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INSPECTOR GENERAL

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August 9, 2010

Honorable Dorothy Brown  
Clerk of the Circuit Court of Cook County  
Richard J. Daley Center  
Room 1001  
Chicago, Illinois 60602

Re: Jeans Day Fundraiser Review (IIG10-0017)

Dear Ms. Brown:

This letter is written in accordance with Section 2-289(c)(2) of the Independent Inspector General Ordinance, Cook County Ill., Ordinances No. 07-O-52 (2007) (the "OIIG Ordinance") relative to a review conducted in relation to the Jeans Day Fundraiser administered by the Office of the Clerk of the Circuit Court of Cook County ("Clerk's Office"). In accordance with the OIIG Ordinance, this statement is made to apprise you of the completion and results of this review.

**Background**

On February 5, 2010, the OIIG was requested to undertake a review of the "Jeans Day" collections and disbursements performed by the Clerk's Office. Employees of the Clerk's Office fund the Jeans Day program by giving donations for specific employee events and charities. Accordingly, the Jeans Day program is a charitable trust;<sup>1</sup> therefore, the Clerk's Office is required to register the Jeans Day charitable trust with the Illinois Attorney General's Office.<sup>2</sup> Moreover, the Clerk's Office is a trustee of the Jeans Day charitable trust pursuant to the Charitable Trust Act.<sup>3</sup> Accordingly, the Clerk's Office has specific fiduciary duties as the Trustee of the Jeans Day charitable trust. The fiduciary duties held by the Clerk's Office require the exercise of due care and loyalty when collecting and disbursing funds.

<sup>1</sup> In *Talmitch Jackson and Michael Byrne v. Callan Publishing, Inc., et al.*, 356 Ill. App. 3d 326 (1<sup>st</sup> Dist. 2005), the Court found all the requisite elements of the trust formation existed, which were the settlors' intentions, the money donations, the charitable purpose, and the conveyance of the property to others.

<sup>2</sup> 760 ILCS 55/15(a)(7)

<sup>3</sup> 760 ILCS 55/3



### **Summary of Investigation**

The OIIG investigation did not result in the identification of specific witnesses or documentation to support an allegation of misconduct or wrongdoing related to Jeans Day collections and disbursements. The Jeans Day charitable trust, however, lacks internal control mechanisms. As a result, in the absence of such internal controls, the OIIG conducted a limited audit to gain reasonable assurance that no material fraud existed with the collections process.

The OIIG was able to perform a very extensive disbursement audit. The OIIG's disbursement audit included reviewing 93.3% of the transactions in the Jeans Day charitable trust for the previous 3 years. Accordingly, the OIIG has been able to develop a reasonable assurance that the Jeans Day funds were properly used for charitable and employee related purposes. The OIIG found, however, the Charitable Trust's bank accounts were also used for unrelated transactions. It appears that these transactions were funded by sources other than Jean Day funds. Therefore, the Clerk's Office has a current operational practice that could lead to commingling of funds and corresponding breach of a fiduciary duty.

As stated above, the Jeans Day fundraiser is deemed a charitable trust pursuant to Illinois law. Additionally, the Clerk's Office is the Trustee of the Jeans Day charitable trust pursuant to the Charitable Trust Act. As such, the Clerk's Office is obligated as the Trustee to register and file annual reports with the Attorney General Office. This and several other aspects of the Jeans Day process should be corrected as outlined below.

### **OIIG Findings and Conclusions**

#### ***Collections***

The Clerk's Office funds several charities and employee events through Jeans Day fundraisers. Specifically, these charities and employee events are referred to as the Employee of the Year Award ("EOY"), the Hispanic Committee Fund ("HC"), the Employee Picnic, and the Benevolence Fund. The Clerk's Office schedules specific dates that allow employees to wear jeans in exchange for a donation to a certain charity or employee event. The Jeans Day fundraisers have generated over \$220,000<sup>4</sup> in the last 3 years to fund these charities and employee events.<sup>5</sup>

In order to obtain an overview of the collection process, the OIIG interviewed Wasiiu Fashina, CFO/Comptroller for the Clerk's Office. Mr. Fashina informed the OIIG that the

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<sup>4</sup> See Attachment A, *Jeans Day Deposits for the Last 3 Years*.

