

U.S. SPORTSMEN'S ALLIANCE FOUNDATION

FUNDRAISING POLICIES AND GUIDELINES

U.S. Sportsmen's Alliance Foundation is a nonprofit corporation organized under the laws of the State of Ohio. Charitable fundraising is an important source of financial support for U.S. Sportsmen's Alliance Foundation ("USSAF"). The following policies and guidelines (the "Policy") govern USSAF's Fundraising activities. All of USSAF's fundraising efforts are intended to provide financial support for activities in furtherance of USSAF's mission and purpose.

I. Purpose of Policies and Guidelines.

USSAF is committed to maintaining the highest standards of conduct and ethics with respect to its fundraising activities, and USSAF's Board of Trustees is responsible for ensuring that USSAF's fundraising activities meet those standards. The Board has, therefore, adopted this Policy.

II. Covered Activities

For purposes of this Policy, the definitions of "Fundraising" and "Fundraising activities" include, but are not limited to

- A. Mail solicitations;
- B. Email solicitations;
- C. Personal solicitations;
- D. Grant solicitations;
- E. Phone solicitations;
- F. Donations submitted via USSAF's website;
- G. Other electronic applications.

III. Donor Relations

It is USSAF's policy that Fundraising be respectful of the needs and interests of the donor or potential donor. USSAF will take steps to ensure that gifts will be used for the purposes for which they were given, and to respect the privacy of individual donors. USSAF therefore recognizes that donors and potential donors have the right:

- A. To be informed of USSAF's mission, the way solicited funds will be used, and USSAF's capacity to use donations for their intended purposes;
- B. To be informed of the identity of those serving on USSAF's Board of Trustees and to expect the Board of Trustees to exercise prudent judgment in its stewardship responsibilities;
- C. To be assured that their gifts will be used for the purposes for which they were given;

- D. To receive appropriate acknowledgement and recognition that complies with the substantiation requirements for tax-deductible contributions;
- E. To be assured that information about their donations is handled with respect and with confidentiality;
- F. To expect that all interaction with individuals representing USSAF will be professional in nature;
- G. To be informed whether those soliciting donations are volunteers, employees of USSAF, or hired Fundraisers;
- H. To have the opportunity to have their names deleted from mailing lists that USSAF may intend to share; and
- I. To feel free to ask questions when making a donation and to receive prompt, truthful, and forthright answers.

IV. Federal and State Law Requirements

USSAF must register, or cause paid Fundraisers to register as required by law, in each and every state in which USSAF plans to solicit contributions, although some states provide for an exemption from registration for churches. This necessarily requires that USSAF determine the registration requirements of each state in which USSAF plans to solicit contributions, and to take steps to comply with those requirements. USSAF shall cause required charitable solicitation registration applications and annual reports to be filed in a timely manner.

V. Advertising Materials

USSAF must take steps to ensure that any promotional, marketing, or other Fundraising material is clear and accurate. Such materials must accurately describe the purpose(s) for which funds are sought, and the tax-deductible nature of contributions to USSAF. If materials are prepared by a third party, USSAF should review and approve such materials before they are used.

VI. Fundraising Costs

USSAF must endeavor to hold its Fundraising costs to a reasonable level.

VII. Paid Fundraisers

USSAF does not intend to use any paid Fundraisers. If, however, a paid Fundraiser is ever engaged, such engagement shall be subject to the following guidelines. In selecting paid Fundraisers, USSAF should use only those entities or individuals who are registered in the state in which the Fundraising will occur. Paid Fundraisers must also provide good references. USSAF must take steps to continuously monitor the performance of paid Fundraisers.

If USSAF engages a paid Fundraiser, it must enter into a contractual agreement with that paid Fundraiser before funds are solicited. The terms of the agreement must identify:

- A. The purpose of the Fundraising which will occur under the contract;
- B. The length of the agreement;

- C. A description of the Fundraising methods allowed under the agreement;
- D. An agreement by the paid Fundraiser to comply with all applicable state and federal regulations;
- E. The frequency with which the paid Fundraiser must report to USSAF;
- F. The terms of the paid Fundraiser's compensation (either fixed fee or percentage, the latter being discouraged) and;
- G. The assurance that we own and control our lists at all times.

Regardless of which party holds responsibility for developing marketing and promotional materials, USSAF must ensure that all distributed materials accurately and fairly describes USSAF, its mission, and the purposes for which funds are sought. The materials must also include contact information for the paid Fundraiser and USSAF.

