minimis expenditures on these programs. And to the extent AVF had a charitable program to assist veterans, that program was not disclosed to donors in telemarketing scripts and consisted of writing checks to veterans homes and third-party charities rather than AVF itself providing immediate support directly to homeless veterans.
- d. During the years 2014 to 2016, AVF raised a total of \$3,819,117 in contributions, but spent just \$23,303—or 0.6% of funds raised—on its "We Care" program. And in 2015 and 2016, despite increasing its contributions from \$777,437 in 2014 to \$929,963 in 2015 and to \$2,111,617 in 2016, AVF's "We Care" expenditures have decreased from \$15,248 (2% of annual contributions) in 2014 to \$5,905 (0.6% of annual contributions) in 2015 to \$2,150 (0.1% of annual contributions) in 2016.
- e. Nor was AVF dedicated to its program to provide immediate support to homeless veterans. In 2014, AVF provided immediate support to just one veteran with a single payment of \$1,565. During the years 2014 to

2016, AVF provided immediate support to just 18 veterans for a three-year total of \$26,361 (0.7% of total contributions during this period).

During the most recent completed year of 2016, despite raising
\$2,111,617 in contributions, AVF provided immediate support to just 6 veterans with total expenditures of just \$8,562 (0.4% of contributions) for this program.

- f. Between 2014 and 2016, AVF spent 0.6% of funds raised on its "We Care" program and 0.7% of funds raised on providing immediate support to veterans, thus spending the remaining 98.7% of the funds raised on other activities, including fundraising, administrative costs, the salary of its President and Executive Director Paul Monville, other costs, and to support a program not disclosed to donors whereby AVF made grants to veterans homes and other charities rather than directly to homeless veterans.
- g. During the years 2016 through 2017, AVF also raised funds using professional fundraiser Donor Relations representing to donors that one of AVF's programs was to "Provide patients in veterans homes with toiletries, clothing, books, games, and other items." However, except for a few small purchases of books, AVF operated no program that directly provided these items to veteran home patients.
- 49. Diversion of Contributions to Other Purpose. MCL 400.288(1)(j).

- a. As detailed in the above common allegations, instead of using the funds raised as represented to donors, AVF diverted nearly all the money raised to other purposes.
- b. In this way, AVF diverted or misdirected nearly all of the \$28,240 raised by professional fundraiser Donor Relations to a purpose other than that for which the funds were contributed or solicited.
- c. 1,052 Violations. The Attorney General alleges that, for each of the 1,052 donations obtained by professional fundraiser Donor Relations during 2016 and 2017, AVF diverted nearly all of each pledge to other purposes, thereby violating Section 18(1)(j) of the Solicitations Act.

50. Misrepresentation of Use of Funds Donated. MCL 400.288(1)(o).

- a. As detailed in the above common allegations, instead of using the funds raised for the programs represented to donors, AVF used nearly all the money raised for other purposes.
- b. 1,279 Violations. The Attorney General alleges that, for each of the 1,279 calls made into Michigan by professional fundraiser Donor Relations during 2016 and 2017, AVF misrepresented the purpose of the funds solicited and thereby violated Section 18(1)(o) of the Solicitations Act.
- 51. Employ Any Scheme to Obtain Donation. MCL 400.288(1)(n).

- a. As detailed in the above common allegations, instead of using the funds raised for the programs represented to donors, AVF used nearly all the money raised for other purposes.
- b. In this way, AVF used a false, deceptive, or misleading pretense, representation, or promise—that funds raised would support particular programs providing direct support to veterans—as the means of employing a device, scheme, or artifice to defraud or obtain money from all 1,805 residents that donated to AVF through professional fundraiser Donor Relations.
- c. 1,052 Violations. The Attorney General alleges that, for each of the 1,052 donations obtained by professional fundraiser Donor Relations during 2016 and 2017, AVF violated Section 18(1)(n) of the Solicitations Act.

Community Cares United Solicitations

52. Common allegations.

a. During the years 2016 and 2017, AVF raised funds using professional fundraiser Community Cares United representing to donors that the goal of the AVF fundraising drive "is to provide food, shelter, clothing and medical supplies to our homeless veterans, care packages to our troops still deployed overseas, and financial assistance to veterans in need."

 b. Community Cares solicitation materials also included rebuttals stating the following:

Question: What is the American Veterans Foundation: The American Veterans Foundation, is a non-profit veterans organization dedicated in helping to prevent more homelessness among veterans and providing *immediate support* to veterans who are homeless, in jeopardy of becoming homeless or in desperate need of assistance.

Question: What does my donation go towards:
Well, the goal of the drive is to support our veterans in need.
The American Veterans Foundation helps to provide food, clothing, shelter and medical supplies to homeless veterans, financial assistance to veterans in need and care packages to our troops still deployed overseas. [Emphasis added.]

- c. In fact, AVF's "We Care" program and programs to assist homeless veterans were de minimis. And to the extent AVF had a charitable program to assist veterans, that program consisted of writing checks to veterans homes and third-party charities rather than AVF itself providing immediate support directly to homeless veterans; nor was this grant program disclosed to donors in telemarketing scripts.
 - During the years 2014 to 2016, AVF raised a total of \$3,819,117 in contributions, but spent just \$23,303—or 0.6% of funds raised—on its "We Care" program. And in 2015 and 2016, despite increasing its contributions from \$777,437 in 2014 to \$929,963 in 2015 and to \$2,111,617 in 2016, AVF's "We Care" expenditures have decreased from \$15,248 (2% of annual contributions) in 2014 to \$5,905 (0.6% of annual contributions) in 2015 to \$2,150 (0.1% of annual contributions) in 2016.

- e. AVF's program to provide immediate support to homeless veterans was also de minimis. In 2014, AVF provided immediate support to just one veteran with a single payment of \$1,565. During the years 2014 to 2016, AVF provided immediate support to just 18 veterans for a three-year total of \$26,361 (0.7% of total contributions during this period). During the most recent completed year of 2016, despite raising \$2,111,617 in contributions, AVF provided immediate support to just 6 veterans with total expenditures of just \$8,562 (0.4% of contributions) for this program.
- f. Between 2014 and 2016, AVF spent 0.6% of funds raised on its "We Care" program and 0.7% of funds raised on providing immediate support to veterans, thus spending the remaining 98.7% of the funds raised on other activities, including fundraising, administrative costs, the salary of its President and Executive Director Paul Monville, other costs, and to support a program not disclosed to donors whereby AVF made grants to veterans homes and other charities rather than directly to homeless veterans.
- g. During the years 2016 through 2017, AVF also raised funds using professional fundraiser Community Cares representing to donors that one of AVF's programs was to "Provide patients in veterans homes with toiletries, clothing, books, games, and other items." However,

except for a few small purchases of books, AVF operated no program that directly provided these items to veteran home patients.

53. Diversion of Contributions to Other Purpose. MCL 400.288(1)(j).

- a. As detailed in the above common allegations, instead of using the funds raised as represented to donors, AVF diverted nearly all the money raised to other purposes.
- b. In this way, AVF diverted or misdirected nearly all the \$123,188 raised by professional fundraiser Community Cares to a purpose other than that for which the funds were contributed or solicited.
- c. 6,234 Violations. The Attorney General alleges that, for each of the 6,234 donations obtained by professional fundraiser Community Cares during 2016 and 2017, AVF diverted nearly all of each pledge to other purposes, thereby violating Section 18(1)(j) of the Solicitations Act.

54. Misrepresentation of Use of Funds Donated. MCL 400.288(1)(o).

- a. As detailed in the above common allegations, instead of using the funds raised for the programs represented to donors, AVF used nearly all the money raised for other purposes.
- b. 240,000 Violations. The Attorney General alleges that, for each of the 240,000 calls made into Michigan by professional fundraiser Community Cares during 2016 and 2017, AVF misrepresented the purpose of the funds solicited and thereby violated Section 18(1)(o) of the Solicitations Act.

55. Employ Any Scheme to Obtain Donation. MCL 400.288(1)(n).

- a. As detailed in the above common allegations, instead of using the funds raised for the programs represented to donors, AVF used nearly all the money raised for other purposes.
- b. In this way, AVF used a false, deceptive, or misleading pretense, representation, or promise—that funds raised would support particular programs providing direct support to veterans—as the means of employing a device, scheme, or artifice to defraud or obtain money from all 6,234 residents that donated to AVF through professional fundraiser Community Cares.
- e. 6,234 Violations. The Attorney General alleges that, for each of the 6,234 donations obtained by professional fundraiser Donor Relations during 2016 and 2017, AVF violated Section 18(1)(n) of the Solicitations Act.

56. Submitting Financial Statements that Misrepresent AVF's charitable activities. MCL 400.288(1)(y).

a. AVF's 2014 and 2015 Form 990s included numerous false statements and misrepresentations. In particular, AVF claimed on Schedule I, Part III of both the 2014 and 2015 990s that in each year it made a cash grant of \$28,700 to 72 individual recipients. AVF then amended its 2014 and 2015 Form 990 and reported on Schedule I, Part III that it assisted 600 individual recipients in each year. AVF's 2014 and 2015

Form 990 and 2014 and 2015 Amended Form 990 were false. According to the Transaction Detail submitted by AVF, AVF made a single grant of \$1,565 to a single homeless veteran in 2014. In 2015, AVF made grants to 11 homeless veterans totaling \$16,234.

- b. AVF's 2014, 2015, and 2016 Form 990s included other false statements and misrepresentations. For example:
 - i. Schedule I, Part III, of AVF's 2014 Form 990 claims that it provided \$3,745 in non-cash assistance in the form of counseling and legal assistance. This amount is not supported by the Transaction Detail AVF submitted and appears to be allocated from indirect costs including legal fees and Paul Monville's compensation.
 - ii. Schedule I, Part III of AVF's 2014 Form 990 states that AVF made \$30,500 in cash grants to individuals through its "We Care" program. However, AVF did not make cash payments to individual troops. Also, the dollar amount of items purchased in this program was actually \$12,128.
 - iii. Schedule I, Part III of AVF's 2015 Form 990 states that AVF made \$4,723 in noncash assistance to homeless individuals. The claim of \$4,723 in noncash grants is not supported by AVF's transaction detail and instead appears to be an allocation of indirect costs, not a noncash grant.

- iv. Schedule I, Part III of AVF's 2015 Form 990 states that AVF

 provided noncash grants to "deployed veterans" in the amount of

 \$15,351. However, according to AVF's transaction detail, the dollar

 amount of purchased goods was actually \$5,521.
- v. Schedule I, Part III, states that AVF made \$4,723 in noncash grants to veterans in veterans homes. Except for \$150.32 in books and a computer, AVF's transaction detail does not report any noncash grants to individuals. It appears that the remainder of this item consists of allocated legal fees and Paul Monville's compensation.
- vi. AVF's 2016 Form 990 reports \$76,750 in grants to other organizations on page 10, line 1. However, despite making more than \$5,000 in grants, AVF nevertheless checked "no" on Part IV, line 21 and failed to complete the required Schedule I detailing these grants. Exhibit F, 2016 Form 990. Again, this permitted AVF to conceal the true nature of its charitable programs.
- c. In submitting to the Attorney General its 2014 Form 990, Amended 2014 Form 990, 2015 Form 990, Amended 2015 Form 990, and 2016 Form 990, all five of which contained false statements and misrepresentations, AVF misrepresented its activities, operations, or use of charitable assets.

- d. 5 Violations. For the submission of these five false and misrepresenting Form 990s, the Attorney General alleges five violations of Section 18(1)(y) of the Charitable Organizations and Solicitations Act.
- 57. Total Violations. In total, and as described in the preceding paragraphs, the Attorney General alleges that AVF has violated the Solicitations Act 279,985 times.¹

V. Attorney General's Authority

- 58. Section 20 of the Charitable Organizations and Solicitations Act specifies the Attorney General's authority to redress violations of the Act, including:
 - a. Issuing a Notice of Intended Action, MCL 400.290(4);
 - b. Issuing a Cease and Desist Order, MCL 400.290(4);
 - c. Bringing a civil action in court with a fine of up to \$10,000 per violation, MCL 400.290(1);
 - d. Accepting an Assurance of Discontinuance, MCL 400.290(4); and
 - e. Requesting injunctive relief, attorney fees and costs, and restitution, MCL 400.290(1).
- 59. Section 20 of the Solicitations Act allows the Attorney General to proceed against individual officers, directors, shareholders, or controlling members of American Veterans Foundation. MCL 400.290(1).

¹ AVF faces a maximum civil fine of \$10,000 per violation.

VI. Cease and Desist Order

- 60. The Attorney General HEREBY ORDERS American Veterans Foundation to CEASE AND DESIST all unlawful solicitations as described in the above violations. Within twenty-one (21) days, American Veterans Foundation must confirm in writing to the Attorney General its compliance with this order.
- 61. Violations of this order may result in a civil action for restitution, civil fines, litigation costs, and injunctive relief. Continuing violations may also result in additional violations alleged in any civil action.

VII. Opportunity to Respond or to Confer with the Attorney General

- 62. Within twenty-one (21) days of receiving this Notice, AVF has the opportunity to respond to the undersigned Assistant Attorney General and to confer with the undersigned Assistant Attorney General in reaching an appropriate assurance of discontinuance or settlement agreement.
- 63. If no satisfactory resolution is reached during this period, the Attorney General intends to bring a civil action against AVF and its President and Executive Director Paul Monville (and possibly other AVF directors or officers), in Ingham County Circuit Court. The Attorney General will request restitution, civil fines, the awarding of litigation costs, and injunctive relief.

BILL SCHUETTE

ATTORNEY GENERAL

William R. Bloomfield (P68515)
Assistant Attorney General
Corporate Oversight Division
P.O. Box 30755
Lansing, MI 48909
Phone: (517) 378-1160
bloomfieldw@michigan.gov

Date: September 25, 2017

Exhibit "2."

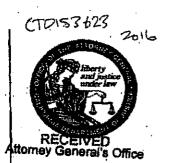
MAIL TÖ: Registry of Charitable Trusts P.O. Box 903447 Sacramento, CA 94203-4470 Telephone: (916) 445-2021

WEB SITE ADDRESS: http://ad.ca.gov/charities/

ANNUAL REGISTRATION RENEWAL FEE REPORT TO ATTORNEY GENERAL OF CALIFORNIA

Sections 12586 and 12587, California Government Code 11 Cal. Code Regs, sections 301-307, 311 and 312

Failure to submit this report annually no later than four months and fifteen days after the end of the organization's accounting period may result in the loss of tax exemption and the assessment of a minimum tax of \$800, plus interest, and/or fines or filing penalties as defined in Government Code section 12586.1. IRS extensions will be honored.



State Charity Registration Number AMERICAN VETERANS FOUNDATION Name of Organization 1950 Northquate Bivd., Suite D-1 Address (Number and Street) Sarasota, FL 34234 City or Yown, State and ZIP Code ANNUAL REGISTRATION RENEWAL FEE SCHEDULE (11 Cal. Code Regs. sections 301-307, 311 and 312) Make Check Payable to Attorney General's Registry of Charitable Trusts Gross Annual Revenue Fee Gross Annual Revenue						
Less than \$25,000 0 Between \$25,000 and \$109,000 \$25	Between 100,001 and \$250,000 Between \$250,001 and \$1 million	\$50 \$75	Between \$1,000,001 and \$10 million Between \$19,000,001 and \$50 million Greater than \$50 million	\$150 \$225 \$300		
PART A - ACTIVITIES For your most recent full accounting per Gross annual revenue \$ 2,111,617.00 PART B - STATEMENTS REGARDING OF	Total assets \$	174,297	00			
	estions below, you must attach a separa					
During this reporting period, were there an officer, director or trustee thereof either director or trustee thereof either director or trustee.	ly contracts, loans, leases or other financial ectly or with an entity in which any such off or the contract of the contract o			Yes No		
During this reporting period, did non-progra During this reporting period, were any organization.	am expenditures exceed 50% of gross rew lankration funds used to pay any penalty, fi	enues?		T K		
Internal Revenue Service, attach a copy. During this reporting period, were the serv provide an attachment issuing the name, ac	lices of a commercial fundralser or fundrals ddress, and telephone number of the service	ing counse to provider.	of for charitable purposes used? if "yes,"	×		
the agency, mailing address, contact pers 7. During this reporting period, did the organ	ization hold a raffle for charitable purposes			X		
number of raffles and the date(s) they occ 8. Does the organization conduct a vehicle of by the charity or whether the organization	arrea. contracts with a commercial fundraiser for	chment in	dicating whether the program is operated purposes.			
Did your organization have prepared an a reporting period?	audited financial statement in accordance w		ly accepted accounting principles for this	\square		
Organization's area code and telephone number (888) 556 8812 Organization's e-mail address amvetsfoundation@aol.com						
I declare under ponsity of perjury that I have it is true, correct and coordinate.	Paul Monville	xanying do	President	4/10/2017		
Signature of authorized officer	Printed Name		Title	Date		

155

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\$ 150

1000 a 40 000

Exhibit "3."

(TO153623 Form 990 Return of Organization Exempt From Income Tax Under section 501(c), 527, or 4947(e)(1) of the internal Revenue Code (except private foundations) 2016 Open to Public Do not enter social security numbers on this form as it may be made public. Poperiment of the Treesury Internal Roverse Service information about Form 980 and its instructions is at www.lrs.powfforms90. For the 2016 calendar year, or tax year beginning B Check if applicable: Admiss charge American Veterans Foundation Dona balance es 80-0273572 Name charge Number and street (or P.O. box if mail is not delivered to street address) 3737 S Tattle Ave inidal return 888-556-8812 en, state or province, country, and ZIP or formion postal pade First telumy learningled FL 34239 Sarasotá 2,111,654 Gnoss recoipts \$ Arrended resum Name and address of principal officer. High is this a group return for subordinates? Yes X No Application panding Paul Monville 3737 S Tuttle Ave HID) Are all subsidicated included? Sarasota . If "No." attech & litt. (nee instruction I.T. 34239 er(ng.)* *** ** "4947(a)(1) o Website: M/A Form of amendration: X Communition Trust Association Year of formation: 2009 M State of lengt domicies: Part 15 Summary Briefly describe the organization's mission or most significant activities: See Schedule O 2 Check this box ▶ ☐ If the organization discontinued its operations or disposed of more than 25% of its net assets. Number of voting members of the governing body (Part VI, line 1a)
 Number of independent voting members of the governing body (Part VI, line 1b) 4 5 Total number of individuals employed in celendar year 2016 (Part V, line 2a) 5 6 Total number of volunteers (estimate if necessary) Ta Total unrelated business revenue from Part VIII, column (C), line 12 7a b Net unrelated business taxable income from Form 990-T, line 34 ō Aprent Yea 8 Contributions and grants (Part VII), line 1h] 9 Program service reversue (Part VIII, line 2g)
10 Investment Income (Part VIII, ociumn (A), lines 3, 4, and 7d) ō 11 Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e) 2,111,617 934,246 935,032 2,111,654 12 Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12) 13 Grants and shritar amounts paid (Part IX, column (A), lines 1-3) 52,639 14 Benefits paid to or for members (Part IX, column (A), line 4)
15 Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10) 75,570 16a Professional fundraising fees (Pert IX. column (A), line 11a)

b Total fundraising expenses (Part IX. column (D), line 26)

1,536,618 762,172 1,536,618 17 Other expenses (Part IX, column (A), lines 11a-11d, 11f-24e) 26,943 414,875 054,837 18 Total expenses. Add lines 13-17 (must equal Part IX, column (A), line 25) 917,324 19 Revenue less expenses, Subtract line 18 from line 12 17,708 56,817 Beginning of Current Year 176,841 20 Yota) assets (Part X, line 16) 119,697 21 Total liabilities (Part X. line 26)
22; Net assists or fund halances. Subtract line 21 from tine 20. 2,700 116,997 2,544 174,297 Part Signature Block Under parasities of partury, I destand 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. Discognition of program (other than officer) is based on all information of which preparer has any knowledge. Sign Paul Monville Here President Type or print name and little . Check . I.CAA Paid Brish Palmar, CPA 04/06/17 set-employed Brian Palmor Chi 200622125 Preparer Brian Palmer, CPA, PA 20-1181345 Flore's EDI Use Only 2937 Bee Ridge Rd. Ste 941-922-4744 Sarasota, FL 34239 🕞 Firm's address X Yes . No May the IRS discuss this return with the preparer shown above? (see instructions) ...,

Form 980 (2016)

For Paperwork Reduction Act Notice, see the separate buildinglichs.