<sup>5</sup> 501(c)(3) of the Internal Revenue Service Code requires not-for-profit enterprises to pay taxes on any earned income or unrelated business profit. The Clerk's Office should assess its circumstances and ensure that taxes are paid, if necessary, on any earned interest income.

Jeans Day collection process begins by distributing stickers to managers.<sup>6</sup> These managers, in turn, collect \$2 to \$10 from employees in exchange for stickers that allow the employees to wear jeans at work for 1 to 5 days. The managers are directed to document the name of the participants and the amount of money collected. This information, along with the funds collected, is then to be placed in a safe or with a cashier at the Clerk's Office.<sup>7</sup> The managers are ultimately required to take the Jeans Day collections to the "Cage" in the Clerk's Office accounting department. In the presence of a monitor from Human Resources, an accounting manager counts the funds, confirms the total, and prepares a deposit slip. The funds and deposit slips are transported to the bank by an armored car service.

In order to confirm Mr. Fashina's statement concerning the collection process, the OIIG reviewed accounting records and selected a sample of managers to interview.<sup>8</sup> The OIIG asked the managers to describe the collection process as they knew it. During the interviews, the managers indicated they were fully aware of the collection process and were able to articulate their duties and responsibilities for collecting Jeans Day funds. Moreover, the managers described the same collection process that Mr. Fashina explained to the OIIG during his interview. Additionally, the OIIG selected a previous Jeans Day participant list and deposits that were purported to be prepared by a manager at the Skokie Courthouse. The Manager at that location identified the documentation and confirmed that she prepared the documentation for submission to the accounting department at the Clerk's Office located in the Daley Center. In sum, the evidence reviewed failed to support the existence of fraud, embezzlement, theft, or misuse of funds in relation to the Jeans Day collections process. The evidence, however, did reveal an internal control weakness in the Jeans Day collections process.

According to the Committee of Sponsoring Organizations of the Treadway Commission ("COSO")<sup>9</sup>, internal controls consist of policies and procedures that help ensure management directives are properly executed. Specifically, the COSO states, "internal control measures include a range of activities such as approvals, authorizations, verifications, reconciliations, and segregation of duties." Internal controls do not guaranty 100% compliance; however, they are intended to provide reasonable assurance that matters have been duly performed. In this case, the OIIG identified a lack of internal controls over the collection process due to the absence of internal controls over the initial distribution of

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<sup>6</sup> Ms. Elena Demos, General Counsel, provided the OIIG with a list of managers responsible for collecting Jeans Day funds.

<sup>7</sup> In this case, the Clerk's Office includes district offices located outside of the loop such as the Second District Courthouse in Skokie.

<sup>8</sup> A list of interviewees will be kept in the permanent file.

<sup>9</sup> The Committee of Sponsoring Organizations of the Treadway Commission is a voluntary private-sector organization dedicated to providing guidance on fraud, financial reporting, internal controls and other business operational matters. The COSO also developed recommendations for public companies and their independent auditors and for the SEC and other regulators.

stickers and reconciliation following the return of any unused stickers. This internal control procedure is the basis for bank reconciliations.

There is no way to verify the amount of funds collected by managers in the Clerk's Office because there is not an internal control procedure in place to track the number of stickers given to managers. Although there are records of managers collecting and submitting funds to the accounting department, the OIIG could not verify that the managers submitted all the money collected from employees. In simple terms, the managers could collect \$20 and document \$10 on the participant list because the Clerk's Office does not reconcile the stickers initially given to managers with any unsold stickers that are returned. The internal control weakness, however, does not, on its face, implicate wrongdoing or misconduct.

### ***Disbursements***

The OIIG could only gain reasonable assurance in the integrity of the collections process due to an internal control weakness with sticker distribution/collection. The disbursement process, however, was more transparent. In order to review Jeans Day disbursements, the OIIG requested bank statements for Jeans Day collections and disbursements for the previous 3 years. The OIIG's scope for auditing transactions were set at disbursements that were (1) greater than \$1,000 to a business enterprise; (2) greater than \$250 to an individual; and (3) any unusual transactions. The OIIG identified 66 transactions that met the criteria for our disbursement audit, which totaled over \$205,000 or 93.3% of bank deposits for the last 3 years.<sup>10</sup> Accordingly, the OIIG obtained supporting documentation from the Clerk's Office to confirm that these were legitimate transactions that were appropriately used for Jeans Day purposes. The OIIG received purchase orders, invoices, sales agreements, leases, cancelled checks, and other supporting documentation for 100% of the requested 66 transactions.