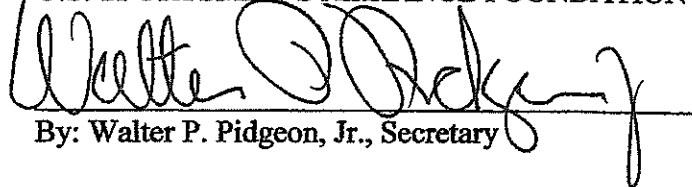
VIII. Changes to Fundraising Policies and Guidelines

The Board of Trustees of USSAF must approve any changes to or deviations from these policies.

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These policies and guidelines were reviewed and accepted by the Board of Trustees of U.S. Sportsmen's Alliance Foundation by resolution dated 10th day of December, 2010.

U.S. SPORTSMEN'S ALLIANCE FOUNDATION


By: Walter P. Pidgeon, Jr., Secretary

U.S. SPORTSMEN'S ALLIANCE FOUNDATION

GIFT ACCEPTANCE POLICIES AND GUIDELINES

U.S. Sportsmen's Alliance Foundation is a nonprofit corporation, exempt from tax as a Foundation described in Sections 501(c)(3) of the Internal Revenue Code (the "Code"). U.S. Sportsmen's Alliance Foundation's ("USSAF") mission is to protect and advance America's heritage of hunting, fishing and trapping by uniting sportsmen to protect against legal attacks by the animal rights movement, win public support for outdoor sports, ensure the future of this heritage by involving families in the outdoor experience and promote the sportsman's stewardship role in the scientific management of America's fish and wildlife.

I. Purpose of Policies and Guidelines

The Board of Trustees of USSAF and its staff solicit current and deferred gifts from individuals and organizations to secure the future growth and success of USSAF and its activities. These policies and guidelines govern the acceptance of gifts by USSAF and provide guidance to prospective donors and their advisors when making gifts to USSAF. The provisions of these policies shall apply to all gifts received by USSAF for any of its activities.

II. Use of Legal Counsel

USSAF shall seek the advice of legal counsel in matters relating to acceptance of gifts when appropriate. Review by counsel is recommended for:

- Closely held stock transfers that are subject to restrictions or buy-sell agreements;
- Documents naming USSAF as Trustee;
- Gifts involving contracts, such as bargain sales or other documents requiring USSAF to assume an obligation;
- Transactions with potential conflict of interest that may invoke IRS sanctions;
- Potential gifts of partnerships, limited liability interests or similar interests.
- Other instances in which use of counsel is deemed appropriate by the Gift Acceptance Committee.

II. Conflict of Interest

USSAF will recommend all prospective donors to seek the assistance of personal legal and financial advisors in matters relating to their gifts and the resulting tax and estate planning consequences.

III. Restrictions on Gifts

USSAF will accept unrestricted gifts, and gifts for specific programs and purposes, provided such gifts are not inconsistent with its stated mission, purposes, and priorities. USSAF will not accept gifts that are too restrictive in purpose. Gifts that are too restrictive are those that violate the terms of USSAF's corporate documents, gifts that are too difficult to administer, or gifts that

are for purposes outside the mission of USSAF. All final decisions on the restrictive nature of a gift, and its acceptance or refusal, shall be made by USSAF's Gift Acceptance Committee.

IV. The Gift Acceptance Committee

The Gift Acceptance Committee shall consist of:

- The Executive Committee of USSAF
- Such other members as appointed by the Chair of the Board of Trustees of USSAF

The Gift Acceptance Committee is charged with the responsibility of reviewing all gifts other than cash and marketable securities, properly screening and accepting those gifts, and making recommendations to the Board on gift acceptance issues when appropriate.

V. Types of Gifts. The following gifts are acceptable, but may require additional review and/or paperwork before acceptance or to ensure the donor has appropriate acknowledgements:

- Cash
- Tangible Personal Property
- Securities
- Real Estate
- Interests in limited liability corporations or partnerships
- Remainder Interests in Property
- Oil, Gas, and Mineral Interests
- Bargain Sales
- Life Insurance
- Charitable Remainder Trusts and Charitable Lead Trusts
- Retirement Plan Beneficiary Designations
- Bequests
- Life Insurance Beneficiary Designations
- Other recognized forms of planned gifts (this may include annuities, pooled income funds and similar gifts)

VI. Gift Acceptance Criteria. The following criteria govern the acceptance of each gift form:

1. **Cash:** Cash is acceptable in any form. Checks shall be made payable to "USSAF" and shall be delivered to the President in USSAF's administrative offices.
2. **Tangible Personal Property:** All other gifts of tangible personal property shall be examined in light of the following criteria:
 - Does the property help directly fulfill the mission of USSAF?