Form 990 (2016) American Veterans Foundation

80-0273572

Page 3

Form 990 (2016)

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13 Office e 14 Informat 15 Royaltie 16 Occupa 17 Travel 18 Paymer for any 19 Conferes 20 Interest 21 Paymer 22 Deprac 23 Insuran 24 Other e above (in line 24e (A) amo	ount, list line 11g expenses on Schedule O.) ritisting and promotion	137,665 229,610	131,603	229,610	
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15 Royalie 16 Occupa 17 Travel 18 Paymer for any 19 Confere 20 Interest 21 Paymer 22 Deprac 23 Insuran 24 Other ex abova (I ine 24e (A) amo	nation technology			24,700	
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21 Paymer 22 Deprec 23 Insuran 24 Other ex 25 abovs (I ine 24e (A) amo	erences, conventions, and meetings			·	'
22 Deprec 23 Insuran 24 Other ex above (I fine 24e (A) amo			<u> </u>		
23 insuran 24 Other ex above (I ine 24e (A) amo	nents to affillates		·	 	ļ
24 Onner ex above (1 line 24e (A) amo	reciation, depletion, and amortization	ļ	 	<u> </u>	
24 Onner ex above (1 line 24e (A) amo	fance		***************************************		
line 24e (A) auno	r expenses. Hemize expenses not covered		a an - big a gran and a sales i w	مند ، سند مينو کي خاند کي سري مين کار	
(A) amo	u (List miscellaneous expenses in line 24e. If	The property of the second second	A Name of the latest of the la	1 mm	1
• •	24e amount exceeds 10% of line 25; column	اره به این است. اره به این است به دارد به است این است.			The second of the second
a ⊃ax	mount, list line 24e expenses on Schedule O.)	January Company of the Company of th	And and the ansage at the state of the	9,74	y the profession of the state o
h 04-	ank fees tate Registration & Corp	9,746 4,643		4,643	
n we	tate Registration & Corp	*,045		*,043	
0 d				-	
	other expenses	· · · · · · · · · · · · · · · · · · ·	 	 	
	functional accompass, Add lines 1 through 246	2,054,837	180,294	337,925	1,536,618
	nunctional expenses, And thes 1 strongs 246 of COSts. Complete this line only if the	E, UJ M, UJ 1	100,234	337,323	2,030,010
. organiza	nization reported in column (B) joint costs		1	1	
	a combined educational campaign and	} '			
furkirais follossin	raising solicitation. Check here ► if wing SQP 98-2 (ASC 958-720)	}	,		

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SCHEDULE G

Supplemental information Regarding Fundraising or Gaming Activities

Complete if the organization answered "Yes" on Form 990, Part IV, line 17, 18, or 19, or if the organization entered more than \$15,000 on Form 990-52, line 6s. (Form 990 or 990-EZ) Attach to Form 980 or Form 990-EZ. Internal Revenue Service Information about Schedule G (Form 990 or 990-52) and its instructions is at weekirs.gov/fo American Veterans Foundation 80-0273572 Fundralsing Activities. Complete if the organization answered "Yes" on Form 990, Part IV, line 17. Form 990-EZ filers are not required to complete this part. Indicate whether the organization raised funds through any of the following activities, Check all that apply. e Solicitation of non-government grants ... Mail solicitations Internet and email solicitations # Solicitation of government grants Phone solicitations g Special fundralsing events In-person solicitations 2a Did the organization have a written or oral agreement with any individual (including officers, directors, trustees, or key employees listed in Form 990, Part VII) or entity in connection with professional fundraising services? b if "Yes," list the 10 highest paid individuals or entities (fundraisers) pursuant to agreements under which the fundraiser is to be compensated at least \$5,000 by the organization. of beed favoured (v) (vi) Amount paid to leiser have custody or control of contributions? fly) Gross recent (or resumed by) (or retained by) (III) Activity or entity (fundament) from activity fundament listed in (f) ico Yes No . 6 10 Total 3 List all states in which the organization is registered or licensed to solicit contributions or has been notified it is exempt from registration or licensing.

AMERICANVET 04/08/2017 8 52 PM

			' (a) Event #1	No Count No	I	
			(a) Evera pri	(b) Even(#2	(a) Other events	(d) Yotel events ' (edd col. (a) through '
		1	(event type)	(svent type)	(total number)	col (a))
	1	Gross receipts				
	2	Less: Contributions				
		Gross income (line 1 minus ane 2)				
	4	Cash prizes				
	5	Noncash prizes		<u> </u>		
	6	Rent/facility costs				· _ ·
	7	Food and beverages				
	8	Enterlainment				
	9	Other direct expenses		<u>.</u>		
1	10	Direct expense summary.	Add lines 4 through 9 in column (c	a)	▶	
		Alas ta agree accordance Co.	btract line 10 from line 3, column (d)	<u> </u>	Į.
		THE INCOME SUMMERY, SU	- I - A - 18 Ab I I		7 N	41
		III: Gaming, Com	plete if the organization ans	wered "Yes" on Form 990, F	Part IV, line 19, or repor	ted more
		III: Gaming, Com	plete if the organization ans on Form 990-EZ, line 6a.	(b) Puli tubelication tongolprogressive bings	Part IV, line 19, or repor	(d) Total paning (add col (a) brough col (a))
		III: Gaming, Com	plete if the organization ans on Form 990-EZ, line 6a.	wered "Yes" on Form 990, F		(d) Total gaming (add
	řŧ.	III: Gaming, Com than \$15,000 c	plete if the organization ans on Form 990-EZ, line 6a.	wered "Yes" on Form 990, F		(d) Total gaming (add
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	1 2	Gaming. Com than \$15,000.c	plete if the organization ans on Form 990-EZ, line 6a.	wered "Yes" on Form 990, F		(d) Total gaming (add
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	1 2 3 4 5 6 7 8	Gnoss revenue Cash prizes Noncash prizes Rent/facility costs Cither direct expenses Volunteer labor Direct expense summary Net gaming income sum	plete if the organization ans on Form 990-EZ, line 6a. (a) Brigo Yes % No Add lines 2 through 5 in column the same of the s	(b) Pull tubelication (b) Pull tubelication (c) Pull tubelication (c) Pull tubelication (d) Pull tubelication	cj Other gaming Yes . % No %	(d) Total gaming (add
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Sche	dule G (Form 990 or 990-EZ) 2016	American	Veterans	Foundation	80-0273	3572	Pa	age 3
11	Does the organization conduct gaming	activities with nonm	embers?				Yes	No
12	is the organization a grantor, beneficiary	or trustee of a trus	it, or a member of	a partnership or other entity	7			_
	formed to administer charitable gaming	7		and the same of the first		🏻	Yes	No
13	Indicate the percentage of gaming active			•			_	_
24	The organization's facility		** * * * * * * * * * * * * * * * * * * *	** *** *** * * * * * * * * * * * * * * *		.13a		%
b	An outside facility		44.44			13b		%
14	Enter the name and address of the per	son who prepares t	he organization's p	aming/special events books	and			
	records:							
		•						
	Name -				***** *** * **** ****			
	Address b		•	•				
•	Address	· · · · · · · · · · · · · · · · · · ·		r - 141 - 131 - 131 ₂ 14544	ni di 🕠 nin s			
15a	Does the organization have a contract	with a titled made for	m whom the emo	alanday ranaktas caralas		•		
LUCI	revenue?	mei a and barth tro	tu seinus nes orbai	INTERNOT FROMINGS			Yes	No
b	If "Yes," enter the amount of gaming re	venue received by t	he normalization	, , . , , , , , , , , , , , ,	and the	LJ	1100	
_	amount of gaming revenue retained by		\$		THE WIND MICH.			
c	if "Yes," enter name and address of the	, ,		t extenses				
		,			•			
	Name >		•					
			, ,					
•	Address >				·			
	*	, ·		• • • • • • • • • • • • • • • • • • • •			٠.	
16	Gaming manager information:				• •			
	Name ▶					• •	•	
	Gaming manager compensation > \$	**** ** *** * ***	•		•		•	
	Description of services provided		,					
						· · · .		
	Director/officer - En	ployee	Independent o	entractor	• •	٠.		
			- ,					
17	Mandatory distributions:	,						
a	. Is the organization required under state	a law to make chari	iable distributions t	from the gaming proceeds to	•			
	retain the state gaming license?		٠				Yes	No
p.	Enter the amount of distributions regula	red under state law	to be distributed to	o other exempt organizations	OL			
170-	spent in the organization's own exemp	t activities during the	e tax year ▶ \$		ÁL	. 1 6 4		
_1"41	rt IV: Supplemental Informa Part III, lines 9, 9b, 10b	TOVIDE T	ie explanations	s required by Part I, line	3 2D, COlumns (III) al	ic (V); ar	ia	
	See instructions	, 150, 150, 10, 1	and toolas at	sbiicanse: wiżo brówiae i	any addidonal inioiti	auch.		
-	OSE MANIELLONS			· · · · · ·	····			
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					Schedule G (Fo	mn 990 or	990-F2	2) 2016
	·•		•		;			

Exhibit "4."

MAIL TO: Registry of Charitable Trusts P.O. Box 903447 Sacramento, CA 84203-4470 Telephone: (916) 445-2021

WEB SITE ADDRESS:

ANNUAL REGISTRATION RENEWAL FEE REPORT TO ATTORNEY GENERAL OF CALIFORNIA

TO ATTORNEY GENERAL OF CALIFORNIA
Sections 12586 and 12587, Galifornia Government Code
11 Cal. Code Regs. sections 301-307, 341 and 312

Failure to submit this report annually no later than four months and fifteen days after the end of the organization's socoupling period may result in the loss of tax exemption and the sessement of a minimum tax of \$500, plus interest, and/or fines or filling panelties as defined in Government Gode section 12586.1. It's extensions will be honored.

0T0153623 2015



RECEIVED
Attorney General's Office

				
State Charity Registration Number CTC153623		Check it:	APR 0 1 2	2016
AMERICAN VETERANS FOUNDATION	N	[<u> </u>		
Name of Organization 3737 S. Tuttle Ave.	,	Amended report	e <mark>gistry of C</mark> harite	a ble Trust e
Address (Number and Street) Saraspta, FL 34239		Corporate or Organizațion	No]
City or Town, State and 217 Godo		Federal Employer I.D. No.	80-0273572	
,		1		
	N RENEWAL FEE SCHEDULE (11 Cal. Co Payable to Attorney General's Registry of		311 and 312)	
Gross Annual Revenue Fee	Gross Annual Revenue	Fee Gross Annual Rev	euna	Fee
Less than \$25,000 0 Botween \$26,000 and \$100,000 \$25	Between 198,001 and \$250,000 Between \$250,001 and \$1 million	\$50 Between \$1,000,00 \$75 Between \$10,000,0 Greater than \$50 n	101 and \$60 million	\$150 \$225 \$300
PART A - ACTIVITIES				,
For your most recent full accounting par	riod (beginning 01 / 01 / 2015 let	iding 12 / 31 / 2016	list:	
מאַב מאַאַ ממ	Total assite \$			
Gross annual revenue \$ 833,032.00	10tal desete \$			
PART B - STATEMENTS REGARDING OF	RGANIZATION DURING THE PERIOD	OF THIS REPORT	·	
Note: If you answer "yes" to any of the que говроязе. Please review RRF-1 insti	estions below, you must attach a separa ructions for information required.	te sheet providing an explans	ition and details for e	ach "yee"
		, , , , , , , , , , , , , , , , , , , 		Yes No
During this reporting period, were there any officer, director or trustee thereof either director.	y contracts, loans, leases or other financial ectly or with an entity in which any such offi	transactions between the orgal cer, director or trustee had any	nization and any financial interest?	
	theff, embezziement, diversion or misuse (╌┈╌┼	
3. During this reporting period, did non-progra	am expenditures exceed 50% of gross reve	nues?		×
During this reporting period, were any orga- internal Revenue Service, attach a copy.	anization funds used to pay any penalty, fin	e or judgment? If you filed a F	orm 4720 with the	
5. During this reporting period, were the servi	ices of a commercial fundralear or fundrals idress, and telephone number of the service	ng counsel for charitable purpo a provider.	ses used? If "yes,"	
	zation receive any governmental funding?			X
<u> </u>	Ization hold a raffle for charitable purposes?	If "yes," provide an attachmen	nt indicating the	×
 	lonation program? If "yes," provide an atta contracts with a commercial fundralser for			×
Did your organization have prepared an all reporting period?	udited financial stalement in accordance wi	th generally accepted accountly	ng principles for this	EX L
Constitute and said and following	, 888), 556 8812			
Organization's area code and telephone number Organization's e-mail address amvetsio undi	ation@aol.com			
I declare under penalty of perjury that I have it is true, correct and complete.	examined this report, including accomp	anying documents, and to the	a best of my knowled	ge and belief,
IN THE	Paul Monville	President		/29/2016
Signature of authorized officer	· Printed Name	· Ti	le	Date

M

4+4437 \$75

RRF-1 (3-05)

Exhibit "5."

CTD193023 2015

Form 99(1				1:	OMB No. 1545-0047
Form 20	 Return of Organization 	Exempt From	Incon	ne Tax		2015
activent of the Treas and Revenue Secreti	Under section 501(a), 527, or 4947(a)(b) of the Do not enter social security number Information about Form 990 and its	exercal Reviews Cods (e ers on this form as it may instructions is at www.ir	2.Boxyot. pe maqë br rechr la use	e (Ubiba). 1656. 17990.	1 T	Open to Public Inspection
	alendar Year, or lox year beginning	, 2015, and				
Crack of applicable				D	Employer (dont)	instion number
Address chan	· 17 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -				80-02739	372
Kame change	Mumber and street for P.O. box a mad is not delicered to six	Room/was	莊	Yelephone mumb	na ·	
Install nature	3737 S. Tuttle Ave.	S	(888) 5	56-8812		
Fastminism	Character of many neutron and country and TiQ or francisco of	Second code	L,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		,	· · · · · · · · · · · · · · · · · · ·
Amended foll	1	FL 34	239			\$ 935,032.
Application p		•			oup return for WADO	
u	Paul Monville 4634 Northwood Tarrace Sar	asota FL34	234	Are all sub	onimates included ch etist. (pest idibit	S · [] Ass [] Kr
Tex-exemps \$0	tus X 501(c)(3) \$01(c) () (insented.)	1917(a)(1) or	527	,		
Website:	N/A	***	1876	Croup on	mpton nontar 🤌	
Form of Organiz	mon: X Corporation Thus Association Other	L Year	inoasmo), t	2009	M Sizie of 6	rgalitomicie: PL
irti Sun	mary				 	
1 Briefly	escribe the organization's mission or most significant a	acumos. Vaefa	r norez	aua Ano	axe powers	es or in jeobard
of be	coming nomeless, providing patients	in veterans ho	wed mit	h toil	erries, c	rocurat pookar
gang	and other Items; providing com	fort and "We (care"	packag	ea co de	<u> broked ficoba</u>
				2000	, .,	
2 Check	his box it is the organization discontinued its oper of voting members of the governing body (Part VI, lin	a ta)	nake use	1 20 76 Us	3	
1. A Mismilia	t of voting managers of the governing bod to independent voting members of the governing bod	v (Part VI. line th)		3	 *	
5 Total n	imber of individuals employed in calendar year 2015 (· · · · · · · · · · · · · · · · · · ·	
6 Total n	unbur of unburlance textimals If assaurant				8	
Za Tolelu	rreleted business ravenue from Part VIII. column (C), i	line 12 RECEL	VED.,		78	0
b Netun	elated business toxable income from Form 990-T, line	Altomey Geni	eral's.C	Mice.	7b	0
4				Pri	or Year	Current Year
. B Contril	uilons and grants (Parl VIII, line 1h)	ADD .o .	1.2016		385.	719
9 Progra	m service revenue (Part VIII, line 2g)	54K 17. (0)	1010			
9 Progra	nent income (Part VIII, column (A), lines 3, 4, and 7th)	ا در دی د دیورد نمید د در اور (l, and 7tl			40,	. 7j
. 1 1.0 ANKS	evenue (Pari VIII, column (A), lines 5, 6d, 8c, 9c, 10c,			LIDSIS	777,152.	934,246
	evenue — add lines 8 Grough 11 (must equal Part VIII)				777,577.	935,032
	and similar amounts paid (Part IX, column (A), lines 1			ــــــــــــــــــــــــــــــــــــــ	33,313.	52,639
· 14 Benef	is paid to or for mambers (Part IX, column (A), fine 4)			<u> </u>		<u> </u>
ุ เร Salari	s, pijier compensation, employee benefits (Pari IX, co	dumn (A), linus 5-10)			74,038.	75,570
16a Profes	sional fundralising fees (Part IX, column (A), line 11e)				638,412.	762,173
16a Profes b Total	undraising expenses (Part IX, column (O), line 25) >	762	172		حاسانا سهمست	
17 Other	expenses (Part IX, column (A), lines 11a-11d, 11f-24e)	\	<u> </u>		23,447.	26,94
	expenses, Add lines 13-17 (most equal Part IX, column			 -	769,210.	917,32
	ue less expenses, Subtract line 18 from the 12	• • •		 	8,367	17,70
1 10 1000	DO HILD THE PLANTAGE OF THE PARTY OF THE PAR		• • • • •	Barina		
	esseus (Part X, line 16)	, , , , , , , , , , , , , , , , , , ,		- DECEMBER	g of Current Yes 102 , 160 .	
	iabilities (Part X, Une 26)			 	2,891	
: XI	sets or fund balances. Subtract line 21 from line 20		• • • • • • • • • • • • • • • • • • • •			
	······································	7 1 1/1 1 1 1 1 1 1 1	*****		99,269	.] 116,99
	anature Block					
ныя режина от ра эприла, Васынай	they, I declare that I have exampled his token, architect accompanying and property (other than attacks of an apparituation of which bridge	mot pre tulk jask-popel iinner end kistemeter b	iled to E.M. DATE	or my success	कर्मीय कारा छक्तांचा' स्	a was correct, stra
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	rian Palmer, CPA		03/08/	11.02	sasi-employeed	P00622125 ·
	Brian Falmer, CPA, PA				<u> </u>	
Use Only	with 2937 Bee Ridge Rd Sce 2					0-1181345
	Sarasota	FL 34239				41) 922-4744
	scuss this return with the preparer shown above? (see					
SAA For Pap	rwork Reduction Act Notice, see the separate inst	ructions.	TEE	A0101 10'	2/15	Form 990 (20

TEEA0103 |0/12/15

BAA

80-0273572

Form 980 (2015)

art IX Statement of Funct	terans Foun		· · · · · · · · · · · · · · · · · · ·	80-0273	572 Page 1
Section 501(c)(3) and 501(c)(4) organi			and according to the second of	nessetala natura (A)	
Check if Schedule	O contains a resor	onse or note to env line	in this Part IX	отрівів соішти (А).	····
Do not include amounts reported on to, 7b, 8b, 9b, and 10b of Part VIII.		(A) Total expenses	(B) : Program service expenses	(C) Management and general expenses	(D) Fundraising expenses
Grants and other assistance to de organizations and domestic gove See Part IV, line 21	roments.				
2 Grants and other assistance to de individuals. See Part IV, line 22.	mestic	52,639,	52,639.		
3 Grants and other assistance to fo organizations, foreign government eign Individuals. See Part IV, tine	reign its, and for- s 15 and 16				
4 Benefits paid to or for members. 5 Compensation of current officers.	[,		
trustess, and key employees Compensation not included above disqualified persons (as defined to the control of the control	e. to	75,570.	18,892.	56,678	0
section 4958(f)(1)) and persons t in section 4958(c)(3)(B)	described		· 		,
7 Other salaries and wages	<u> </u>	-:			
g Pension, plan eccruals and contri (include section 401(k) and 403(t employer contributions)	o)	. ,			Man
9 Other employee benefits	· —				
10 Payroll taxes	_			·	
11 Fees for services (non-employee			•	•	• •
a Management	1		<u> </u>		
b Legal		1,090,	1,090.	<u>, 0, </u>	0
e Accounting	· ·	3,325.	<u>``0.</u>	3.325.	
, d Lobbying					
e Protessional fundraising services. See i	· -	762.172.	· · ·		762;172
f Invasiment management fees g Other. (Il line 11g amount exceeds 10% (A) amount, list line 11g expenses on 8	of line 26, column checiule O.)	. 4,222.	. 0.	4,222.	
12 Advertising and promotion					
13 Office expenses		10,545.	0.	10,545.	
14 Information technology		<u> </u>			<u> </u>
15 Royalties		·	<u>.</u>		
16 Оссырансу	· • • • • • • <u>•</u> • <u>-</u>	, ,			
17 Travel		3,462.	<u> </u>	3.462.	
18 Payments of travel or entertainm expenses for any lederal, state, public officials	rent or local				
19 Conferences, conventions, and					-
20 Interest					
21 Payments to affiliates					
22 Depreciation, depletion, and am	<u> </u>	· ·	<u> </u>		<u> </u>
23 Insurance 24 Other expenses, Itemize expens covered above (List miscellanes	ies not		•		
in line 24e. If line 24e amount e of line 25, column (A) amount, li expenses on Scheddle O.)	kcaeds 10% st line 24e				
State Registration 6	Corp Fees	4.299.	Q.	4,299	
<u> </u>					
· ·					
e All other expenses			ļ. <u> </u>		
25 Total functional expenses. Add lines	" . 'F	917,324.	. 72,621.	82,531.	762,172
26 Joint costs. Complete this line the organization reported in coll joint costs from a combined edu campaign and fundralsing solici	leational				
Check here F if following SOP 98-2 (ASC 958-720) BAA					Form 990 (20°

SCHEDULE G (Form 990 or 990-EZ)

Supplemental Information Regarding Fundraising or Gaming Activities

Complete if the organization answered 'Yes' on Form 986, Part IV, lines 17, 18, or 18, or if the organization entered more than \$15,000 on Form 980-EZ, line 8a.

OMB No. 1545-0047 2015

➤ Attach to Form 990 or Form 990-EZ.