The OIIG identified 11 transactions, however, that did not relate to Jeans Day purposes. In response to our inquiry about these transactions, Mr. Fashina indicated that the Clerk's Office could not use cash to pay for these transactions and instead was required to pay with a check. According to Mr. Fashina, these items are referred to as "In and Out" transactions. Mr. Fashina explained that In and Out transactions are basically deposits made to fund an immediate disbursement. The subject In and Out transactions included employee parking expenses, Bulls tickets, and Great America Amusement Park tickets. As such, the OIIG identified deposits that covered subsequent disbursements as stated by Mr. Fashina. Although the OIIG did not find any fraud, embezzlement, or misuse of funds for the In and Out transactions, these transactions raise a concern of commingling of funds.

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<sup>10</sup> See Attachment B titled *Jeans Day Disbursement Audit*.

As the Trustee of the Jeans Day charitable trust, the Clerk's Office has a fiduciary duty of care. Illinois law imposes a fiduciary duty of care onto Trustee's handling of donations and contributions. Moreover, the Clerk's Office has a duty not to commingle Jeans Day funds with any other funds. As such, the Clerk's Office could be at risk of breaching its duty when the In and Out transactions are executed in the charitable trust bank accounts.<sup>11</sup> Fortunately, the OIIG was able to easily identify the In and Out transactions and segregate them from Jeans Day donations. Thus, the OIIG did not discover any cases where funds were so intermingled that the monies in the bank accounts were fungible such that it was impossible to separate Jeans Day donations from In and Out transactions. As such, the evidence does not support a conclusion reflecting inappropriate use of funds.

### **OIIG Recommendations**

The preponderance of the evidence considered during the course of this investigation has revealed that the Jeans Day fundraiser was operated to support positive employee morale and provide charitable assistance to members of the community.<sup>12</sup> Moreover, we have failed to detect specific evidence of fraud, embezzlement, theft, or other incidence of wrongdoing in the administration of the charity. Nonetheless, we recommend that further consideration to a number of material issues related to the charity be considered.

Specifically, as outlined above, we recommend the Clerk's Office address the weaknesses in internal controls, commingling of funds risks, and registration compliance by virtue of its status as a charitable trust with the Illinois Attorney General's Office.<sup>13</sup> Significantly, the registration obligations are intended to provide transparency to charities because financial reports are required to be filed annually.<sup>14</sup> In the event Jeans Day is resumed, the Clerk's Office should endeavor to record the exact number of stickers that are distributed to managers. Additionally, the Clerk's Office should require the managers to return any unused stickers to the Clerk's Office. This would enable the CFO/Comptroller to perform regular bank reconciliations to ensure all inflows of money are deposited with the accounting department. Importantly, the Clerk's Office must cease the practice of utilizing

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<sup>11</sup> The Charitable Trust consists of the Benevolence fund, Employee of the Year Award, Hispanic Committee Fund, and Employee Picnic.

<sup>12</sup> Reasonable criticism could be asserted concerning the amount of compensated time required to administer the Jeans Day charity by members of the Clerk's Office. We are compelled to highlight this issue due to the public nature of the Clerk's Office. Moreover, we also recognize that by permitting staff to dress more comfortably may result in an increase in employee morale. However, a contrary view exists recognizing that by permitting employees to dress in such a casual manner in public buildings and courthouses creates an unprofessional atmosphere resulting in a negative impression by some members of the public. Both of these issues are properly left to management to consider.

<sup>13</sup> See Attached Forms AG990-IL.INS and CO.REG.INS.

<sup>14</sup> Form AG990-IL requires Charitable Trust to disclose all revenues, expenditures, liabilities and assets generated during the previous year.

Honorable Dorothy Brown  
August 9, 2010  
Page 6

the Jeans Day charitable trust bank accounts for In and Out transactions because it could lead to a breach of a fiduciary duty (commingling funds).

I hope this information proves helpful. In accordance with section 2-285(e) of the OIG Ordinance, this office respectfully requests notification within 30 days of any action taken in response to these recommendations. If you have any questions or would like to discuss any aspect of this matter further, please do not hesitate to contact me. Thank you for your time and consideration.