- Is the property marketable?
- Are there any undue restrictions on the use, display, or sale of the property?
- Are there any carrying costs for the property?

The final determination on the acceptance of other tangible property gifts shall be made by the Gift Acceptance Committee of USSAF.

3. **Securities:** USSAF can accept both publicly traded securities and closely held securities.

4. **Publicly Traded Securities:** Marketable securities may be transferred to an account maintained at one or more brokerage firms or delivered physically with the transferor's signature or stock power attached. As a general rule, all marketable securities shall be sold upon receipt unless otherwise directed by the board. In some cases marketable securities may be restricted by applicable securities laws; in such instance the final determination on the acceptance of the restricted securities shall be made by the Gift Acceptance Committee of USSAF.

5. **Closely Held Securities:** Closely held securities, which include not only debt and equity positions in non-publicly traded companies but also interests in LLPs and LLCs or other ownership forms, can be accepted subject to the approval of the Gift Acceptance Committee of USSAF. However, gifts must be reviewed prior to acceptance to determine that:

- There are no restrictions on the security that would prevent USSAF from ultimately converting those assets to cash,
- The security is marketable, and
- The security will not generate any undesirable tax consequences for USSAF.

If potential problems arise on initial review of the security, further review and recommendation by an outside professional may be sought before making a final decision on acceptance of the gift. The final determination on the acceptance of closely held securities shall be made by the Gift Acceptance Committee of USSAF and, when necessary, legal counsel. Every effort will be made to sell non-marketable securities as quickly as possible.

6. **Real Estate:** Gifts of real estate may include developed property, undeveloped property, or gifts subject to a prior life interest. Prior to acceptance of real estate, USSAF shall require an initial environmental review of the property to ensure that the property has no environmental damage. In the event that the initial inspection reveals a potential problem, USSAF shall retain a qualified inspection firm to conduct an environmental audit. The cost of the environmental audit shall generally be an expense of the donor.

When appropriate, a title binder shall be obtained by USSAF prior to the acceptance of the real property gift. The cost of this title binder shall generally be an expense of the donor.

Prior to acceptance of the real property, the gift shall be approved by the Gift Acceptance Committee of USSAF and by USSAF's legal counsel. Criteria for acceptance of the property shall include:

- Is the property useful for the purposes of USSAF?
 - Is the property marketable?
 - Are there any restrictions, reservations, easements, or other limitations associated with the property?
 - Are there carrying costs, which may include insurance, property taxes, mortgages, or notes, *etc.*, associated with the property?
 - Does the environmental audit reflect that the property is not damaged?
7. **Remainder Interests In Property:** USSAF will accept a remainder interest in a personal residence, farm, or vacation property subject to the provisions of paragraph 4 above. The donor or other occupants may continue to occupy the real property for the duration of the stated life. At the death of the donor, USSAF may use the property or reduce it to cash. Where USSAF receives a gift of a remainder interest, expenses for maintenance, real estate taxes, and any property indebtedness are to be paid by the donor or primary beneficiary.
8. **Oil, Gas, and Mineral Interests:** USSAF may accept oil, gas and mineral property interests, when appropriate. Prior to acceptance of an oil, gas and/or mineral interest, the gift shall be approved by the Gift Acceptance Committee, and if necessary, by USSAF's legal counsel. Criteria for acceptance of the property shall include:
- Gifts of surface rights should have a value of \$20,000 or greater.
 - Gifts of oil, gas and mineral interests should generate at least \$3,000 per year in royalties or other income (as determined by the average of the three years prior to the gift).
 - The property should not have extended liabilities or other considerations that make receipt of the gift inappropriate.
 - A working interest is rarely accepted. A working interest may only be accepted when there is a plan to minimize potential liability and tax consequences.
 - The property should undergo an environmental review to ensure that USSAF has no current or potential exposure to environmental liability.
9. **Bargain Sales:** USSAF will enter into a bargain sale arrangement in instances in which the bargain sale furthers the mission and purposes of USSAF. All bargain sales must be reviewed and recommended by the Gift Acceptance Committee and approved by the Board of Trustees. Factors used in determining the appropriateness of the transaction include:
- USSAF must obtain an independent appraisal substantiating the value of the property.
 - If USSAF assumes debt with the property, the debt ratio must be less than 50% of the appraised market value.