Open to Public inspection Department of the Treasury Internal Revenue Service Information about Schedule G (Form 990 or 980-EZ) and its instructions is at www.irs.gov/form990. 80-0273572 American Veterans Foundation Part I Fundrelsing Activities. Complete if the organization answered 'Yes' on Form 990, Part IV. Ilina 17. Form 990-EZ filers are not required to complete this part. Indicate whether the organization raised funds through any of the following activities. Check all that apply. Mail solicitations Solicitation of non-government grants X Internet and email solicitations Solicitation of government grants Phone solicitations g Special fundralsing events x d In-person solicitations 2a Did the organization have a written or oral agreement with any individual (including officers, directors, trustees or key employees listed in Form 990, Part VtI) or entity in connection with professional fundraising services? X Yes No b if Yes, list the ten highest paid individuals or entitles (fundraisers) pursuant to agreements under which the fundraiser is to be companisated at least \$5,000 by the organization. (i) Name and address of individual or entity (fundralser) (v) Amount paid to (or retained by) fundraiser listed in column (i) (vi) Amount paid to (or retained by) organization (II) Activity (iii) Did fundralser (iv) Gross receipts from activity ve custody or contro of combinitions? Yes Courtesy Call, Inc No Phone Solicitation 369,351 314,624 54;727. J&J Marketing, LLC bone Solicitation Х 97,312 19,574 Menacola Marketing, Inc Phone Solicitation X 104.986 87,730 <u>17,256.</u> The Professional Fundraises Phone <u>Solicitatio</u>ns 6,175 1,054. Debbie Lopez Phone Solicitations 20,300 16,240 4,060: Midwest Marketing Firm Phone Solicitations B.905 3,784. Safety Communications, Inc. Phone Solicitations 21,388 17,994 3.394. Supplemental Security Phone Solicitations 69,448 <u> 16,721.</u> 86,169 Sunset Productions 55,926 13,935. Phone Solicitations 69,,861 Reliance Support, LLC 10 X Phone Solicitationa 9,239 5,018. 3,421. 793,686 655,760 137.926. 3 List all states in which the organization is registered or licensed to solicit contributions or has been notified it is exempt from registration or licensing. Alaska Alabama Arkangas

See Part I, Line 3 List of States Registered or Licensed to Solicit Funds BAA For Paperwork Reduction Act Notice, see the Instructions for Form 990 or 990-EZ

Schedula G (Form 990 or 990-EZ) 2015

TEEA9701 12/02/15

1			(a) Event#1	(b) Event #2	(c) Other events	(d) Total events (add column (a)
- 1			(event lype)	(event type)	NONE (total number)	through column (o))
		Gross receipts				
ĺ		Less: Contributions		•		
1	_	·			, .	
╁	3_	Gross income (line 1 minus line 2)			<u> </u>	
١	4	Cash prizes	, ,	:		
1	5	Noncash prizes		. ;		
l	6	Rent/facility costs		<u> </u>		
1	7	Food and beverages			١	
١	8	Entertainment	<u> </u>			
1	9	Other direct expenses		<u>. </u>		
	16	Direct evenues examples Add lines 4 these.	ah Q in molumn (4)			
	11	Direct expense summary. Add lines 4 through the income summary. Subtract line 10 from			* . *	
rt	III	Gaming. Complete if the organizati \$15,000 on Form 990-EZ, line 6a.	on answered 'Yes'	on Form 990, Part I	V, line 19, or report	ed more than
T			(a) Bingo	(b) Puli tabs/instant bingo/progressive bingo	(c) Other gaming	(d) Total gaming (add column (a) through column (c)
	1	Gross revenue				
	2	Cash prizes				
EXPENSE	3	Noncash prizes				
SES	4	Rentifacility costs	•			
Ė	٠ 6	Other direct expenses				
ı		Willer direct Oxforised 1		<u> </u>	<u> </u>	
	a	Voluntaer Johan	Yes	Yes - 9	Yes	1
	6		No	Yes %	Yes &	
	ľ	Volunteer labor	No	- 		
	7	•	No ngh 5 in column (d)	No	No	
2	8 Enl	Direct expense summary, Atid lines 2 through	No ugh 5 in column (d) 27 from line 1, column (d) ducts gaming activities:	No No	No	Yes No

Schedule G (Form 990 or 990-EZ) 2015 American Veterans Foundation

Exhibit "6."

WAIL TO: rorant 10: Registry of Cheritable Trusts P.O. Box 993457 Secramento, CA 94203-4470 Telephone: (916) 443-2021

WEB SITE ADDRESS: htto://eu.ca.gov/cherities/

REGISTRATION RENEWAL FEE REPORT TO ATTORNEY GENERAL OF CALIFORNIA Sections 12586 and 12587, California Government Code 11 Cal. Code Regs. sections 301-307, 311 and 312

Pailure to submit this report senually no later than four months and fifteen days after the end of the organization's occounting period may restrict in the loss of tax exemption and the accessment of a minimum tax of \$600, plus interest, and/or lines or filling penulties as defined in Government Code section 12500.1. IRS extensions will be honored.



<u> </u>				<u></u>	APR					
State Cherty Registration Mumber CT0153823 Check if: Che										
Name of Organization 3737 S. Tuttle Ave.		,	LIAmar	rded report						
Address Number and Street	<u> </u>		Corpora	ate or Organization No						
Sarasota, FL 34239 Sarasota, FL 34239 Federal Employer I.D. No. 80-0273572										
City or Town, Stots and ZIP Cods			Pedera	Employer I.O. No.						
		VAL FEE SCHEDULE (11 Cal. Attorney General's Registry			and 312)					
Gross Annual Revenue	Fee Gross /	Annual Revenue .	<u>Fea</u>	Gross Annual Revenu	<u>16</u>	<u>Fee</u>				
Less than \$25,000 Between \$25,000 and \$100,000		n 190,001 and \$250,000 on \$250,001 and \$1 million	\$50 \$75	Between \$1,000,001 a Between \$10,000,001 Greater than \$60 mill	and \$50 million.	\$150 \$225 \$300				
PART A - ACTIVITIES										
For your most recent full acco	ounling period (bed)	inning 01 / 01 / 2014	endina 12	31 ,2014) III	st:					
Gross annual revenue \$		Total assets 8								
				· · · · · · · · · · · · · · · · · · ·						
PART B - STATEMENTS REGAL	RDING ORGANIZA	ATION DURING THE PERM	OD OF THE	S REPORT		· · · · · · · · · · · · · · · · · · ·				
Note: If you answer "yes" to any of the questions below, you must attach a separate sheet providing an explanation and details for each "yes" response. Please review RRF-1 instructions for information required.										
1. During this reporting period, we officer, director or trustee there	re there any contract of either directly or wi	s, loans, jeases or other financi ith an entity in which any such (al transactio officer, direct	ins between the organizator or trustee had any lin	ation and any andal interest?	Yes No.				
2. During this reporting period, wa	as there any theft, em	bezziement, diversion or misus	e of the orga	anization's charitable pro	perty or funds?	×				
3. Ouring this reporting period, did	f non-program expens	ditures exceed 50% of gross re	venues?	4		×				
During this reporting period, we internal Revenue Service, attack	ere any organization i ch a copy.	funds used to pay any penalty,	fine or Judgr	nent? If you filed a Form	1 4720 with the	T E				
5. During this reporting period, we provide an attachment listing the	≥re the services of a c ne name, address, an	commercial fundraiser or fundra id telephone number of the serv	ising counse lice provider	al for charitable purposes	s used? If "yes,"	T X				
During this reporting period, did the agency, mailing address, or	d the organization recontact person, and le	eive any governmental funding lephone number	? (fso, prov	vide an attachment listing	the name of	, *				
During this reporting period, did number of raffles and the date.	d the organization hol (s) they occurred.	ld a raffie for charitable purpose	es? If yes,"	provide an attachment i	ndicating the					
Does the organization conduct by the charity or whether the organization.	t a vehicle donation pr rganization contracts	rogram? If 'yes,' provide an a with a commercial fundraliser for	tachment in or charitable	dicating whether the propulation	gram is operated	×				
Did your organization have pre- reporting period?	pared an audited fina	ancial statement in accordance	with general	lly accepted accounting p	orinolpies for this					
Organization's area code and telepho	one number/ 888	. 656 , 881	2		· , , , _ , _ , , _ , , , , , , , , , , 					
Organization's e-mail address amy	retsfoundation@a	eol.com	.,							
I declare under penalty of perjury it is true, correct and complete.		·····	npanying do	ocuments, and to the b	ast of my knowle	dge and bellef,				
MA		Paul Monville	, 	President		4/14/2015				
Signature of authori	ized officer	Printed Name		Title		Date				

me

Exhibit "7."

Form **990**

Return of Organization Exempt From Income Tax

OMB No. 1545-0047 2014

Under Section 601(c), 627, or 4947(3)(1) of the Internal Revenue Code (except private loundations) Department of the Transpury Internal Revenue Service Information about Form 960 and its Institutions is at www.irs.gov/form990.								Open to Public				
			ndar y	ear, or tax year beginning	ıg	, 2014, an	d ending					
		upplicable:			can Veterans For				D Employ	er identi	Reation number	
_		iross chenge	_	olng business as			<u> </u>	_	80-1	273	572	
	-1				nax is not delivered to sheet address	· · · ·	Rocinisui	ta		ne numb		<u> </u>
	·—	Me change	1	· · · · · · · · · · · · · · · · · · ·	•			~ \ \				
	-	ial return		7 9. Tuttle Ave					(88)	3), 5	56-8812	
	∐F84	म्पर्यक्रमभाग्यास्यस्य	1 6	affa da manur sasara da badanarar con	ntry, and ZIP or foreign postal code			ł	•		'	
÷	Απ	ended raium		asota		FL 3	4239				\$ 777,5 7 7.	
•	Пи	plication pending	FN	lante and address of principal off	COL			(a) is this a				No
			Paul	Moriville 4634 North	ood Terrace Sarasota	FL 3	4234 H	(b) Aranijsi if No. ni	entenbiodi	included:	? Yes	No
-	7	exempl slalus		01(c)(3) 501(c) (17(a)(1) or	527	if 'No,' ni	wich a list (riani oos	uctions) ·	- .
÷				a total	(1) (10) (10)	1 (4/1/4)		l(c) Group ex		Be		
÷			/A			15.						
K		of organization:		Corporation Trust /	disoration Other	L. Yes	r of formation	2009	M S	State of Ic	egal domiciat FL	
Pa	irt l	Summa						<u> </u>	., 		· · · · · · · · · · · · · · · · · · ·	
	1				r most significant activities:		st vete	<u>rans_wh</u> q	o are h	<u>omele</u>	<u>es or in jeopa</u>	<u>rdy</u>
Φ		of becom	ing .	homeless, provid:	<u>ing patients in vet</u>	erans h	omes wi	th toi.	letrie	<u>s, c</u> l	<u>lothing</u> books	<u>s.</u>
ذ	ļ	games a	<u>nd_c</u>	ther items; pro	viding comfort a	nd "We	Care"	packa	des tr	de	oloyed troop	s.
Activities & Governance	l											
ð	2	Check this I			iscontinued its operations of	disposed o	of more tha	n 25% of	ils net a	ssels.		
ā	3	Number of	reilny r	nembers of the governing	j body (Part VI, line 1a)		• • • • •			3 -		5.
ᅇ	4	Number of i	ndeper	dent voting members of	the governing body (Part VI,	ine to	6 P. C.	والمساوية		4		5
쁞	5	Total numb	er of în	dividuals employed in cel	endar year 2014 (Part V, liggessary)		اهدولاحكا	ىن. 14. ئار		5		1
	6	Total numb	er of vo	ilunteers (estimate it nacc	essary)	Michigan,				6		4
ď,	7a	Total unrela	ited bu	sinass revenue from Parl	VIII, column (C), line 12 I Form 990-T, line 34	(Set A	49 9	190		7a		٥.
_	b	Net unrefat	ed busi	ness taxable income fron	Form 990-T, line 34	<u> </u>	. ! ! .	, , , , , , , , , , , , , , , , , , ,		7b	•	٥.
-		•		.,		12,	egistry	(b) Pr	or Year	,	Current Year	
*	8	Contribution	ns and	grants (Part VIII, line 1h)		1785 	iside i	niels		.75.	38	35.
Hevenue	9	Program se	rvice r	evenue (Part VIII, line 2g)	<i> </i>	Chair	י אינונגוו	111111			-	<u> </u>
₹	10				nes 3, 4, and 7d)				• ,	4		40.
æ	11				5, 6d, 8c, 9c, 10c, and 11e)				598.		777.1	_
	12				ısı equal Part VIII, column (/			·	598		777,5	
	13				olumn (A), lines 1-3)			 				
	14				dumn (A), iine 4)				32,:	<u>, 73 - </u>	33,31	1.3.
	1							<u> </u>			<u> </u>	
9	15				nefilia (Part IX, column (A), I			<u>'</u>	61,227.		74,03	<u> </u>
Exceptes	16a	Profession:	al fundi	aising fees (Part IX, colu	mn (A), line 11e)			<u></u>	484	590.	638,41	1 <u>2,</u>
- 8	. 1	Total fundr	alsing e	храляев (Part IX, colum	n (D), line 25) ≻	638	.432.					
ū	17		_		11a-11d, 11f-24e}				.19,1	000	22.0	4 53
	18				al Part IX, column (A), line 2			ļ			23,44	
	1			· · · · · · · · · · · · · · · · · · ·	* **	•		. 	597		769,2	
	19	Kevenue i	ss exp	enses. Subtract line 18 ii	om line 12	<u></u>	• • • • •			970 <u>.</u>	8,30	<u> 57 </u>
ğ	XI .						٠.	Beginnin	ig of Curre			
1	20	(otal-asset	s (Part	X, line 16)		• • • • • • •		ļ	92,		102,10	
4	21	Total liabil	lles (Pa	art X, line 26)	• • • • • • • • • • • • •	• • • • • •		<u></u>	2.	<u>978,</u>	2,8	91.
ૃષ્ટ્ર	22	Net assets	or fund	l balances, Subtract line :	21 from line 20				90	861.	99,2	69.
P	art II	Signat	ure E	Block	······································							-
					schieller accompanyles schedules est	d etalements o	nd to the bes	of my know	adne and b	ifuf, it is	Lute coased and	
CO	npidla, C	ectaration of pro	perer (al	har than officer) is based on all in	sciuding accompanying schedules and formulion of which preparet has any k	nowiedge.		21117 412.5	100 to 100 to 1		and a special cond	
-								l n	3/24/	1.5		
	1_4	. F 310	nalura of	officer					nd 7	4		
ä	lgn			•								
. 17	ere	▶ ₹	tul i	Monville				Presi	ldent			
				name and title,								
		Printry	be breber	ror's name	Proposor's algostum		Dale ,		Check	∐!r	PTIN	
P	ald	Briz	n Pa	llmer, CPA	·		03/30/	15	seif-emplo;	ped		
	гера			Brian Palmer,	CPA, PA							
	se O			2937 Bee Rido				·	Firm's EIN	► 50	-1181345	
•						24020		· · · · · ·	Распе по.		1) 922-4744	
-	outh-	IDO din no	thic -	Sarasota	FL							No.
					own above? (see instructions	5/ • • • • • •				• • • •	····	No
В	AA F	or Paperwoi	k Red	uction Act Notice, see ti	ie separate instructions.		TEE	A0101 05/2	8/14		Form 990 (2	014)

<u> </u>	aπ	14 Cueckiet of Vedulled Schedules			
		· · · · · · · · · · · · · · · · · · ·	, -	Yes	No
•	1	ts the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? If "Yes," complete'	1	х	
:		is the organization required to complete Schedule B, Schedule of Contributors (see Instructions)?	2		·x
:	3	Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for public office? If Yes, complete Schedule C, Pent I.	3	,	х
	4	Section 501(d)(3) organizations. Did the organization engage in lobbying activities, or have a section 501(h) election in effect during the tax year? if "Yes," complete Schedulo C, Part II	4		ж
	5	is the organization a section 501(o)(4), 501(o)(5), or 501(o)(6) organization that receives membership dues, assessments, or similar amounts as defined in Revenue Procedure 98-19? If "Yes," complete Schedule C, Part III	5		x
	6	Did the organization maintain any donor advised funds or any similar funds or accounts for which donors have the right to provide advice on the distribution or investment of amounts in such funds or accounts? If Yes, complete Schadule D, Part 1.			X
	7	Old the organization receive or hold a conservation easement, including easements to preserve open space, the environment, historic land areas, or historic structures? If "Yes," complete Schedule D, Part II	· 7		х
٠	8	Old the organization metritain collections of works of art, historical treasures, or other similar assets? If Yes, complete Schedule D, Part III.	8		х
	9	Did the organization report an amount in Part X, line 21, for accrow or custodial account liability; serve as a custodian for amounts not listed in Part X; or provide credit counseling, debt management, credit repair, or debt negotiation services? If Yes, complete Schedule D, Part IV	9		x
•	10	Did the organization, directly or through a related organization, hold assets in temporarily restricted endowments, permanent endowments, or quasi-endowments? If 'Yes,' complete Schedule D, Part V	10	Ŀ	x
•	11	If the organization's answer to any of the following questions is 'Yes', then complete Schedule D. Parts VI, VIII, VIII, IX, or X as applicable.	ĺ		
		Did the organization report an amount for land, buildings and equipment in Part X, line 107 If Yes,' complete Schedule D, Part VI:	11a		· x
	i	Did the organization report an amount for investments — other securities in Part X, line 12 that is 5% or more of its total assets reported in Part X, line 16? If Yes, complete Schedule D, Part VII.	115		×
	(Did the organization report an amount for investments — program related in Part X, fine 13 that is 5% or more of its total assets reported in Part X, fine 16? if Yes, complete Schedule D, Part VIII	11 0		х
	•	d Did the organization report en amount for other assets in Part X, line 15 that is 5% or more of its total assets reported in Part X, line 16? If Yes, complete Schedule D, Part IX	110		x
	4	e Did the organization report an amount for other itabilities in Part X, line 257 If 'Yes,' complete Schedule D, Part X	11 e	<u> </u>	. X
	i	f Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses the organization's liability for uncertain tax positione under FIN 48 (ASO 740)? If 'Yes,' complete Schedule D, Pert X	111		x
	12:	a Did the organization obtain separate, independent audited financial statements for the tax year? If Yes, complete Schedule D, Parts XI, and XII.	120	x	,
	1	b Was the organization included in consolidated, independent audited financial statements for the tax year? If 'Yas,' and If the organization answered 'No' to line 12e, then completing Schedule D, Parts XI and XII is optional	121		×
	13	is the organization a school described in section 170(b)(1)(A)(ti)? If Yes, complete Schedule E	13		X
	14	a Did the organization maintain an office, employees, or agents outside of the United States?	142	1	X
		b Did the organization have aggregate revenues or expanses of more than \$10,000 from grantmaking, fundraising, business, investment, and program service activities outside the United States, or aggregate foreign investments valued at \$100,000 or more? If "Yes," complete Schedule F, Parts I and IV	141		X
,	15	The state of the s	15		X
	16	Old the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or other assistance to or for foreign individuals? if "Yes," complete Schedule F, Parts til and IV	16		,
	17	Did the organization report a total of more than \$16,000 of expenses for professional fundralsing services on Part IX, column (A), lines 6 and 11e? If "Yes," complete Schadule G, Part I (see instructions)	17	2	
	48	Did the organization report more than \$15,000 total of fundratsing event gross income and contributions on Part VIII. lines 1c and 8a? If Yes, complete Schedule G, Part II	18	2	
	. 18		19		,
	20	a Did the organization operate one or more hospital facilities? If Yes, complete Schedule H	20	7	7
		6 if Year to line 20m did the appearing attach a copy of the studied financial statements to this return?	20	ь	1

TEEA0103 05/28/14

BAA

Form 990 (2014)

Part IX Statement of Functional Expens Section 501(c)(3) and 501(c)(4) organizations must con	plete all columns. All ot	her organizations must c	omplete column (A).	
Check if Schedule O contains a res	ponse or note to any line	In this Part IX	,,,,,,,,,,,	
Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part Vill.	(A) Total expenses	(B) Program service expenses	(C) Management and general expenses	(D) Fundraising expenses
Grants and other assistance to domestic organizations and domestic governments. See Part IV, line 21.		,	,	
2 Grants and other assistance to domestic individuals. See Part IV, line 22	33,313.	33.313.		
Grants and other assistance to foreign organizetions, foreign governments, and foreign individuals, See Part IV, lines 15 and 16				
4 Benefits paid to or for members.				
6 Compensation of current officers, directors, trustees, and key employees	74.009	18.502.	55,507,	<u> </u>
6 Compensation not included above, to disqualified persons (as defined under section 4968(n)) and persons described in section 4968(n)(3)(8).			•	
7 Other salaries and wages				
g Pension plan accruels and contributions (include saction 401 (k) and 403(b) employer contributions)				
9 Other employee benefits	- , 			
10 Payroll lexes	29,	0.	29.	0.
11 Fees for services (non-employees):				
# Managament			,	
b Legal	1.895.	1.895.	0.	Ο,
c Accounting	3.175.	. 0.	3,175,	0.
d Lobbying		····		
Professional fundralsing services. See Part IV, line 17	638.412			638,412,
f Investment management fees				
g Other, (If line 11g and exceeds 10% of line 25, column (A) amount, list line 11g expenses on Schedule O).	6.087.	0.	6,087.	0.
12 Advertising and promotion	5 244		. 5 264	
14 Information technology	5,244.		5.244.	<u></u>
15 Royalties				
16 Occupancy				
17 Travel	2,395.	0.	2,395,	0.
18 Payments of travel or entertainment expenses for any federal, state, or local public officials				
19 Conferences, conventions, and meetings				
20 Interest				
21 Payments to affiliates				·
22 Depreciation, depletion, and amortization.	<u> </u>	ļ <u> </u>	<u> </u>	ļ
23 Insurance 24 Other expenses, Itemize expenses not covered above (List miscalianeous expenses in line 24e, if line 24e emount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule ().				
or tine 25, column (A) amount, list line 24e expenses on Schedule ().)				
a State Registration & Corp Fees	4,651.	<u> </u>	4,651	<u>.</u> o.
0				
d				
e All other expenses		<u> </u>	<u> </u>	<u> </u>
26 Total functional expenses! Add thes 1 through 74e.	769,210.	53,710.	77,088.	638,412.
26 Joint costs. Complete this line only if the organization reported in column (8) joint costs from a combined educational campaign and fundraising solicitation. Check here ► ☐ if following				
SOP 98-2 (ASC 958-720)				}
BAA	YEEA0110 C	f.,	 	Form 990 (2014)

SCHEDULE G (Form 990 or 990-EZ)

Supplemental information Regarding Fundralsing or Gaming Activities
Complete if the organization enswered "Yes" to Form 990, Part IV, lines 17, 18, or 19, or if the
organization obtained more than \$15,000 on Form 990-EZ, line 5a.

- Attach to Form 990 or Form 990-EZ.

OMB No. 1545-0847

2014

information about Schedule G (Form 990 or 990-EZ) and its instructions is at www.irs.gov/form990.

Open to Public Inspection

Name of the organization Employer identification number											
American Veterans Foundation 80-0273572 Part Fundralsing Activities. Complete if the organization answered Yes' to Form 980, Part IV, line 17.											
Part	Form 990-EZ filers are not requ	fred to complete	this part.			ne 17,					
_1,	Indicate whether the organization rai	sed funds throug	h any of t	ne tollowin	g activities. Check all tha	t apply.	•				
` , a	Mail solicitations			. е	Solicitation of non-go	ovemment grants					
b	X Internet and email solicitations		•	. f	Solicitation of govern	iment grants					
C	X Phone solicitations			g	Special fundraising e	events	•				
đ	n-person solicitations										
2a	Did the organization have a written c employaes listed in Form 990, Part V	r oral agreemen /II) or entity in co	i with any moeclion v	feublyibni ealorg rithw	including officers, directors sonal fundralsing services	ors, trustees or key	XYes No				
	If Yes, list the len highest paid indiv compensated at least \$5,000 by the	iduals or entilles organization.	(fundralse	ara) pursua	int to agreements under t	which the fundraiser is to	be				
(1)	Name and address of individual	(II) Activity	(iii) Old fi	undraiser	(iv) Gross receipts	(v) Amount paid to	(vi) Amount paid to (or retained by)				
	or entity (fundralser)		have custos bi contri	ty or control butions?	from activity	(or retained by) fundralser listed in column (i)	(or relained by) organization				
			Yes	No							
1						,					
	Courtesy Call. Inc	Phone Solicitation		x	227.138.	192,974.	34,164.				
2				·			34,104.				
	J&J Marketing, LLC	Phone Solicitation		· x	36,935	29,418,	7.517.				
3											
	Menacola Marketing, Inc.	Phone Solicitation		x	155,248	133,185.	22,063				
. 4		•			,	2227,2001	<u> </u>				
	Circle 3	Phone Solicitations	,	х	10.153	8.593.	1.560.				
5		· ·				•	, <u>, , , , , , , , , , , , , , , , , , </u>				
	Debbie Lopez	Phone Solicitations		. х	25,218,	20.180.	5,038.				
- 8	,						<u></u>				
	Held Marketing, LLC	Phone Solicitations		X	130,483	103,559.	26,924.				
7							227722				
·	Safety Communications, Inc.	Phone Solicitations	<u> </u>	X	41,157	33.354.	7,803.				
8											
	Supplemental Security	Phone Solicitations	1	x	101.132.	80,505,	20,627.				
9	, ,]		1	,						
	Sunset Productions	Rhone Solicitations		X	40,060	32,184	7,876.				
10	•	ļ .		Ι							
	,		1		•		•				
	•										
Tota		<u>.</u> ,,, <u>.</u> ,,,,		·	767,524	633,952	133,572.				
. 3	List all states in which the organization licensing.	on is registered	or license	d to solicit	contributions or has been	notified it is exempt from	n registration .				
	Alaska										
	Alabama										
	Arkansas				,						
	Arizona										
	California				· · · · · · · · · · · · · · · · · · ·						
	Colorado			,							
	Connecticut						~~~~~~~~				
	Delaware						~				
	Florida	:									
	Georgia			·							
	Idaho										
	See Part I, Line 3 List of States Rec	nistered or Licen	sed to Sof	cit Funde							
		□ R. 3. 2. 7. 10. 51.	*-# to 24	125 1 21 22 .							

art		Fundraising Events. Complete if the more than \$15,000 of fundraising ev List events with gross receipts great	e organization ans ent contributions a er than \$5,000.	wered 'Yes' to Form nd gross income on	990, Part IV, line 11 Form 990-EZ, Ilnes	3, or reported 1 and 6b.
			(a) Event#1	(b) Event #2	(c) Other events NONE	(d) Total events (add column (e) through column (c))
		*	(event type)	(event type)	(total number) ,	-
ļ	1	Gross receipts	<u> </u>			
	2	Less: Contributions :				
-	3	Gross income (line 1 minus line 2)		•		,,
1		Cash prizes				
1				•		
1	5	Noncash prizes				
1	6	Rent/facility costs :				
	7	Food and beverages				
	8	Entertainment	,	,	•	
	ņ	Other direct expanses				
	. "		•			
١	10 11					
ari		Net income summary. Subtract line 10 from Gaming. Complete if the organizati				d more than
		\$15,000 on Form 990-EZ, line 6a.			, mo toj or raporto	
			(a) Bingo	(b) Pull tabs/Instant bingo/progressive bingo	(c) Other gaming	(d) Total garning (add column (a) through column (c)
	١,	Gross revenue			,	
	2	Gash prizes	,			
HXC4X6W	3	Noncash prizes				
2003	4	Rent/facility costs	i i			
Þ	ļ					
	- 5	Other direct expenses	Yes %	Yes %	Yes &	
	⋅8	Volunteer labor	No	Mo T	No To	·
	7	Direct expense summary, Add lines 2 through	ıgh 5 în column (d)	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	٠	
	8	Net gaming income summary. Subtract line	7 from line 1, column f	d)		
1	a Is I	ler the state(s) in which the organization cond he organization licensed to conduct gaming a No, explain:	activities in each of these	e states?		Yes No
		ere any of the organization's gaming licenses Yes, 'explain:	reyoked, suspended or	terminated during the tax	year?	Yes No

	ule G (Form 990 or 980-EZ) 2014 American Veterans Foundation .80-0273572	Page
	Oces the organization operate gaming solivities with nonmembers?	No.
1	e the organization a granter, beneficiary or fustee of a fust or a member of a partnership or other entity formed to dminister charitable gaming? Yes	No
ı	ndicate the percentage of gaming autivity conducted in:	
	This organization's faolity	8
2 .	An outside facility	Ą
. 1	anier the name and address of the person who prepares the organization's gaming/special events books and records:	
1	Yame >	
	Address F	
3	Oces the organization have a contact with a third party from whom the organization receives gaming revenue?	
3	f Yes, enter the amount of gaming revenue received by the organization - \$ and the amount	۳.
•	of gaming revenue reteined by the third party * \$	
,	f Yes, enter name and address of the third party:	
	Name *	
	Address *	
	Audiess	
	Gaming menager Information:	
	Name *	-
	Out to the same and the same an	
	Gaming manager compensation * \$	
	Gaming manager compensation \$	
	Description of services provided *	
	Description of services provided Director/officer Employee Independent contractor	
	Description of services provided *	
	Description of services provided Director/officer Employee Independent contractor Mandatory distributions Is the organization required under state law to make charitable distributions from the caming proceeds to retain the	
а	Description of services provided Director/officer Employee Independent contractor Mandatory distributions Is the organization required under state law to make charitable distributions from the gaming proceeds to retain the state gaming license?	
а	Description of services provided Director/officer Employee Independent contractor Mandatory distributions Is the organization required under state law to make charitable distributions from the gaming proceeds to retain the state gaming license? Enter the amount of distributions required under state law to be distributed to other exempt organizations or sport in the	
a	Description of services provided Director/officer	
,	Description of services provided Director/officer	
,	Description of services provided Director/officer	N
,	Director/officer Employee Independent contractor Mandatory distributions Is the organization required under state law to make charitable distributions from the gaming proceeds to retain the state gaming license? Enter the amount of distributions required under state law to be distributed to other exempt organizations or spent in the organization's own exempt activities during the tax year EV Supplemental Information. Provide the explanations required by Part I, line 2b, columns (iii) and (v), and Part III, lines 9; 9b, 10b, 15b, 15c, 16, and 17b, as applicable. Also provide any additional	
,	Director/officer Employee Independent contractor Mandatory distributions Is the organization required under state law to make charitable distributions from the gaming proceeds to retain the state gaming license? Enter the amount of distributions required under state law to be distributed to other exempt organizations or spent in the organization's own exempt activities during the tax year EV Supplemental Information. Provide the explanations required by Part I, line 2b, columns (iii) and (v), and Part III, lines 9; 9b, 10b, 15b, 15c, 16, and 17b, as applicable. Also provide any additional	N
1	Director/officer Employee Independent contractor Mandatory distributions Is the organization required under state law to make charitable distributions from the gaming proceeds to retain the state gaming license? Enter the amount of distributions required under state law to be distributed to other exempt organizations or spent in the organization's own exempt activities during the tax year EV Supplemental Information. Provide the explanations required by Part I, line 2b, columns (iii) and (v), and Part III, lines 9; 9b, 10b, 15b, 15c, 16, and 17b, as applicable. Also provide any additional	N
,	Director/officer Employee Independent contractor Mandatory distributions Is the organization required under state law to make charitable distributions from the gaming proceeds to retain the state gaming license? Enter the amount of distributions required under state law to be distributed to other exempt organizations or spent in the organization's own exempt activities during the tax year EV Supplemental Information. Provide the explanations required by Part I, line 2b, columns (iii) and (v), and Part III, lines 9; 9b, 10b, 15b, 15c, 16, and 17b, as applicable. Also provide any additional	n
1	Director/officer Employee Independent contractor Mandatory distributions Is the organization required under state law to make charitable distributions from the gaming proceeds to retain the state gaming license? Enter the amount of distributions required under state law to be distributed to other exempt organizations or spent in the organization's own exempt activities during the tax year EV Supplemental Information. Provide the explanations required by Part I, line 2b, columns (iii) and (v), and Part III, lines 9; 9b, 10b, 15b, 15c, 16, and 17b, as applicable. Also provide any additional	n
	Director/officer Employee Independent contractor Mandatory distributions Is the organization required under state law to make charitable distributions from the gaming proceeds to retain the state gaming license? Enter the amount of distributions required under state law to be distributed to other exempt organizations or spent in the organization's own exempt activities during the tax year EV Supplemental Information. Provide the explanations required by Part I, line 2b, columns (iii) and (v), and Part III, lines 9; 9b, 10b, 15b, 15c, 16, and 17b, as applicable. Also provide any additional	□N
	Director/officer Employee Independent contractor Mandatory distributions Is the organization required under state law to make charitable distributions from the gaming proceeds to retain the state gaming license? Enter the amount of distributions required under state law to be distributed to other exempt organizations or spent in the organization's own exempt activities during the tax year EV Supplemental Information. Provide the explanations required by Part I, line 2b, columns (iii) and (v), and Part III, lines 9; 9b, 10b, 15b, 15c, 16, and 17b, as applicable. Also provide any additional	□ N
	Director/officer Employee Independent contractor Mandatory distributions Is the organization required under state law to make charitable distributions from the gaming proceeds to retain the state gaming license? Enter the amount of distributions required under state law to be distributed to other exempt organizations or spent in the organization's own exempt activities during the tax year EV Supplemental Information. Provide the explanations required by Part I, line 2b, columns (iii) and (v), and Part III, lines 9; 9b, 10b, 15b, 15c, 16, and 17b, as applicable. Also provide any additional	□N
	Director/officer Employee Independent contractor Mandatory distributions Is the organization required under state law to make charitable distributions from the gaming proceeds to retain the state gaming license? Enter the amount of distributions required under state law to be distributed to other exempt organizations or spent in the organization's own exempt activities during the tax year EV Supplemental Information. Provide the explanations required by Part I, line 2b, columns (iii) and (v), and Part III, lines 9; 9b, 10b, 15b, 15c, 16, and 17b, as applicable. Also provide any additional	N
a	Director/officer Employee Independent contractor Mandatory distributions Is the organization required under state law to make charitable distributions from the gaming proceeds to retain the state gaming license? Enter the amount of distributions required under state law to be distributed to other exempt organizations or spent in the organization's own exempt activities during the tax year EV Supplemental Information. Provide the explanations required by Part I, line 2b, columns (iii) and (v), and Part III, lines 9; 9b, 10b, 15b, 15c, 16, and 17b, as applicable. Also provide any additional	No
a	Director/officer Employee Independent contractor Mandatory distributions Is the organization required under state law to make charitable distributions from the gaming proceeds to retain the state gaming license? Enter the amount of distributions required under state law to be distributed to other exempt organizations or spent in the organization's own exempt activities during the tax year EV Supplemental Information. Provide the explanations required by Part I, line 2b, columns (iii) and (v), and Part III, lines 9; 9b, 10b, 15b, 15c, 16, and 17b, as applicable. Also provide any additional	Nc Nc
a	Director/officer Employee Independent contractor Mandatory distributions Is the organization required under state law to make charitable distributions from the gaming proceeds to retain the state gaming license? Enter the amount of distributions required under state law to be distributed to other exempt organizations or spent in the organization's own exempt activities during the tax year EV Supplemental Information. Provide the explanations required by Part I, line 2b, columns (iii) and (v), and Part III, lines 9; 9b, 10b, 15b, 15c, 16, and 17b, as applicable. Also provide any additional	No

·

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• . .

Exhibit "8."

MAIL TO: Registry of Charitable Trusts P.O. Box 903447 Sacramento, CA 94203-4470 Telephone: [916] 445-2021

WEB SITE ADDRESS: 1 http://ag.ca.gov/charitles/

REGISTRATION RENEWAL FEE REPORT TO ATTORNEY GENERAL OF CALIFORNIA Sections 12585 and 12587, California Government Code 11 Cal. Code Regs, sections 301-307, 311 and 312

Failure to submit this report annually no later than four months and fifteen days after the end of the organization's accounting period may result in the loss of tax examption and the assessment of a minimum tax of \$800, plus interest, and/or fines or filling penalties as defined in Government Code section 12585.1. IRS extensions will be honored.



			_,			Attomey (General's Of
State Charity Registration Number	0153623 UNDATION			Check if:	o of address	MAY	1 4 2014
Name of Organization 3737 S. Tuttle Ave.				Arpend	led report	· Re	gistry of able Trusts
Address (Number and Street)	· · · · · ·	<u> </u>		Corporat	e or Organization N	-	
Sarasota, FL 34239 City or Town, State and ZIP Code	***			Federal E	implayer i, D. No. 👯	0-0273572	
ANNUAL RE	GISTRATION Rake Check Paya	ENEWAL FEE SCHED	OULE (11 Cal. Co ral's Registry of	odė Rėgs, s Charitable	sections 301-307, 31 Trusts	1 and 312)	
Gross Annual Revenue	Fee G	ross Annual Revenus		Fee !	Gross Annual Reven	ńв	Fee ·
Less than \$25,000 Setween \$25,000 and \$100,000		etween 100,001 and \$ otween \$250,001 and		\$75	Between,\$1,800,081 Between \$10,000,00 Greater than \$50 mil	and \$50 million	
PART A - ACTIVITIES							,
Por your most recent full acc Gross annual revenue \$ _5;	ounting period 98768.00		,	nding <u>12</u> 90861.00	<u> 131 12013 </u> 1	lst:	
Gross annual levenue \$				Ar TINA	mbrant.		
PART B - STATEMENTS REGA	 						
Note: If you answer "yes" to at response. Please review	ly of the question RRF-1 Instruct	ons below, you must. Ions for information :	altach a separa required.	te sheet pr	oviding an explanati	on and details f	or each "yes"
During this reporting period, w officer, director or trustee then	ere there any co eof either directly	niracis, loans, leases o or with an enlity in wh	or other (inancia) ich any auch offi	transaction: cer, director	s between the organiz or trustee had any fir	tation and any nancial interest?	Yes No
2. During this reporting period, w	as there any the	ft, embezzieméni, díve	rsion ormisuse o	of the organ	Ization's charitable pr	openy or funds?	×
Ourling this reporting period, d	id non-program e	expenditures exceed 5	0% of gross reve	nues?			×
During this reporting period, v tnlemal Revenue Service, atta	vere any organiz ach a copy.	ation funds used to pa	y any penalty, fin	e or judgme	ent? If you filed a For	m 4720 with the	
 During this reporting period, we provide an attachment listing 	rere the services the name, addres	of a commercial fundr ss, and telephone num	aiser or fundrals ber of the service	ng counse) e provider.	for charitable purpose	s used? If yes,	·
 During this reporting period, d the agency, mailing address. 	id the organization	on receive any governr ind telephone number.	nental (unding?	if so, provid	ie an attachment listin	g the name of	×
 During this reporting period, on number of raffles and the date 	id the organization(s) they occurre	on hold a raffle for cha d,	ritable purposes'i	i("yes," pi	rovide an altachmen).	Indicating the	
Does the organization conduct by the charity or whether the	t a vehicle dona organization cont	tion program? If *yes, tracts with a commercia	" provide en atte al fundraiser for t	chment indi chantable pr	caling whether the pro urposes.	igram is operater	
Did your organization have preporting period?	epared an audite	ad financial statement i	n accordance wi	th generally	accepted accounting	principles for this	
Organization's area code and telep	hone number (*	888], 556	8812				
Organization's e-mail address am	velsfoundatio	n@aol.com			* .		
I declare under perialty of perjury It is true, correct and pomplete.	that I have exa	mined this report, inc	luding accomp	anying doc	numents, and to the l	est of my know	ledge and belie
J/1/2/1	·	Paul Mor			President		5/12/2014
Signature of author	rized officer		Printed Name		Πtle		Date

#340792 \$75

RRF-1 (3-05)

Exhibit "9."

	000	· .		•	4	. DMB Kg. 1645-8047			
	Form 990	Paturn of Organ	ization Exempt F	rom Incon	na Tov	2013			
		Under section 601(c), 527, or 4947	(a)(i) of the Internal Revenue C	ode (except priva	ite foundalions)	ZUIJ			
Перы	tinen) of the Treasury at Reviews Service	 De not enter Social Se Informalion about Form 	curity numbers on this form as 1990 and its instructions is at a	iti may be made po	ubilc.	Open to Public			
		er year, or tax year beginning		and ending		-			
-	Check if opposition		Veterans Foundat	ion	D Employes ide	milication Number			
	Address change	Diging Business As			80-027				
	Nama changa	Hember and about for P.O. box if mail is not	chivered to sveet sodiess)	Room/spla	E Telephana nu	किंग			
	tudial teatura	3737 S. Tuttle Ave. City or town, state or province, cotonley, eac.	III artavilne barral anda		(888)	556-8812			
	Amended return	Sarasota	er a kraja posta cosa FI	34239	G Grosstepeipt	\$ 598,768.			
	Application ponding	F Name and eddress of principal officers			Is this a grade return for a				
	LJ	Paul Konville 1025 Pose Creek Dr Et	e 621 Woodstock E	L 30189 H) Ang all sussordinatos includ if No., attach a list, (see in	od7 Yes No			
二	Tax-exempl stalus	X 501(c)(3) 501(c) ()	(insert no.) 4947(a)(1)	JF 527	•				
. 4	Waballa: N/				Group exemption number				
K	Form of arganizations	X Gosporation Trust Association	1 Otter►	Year of larnestons	2009 M State	si lagasi donsicuo: EL			
1 12	rt Summai	/ e the organization's mission or most :	sionificant activities: 2	esist weter:	ans who are hore	less or in jeopardy			
. 40	of becomi	na homeless, providina pa	tients in veterah	s homes wit	h toiletries.	clothing, books.			
kctivities & Governance	dames 'yu	other items; providi	ng comfort and "	de Care" p	ackages to de	poloyed troops.			
Per	2 Check this bo	(* [] (f the organization discontin			na na ini				
ĝ	3 Namparative	ing members of the governing body (Part VI. line 181	sed or more than	1 25% 01 113 1191 256913				
हो 4	4 Number of in-	ependent valing members of the gay	erning body (Part VI, line 1)	3)	4				
尝		of Individuals employed in calandar y of volunteers (estimate if necessary)			4				
쳝		d business revenue from Part VIII. co			5	7			
		business taxable income from Form				Б · · · · · · · · · · · · · · · · · · ·			
				· . · · [Prior Year	Current Year			
g	L	and grants (Part VIII, line 1h)		• • • • • [410	. 175,			
Revenue		ce revenue (Part VII), line 2g) come (Part VIII, column (A), lines 3, 4			4.6				
윤		(Pan Vill, column (A), lines 5, 6d, 8			46 552,494				
		add lines 8 through 11 (must equa			652,950				
		ts and similar amounts paid (Part IX, column (A), lines 1-3)							
		ie or tor members (Part IX, column (A r compensation, employee benefits (30.003	41.000			
Š	16a Professional	undraising less (Part IX, column (A),	for the tulbuilt (A), side of		72,867 530,978				
Je P		ing expenses (Part IX, column (D), fir			230,916	484,590.			
Щ	1	es (Pari IX, column (A), lines 11a-11a		184,590,	17,011	. 19,802.			
	18 Total expens	s. Add lines 13-17 (must equal Part	X, column (AFRINERS)	1/26-50	. 655. 712	THE WOLLD'S CO., LANSING MICH.			
	19 Revenue les	expenses. Subtract line 18 from line	12 Attorney Ger	ierei a Offici	-2,762				
2		•	•		Beginning of Current Ye				
,	20 Total assets 21 Total liabilitie	Part X, line †6)	· · · · · · · · · · · · · · · · · · ·	4- 2014	92,903				
2		lund belances. Subtract line 21 from		n of	3,012				
P		re Block	Charitable		89,891	90,861.			
		siaro that have examined this ration, lecturing a micro thou affect to bayest on all miormation			if my knowledge and bellef, if	is true, conces, and			
500	Wate. Deciproton of prepr	treated into telecory of eared on all knormation	if which proparer has any knowledge						
61		iru ol pilatu			103/31/14 . Date .				
Ş:	ai.	1 Monville			President				
-		print names and LUD.			ETAGTORIC.	······································			
,	Protifype	repater's nature Preparer	niconiuo .	Cato	Checklt	PNN			
P	aid <u>Briar</u>	Palmer, CPA	15/1	4 04/09/1	4 self-amployed				
	reparer Frontinos		, PA .						
LJ.	se Only Funda add			200		20-1181345			
NA.	av the IRS discuss 1	Sarasora Is return with the preparer shown abo		239	Phona no. (941) 922-4744			
		Reduction Act Notice, see the sepa			0101 11/08/13	Form 990 (2013)			

TEEA0103 11/08/13

80-0273572

Page 3

Form 990 (2013)

Form 990 (2013)

RAA

American Veterans Foundation

American Veterans Foundation Page 10 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 tine in this Part IX. (B) Program service expenses (C) Management and (D) Frindsalsing (A) Total expenses Do not include amounts reported on lines 6b. 7b. 8b. 9b, and 10b of Part Vill. general expenses expenses Grants and other assistance to governments and organizations in the United States. See Part IV. line 21
Grants and other assistance to individuals in the United States. See Part IV, line 22 32,179 32,179 Grants and other assistance to governments, organizations, and individuals outside the United States. See Part IV, lines 15 and 16. Benefits gard to or for members. Compensation of current officers, directors, trustees, and key employees 61,163 15,290 <u>45,873</u> Compensation not included above, to disqualified persons (as defined under section 4958(t)(1)) and persons desorbed in section 4958(c)(3)(9): Other salaries and wages Pension plan acruals and contributions [molude section 401(k) and 403(b) employer contributions] 10 Psyroll taxes 64. 64 11 Fees for services (non-employees): a Management 5, 371 5,371 Q. 0 a Accounting 3,200 3,200 ø. e Professional fundralsing servicus. See Part IV, line 17 484,590 484,590. f Investment management fees Other (If line 11g and exceeds 10% of the 25, column (A) amount, list the 11g expenses on Schedule C). . . 2,126 ò 2.126 12 Advertising and promotion Office expenses 3,659 Ò. 3.659 14 Information technology 15 Royalties Оссирансу........ 16 Travel 17 2,131 2.131Payments of travel of entertainment expanses for any lederal, state, or local public officials Conferences, conventions, and meetings . . . 20 Interest. Payments to alfithates....... Depreciation, depletion, and amortization . . . 22 Insurance
Other expanses, Itemize expenses not povered above (List miscellaneous expenses in line 24s. If line 24e amount expenses 10% of line 25, column (A) amount, list line 24e expenses on Schedule O.) State Registration & Corp Faca 3.315 3.315 25 Total functional expenses. Add lines 1 lbrough 24c. . 597,798 52,840 60,368. 484,590. Joint costs. Complete this line only if the organization reported in column (B) the digestround reposited at county (8) joint costs from a combined educational campaign and fundraising solicitation.