- USSAF must determine that it will use the property, or that there is a market for sale of the property allowing sale within 12 months of receipt.
- USSAF must calculate the costs to safeguard, insure, and expense the property (including property tax, if applicable) during the holding period.

10. **Life Insurance:** USSAF must be named as both beneficiary and irrevocable owner of an insurance policy before a life insurance policy can be recorded as a gift. The gift is valued at its interpolated terminal reserve value, or cash surrender value, upon receipt. If the donor contributes future premium payments, USSAF will include the entire amount of the additional premium payment as a gift in the year that it is made.

If the donor does not elect to continue to make gifts to cover premium payments on the life insurance policy, USSAF may:

- Continue to pay the premiums,
- Convert the policy to paid up insurance, or
- Surrender the policy for its current cash value.

11. **Charitable Remainder Trusts:** USSAF may accept designation as remainder beneficiary of a charitable remainder trust with the approval of the Gift Acceptance Committee of USSAF. USSAF will not accept appointment as Trustee of a charitable remainder trust.
12. **Charitable Lead Trusts:** USSAF may accept a designation as income beneficiary of a charitable lead trust. The Board of USSAF will not accept an appointment as Trustee of a charitable lead trust.
13. **Retirement Plan Beneficiary Designations:** Donors to and supporters of USSAF will be encouraged to name USSAF as beneficiary of their retirement plans. Such designations will not be recorded as gifts to USSAF until such time as the gift is irrevocable. USSAF will seek advice from its accounting professionals as to how and when to record such gifts.
14. **Bequests:** Donors to and supporters of USSAF will be encouraged to make bequests to USSAF under their wills and trusts. Such bequests will not be recorded as gifts to USSAF until such time as the gift is irrevocable. USSAF will seek advice from its accounting professionals as to how and when to record such gifts.
15. **Life Insurance Beneficiary Designations:** Donors to and supporters of USSAF will be encouraged to name USSAF as beneficiary or contingent beneficiary of their life insurance policies. Such designations shall not be recorded as gifts to USSAF until such time as the gift is irrevocable. USSAF will seek advice from its accounting professionals as to how and when to record such gifts.

VI. Miscellaneous Provisions

1. **Securing appraisals and legal fees for gifts to USSAF:** Except where the Gift Acceptance Committee determines otherwise, it will generally be the responsibility of the contributor to secure an appraisal (where required) and independent legal counsel for all contributions made to USSAF.
2. **Valuation of gifts for development purposes:** USSAF will record a gift received by USSAF at its valuation for gift purposes on the date of gift.
3. **Responsibility for IRS Filings upon sale of gift items:** The Gift Acceptance Committee of USSAF is responsible for filing IRS Form 8282 upon the sale or disposition of any asset sold within three (3) years of receipt by USSAF when the charitable deduction value of the item is more than \$5,000. USSAF must file this form within 125 days of the date of sale or disposition of the asset.
4. **Substantiation and Acknowledgement:** Substantiation and Acknowledgement of all gifts made to USSAF and compliance with the current IRS requirements in acknowledgement of such gifts shall be the responsibility of USSAF's Board.

VII. Changes to Gift Acceptance Policies

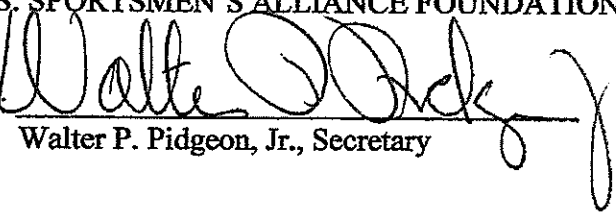
These policies and guidelines have been reviewed and accepted by the Board of Trustees of USSAF. USSAF's Board of Trustees must approve any changes to or deviations from these policies.

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These policies and guidelines were reviewed and accepted by the Board of Trustees of the U.S. Sportsmen's Alliance Foundation by resolution dated 10th day of December, 2010.

U.S. SPORTSMEN'S ALLIANCE FOUNDATION

By


Walter P. Pidgeon, Jr., Secretary