Check here : _____ if fullowing SOP 98-2 (ASC 958-720).

TREADING STANKING

Form 990 (2013)

BAA

SCHEDULE G (Form 990 or 990-EZ)

2013

Supplemental information Regarding
Fundraising or Gaming Activities
Complete if the organization enswered "Yes" to Form 990, Part IV, lines 17, 19, or 19, or if the organization entered more than \$15,000 on Form 990-EZ, line 6a.

Altach to Form 990 or Form 990-EZ. See separate instructions in information about Schedule 6 (Form 590 or 990-EZ) and its instructions is at www.lis.gov/forms90. Open to Public Inspection Department of the Treasury Internal Revenue Buckles American Veterans Foundation

Part 1 | Fundralsing Activities, Compilete it the organization enswered Yes' to Form 990, Part IV, line 17.

Form 990-EZ filers are not required to complete this part. 80-0273572 indicate whether the organization raised funds through any of the following activities. Check all that apply. e Solicitation of non-government grants Mali solicitations b X internet and email solicitations Solicitation of government grants c X Phone solidiations g Special fundralising events d In-person solicitations 2 a Did the organization have a written or oral agreement with any individual (lockuling officers, directors, trustens or key omnoyees listed in Form 890, Part VII) or entity in connection with professional fundraleting services? 6 H Yes, flat the ten highest held individuals or entities (undreisers) pursuant to agreements under which the fundreiser is to be compensated at least \$5,000 by the organization. (i) Name and address of Individual or entity (fundralser) (ii) Activity (iti) Did fundralser lave custody or control of contributions? (v) Amount paid to (or retained by) ' fundraiser listed in column (i) (vi) Amount paid to (or retained by) organization (iv) Gross receipts from activity Yes No <u>Independant Harkering Solutions, the Firms Salicitation</u> 15,972 12,914 4,058. 72 892 59,335 13.557. Telegual, Manacola Marketing Phene Solicitation 97,710 67,629 180.08 ibre Solicitation 23,037 18,884 4,153. Dabbie Lopez hera Selleitation 34,502 27,602 6,960. Hald Marketing ine Selfeiretion 120,678. 92,954 <u> 27,814.</u> 19.079 2,232. fery Communications, fave Selicitetics 16.847 x Sponlemental Security 98,025 74.951 23,075. 10 List all states in which the organization is registered or licensed to solicit contributions or has been notified it is exempt from registration or ilcensing. Alabama California Colorado Connections Georgia Iowa _Idaho Indiana Kansas See Part I, Line 3 List of States Registered or Licensed to Solicit Funds

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

Schedule G (Form 990 or 990-EZ) 2013

Exhibit "10."

MAIL TO: Registry of Charitable Trusts P.O. Box 903447 Sacramento, CA 94203-4470 Telephone: (816) 445-2021

WEB SITE ADDRESS: http://ag.ca.gov/charities/

ANNUAL REGISTRATION RENEWAL FEE REPORT TO ATTORNEY GENERAL OF CALIFORNIA

Sections 12586 and 12587, California Government Code 11 Cal. Code Regs. sections 301-307, 311 and 312

Pallure to submit this report annually no later than four months and fifteen days after the end of the organization's accounting period may result in the loss of tax examption and the assessment of a minimum tax of \$800, plus interest, and/or fines or filling penalties as defined in Government Code section 12586.1. IRS extensions will be honored.



				Attorney General	Ollion,	
State Charity Registration Number		Check if	: ge of address	APR 12		
AMERICAN VETERANS FOUNDATION Name of Organization	Registry C			of rusis		
3737 S. Tuttle Ave. Address (Number and Street)		·	te or Organization N			
Sarásota, Florida 34239			Employer I.D. No.		,	
City or Town, State and ZIP Code						
	N RENEWAL FEE SCHEDULE (11 Cal. 0 'ayable to Attorney General's Registry c			1 and 312)		· i
Gross Annual Revenue Fee	Gross Annual Revenue	Fee	Gross Annual Rever	nn a	Ţ	<u>ee</u> .
Less than \$25,000 0 Between \$25,000 and \$100,000 \$25	Between 100,001 and \$250,000 Retween \$250,001 and \$1 million	\$50 \$75	Between \$1,000,001 Between \$10,000,00 Greater than \$50 ml	1 and \$50 million	, \$	150 225 300
PART A - ACTIVITIES				•		
For your most recent full accounting particles annual revenue \$ 652,950.00	riod (beginning <u>01 , 01 ,2012 </u> e	nding <u>12</u> 89,891,00		list:		,
PART B - STATEMENTS REGARDING OF		D OF THIS	PEDOPT		·····	
	estions below, you must affach a separa			ion and details for	r each "v	es"
response. Please review RRF-1 inst						
During this reporting period, were there are officer, director or irustee thereof either director.	y contracts, loans, leases or other financia eotly or with an entity in which any such of	l transaction loer, directo	ns between the organi or or trustee had any fl	zation and any nancial interest?	Yes	No
2. During this reporting period, was there any	theft, embezziement, diversion or misuse	of the orga	nization's charitable p	roperty or funds?		X
3. During this reporting period, did non-progre	am expenditures exceed 50% of gross rev	enues?				X
 During this reporting period, were any organization internal Revenue Service, attach a copy. 	anization funds used to pay any penalty, fi	nė or Judgim	ent? If you filed a For	m 4720 with the		
During this reporting period, were the servi provide an attach ment listing the name, ad	ices of a commercial fundralser or fundrals idress, and telephone number of the servic	ing counsel e provider.	for chadtable purpos	es used? f"yes,"	É	
6. During this reporting period, did the organi the agency, mailing address, contact person	zation receive any governmental funding? on, and telephone number.	If so, provi	de an atlachment listir	ng the name of		IX:
 During this reporting period, did the organi number of raffles and the date(s) they occ 	zation hold a raffle for charitable purposes urred.	7 If "yes," p	provide an attachment	Indicating the		
Does the organization conduct a vehicle of by the charity or whether the organization	onation program? If "yes," provide an atta contracts with a commercial fundraiser for	chment ind charitable r	licating whether the prourposes.	ogram is operated		X
Did your organization have prepared an at reporting period?	udited financial statement in accordance w	ith generally	y accepted accounting	principles for this	rx I	
Organization's area code and telephone number amvetsfound		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,				
I declare under penalty of perjury that I have it is true, correct and complete.	examined this report, including accomp	sanying do	cuments, and to the	best of my knowle	dge and	bellef,
ar Ville	Paul Monville		President		04/09/20	13
Signatyre of authorized officer	Printed Name		Title)	Date	

OT

282092 #75

CALIFORNIA

RRF-1 FORM ATTACHMENT

5. During this reporting period, were the services of a commercial fundraiser or fundraising counsel for charitable purposes used? If "yes," provide an attachment listing the name, address, and telephone number of the service provider.

The Campaign Center, Inc. (out of business) 2511 W. 3rd Street, Suite 2 Bloomington, IN 47404 (812) 336-1657

Exhibit "11."

0T6|S34*23* 2012

Form 990

Return of Organization Exempt From Income Tax

OMB No. 1545-9047

2012

Under section 501(c), 527, or 4947(a)(1) of the internal Revenue Code (except black lung benefit trust or private foundation)

Form 990 (2012)

TEEA0101 08/08/12

Open to Public The organization may have to use a copy of this return to satisfy state reporting requirements. Department of the Treasury Internal Revenue Service , 2012, and ending For the 2012 calendar year, or tax year baginning Name of organization American Veterans Foundation 80-0273572 Number and street (or P.O. box if mail is not delivered to street addr) (888) 556-8812 3737 S. Tuttle Ave. Initial return State ZIP code + 4 G Gross receipts \$ 652 950 34239 Sarasot<u>a</u> group return for effiliates? F Name and address of principal officer: Application pending H(b) Are all affiliates included?
If 'No.' attach a liet, (see instructions) Paul Monville 1025 Rose Creek Dr Ste 620 Woodstock FL 30189 4947(a)(1) or 527 X 501(c)(3) · 501(c) (Tax-exempt status R(c) Group exemption number Website: 🗲 N/A :elicimob legal lo etals M Form of organization: X Corporation | Trust | Association L Year of Formation: 2009 Summary Part I. Briefly describe the organization's mission or most significant activities: Assist veterans who are homeless or in jeopardy of becoming homeless, providing patients in veterans homes with toiletries, clothing, books, games and other items; providing comfort and "We Care" packages to depoloyed troops. 5 Total number of Individuals employed in calendar year 2011 (Part V, line 2a) .l. Total number of volunteers (estimate if necessary) Total unrelated business revenue from Part VIII, column (C), line 12 . . 7a 0. 7b b Net unrelated business texable Income from Form 990-T, line 34 ... Prior Year Current Year 410. Contributions and grants (Part VIII, line 1h) . : Program service revenue (Part VIII, line 2g) 104 46. Investment income (Part VIII, column (A), lines 3, 4, and 7d) . 652,494. Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e) 646,977. 652,950 Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12) <u>647,668.</u> 34,856. 28,700. 74.976 72,867. 15 Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10) 530,978. 457,109 b Total fundreising expenses (Part IX, column (D), line 25) ► 17., 01<u>1</u>. 106,527 655<u>,712.,</u> 18 Total expenses, Add lines 13-17 (must equal Part IX, column (A), line 25) . 667,312, 2,762. -19,644. End of Year Beginning of Current Year 92,903. Total assets (Part X, line 16) . . 95,074. 3,012. Total liabilities (Part X, line 26) 2,483 Net assets or fund balances, Subtract line 21 from line 20 . Signature Block Sign Here President Paul Monvill Preparer's signature self-employed Brian Palmer, CPA Paid Brian Palmer, CPA, PA Preparer Use Only 20-1181345 2937 Bee Ridge Rd Ste 2 (941) 922-4744 Sarasota]_]Nó ,May the IRS discuss this return with the preparer shown above? (see instructions) X Yes

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

b if "Yes" to line 20a, did the organization attach a copy of its audited financial statements to this return? BAA

TEEA0103 12/13/12

20 b

Page 10 Form 990 (2012) American Veterans Foundation 80-0273572 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 to any question in this Part IX (C) Management and general expanses .. (D) Fundratsing Total expenses (B) Program service Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII. expenses expenses Grants and other assistance to governments and organizations in the United States. See Part IV, line 21 Grants and other assistance to individuals in the United States, See Part IV, line 22 34,856 34,856 3 Grants and other assistance to governments, organizations, and individuals outside the United States. See Part IV, lines 15 and 18 . . 4 Benefits paid to or for members. Compensation of current officers, directors, trustees, and key employees 68,003 51,002 17.001 Compansation not included above, to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(o)(3)(8). Pension plan accruals and contributions 4,848. 0 4,848 0. ٥. ο. 16 16 11 Fees for services (non-employees): 2,277 2,277 ٥. ٥. 4,215. 4,215 0. 0. e Professional fundralsing services. See Part IV, line 17 . 530,978. 530,978. f Investment management fees Gither. (If fine 11g amt exceeds 10% of line 25, column (A) amt, list line 11g expenses on Sch O)
 Advertising and promotion 2,540 2,540 ٥. 2,370 ۵ 2.370 0. 14 Occupancy 16 2,400 2,400 O 0 0. 965 965 ٥. Payments of travel or entertainment expenses for any federal, state, or local public officials 18 Conferences, conventions, and meetings . . . 22 Depreciation, depletion, and amortization . . . Other expenses. Itemize expenses not covered above (List miscellaneous expenses in line 24e. If line 24e armount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O.) a State Registration 395 ٥ .395 ٥. b Corp Fee 317 ٠O. 317 ٥. C Business Registration 35 ٥, 35 0. d Franchise Tax 27. 0 27 0 470 Û. 470 0. 25 Total functional expenses, Add lines 1 through 24e. . 655,712 54,134. 70,600. 530 97B. Joint costs. Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation. Check here ➤ ☐ If following SOP 98-2 (ASC 968-720). . . .

TEEA0110 12/18/12

Form 990 (2012)

BAA

SCHEDULE G (Form 990 or 990-EZ)

Supplemental Information Regarding
Fundralsing or Gaming Activities

Complete if the organization answered 'Yes' to Form 990, Part IV, lines 17, 18, or 19, or if the organization entered more than \$15,000 on Form 990-EZ, line 6a.

Attach to Form 990 or Form 990-EZ. See separate instructions.

OMB No. 1645-0047

2012

Open to Public inspection

Name of the	organization					Employer identificat	
Americ	an Veterans Foundat:	ion				80-0273572	
Part I	Fundraising Activities. Comple Form 990-EZ filers are not requ	ired to complete	this part,				
1 Indi	cate whether the organization rais	sed funds throug	jh any of t	he fallowin			
a	Mall solicitations			. ө	Solicitation of non-go		
bХ	Internet and email solicitations	-		· • •	Solicitation of govern	nment grants	. ,
c X	Phone solicitations			g	Special fundraising e	events	
d 🗔	In-person solicitations				- ·		,
2 a Did em	, i the organization have a written o plovees listed in Form 990, Part V	r oral agreement (II) or entity in co	t With eny onnection	Individual (with profes	(including officers, direct sional fundraising service	ors, trustees or key es?	XYes No
	es, list the ten highest paid indivingensated at least \$5,000 by the	duals or entitles organization.	(fundralse	ers) pursua	int to agreements under	which the fundraiser is to	. be
(I) Nar	ne and address of individual or entity (fundralser)	(II) Activity.	(iii) Did fo	undraiser dy or control bullons?	(iv) Gross receipts from activity	(v) Amount paid to (or retained by) fundraiser listed in	(vi) Amount paid to (or retained by) organization
٠.			ui azam		•	column (l)	
			Yes	No			
Trướ	dependent Marketing Solutions, Inc	Whoma Colinitation		x	70,452.	56,470	13,982
2		THE ACT TATEBUTAL	1	1.	70,534.	30,370.	, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
	elequal, LLC	Phone Solicitation	1	x	310,921.	247.004.	63,917.
3	,	Phone Solioitation		х	20,830.	16,776	4,054,
4	macola Marketing, Inc.	Phone Solicitation	Ţ	x	201,547,	166.475	35,072.
5	ircle 3	Phone Solicitations		x	39,708.	31,293.	8,415.
6		NOME COLLEGE TORK			32,100.	3.1,2331	<u> </u>
7 .				<u> </u>			
8							
9		,					
10							
Total .					643,458.	518,018.	125,440,
3 Li	st all states in which the organizat	ion is registered	or license	d to solicit	contributions or has bee		m registration
	licensing.				,		
	labama						
	alifornia						
-	olorado						
	onnectiont			-			
	<u>eorgia</u>						·
	owa						·
_	<u>daho '</u>						
	llinois		· 				· ^ ~ ~ ~ ~ ~ ~ ~ ~
Ī	ndiana						
_	aneae						
_s	ee Part I, Line 3 List of States Re	gistered or Lice	nsed to So	<u>licit Funds</u>			

			er than \$5,000. (a) Event#1 (event type)	(b) Event #2	(c) Other events NONE (total number).	(d) Total events, (add column (a) through column (c))
1			(23			
	1	Gross receipts	· · · · · · · · · · · · · · · · · · ·	,		,
	2	Less: Charitable contributions		<u> </u>	<u> </u>	
-	3	Gross Income (line 1 minus line 2)				<u></u>
	.4 ,	Cash prizes		 		
,	5	Noncash prizes				
O REPORT	6	Rent/facility costs				
	7	Food and beverages			<u>.</u>	
	8	· Entertainment	<u> </u>			
2	9	Other direct expenses	•			
5	40	Discontinuos and discontinuos de del Plane de Region	-			
	10 11	Direct expense summary, Add lines 4 through Net income summary. Combine line 3, columns.				}
ar	t III	Gaming. Complete if the organizati \$15,000 on Form 990-EZ, line 6a.	on answered 'Yes'	to Form 990, Part I	/, line 19, or reporte	ed more than
		A 12'000 OILLOUIL SEV-EE' IIIIG DG"				
.			(a) Bingo	(b) Pull tabs/instant	(c) Other caming	(d) Total gaming
REV			(a) Bingo	(b) Pull tabs/instant bingo/progressive- bingo	(c) Other gaming	(d) Total gaming (add column (a) through column (c))
REVENU			(a) Bingo	. blngo/progressive-	(a) Other gaming	(d) Total gaming (add column (a) through column (c))
REVENUE	1	Gross revenue	(a) Bingo	. blngo/progressive-	(a) Other gaming	(d) Total gaming (add column (a) through column (c))
	1 2	Gross revenue	(a) Bingo	. blngo/progressive-	(a) Other gaming	(d) Total gaming (add column (a) through column (c))
٠٠,٠٠	2	Cash prizes	(a) Bingo	. blngo/progressive-	(a) Other gaming	(d) Total gaming (add column (a) through column (c))
			(a) Bingo	. blngo/progressive-	(a) Other gaming	(d) Total gaming (add column (a) through column (c))
 E	2	Cash prizes	(a) Bingo	. blngo/progressive-	(a) Other gaming	(d) Total gaming (add column (a) through column (c))
	2	Cash prizes	(a) Bingo	. blngo/progressive-		(d) Total gaming (add column (a) through column (c))
	3 4 5	Cash prizes	Yes~	bingo/progressive bingo	Yés \$	(d) Total gaming (add column (a) through column (c))
	3 4	Cash prizes Non-cash prizes Rent/facility costs Other direct expenses		bingo/progressive- bingo		through column (c))
REVENUE SEES SEES	3 4 5	Cash prizes Non-cash prizes Rent/facility costs Other direct expenses Volunteer labor	Yes %	bingo/progressive-bingo	Yés \$	through column (c))
٠٠,٠٠	2 3 4 5	Cash prizes Non-cash prizes Rent/facility costs Other direct expenses Volunteer labor	Yes % No.	bingo/progressive-bingo	Yes &	through column (c))
EXERTERS 5	2 3 4 5 6 7 8 Entre a list	Cash prizes Non-cash prizes Rent/facility costs Other direct expenses Volunteer labor Direct expense summary. Add lines 2 throunder the state(s) in which the organization oper the organization licensed to operate gaming a	Yes % No Igh 6 in column (d) es 1, column (d) and lir ates gaming activities: ctivities in each of thes	No States?	Yes %	through column (c))
EXPENSES 9	2 3 4 5 6 7 8 Entre a list	Cash prizes Non-cash prizes Rent/facility costs Other direct expenses Volunteer labor Direct expense summary. Add lines 2 throunder the state(s) in which the organization oper the organization licensed to operate gaming a	Yes % No: Igh 6 In volumn (d) es 1, column (d) and lires gaming activities:	No States?	Yes %	through column (c))

hedule G (Form 990 or 990-EZ) 2012 American Vecerans Foundation 80	0-0273572	Page
Does the organization operate gaming activities with nonmembers?		No
Is the organization a grantor, beneficiary or trustee of a trust or a member of a partnership or other entity formed to administer charitable gaming?		— □No
		_
Indicate the percentage of gaming activity operated in:		R.
The organization's facility		4.
and outside the first the first terms to the first term terms to the first terms term terms to the first terms to the first terms term terms to th	13b	
Enter the name and address of the person who prepares the organization's gaming/special events books and recor	ua.	
Name -	<u>-</u>	
Address •		
a Does the organization have a contact with a third party from whom the organization receives gaming revenue?		. Пи
b if Yes, enter the amount of gaming revenue received by the organization		
of gaming revenue retained by the third party	,	
c If Yes, enter name and address of the third party:	•	:
Name -		
		•
Address		
Gaming manager information:		
Name *		
Gaming manager compensation ➤ \$	•	
Description of services provided		
Director/officer Employee Independent contractor	••••	
Mandalory distributions		•
a is the organization required under state law to make charitable distributions from the gaming proceeds to retain the state gaming license?		s 🗀 No
b Enter the amount of distributions required under state law to be distributed to other exempt organizations or spent	In the	
organization's own exempt activities during the tax year 🔭 Ş		
art IV Supplemental Information. Complete this part to provide the explanations required to columns (ill) and (v), and Part III, lines 9, 9b, 10b, 15b, 15c, 16, and 17b, as applicable	by Part I, line 20.	!
this part to provide any additional information (see instructions).	a. Also complete	
	,	
		
·		
	· · · · · · · · · · · · · · · · · · ·	

Exhibit "12."

MAIL, TO: Registry of Charitable Trusts P.O. Box 903447 Sacramento, CA 94203-4470 Telephone: (916) 445-2021

 WEB SITE ADDRESS: http://ag.ca.gov/charities/

ANNUAL REGISTRATION RENEWAL FEE REPORT TO ATTORNEY GENERAL OF CALIFORNIA

Sections 12586 and 12587, California Government Code 11 Cal. Code Regs. sections 301-307, 311 and 312

Failure to submit this report annually no later than four months and sifteen days after the end of the organization's accounting period may result in the loss of tax examption and the assessment of a minimum tax of \$800, plus interest, and/or fines or filling penalties as defined in Government Code section 12686.1. IRS extensions will be honored.



			·	RESEIVEL)
CT	0153623		Check i		ifice
State Charity Registration Number AMERICAN VETERANS FOUNDATION				12	
Name of Organization 3737 S. TUTTLE AVENUE				nded report MAY 2 5 201 Registry of	
Address (Number and Street) SARASOTA, FL 34239			Corpora	ete or Organization (Ma mable Trus 80-0273572	18
City or Town, State and ZIP Code			Federal	Employer I.D. No. 60-0273372	
ANNUAL RE	GISTRATION RENEWA ke Check Payable to A	L FEE SCHEDULE (11 Cal ttorney General's Registr	Code Regs of Charitab	sections 301-307, 311 and 312) le Trusts	·
Gross Annual Revenue .	Fee Gross An	nual Revenue	Fee	Gross Annual Revenue	<u>Fee</u>
Less than \$25,000 Between \$25,000 and \$100,000		100,001 and \$250,800 \$250,001 and \$1 million	\$50 \$75	Between \$1,000,001 and \$10 million Between \$10,000,001 and \$50 million Greater than \$50 million	\$150 \$225 \$380
PART A - ACTIVITIES				:	
For your most recent full acc	ounting period (beginn	ing 01 / 01 / 2011	ending 12	<u>/ 31 2011 </u>	
	17,668.00	Total assets	\$ 92,691.0	00	•
PART B - STATEMENTS REGA	RDING ORGANIZAT	ION DURING THE PER	OD OF TH	S REPORT	. ,
······································	· · · · · · · · · · · · · · · · · · ·			providing an explanation and details f	or each "ves"
response. Please review	RRF-1 instructions for	Information required.	er dre arricer t	notaing an expansion and parame.	
During this reporting period, w officer, director or trustee there	ere there any contracts, and either directly or with	loans, leases or other finan- an entity in which any such	cial transactio	ons between the organization and any for or trustee had any financial interest?	Yes No
				anization's charitable property or funds?	T K
3. During this reporting period, d	d non-program expendit	ures exceed 50% of gross r	evenues?		×
During this reporting period, v internal Revenue Service, atta	vere any organization fur ach a copy.	ds used to pay any penalty	,∙fine or judgi	nent? If you filed a Form 4720 with the	×
 During this reporting period, w provide an attachment listing t 	ere the services of a con he name, address, and t	nmercial fundralser or fundr elephone number of the se	alsing couns vice provide	el for charllable purposes used? If "yes,"	
 During this reporting period, d the agency, mailing address, or 	ld the organization receive contact person, and telep	re any governmental fundin phone number,	g? If so, pro	vide an attachment listing the name of	X
7. During this reporting period, d number of raffles and the date	id the organization hold a (s) they occurred,	a reffle for charitable purpos	iës? ·lf "yes,"	provide an attachment indicating the	×
8: Does the organization conduct by the charity or whether the conductions are the conductions and the conductions are the con	t a vehicle donation prog organization contracts wi	ram? If "yes," provide an a th a commercial fundraiser	itachment in for charllable	dicating whether the program is operated purposes.	
Did your organization have pr reporting period?	epared an audited financ	ial stalement in accordance	with genera	lly accepted accounting principles for this	
Organization's area code and telepi	none number (556 88	12	,	
Organization's e-mail address am	vetsfoundation@aol	.com			
			mpanying d	ocuments, and to the best of my know	ledge and bellef,
Willes	W////	Paul Monville		President	5/22/2012
Signeture of author	fized officer	Printed Nam	e	· Title	Date

240321 475

Exhibit "13."

Form 990

Return of Organization Exempt From Income Tax

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except black lung benefit trust or private foundation)

OMB No. 1545-0047

Open to Public Inspection

The organization may have to use a copy of this return to satisfy state reporting requirements. Department of the Treasury Internal Revenue Service 2011, and ending For the 2011 calendar year, or tax year beginning Employer Identification Number C Name of organization American Veterans Foundation Check if applicables 80-0273572 Doing Business As Address change Number and street (or P.O. box if mail is not delivered to street addr) Telephone number Name change (888) 556-8812 1025 Rose Creek Drive Ste 620 Box 328 Initial return ZIP code + 4 Terminated -30189 G Gross receipts \$ 647,668 GΑ Woodstock Amondori ratura i(a) is this a group relum for affiliates? . Yes F Name and address of principal officer. Application pending H(b) Are all infiliates included?
If 'No,' altech a list, (see instructions) Yes Paul Monville 1025 Rose Creek Dr Ste 620 Woodstock FL 30189 .4947(a)(1) or 527 X 501(c)(3) 501(c) (} = (insert no.) Tax-exempt status i(a) Group exemption number 🟲 J Website: ► N/A L Year of Formation: 2009 M State of legal domicile; GA Form of organization: X Corporation Trust Part I Summary Assist veterans who are homeless or in jeopardy 1 Briefly describe the organization's mission or most significant activities: of becoming homeless, providing patients in veterans homes with toiletries, clothing, books, games and other items; providing comfort and "We Care" packages to depoloyed troops. Check this box | if the organization discontinued its operations or disposed of horse than 20 to 15 not assets.

Number of voting members of the governing body (Part VI, line 1a).

Alterney General's Office. Total number of individuals employed in calendar year 2011 (Part V, line 2a) ... MAY. 2.5 2012 5 6 Total number of volunteers (estimate if necessary) Registry of Charitable Trusts 7 a Ō. Total unrelated business revenue from Part VIII, column (C), line 12 . 7 b b Net unrelated business taxable Income from Form 990-T, line 34 Prior Year Current Year Contributions and grants (Part VIII, line 1h) . . 587. 104. 877. Investment Income (Part VIII, column (A), lines 3, 4, and 7d) . . Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e) . 588,691. 646,977. 11 647,668. Total revenue -- add lines 8 through 11 (must equal Part VIII, column (A), line 12) 590,378. 12 28,700. 17,953 13 14 Benefits paid to or for members (Part IX, column (A), line 4) 15 Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10) 74,976, 54,297 412,984 457,109. b Total fundralsing expenses (Part IX, column (D), line 25) > 80,972. 106,527. Total expenses. Add lines 16-17 (must equal Part IX, column (A), line 25) . . 667,312, 566,206. -19,<u>644</u>. 19 24,172 Beginning of Current Year End of Year Total assets (Part X, line 16) . . 95,074 Total liabilities (Part X, line 26) 2,483. 112,235. 92,591 Signature Block Under pensilles of perjury, I declare that I have examined internation of companying schedules and statements, and to the best of my knowledge and halled, it is true, correct, and complete. Declaration of property foliar than officed to be ad on all information of which prepared to the property of the 03/23/12 Sign Paul Monville Type or print name and Bille. Here President Preparer's signalure Date i lif Brian Palmer, CPA sett-employed Paid 04/23/12 Preparer Brian Palmer, CPA, PA Use Only Firm's EIN - 20-1181345 Firm's address * 2937 Bee Ridge Rd Ste 2 (941) 922-4744 FL 34239 Sarasota May the IRS discuss this return with the preparer shown above? (see instructions) X Yes No

TEEA0101 07/05/11

Form 990 (2011)

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

b If Yes' to line 20a, did the organization attach a copy of its audited financial statements to this return? . .

Form 990 (2011)

BAA

Form 980 (2011) American Veterans Foundation

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) but are not required to complete columns (B), (C), and (D).

	Check if Schedule O contains a res		this Part IX (B)	(C)	. (D)
Do n 6b, 7	ot include amounts reported on lines b, 8b, 9b, and 10b of Part Vill.	(A) Total expenses	Program service expenses	Management and general expenses	Fundralsing expenses
1	Grants and other assistance to governments and organizations in the United States See Part IV, line 21		_		
2	Grants and other assistance to individuals in the United States. See Part IV, line 22	28,700.	28,700.		
3	Grants and other assistence to governments, organizations, and individuals outside the United States. See Part IV, lines 15 and 16		,		
4 5	Benefits paid to or for members	68,724.	17,181	51,543.	0.
.	Compensation not included above, to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(o)(3)(B).				
7	Other salaries and wages.				
8	Pension plan accruals and contributions (include section 401(k) and section 403(b) employer contributions).			•	
9	Other employee benefits	6,252.	. 0.	6,252.	0.
	Payroll taxes			 	
	Fees for services (non-employees):	11,974.	0	0.	11,974.
	à Management	18,941.	2,000.	16,941.	0.
	_	1,925.	2,000.	1,925.	D.
	g Accounting	1,365,		+,,,,,,	
	e Professional fundraising services, See Part IV, line 17	457,109.	_ 		457,109.
	f Investment management fees	1 457,109.			207,109,
	g Other	1,076.	- 0.	1,076.	0.
12			0.	1,0,6.	68,304
13			0.	. 2,400.	00,304
14	*************	2,400.		. 2,400.	
15					· ·
16	Occupancy				
17	Travel	200.	0.	200.	0.
18	· · · · · · · · · · · · · · · · · · ·	2001		2001	
19		\			
20				 	-
21	Payments to affiliates				
22				•	
23 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.)	•	ļ	<u> </u>	
	a State Registration	1,275.	0.	1,275.	0
	b Corp Fee	322.	0.	322.	0.
	c Business Registration	110.	0.	110.	. 0
	e All other expenses				
25	Total functional expenses. Add lines 1 through 24e	667,312.	47,881.	82,044.	537,387
26					
	Check here ► ☐ If following SOP 98-2 (ASC 958-720),				
			<u></u>		

SCHEDULE G (Form 990 or 990-EZ)

OMB No. 1645-0047 2011

Supplemental Information Regarding
Fundraising or Gaming Activities

Complete If the organization answered 'Yes' to Form 990, Part IV, lines 17, 18, or 19, or if the organization entered more than \$15,000 on Form 990-EZ, line 6a.

Attach to Form 990 or Form 990-EZ. See separate instructions.

Open to Public Inspection

ne of l	evenue Service						Employer identifica	tion number
ner	ican Veterans Foundat	ion					80-027357	2
art	Erradentaine Activities, Compl	ete if the organiz ired to complete	ation ansy this part.	vered 'Yes'	to Form	990, Part IV, Ilne	17.	· ·
	ndicate whether the organization ra	ised funds throug	h any of t	he following	activitie	s. Check all tha	apply.	·.
a	Mail solicitations			. е			vemment grants	
H	X Internet and email solicitations	•		ť	Solici	tation of govern	ment grants	* 1
	X Phone solicitations	•	•	g	Spec	lal fundraising e	vents	
ď	In-person solicitations					•		
2 a É	old the organization have a written omployees listed in Form 990, Part	V(I) or entity in co	onnection r	with profess	sional für	idtalajud setvice	87	Yes N
	f 'Yes,' list the ten highest paid indition compensated at least \$5,000 by the	/iduals or entitles organization.	(fundrals:	ers) pursua	nt to agre	ements under v	vhich the fundreiser is t	o be
(1)	Name and address of Individual or entity (fundraiser)	(II) Activity	(ili) Did (have custo	undraiser dy or control ibutions?	(Iv) Gr	oss receipts n activity	(v) Amount paid to (or retained by) fundralser listed in	(vi) Amount paid to (or retained by)
			of contri	ibutions?			fundralser listed in column (i)	organization
,			Yes	No		· · ·		1 .
1]	i		nas ána		00.00
	Independent Marketing Solutions, Inc	None Solicication	}	X		112,176.	89,415.	22,76
2	Telequal, LLC	Phone Solicitation		x		225,717.	180,884.	44,83
3	The Campaign Center, Inc.	Phone Solicitation		x	· .	101 605	86,466.	15,21
	THE CAMPAIGN CONCER, INC.	Lume dottereacter		· -		101,685.	00,400,	15,41
<u>"</u>	Menacola Marketing, Inc.	Phone Solicitation	<u> </u>	х	·	194,807.	163,185.	31,62
5					-			
6							•	
7					-			
8			 		 -	· · · · · · · · · · · · · · · · · · ·		-
			<u> </u>	· ·	<u>.</u>			
9								
0								
<u>. </u>	· · · · · · · · · · · · · · · · · · ·		!	<u> </u>	<u>'</u>	· · · · · · · · · · · · · · · · · · ·		
- A T			•		}	C24 255	519,950.	114,43
otal 3	List all states in which the organiza	lion is registered	or license	d to solicit	contribud	634,385.		
-	or licensing.					-110 01 1100 11011		
	Alabama			 _ 	•			
	California							
	Colorado							
•	Connecticut							
	Georgia				-~			
	Iowa							
	Idaho							-,
•	Illinois							
	~							
	<u>Indiana</u>				,			:

l		List events with gross receipts great	(a) Event#1	(b) Event #2	(c) Other events NONE	(d) Total events (add column (a) through column (c))
			(event type)	(avent lype)	(total number)	unough column (c))
	1	Gross receipts		•		
	2 .	Less: Charlable contributions				
L	3	Gross Income (line 1 minus line 2)	···			
	4	Cash prizes		 		<u> </u>
١	5	Noncash prizes		· · ·		<u> </u>
	6	Rent/facility costs			 	
	7	Food and beverages		· · · · · · · · · · · · · · · · · · ·		
1	8	Entertainment		· ·	<u> </u>	<u> </u>
1	9	Other direct expenses			J	
	10	Direct expense summary. Add lines 4 through	gh 9 in column (d)			
1	14	Net income summary. Combine line 3, colu				al name than
<u></u>	. 141	Gaming. Complete if the organizat \$15,000 on Form 990-EZ, line 6a.	on answered Yes	to Form 990, Part P	V, line 19, or repoπe	ed more than
ł		-	(a) Bingo	(b) Pull tabs/instant	(c) Other gaming	(d) Total gaming
			1,	bingo/progressive bingo	(a) adda Samus	(d) Total gaming (add column (a) through column (c)
				bingo/progressive bingo		(add column (a) through column (c)
	1	Gross revenue		bingo/progressive bingo		(add column (a) through column (c)
	1 2	Gross revenue		bingo/progressive bingo	(a) Called	(add column (a) through column (a)
11 CO 111				blngo/progressive bingo		(add column (a) through column (a)
THE CALL CALL	2	Cash prizes		bingo/progressive bingo		(add column (a) through column (a)
STATE OF THE STATE	2 3 '- 4	Cash prizes		bingo/progressive bingo		(add column (a) through column (c)
STATE OF THE STATE	2	Cash prizes	Yes &	bingo/progressive bingo	Yes %	(add column (a) through column (c)
	2 3 '- 4	Cash prizes		bingo/progressive bingo		(add column (a) through column (c)
	2 3 , 4 5	Cash prizes Non-cash prizes Rent/facility costs Other direct expenses Volunteer labor	Yes &	bingo/progressive bingo	Yes *	(add column (a)
	2 3 4 5	Cash prizes Non-cash prizes Rent/facility costs Other direct expenses. Volunteer labor	Yes % No gh 5 in column (d)	bingo/progressive bingo	Yes *	(add column (a) through column (c)
	2 3, 4 5 6 7 8	Cash prizes Non-cash prizes Rent/facility costs Other direct expenses Volunteer labor Direct expense summary. Add lines 2 throunds gaming income summary. Combine lines of the state(s) in which the organization oper	Yes % No Igh 5 in column (d)	bingo/progressive bingo	Yes & No	through column (e)
	2 3, 4 5 6 7 8 Ent	Cash prizes Non-cash prizes Rent/facility costs Other direct expenses Volunteer labor Direct expense summary. Add lines 2 throunds gaming income summary. Combine lines	Yes & No Igh 5 in column (d)	Pingo/progressive bingo Yes % No states?	Yes %	Yes No

Pahadula @ (Earm 000 or 000-E7)2011 American Veteran	s Foundation	80-	-0273572	Page 3
11 Does the organization opera	ate gaming activities with nonmember	ra?			No
12 is the organization a granto administer charilable gamin	r, beneficiary or trustee of a trust or a g?	member of a partnership or	other entity formed to	, Tyes	No
13 Indicate the percentage of g	naming activity operated in:		, '	l	
a The creanization's facility.			. ,	13 a	용
h An outside fecility.				136	용
14 Enter the name and address	s of the person who prepares the org	anization's gaming/special e	vents books and record	s:	
Name -		· 		· 	
			•	•	
Address				,	,
15a Does the organization have b if Yes,' enter the amount o	e a contact with a third party from who if gaming revenue received by the org	om the organization receives	gaming revenue? and the	Yes amount	∏ No
of gaming revenue relained		,			1
c if Yes,' enter name and ad	dress of the third party:	` ,		•	
* '		, ,			
Name	·				
Addmin to	•		•		,
Address >		• •	•		•
16 Gaming manager informat	lon				
to wanting mettinger measures					•
Name ►					
. Gaming manager compen	sation ► \$			`	•
Description of services pro	wided *				
Director/officer	Employee .	independent contr	gotor .		·
17 Mandatory distributions	•				
a to the organization require	d under state law to make charitable	distributions from the camini	n proceeds to retain the	· _ ·	
state gaming license?	tile bis en to make or all the t	4 * 4 1 * 4 * * * * * * 5 2 2 2 2 2 2 2 2 2 2 2 2 2	a biologogo to lorgin file	Yes	i ∐ No
b Enter the amount of distrit	ed ot wal etate rebnu betluper anollud	distributed to other exempt	organizations or spent l	n the	• '
		<u>.\$</u>			
columns (lil) an	Information. Complete this p d (v), and Part III, lines 9, 9b, vide any additional information	10b, 15b, 15c, 16, and	inations required b 17b, as applicable	y Part I, line 2b, . Also complete	
	· ·				 .
	<u> </u>				
	·				
	<u> </u>				
·				·	
					
· · · · · · · · · · · · · · · · · · ·					
			_ 		
					
BAA		TEFA3703 05/20/11	Schadu	la G (Form 990 or 9	90-F7\ 201

••••

Exhibit "14."

CT OIS3623

MAIL TO: Registry of Charitable Trusts P.O. Box 903447 Sacramento, CA 94203-4470 Telephone: (916) 445-2021

WEB SITE ADDRESS: http://ag.ca.gov/charities/

REGISTRATION RENEWAL FEE REPORT TO ATTORNEY GENERAL OF CALIFORNIA Sections 12586 and 12587, Galifornia Government Code 11 Cal. Code Regs. sections 301-307, 311 and 312

Failure to submit this report annually no later than four months and fifteen days after the end of the organization's accounting period may result in the loss of tax exemption as the assessment of a minimum tax of \$300, plus interest, and/or tines or filing penalliberas defined in Government Code section 12586.1. IRS extensions will be honored tiomay can

2010

· '			
CT0153623 State Charity Registration Number	Check	if: Registry of	
American Veterans Foundation	L Char	nge of address Registry of Charitable Trusts	
and of Organization	☐ Ame	nded report	
1025 Rose Creek Dr., Suite 620, Rm. 328	Corpor	rate or Organization No.	
Woodstock, GA 30189-6795] [al Employer I.D. No. 80-0273572	
Ity or Town, State and ZIP Gode	Ladete	a Employe (i.b. 140)	
ANNUAL REGISTRATION RENEWAL FEE SCHEDULE (11 Cal. (Make Check Payable to Attorney General's Registry (ode Regs of Charital	s. sections 301-307, 311 and 312) ble Trusts	
Gross Annual Revenue Fee Gross Annual Revenue	<u>Fee</u>	Gross Annual Revenue	Fee
Less than \$25,000 0 Between \$25,000 and \$100,000 \$25 Between \$250,001 and \$1 million	\$50 \$75	Between \$1,000,001 and \$10 million Between \$10,000,001 and \$50 million Greater than \$50 million	\$150 \$22 5 \$3 00
PART A - ACTIVITIES			
For your most recent full accounting period (beginning 01 / 01 / 10)	ending <u>1</u>	2 / 31 / 10 1 list:	
Gross annual revenue \$ 590378.00 Total assets \$	112235.		•
PART B - STATEMENTS REGARDING ORGANIZATION DURING THE PERIO	D OF TH	IIS REPORT	
Note: If you answer "yes" to any of the questions below, you must attach a separ response. Please review RRF-1 instructions for information required.	ate sheet	providing an explanation and details for	each "yes"
 During this reporting period, were there any contracts, loans, leases or other financial officer, director or trustee thereof either directly or with an entity in which any such of 	ıl transaction ilicer, direc	ons between the organization and any tor or trustee had any financial interest?	Yes No
2. During this reporting period, was there any theft, embezzlement, diversion or misuse	of the org	anization's charitable property or funds?	
During this reporting period, did non-program expenditures exceed 50% of gross rev	enues?		
 During this reporting period, were any organization funds used to pay any penalty, fi Internal Revenue Service, attach a copy. 	ine or judg	ment? If you filed a Form 4720 with the	
 During this reporting period, were the services of a commercial fundralser or fundral provide an attachment listing the name, address, and telephone number of the servi 	sing couns ce provide	el for charitable purposes used? If "yes," rr.	
 During this reporting period, did the organization receive any governmental funding? the agency, mailing address, contact person, and telephone number. 	lfso, pro	yide an attachment listing the name of	
 During this reporting period, did the organization hold a raffie for charitable purposes number of raffles and the date(s) they occurred. 	s? If"yes,	provide an attachment indicating the	
B. Does the organization conduct a vehicle donation program? If "yes," provide an att by the charity or whether the organization contracts with a commercial fundraiser for	achment in r charitable	ndicating whether the program is operated a purposes.	
 Did your organization have prepared an audited financial statement in accordance v reporting period? 	vith genera	ally accepted accounting principles for this	
Organization's area code and telephone number (888) 556 8812) 		
Organization's e-mail addiese amvetsfoundation@aol.com			
I declare under penalty of perjury that I have examined this report, including accomit is true, correct and complete.	panying d	locuments, and to the best of my knowle	edge and belie
Paul Monville		President .	5/4/2011
Signature of authorized officer Printed Name		Title .	Date
b / .		,8635	.00

CALIFORNIA RRF-1 FORM ATTACHMENT

1. During this reporting period, were there any contracts, loans, leases or other financial transactions between the organization and any officer, director or trustee thereof either directly or with an entity in which any such officer, director or trustee had any financial interest?

Yes, Paul Monville, President / Executive Director was loaned (with permission of the Board of Directors) \$24,499.80 on July 17, 2010. Mr. Monville signed a Promissory Note (attached) whereby he paid \$12,249.90 plus interest at 6% in the amount of \$735.10 on December 16, 2010. Pursuant to the Promissory Note he will pay the balance of \$12,249.90 plus 6% interest by December 31, 2011.

5. During this reporting period, were the services of a commercial fundraliser or fundralising counsel for charitable purposes used? If "yes," provide an attachment listing the name, address, and telephone number of the service provider.

The Campaign Center, Inc. 2511 W. 3rd Street, Suite 2 Bloomington, IN 47404 (812) 336-1657

Exhibit "15."

Return of Organization Exempt From Income Tax
Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code
(except black lung benefit trust or private foundation)

The organization may have to use a copy of this return to sallsfy state reporting requirements.

Department of the Treasury

	SI VatAstrus centau		Lodeneties E - O	A SOMEONE STATE OF THE
		atendar year, or tax year beginning , 2010, and ending	D Employer identil	Taratian Albumban
8	Check if applicable	1 .		•
	Address char		80-02735	
	Name change	Number and street (or P.O. box if mail is not delivered to street add?) Room/suit	le E Telephone numb	er .
	initial return	1025 Rose Creek Drive Ste 620 Box 328	(888) 55	6-8812
	Terminated	City, town or country State ZIP cods +4		
	Amended ret	m Woodstock GA 30189	G Gross receipts \$	590,378.
	Application p	inding F Name and address of principal officer;	(a) is this a group return for affili	Blas? Yes X No
٠		Paul Monville 1225 Rose Creek pr ste Woodstock FL 30189	(b) Are all offiliates included?	Yes No
ī	Tax-exempt sta		If No, attach a list, (see inst	ructions)
J	Website: ►		(c) Group exemplion number	
K		ation: X Corporation Trust Association Oliner L Year of Formation		gal domicile: GA
Òα	rate d Sur		1 200 5 111 State of R	Gal configures CEEX
20195	1 Briefiv	escribe the organization's mission or most significant activities: Assist veto		
1	of he	coming homeless, providing patients in veterans homes wi	rone who are nomere	es or Tu lectural
Activities & Governance	. came.	and other items; providing comfort and "We Care"	or correction of	orimid tooks.
5	Geriffe	- and other reside the stratege contact red was setted "	Far vades "fo" debi	STONER CROOKE
ķeţ	2 Check	his box • if the organization discontinued its operations or disposed of more		
ę,	3 Number	of voting marriers of the governing body (Part VII line 1s)	inan 20% or its het asse	
ಹ	4 Numbe	of voting members of the governing body (Part VI, line 1a)	Offic3 4	5
ş	5 Total n	of Independent voting members of the governing body (Part VI, line and Control of Individuals employed in calendar year 2010 (Part V, line and the Golden's	Onios	2
\$	6 Totaln	mber of volunteers (estimate if necessary)	6	4
₹	7a Total u	related business revenue from Part VIII. column (C), line 12	2011 7a	0.
	b Net un	related business revenue from Part VIII, column (C), line 12	7b	
)		nisisPriorYear	Current Year
	8 Contrib	rtions and grants (Part VIII, line 1h)	635.	810.
8	9 Progra	n service revenue (Part VIII, line 2g)		010.
Revenue		ent income (Part VIII, column (A), lines 3, 4, and 7d)		877.
E.	11 Other	evenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)	576,375.	588,691.
_	12 Total n	venue - add lines 8 through 11 (must equal Part VIII, column (A), line 12)	577,010	590,378.
		and similar amounts paid (Part IX, column (A), lines 1-3)		
		s paid to or for members (Part IX, column (A), line 4)	75,500	17,953.
			ļ	
90	1	s, other compensation, employee benefits (Part IX, column (A), lines 5-10)		<u>54,297.</u>
Expenses	16a Profes	ional fundralsing fees (Part IX, column (A), line 11e)	405,605.	412,984.
ᇎ	b Total f	ndraising expenses (Part IX, column (D), line 25) - 479, 984.		
ũ	17 Other	xpenses (Part IX, column (A), lines 11a-11d, 11f-24f)	67,836.	80,972.
	18 Total e	openses, Add lines 13-17 (must equal Part IX, column (A), line 25)		566,206.
		e less expenses. Subtract line 18 from line 12		24,172.
- 1		c loss expenses, adultace time to from fine 12		
Arable or Salerices	20 Totalra	ssets (Part X, line 16)	Beginning of Current Year	End of Year
į	21 Total I			112,235,
# 1	1	abilitiles (Part X, line 26)		
Z.(ets or fund balances. Subtract line 21 from line 20	. 88,063.	112,235,
		nature Block		
Ųп	der penalties of p	iluy, I deciare that there exemined this return, including accompanying schedules and statements, and to to or preparer (other trapporties) is based on all information of which preparer has any knowledge.	he best of my knowledge and be	ilet, it is true, correct, and
	mprose. Occiorado	or property (other steps officer) is observed in all fill officers of which property (i.e., property).	·	
	4	- Jala	- 03/25/11	
S	gn	Slocature of officer	, Dala	
Н	ere 🕨	Paul Monville	President	
		Type or print name and title.		
_	Pa	nUType preparer's name Preparer's signature Date	Check If	PTIN
D .	·	ian Palmer, CPA 03/28/		
			1.1 self-employed	· · · · · · · · · · · · · · · · · · ·
1		ws name Brian Palmer, CPA, PA		. •
٠.	A ANITA IN	n's address > 2937 Bee Ridge Rd Ste 2	Firm's EIN 🛰	
		Sarasota FL 34239	Phone no. (94	
		suss this return with the preparer shown above? (see Instructions)		X Yes · No
В	A For Paper	work Reduction Act Notice, see the separate instructions.	(A010) 12/21/10	Form 990 (2010

filers that operate one or more hospitals must attach audited financial statements (see instructions) . .

TEEA0103 12/21/10

Form 990 (2010)

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RAA

Form 990 (2010) American Veterans Foundation 80-027357.

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) but are not required to complete columns (B), (C), and (D).

Do no 6b, 7	ot include amounts reported on lines b, 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 governments and organizations in the U.S. See Part IV,				, ,
Ź	Grants and other assistance to individuals in the U.S. See Part IV, line 22	17,953.	17,953.		,
	Granis and other assistance to governments, organizations, and individuals outside the U.S. See Part IV, lines 15 and 16	•			• •
	Benefits paid to or for members		· · · · · · · · · · · · · · · · · · ·		·
7	Compensation of current officers, directors, trustees, and key employees	34,452.	0.	34,452.	0.
6	Compensation not included above, to disqualified persons (as defined under section 4958(G(3)) and persons described in section 4958(c)(3)(3)				<u>-</u>
7	Other salaries and wages	12,111	0.	12,111.	0.
8	Pension plan contributions (Include section 401(k) and section 403(b) employer contributions)			,	
. 9	Other employee benefits	7,734.	· 0.	7,734.	0.
10	Payroli taxes				
11	Fees for services (non-employees):			· . 1	
	Management	5,290.	0.	0.	5,290.
	Legal	2,500.	0,	2,500.	
C	Accounting	2,625.	0.	2,625.	
0	Professional fundraising services, See Part IV, line 17	412.984.	<u> </u>		412,984
	Investment management fees	412,304,			412, 904
	Other	2,023.	. 0.	2,023.	0.
12	Advertising and promotion	61,710.	0.	. 0.	. 61,710
13	Office expenses	4,127.	0.	4,127.	0.
14	Information technology				
15	Royalties				
16	Occupancy	<u> </u>			
17	Travel	1,110	·	1,110.	· 0
18	Payments of travel or entertainment expenses for any federal, state, or local public officials		. ,		
19	Conferences, conventions, and meetings			·	· · · · · · · · · · · · · · · · · · ·
20	Interest			· '	
21	Payments to affiliates			 ,	
22 23	Insurance		 	· · · · · · · · · · · · · · · · · · ·	
24	Other expenses. Itemize expenses not covered above (List miscellaneous expenses in line 24f. if line 24f amount exceeds 10%	.•			
	expenses on Schedule O.)				
	State Registration	1,235.	0.	1,235.	0
	b Corp Fee	352.	<u> </u>	352.	0
	c				
		···	 	 	
25	f All other expenses	566,206.	17,953.	68,269.	479,984
26		300,200.	2 (7 2 2 2 2		
BA	campaign and fundraising solicitation			<u> </u>	Form 990 (201

Supplemental Information Regarding Fundraising or Gaming Activities

OM9 No. 1545-0047 2010

Complete if the organization answered Yes' to Form 990, Part IV, lines 17, 18, or 19, or if the organization entered more than \$15,000 on Form 990-EZ, line 6a.

Attach to Form 990 or Form 990-EZ. See separate instructions.

Open to Public Inspection

ne of the organization	•		•		Employer identifica	
nerican Veterans Founda	tion.				80-0273572	}
art I Fundraising Activities, Comp Form 990-EZ filers are not re	lete if the organi quired to comple					
Indicate whether the organization	raised funds thro	ough any o	f the follow	ving activities. Check all	that apply.	
a Mail solicitations			' e	Solicitation of non-g	dvernment grants	
b X Internet and email solicitation	S		· f	Solicitation of gover	nment grants	
c X Phone solicitations			g	Special fundralsing	events	
d In-person solicitations	•		•		· ,	
2a Did the organization have a writte employees listed in Form 990, Pa	n or oral agreem rt VII) or entity in	ent with a connection	ny individu on with pro	al (including officers, di fessional fundraising se	rectors, trustees or key	XYes N
b If 'Yes,' list the ten highest paid in compensated at least \$5,000 by the	dividuals or enti- he organization.	tles (fundr	alsers) pur	suant to agreements un	der which the fundraise	r is to be
(i) Name and address of Individual or entity (fundralser)	(ii) Activity	(iii) Did have custod of contri	fundralser ly or control lbutions?	(Iv) Gross receipts from activity	(v) Amount pald to (or retained by) fundraiser listed in column (i)	(vi) Amount paid to (or retained by) organization
		Yes	No		•	
Independent Marketing Solutions,	I Phone Solicitat	,	<u>x</u>	108,316.	* 88,539.	דמל מו
	I Phone Solicitat	 		100,310.	60,009.	19,777
Lino's, Inc	Phone Solicitat	ļ. <u>.</u>	·x	49,578.	38,416.	11,162
Telequal, LLC	Phone Solicitat		x	248,745.	198,211.	(50,534
4 The Campaign Center, Inc	. Phone Solivitat		x	175,577.	149,528	26,049
5						
6						
7		,		,		
8	,	<u> </u>		,		-
9		,	<u> </u>		,	
		<u> </u>	· ·			
10		,				٠.
	,				•	
otal	*******		<u>,,,,,,,</u>	582,216.	474,694.	107,522
 List all states in which the organi or licensing. 	zation is register	ed or licer	nsed to sol	icit contributions or has	been notified it is exem	pt from registration
-					·	•
Alabama						<u>-</u>
California						
Colorado						
Georgia						
Illinois	·			· -	,	
Indiana			· -			
Kansas						
Missouri						,

1 Gross receipts 2 Less: Chairtable contributions 3 Gross income (line 1 minus line 2)		,		eipts greater than . (a) Evént #1	(b) Event #2	(c) Other events	(d) Total events (add column (a) through column (c))
2 Less: Charitable contributions 3 Gross income (line 1 minus line 2)			<u>}</u>	(event type)	(event type)	(total number)	
3 Gross income (line 1 minus line 2)		1	Gross receipts	, ,			
4 Cash prizes 5 Noncash prizes 6 Rent/facility costs 7 Food and beverages 8 Entertainment 9 Other direct expenses 10. Direct expense summary. Add lines 4- through 9 in column (d) 11 Net income summary. Combine line 3, column (d), and line 10 11 III Gaming. Complete if the organization answered 'Yes' to Form 990, Part IV., line 19, or reported more than \$15,000 on Form 990-EZ, line 6a. (a) Bingo (b) Pull tabs/instant bingo/progressive bingo (d) Total gaming (add column (a) through column (c) 1 Gross revenue 2 Cash prizes 3 Non-cash prizes 4 Rent/facility costs 5 Other direct expenses Yes & Yes & Yes & Yes &		2	Less: Charitable contributions				
5 Noncash prizes 6 Rent/facility costs 7 Food and beverages 8 Entertainment 9 Other direct expenses summary. Add tines 4- through 9 in column (d) 11 Net income summary. Combine line 3, column (d), and line 10 11 Ill Gaming, Complete if the organization answered 'Yes' to Form 990, Part IV, line 19, or reported more than \$15,000 on Form 990-EZ, line 6a. (a) Bingo (b) Pull tabs/instant bingo/progressive bingo (c) Other gaming (add column (a) through column (c) 1 Gross revenue 2 Cash prizes 3 Non-cash prizes 4 Rent/facility costs 5 Other direct expenses [Yes % Yes Xes Yes Yes Yes Yes Yes Yes Yes Yes Yes Y		3	Gross income (line 1 minus line 2)			_	
5 Noncash prizes 6 Rent/facility costs 7 Food and beverages 8 Entertainment 9 Other direct expenses summary. Add tines 4- through 9 in column (d) 11 Net income summary. Combine line 3, column (d), and line 10 11 Ill Gaming, Complete if the organization answered 'Yes' to Form 990, Part IV, line 19, or reported more than \$15,000 on Form 990-EZ, line 6a. (a) Bingo (b) Pull tabs/instant bingo/progressive bingo (c) Other gaming (add column (a) through column (c) 1 Gross revenue 2 Cash prizes 3 Non-cash prizes 4 Rent/facility costs 5 Other direct expenses [Yes % Yes Xes Yes Yes Yes Yes Yes Yes Yes Yes Yes Y	1	4	Cash prizes	,			
6 Rent/facility costs 7 Food and beverages 8 Entertainment 9 Other direct expenses 10 Direct expense summary. Add lines 4- through 9 in column (d) 11 Net income summary. Combine line 3, column (d), and line 10 11 Gaming. Complete if the organization answered 'Yes' to Form 990, Part IV., line 19, or reported more than \$15,000 on Form 990-EZ, time 6a. (a) Bingo (b) Pull tabs/instant bingo/progressive bingo (c) Other gaming (add column (a) through column (c) 1 Gross revenue 2 Cash prizes 3 Non-cash prizes 4 Rent/facility costs 5 Other direct expenses			`				
7 Food and beverages 8 Entertainment 9 Other direct expenses 10. Direct expense summary. Add tines 4- through 9 in column (d) 11 Net income summary. Combine line 3, column (d), and line 10 11 Gaming. Complete if the organization answered 'Yes' to Form 990, Part IV, line 19, or reported more than \$15,000 on Form 990-EZ, line 6a. (a) Bingo (b) Pull tabs/instant bingo/progressive bingo (c) Other gaming (add column (a) through column (c) 1 Gross revenue 2 Cash prizes 3 Non-cash prizes 4 Rent/facility costs 5 Other direct expenses Yes % Yes % Yes % Yes % Yes %							
8 Entertainment 9 Other direct expenses 10. Direct expense summary. Add lines 4- through 9 in column (d) 11. Net income summary. Combine line 3, column (d), and line 10 12. Strill Gaming. Complete if the organization answered 'Yes' to Form 990, Part IV., line 19, or reported more than \$15,000 on Form 990-EZ, line 6a. (a) Bingo (b) Pull tabs/instant bingo/progressive bingo (c) Other gaming (d) Total gaming (add column (a) through column (c)				·			
9 Other direct expenses 10. Direct expense summary. Add lines 4- through 9 in column (d) 11. Net income summary. Combine line 3, column (d), and line 10 12. String Gaming. Complete if the organization answered 'Yes' to Form 990, Part IV, line 19, or reported more than \$15,000 on Form 990-EZ, line 6a. (a) Bingo (b) Pull tabs/instant bingo/progressive bingo/progressive bingo (c) Other gaming (add column (a) through column (c) through column (c) 1. Gross revenue 2. Cash prizes 3. Non-cash prizes 4. Rent/facility costs 5. Other direct expenses	1	7	Food and beverages				
16. Direct expense summary. Add tines 4- through 9 in column (d) 17. Net income summary. Combine line 3, column (d), and line 10 28. St. 10.		8	Entertainment				
Net income summary. Combine line 3, column (d), and line 10 Cart III Gaming. Complete if the organization answered 'Yes' to Form 990, Part IV., line 19, or reported more than \$15,000 on Form 990-EZ, line 6a. Cart III Gaming. Complete if the organization answered 'Yes' to Form 990, Part IV., line 19, or reported more than \$15,000 on Form 990-EZ, line 6a. Cart III Gaming. Complete if the organization answered 'Yes' to Form 990, Part IV., line 19, or reported more than \$15,000 on Form 990-EZ, line 6a. Cart III Gaming. Complete if the organization answered 'Yes' to Form 990, Part IV., line 19, or reported more than \$15,000 on Form 990-EZ, line 6a. Cart III Gaming. Complete if the organization answered 'Yes' to Form 990, Part IV., line 19, or reported more than \$15,000 on Form 990-EZ, line 6a. Cart III Gaming. Complete if the organization answered 'Yes' to Form 990, Part IV., line 19, or reported more than \$15,000 on Form 990-EZ, line 6a. Cart III Gaming. Complete if the organization answered 'Yes' to Form 990, Part IV., line 19, or reported more than \$15,000 on Form 990-EZ, line 6a. Cart III Gaming. Complete if the organization answered 'Yes' to Form 990, Part IV., line 19, or reported more than \$15,000 on Form 990-EZ, line 6a. Cart III Gaming. Complete if the organization answered 'Yes' to Form 990, Part IV., line 19, or reported more than \$15,000 on Form 990-EZ, line 6a. Cart III Gaming. Complete if the organization answered 'Yes' to Form 990, Part IV., line 19, or reported more than \$15,000 on Form 990, Part IV., line 19, or reported more than \$15,000 on Form 990, Part IV., line 19, or reported more than \$15,000 on Form 990, Part IV., line 19, or reported more than \$15,000 on Form 990, Part IV., line 19, or reported more than \$15,000 on Form 990, Part IV., line 19, or reported more than \$15,000 on Form 990, Part IV., line 19, or reported more than \$15,000 on Form 990, Part IV., line 19, or reported more than \$15,000 on Form 990, Part IV., line 19, or reported mor		þ	Other direct expenses	<u>·</u> .	<u> </u>		
bingo/progressive dadd column (a) through column (c) 1 Gross revenue 2 Cash prizes 3 Non-cash prizes 4 Rent/facility costs 5 Other direct expenses Yes % Yes % Yes %			\$15,000 on Form 990-EZ, line 6a.		· · · · · · · · · · · · · · · · · · ·		
2 Cash prizes 3 Non-cash prizes 4 Rent/facility costs 5 Other direct expenses Yes % Yes % Yes % Yes %	.]			(a) Bingo	(b) Pull tabs/instant	(c) Other gaming	(d) Total gaming.
2 Cash prizes				(a) Blinge	(b) Pull tabs/instant bingo/progressive bingo	(c) Other gaming	(d) Total gaming. (add column (a) through column (c)
3 Non-cash prizes		1	Gross revenue	(a) Bingo	(b) Pull tabs/instant bingo/progressive bingo	(c) Other gaming	(add column (a)
5 Other direct expenses		_1_	Gross revenue	(a) Bingo	(b) Pull tabs/instant bingo/progressive bingo	(c) Other gaming	(add column (a)
5 Other direct expenses				(a) Bingo	(b) Pull tabs/instant bingo/progressive bingo	(c) Other gaming	(add column (a)
5 Other direct expenses		2	Cash prizes	(a) Bingo	(b) Pull tabs/instant bingo/progressive bingo	(c) Other gaming	(add column (a)
Yes % Yes % Yes %		2	Cash prizes	(a) Bingo	(b) Pull tabs/instant bingo/progressive bingo	(c) Other gaming	(add column (a)
6 Volunteer labor		3	Cash prizes Non-cash prizes Rent/facility costs	(a) Bingo	(b) Pull tabs/instant bingo/progressive bingo	(c) Other gaming	(add column (a)
		3	Cash prizes Non-cash prizes Rent/facility costs		bingo/progressive bingo		(add column (a)
		2 3 4 5	Cash prizes	Yes %	bingo/progressive bingo	Yes %	(add column (a)
7 Direct expense summary. Add lines 2 through 5 in column (d)		2 3 4 5	Cash prizes	Yes %	bingo/progressive bingo	Yes %	(add column (a)
Net gaming income summary. Combine lines 1, column (d) and line 7		2 3 4 5 7	Cash prizes Non-cash prizes Rent/facility costs Other direct expenses Volunteer labor Direct expense summary. Add lines 2 three	Yes % No Sugh 5 in column (d)	bingo/progressive bingo	Yes %	(add column (a)
8 Net gaming income summary, Combine lines 1, column (d) and line 7	HXPEX944	2 3 4 5 6	Cash prizes	Yes % No ough 5 in column (d)	bingo/progressive bingo Yes % No	Yes %	(add column (a)
8 Net gaming income summary. Combine lines 1, column (d) and line 7	HXPEX#MS 9	2 3 4 5 5 6 7 8 Entitle a is i	Cash prizes Non-cash prizes Rent/facility costs Other direct expenses Volunteer labor Direct expense summary, Add lines 2 thro Net gaming income summary, Combine liter the state(s) in which the organization opthe organization ficensed to operate gaming	Yes % No ough 5 in column (d) nes 1, column (d) and erates gaming activities activities in each of it	bingo/progressive bingo Yes % No line 7	Yes %	(add column (a) through column (c
8 Net gaming income summary. Combine lines 1, column (d) and line 7	EXPENSES 9	2 3 4 5 6 7 8 Entra list it is if '	Cash prizes Non-cash prizes Rent/facility costs Other direct expenses Volunteer labor Direct expense summary. Add lines 2 thro Net gaming income summary. Combine liter the state(s) in which the organization op the organization licensed to operate gaming No, explain:	Yes % No Sugh 5 in column (d) and nes 1, column (d) and erates gaming activities activities in each of the	bingo/progressive bingo Yes % No line 7	Yes &	(add column (a) through column (c)

Schedule G (Form 990 or 990 EZ) 2010 American Veterans Foundation 11 Does the organization operate gaming activities with nonmembers?	80-02735		Page 3
12 is the organization a grantor, beneficiary or trustee of a trust or a member of a partnership or other entity administer charitable gaming?		_[Yes [∵ ∵Yes [_]No
13 Indicate the percentage of gaming activity operated in: a The organization's facility b An outside facility 14 Enter the name and address of the person who prepares the organization's gaming/special events books	13a		- 8
Address >	<u> </u>		- -
15a Does the organization have a contact with a third party from whom the organization receives gaming reversibilities, enter the amount of gaming revenue received by the organization \$ c if 'Yes,' enter name and address of the third party:	and the amount	Yes	∐ No
Name -	,		
Address >		•	•
16 Gaming manager information: Name ►			• •
Gaming manager compensation ► \$ Description of services provided ► Director/officer		: 	- -
17 Mandatory distributions a is the organization required under state law to make charitable distributions from the gaming proceeds to state gaming license? b Enter the amount of distributions required under state law to be distributed to other exempt organizations organization's own exempt activities during the tax year ► \$ Part IV Supplemental Information. Complete this part to provide the explanations re	s or spent in the		Μo
columns (iii) and (v), and Part III, lines 9, 9b, 10b, 15b, 15c, 16, and 17b, as this part to provide any additional information (see instructions).	applicable, A	rt 1, line.2 Aso comp	b, lete
		•	
		,	
BAA TEEA3703 01/13/11 Sc	hèdule G (Form	990 or 990-l	EZ) 201

Exhibit "16."



MAIL TO; Registry of Charitable Trusts P.O. Box 903447 Sacramento, CA 94203-4470 Telephone: (915) 445-2021

WEB SITE ADDRESS:

(': parga.gov/charities/

ANNUAL REGISTRATION RENEWAL FEE REPORT TO ATTORNEY GENERAL OF CALIFORNIA Sections 12588 and 12587, California Government Code 11 Cal. Code Regs. sections 301-307, 311 and 312

Failure to submit this report annually no later than four months and fifteen days after the end of the organization's accounting period may result in the loss of tax exemption and the assessment of a minimum tax of \$000, plus interest, and/or files or filling penalties as defined in Government Code section 12586.1. IRS extensions will be honored.



			,	
State Charity Registration NumberCT0153623	·	Check	lf: nge of address MAY 2.4	2010
American Veterans Foundation	·	1= .	Sec. market	
Name of Organization 1025 Rose Creak Dr., Sulte 620, Rm.	328	∐. Ame	nded report Registry	Titus:
Address (Number and Street)		- Corpor	rate or Organization No.	· · · · · · · · · · · · · · · · · · ·
Woodstock, GA 30189-6795			al Employer I.D. No. 80-0273572	
City or Town, State and ZIP Code		recera	A) ERIPTOYOT I.D. NO.	
ANNUAL REGISTRATIO Make Check f	N RENEWAL FEE SCHEDULE (11 Cal. Payable to Attorney General's Registry	Code Regs of Charital	s, sections 301-307, 311 and 312) ble Trusts	
Gross Annual Revenue Fee	Gross Annual Revenue	Fee	Gross Annual Revenue	<u>Fee</u>
Less than \$25,000 0 Between \$25,000 and \$100,000 \$25	Between 100,001 and \$250,000 Between \$250,001 and \$1 million	\$50 \$75	Between \$1,000,001 and \$10 million Between \$10,000,001 and \$50 million Greater than \$50 million	
PART A - ACTIVITIES				
For your most recent full accounting pe	eriod (paginning 01 / 01 / 09	ending 1	2 / 31 / 09) list:	
577 010 22		98 B83 ·	· · · · · · · · · · · · · · · · · · ·	· .
Gross annual revenue \$	Total assets \$		<u> </u>	
PART B - STATEMENTS REGARDING O	RGANIZATION DURING THE PERIO	DD OF TH	IIS REPORT	· ·
Note: If you answer "yes" to any of the que response. Please review RRF-1 ins	estions below, you must attach a sepa tructions for information required.	rate sheet	providing an explanation and details	for each "yes"
				Yes No
 During this reporting period, were there are officer, director or trustee thereof either directors. 	ny contracts, loans, leases or other financi rectly or with an entity in which any such c	al transacti officer, direc	ions between the organization and any stor or trustee had any financial interest?	
2. During this reporting period, was there an	y thaft, embezziament, diversion or misus	e of the org	ganization's charitable property or funds'	, X
3. During this reporting period, did non-progr	rem expenditures exceed 60% of gross re	venues?		
During this reporting period, were any org internal Revenue Service, attach a copy.	genization funds used to pay any penalty,	fine or judg	ment? If you illed a Form 4720 with the	
During this reporting period, were the sen provide an attachment listing the name, a	vices of a commercial fundraiser or fundra ddress, and telephone number of the sen	ising couns	sel for charitable purposes used? If "yes er.	*," ×
During this reporting period, did the organithe agency, mailing address, contact personal contact perso	ization receive any governmental funding			
	nization hold a raffle for charitable purpose	es? If yes,	" provide an attachment indicating the	
	donation program? If "yes," provide an a	tachment is	ndicating whether the program is operate purposes.	X be
9. Old your organization have prepared an	audited financial statement in accordance			1 ' 1
reporting period?	888 556 881	2		
Organization's area code and telephone numb	er ()	<u> </u>		
Organization's e-mail address amvetsfound	dation@aol.com			
I declare under penalty of perjury that I have it is true, correct and of mplete.		npanying (documents, and to the best of my kno	wiedge and belief,
	Paul Monville		President	5/19/2010
Signature of authorized office	r Printed Name	_ 	Title	Date
/ Signature of authorized office	, internet			

RRF-1 (3-05)

CALIFORNIA RRF1 ATTACHMENT

Question #5 Answer

The Campaign Center, Inc. Mr. Jon Wright 2511 W. 3rd Street, Suite 2 Bloomington, IN 47404 (812) 336-1657

Exhibit "17."

cto153623

Return of Organization Exempt From Income Tax

Form 990

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except black lung benefit trust or private foundation)

OMB No. 1545-0047

2009

Form 990 (2009)

TEEA0101 07/20/09

Department of the Treasury Internal Revenus Service Open to Public Inspection The organization may have to use a copy of this return to satisfy state reporting requirements. , 2009, and ending For the 2009 calendar year, or tax year beginning C Name of organization D Employer Identification Nur Check if applicable: 80-0273572 American Veterans Foundation Address change Number and street (or P.O. box if mad is not delivered to street addr) E Telephone number Name chance' (888) 556-8812 1025 Rose Creek Drive Ste 620 Box 328 X Indial return State ZIP rode + 4 i Termination Woodstock 30189 G Gross records \$ 577,010 F Name and address of oringipal officer: H(a) is this a group return for affiliates? Yes Annication pending Hib) Are all affiliates included? FL 30189 Yes Paul Monville 1925 Home Crock Dr Ste Woodstock Tax-exempt status X 501(c) (3)≺ (Insert no.) 4947(a)(1) or Website: ► N/A (c) Groùp exemplion numbor 🏲 Form of organizations X Corporation Trust Association Other L Year of Formation: 2009 M State of legal domicile: GA Summary Briefly describe the organization's mission or most significant activities: Helping to prevent more homelessness among veterans and providing immediate support to veterans who are homeless, in jeopardy of becomig homeless or in desperate need of assistance. Check this box > ____ If the organization discontinued its operations or disposed of more than 25% of its assets. Number of voting members of the governing body (Part VI, line 1a)

Number of Independent voting members of the governing body (Part VI, line 1b) Total number of employees (Part V, line 2a) Total number of volunteers (estimate if necessary) 7a Total gross unrelated business revenue from Part VIII, Icolumn (C), ine 12 . b Net unrelated business taxable Income from Form 990-T, line 34 Contributions and grants (Part VIII, line 1h) Program service revenue (Part VIII, line 2g) Investment income (Part VIII, column (A), lines 3, 4, and 7d) 31 Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 17e) 576,375. 12 Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12) 577,010. 13 Grants and similar amounts paid (Part IX. column (A), lines 1-3) 15,506. 14 Benefits paid to or for members (Part IX, column (A), line 4) 15 · Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10) 16a Professional fundraising fees (Part IX, column (A), line 11e)

b Total fundraising expenses (Part IX, column (D), line 25) 405,605 17 Other expenses (Part IX, column (D), line 25) 18 Total expenses. Add lines 13-17 (must equal Part IX, column (A). line 25) 19 Revenue less expenses. 67,836. 488,947. 88,063. AMAINSTAN LINGS End of Year 20 Total assets (Part X, line 16) B8,063. 21 Total habitities (Part X, line 26) 22 Net assets or fund balances. Subtract line 21 from line 20 88,063. Part II Signature Block Under possibles of penjay. I declare that I have examined this return, including accompanying schedules and statements, and to the pest of my knowledge and bolief, it is two, correct, and complete, Declaration of preparer (other than cificer) is based on all information of which preparer has any knowledge on the preparer to the contract of the period of the contract of the period of the peri 03/29/10 Sign Here Signature of office Date Paul Monville President Preparer's identifying (see instructions) Check ' solf-employed Paid Pre-04/02/10 parer's Use Brian Palmer, CPA, PA . ZO-1181345 ▶ 2937 Bee Ridge Rd Ste 2 Only Phone no. > (941) 922-4744 FT. 34239 Sarasota May the IRS discuss this return with the preparer shown above? (see instructions) Yes No

BAA For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions.

American Veterans Foundation

Form 990 (2009)

80-0273572

Form 998 (2009) American Veterans Foundation 80-0273572

[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) but are not required to complete columns (B), (C), and (D).

Do 11 5b, 7	not include amounts reported on lines 75, 85, 95, and 195 of Part Vill:	(A) Total expenses	(B) Program service expanses	(C) Management and general expenses	(0) Fundraising expanses
1	Grants and other assistance to governments and organizations in the U.S. See Part IV.				
2	Grants and other assistance to individuals in the U.S. See Part IV, line 22	15,506.	15,506.		
3					
4 5	Benefits paid to or for members Compansation of current officers, directors, trustees, and key employees	• •			,
6	Compensation not included above, to disqualified persons (as defined under section 4958(n(1) and persons described in section 4958(o)(3)(B)				
7	Other salaries and wages				·
8	Pension plan contributions (include section 401(k) and section 403(b) employer contributions)				
9	Other employee benefits				· ·
	Payroll taxes				
	Fees for services (non-employees)				
Ş	Management ,				
Ł	b Legal				
¢	Accounting	1,100.	0.1	1,100.	C
Ć	i Lobbying				
•	e Prof fundraising svcs. See Part Ⅳ, in 17	405,605.		1.	405,605
ſ	Investment management fees	<i>,</i>	<u> </u>		
	; Other		,		
12	Advertising and promotion	60,608.	0.	0.	60,608
13	Office expanses ,	5,210.		5,210.	
14	Information technology		·		<u>. </u>
15	Royaltles				
16	Occupancy	, – , , , , , , , , , , , , , , , , , ,			
17	Travel	455.	0.	455.	
18	Payments of travel or entertainment expenses for any federal, state, or local public officials				'
19				,	1
20	Interest		<u> </u>		
21	Payments to affiliates , , ,				
22	Depreciation, depletion, and amortization			<u> </u>	· · · · · · · · · · · · · · · · · · ·
23 24	Other expenses, Itemize expenses not				· ·
	covered above. (Expenses grouped together and labeled miscellaneous may not exceed 5% of total expenses shown on line 25 below.)	· ,	•		
	a Registration & Setup	329.	0.	· 329.	
	b Sales Tax	134.	<u> </u>	134.	
,	d				
					ļ
	f All other expenses	<u> </u>			· · · · · · · · · · · · · · · · · · ·
25		488,947.	15,506.	7,228.	466,213
26	Joint costs. Check here ► ☐ if following SOP 98-2. Complete this line only if the organization reported in column (B) joint costs from a combined educational			٠.	
ВАЛ	cempaign and fundraising solicitation	<u></u>		,	Form 990 (20

SCHEDULE G (Form 990 or 990-EZ)

Supplemental Information Regarding Fundralsing or Gaming Activities Complete If the organization answered yes to Form 990, Party Nilles 17, 18,

2009

Intelligity of the contract of		r if the organiza Attach to Form	tion enter 990 or Fo	ed more t rm 990-E2	0-EZ, line 6a. rctions.	Open to Public Inspection		
Name of the organization						Employer identifica	lon number	
American Veteran	s Foundat	tion				80-0273572	2	
Part 1 Fundralsing Act Form 990EZ filer	vities. Compies are not requ	ete if the organis	zation ans e this part	wered 'Ye	s' to Form 990, Part IV,	line 17.	,	
	organization ra	aised funds thro	ugh any o	f the follow	ving activities. Check all	that apoly.		
· Mall solicitations				,	Solicitation of non-g	overnment grants		
X Internet and ema	li sollcitations				Solicitation of govern	nment grants	•	
X Phone solicitation	าร			•	Special fundralsing	events	• •	
In-person solicita	tions							
2a Did the organization employees listed in F		r oral agreement VII) or entity in	t with any connection	individual on with pro	(including officers, directions) dessional fundraising se	ctors, trustees or key	X Yes No	
b if 'Yes,' list the ten hi compensated at least	ighest paid inc i \$5,000 by the	ilviduals or entit e organization.	ies (fundn	alsers) pur	rsuant to agreements un	der which the fundraise	r is to be	
			· .			(v) Amount paid to		
(i) Name of Individual or entity (fundraiser)		(ii) Activity	(fil) Did fundralser		(iv) Gross receipts	(or retained by) fundralser [[sted in	(vi) Amount paid to	
or entity (surficial	ser)		have custody or control of contributions?		from activity	CD (i)	(or retained by) organization	
			Yes	No				
Community Publicat	ione Tho	Db 0-34		x .	41,075	34,914	_6,161.	
COMMUNITED ENDITED	LUMB, LINE	SWOUN SOUTH	 -		41,013.	34,314.	0,101,	
Independent Marketing Sc	lutions, Inc	Phone Solicitat	ļ	. x.	119,129.	95,431.	. 23,698.	
			l · .			•		
Lino's, Inc		Phone Solicitat	<u> </u>	X	26,323.	21,597.	4,726.	
Telequal, LLC		Phone Solicitat	ļ ·	x	244,798.	195,784	49,014.	
		-						
The Campaign Cen	ter, Inc.	Phone Solicitat		l x l	140,505.	118,487.	-22,018.	
			1 :	<u> </u>				
			ļ				·	
		<u>,</u>	\	[
•			,					
		f						
] '		· · ·		
		7 .	 	·			· · · · · · · · · · · · · · · · · · ·	
		ļ	ļ'	J	•		· .	
						•		
_ Total	•••••				571,830.	466.213.	105,617.	
	h the organiz	ation is register	ed or licen	sed to sol	cit funds or has been no	otified it is exempt from	registration	
Alabama								
California								
Colorado								
Illinois								
Kansas					· ,			
Missouri	·				,	, 		
Nevada								
Ohio.		 -						
AHTO	,			-,				
	·					·		
	-	- <i></i>				,		
								

			(a) Event #1	(b) Event #2	(c) Other Events	(d) Total Events (Add col. (a) throug col. (c))
			(event type)	(event type) ·	(lotel number)	col. (c))
I	1	Gross receipts		·		
l						
l		Less: Charitable contributions Gross Income (line 1 minus line 2)				
†		Cash prizes				
1						
Ì		Noncash prizes	<u> </u>			
l	6	Rent/facility costs			·	,
	7	Food and beverages		 		· · · · · · · · · · · · · · · · · · ·
ļ	8	Entertainment		<u> </u>		ļ
	9	Other direct expenses		<u> </u>		
ĺ	10	Direct expense summary. Add lines 4- th	rough 9 to column (d)			} .
1	17	Net Income summary, Combine lines 3, c	olumn (d) and line 10.			
r	t III	Gaming. Complete if the organization	ation answered 'Ye	s' to Form 990. Pa	rt IV, line 19, or re	ported more tha
Ţ		\$15,000 on Form 990-EZ, line 6a	'	T	r	,
ı			(a) Bingo	(b) Pull tabs/Instant bingo/progressive	(c) Other gaming	(d) Total gaming (Add col. (a) throu
١			, ,	bingo		(Add col. (a) throu col. (c))
	1	Gross revenue		} .		
	- -	Globa Jordina IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII	 	 		
	. 2	Cash prizes		ļ	· · · · · · · · · · · · · · · · · · ·	
7 1 1 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	3	Non-cash prizes	<u> </u>			
S		RenV/acility costs ,				1
	4	Renuracinty costs ,:	<u> </u>	 	 	
	5	Other direct expenses		, , , , , , , , , , , , , , , , , , , 	1	
	6	Volunteer labor	Yes%	Yes%	Yes —— &	
			,			
	7	Direct expense summary. Add lines 2 three	ough 5 in column (d)		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
_	8	Net gaming income summary. Combine i	ines 1, column (d) and	line 7	<u></u>	
			,	٠		YES
		ler the state(s) in which the organization op he organization licensed to operate gaming				9a
4		No,' expiain:	,	. ,		
	 -	re any of the organization's gaming license				
١		re any or the organization's gaming license Yes,' explain:	s revoked, suspended	or terminated during the	tax year?	10a
ו					. •	1 1 1
ו			·			
0 1	o If "					
10 i	o If " Do	es the organization operate gaming activitie	es with nonmembers?			11
1	o If " Do		es with nonmembers?			· }

edule G (Form 990 or 990-EZ) 2009 American Veterans Foundation	80~02735	72		age 3
the different factor of the second of the se			YES	ЙО
Indicate the percentage of gaming activity operated in: a The organization's facility	2	.]		
b An outside facility].		ı.
Enter the name and address of the person who prepares the organization's gaming/special events bo	oks and records:			!
				l.
Name: P		.) '		ĺ
Address: ►				
windless: 5		• '	\	l .
a Does the organization have a contact with a third party from whom the organization receives gaming	revenue?	1 <u>5</u> a	()	
b If 'Yes,' enter the amount of gaming revenue received by the organization \$	_and the amount			·
of gaming revenue retained by the third party \$		-	'	!
c if 'Yes,' enter name and address of the third party:				1
Name: ►	·	1		
Name: *		٠ [
Address:			1	1
			1	
Gaming manager information		- } '		ļ
Name: ►		-	j]
Idelie. ,		-	١.	
Gaming manager compensation ► \$	•			
· · · · · · · · · · · · · · · · · · ·		Ι.	Ì	1 .
Description of services provided: >		_·		١.
Director/officer Employee Independent contractor	•		ļ	1
☐ Director/officer ☐ Employee ☐ Independent contractor		.	1	ŀ
Mandatory distributions				
a is the organization required under state law to make charitable distributions from the gaming proceed	ds to retain the		1	
slate gaming license?		17z	<u> </u>	ļ <u>.</u>
b Enter the amount of distributions required under state law to be distributed to other exempt organiza	tions or spent in the	•	'	}
organization's own exempt activities during the tax year: 🛌 Ş	_		1	1

•