Very truly yours,



Patrick M. Blanchard  
Inspector General

cc: Ms. Elena Demos, General Counsel, Office of the Clerk of the Circuit Court

The Office of the Independent Inspector General of Cook County  
 Jeans Day Investigation  
 Disbursement Audit

Fund	Check#	Date	Amount	Payee	Good/Service	Finding	OIG's Comments
HGF	2016	5/27/2009	\$ 650.00	E. Moreno	Food	Bank record shows payment. There is no invoice.	[comments will be kept confidential]
	2082	8/29/2008	\$ 290.48	Sant Diaz	Food	Bank record shows payment. There is no invoice.	
Benevolence	3264	1/7/2010	\$ 6,300.00	Interpark	Monthly Parking	CT	
	3267	2/4/2010	\$ 6,150.00	Interpark	Monthly Parking	CT	
	Temp	1/16/2009	\$ 2,853.00	Marie Norred	Fire Victim	CT	
	3521	6/5/2009	\$ 1,343.00	Interpark	Engagement Summit	CT	
	3522	7/1/2009	\$ 3,000.00	Interpark	Monthly Parking	CT	
	3523	7/2/2009	\$ 1,235.00	Interpark	Individual Parking Tickets	CT	
	3524	7/31/2009	\$ 3,450.00	Interpark	Monthly Parking	CT	
	3526	8/27/2009	\$ 5,175.00	Interpark	Monthly Parking	CT	
	3253	9/29/2009	\$ 5,100.00	Interpark	Monthly Parking	CT	
				American Heart			
	Temp	10/9/2009	\$ 8,961.00	Association	Charity	CT	
	3257	10/30/2009	\$ 5,700.00	Interpark	Monthly Parking	CT	
	3259	11/5/2009	\$ 1,248.00	Great America	Amusement Park	CT	
	3260	12/1/2009	\$ 6,000.00	Interpark	Monthly Parking	CT	
	Temp	2/7/2008	\$ 3,065.00		HIV/AIDS Walk	CT	
	Temp	5/17/2007	\$ 2,040.00	Christine Duck	Fire Victim	CT	
CCC Picnic	1040	8/6/2007	\$ 3,000.00	Executive Kitchens	Catering	CT and reviewed lease agreement	
	1042	8/8/2007	\$ 1,028.30	Walmart	Miscellaneous	CT	
	1043	8/10/2007	\$ 1,130.00	CCFPD	Permit/Venue	CT	
	1044	8/11/2007	\$ 1,144.48	Best Buy	Big Screen TV	CT	
	1046	8/13/2007	\$ 1,500.00	Diplomat Travel	Door Price	CT	
	1048	8/14/2007	\$ 252.47	Mary T. Weaver	Candy	CT	
	1053	8/18/2007	\$ 3,300.00	Executive Kitchens	Catering	CT	
	1061	8/18/2007	\$ 5,734.00	Fundways of IL	Inflatables	CT and reviewed lease agreement	
	1062	8/18/2007	\$ 1,615.00	Record a Hit	Climbing wall rental	CT and reviewed lease agreement	
	1079	5/20/2008	\$ 3,750.00	Exquisite Touch	Catering	CT	
	1081	6/27/2008	\$ 1,000.00	Exquisite Touch	Catering	CT	
	1082	7/23/2008	\$ 1,160.00	CCFPD	Permit/Venue	CT	
	1088	8/17/2008	\$ 2,000.00	Diplomat Travel	Door Price	CT	
	1103	8/21/2008	\$ 1,125.39	Sant's Club	Door Price	CT	
	1108	8/22/2008	\$ 341.53	George Zemann	Bingo Game reimbursement	CT	
	1089	8/23/2008	\$ 2,750.00	Exquisite Touch	Catering	CT	
	1092	8/23/2008	\$ 1,700.00	Touch	NASCAR racing	CT	
	1093	8/23/2008	\$ 7,915.00	Fundways of IL	Inflatables	CT and reviewed lease agreement	
	1117	2/18/2009	\$ 1,080.00	J&J Printing	Door Price Tickets	CT	

Fund	Check#	Date	Amount	Payee	Good/Service	Finding	OIG's Comments
	1119	6/15/2009	\$ 4,750.00	Exquisite Touch	Catering	CIT	
	1120	6/15/2009	\$ 4,000.00	Lee & Eddie's Catering	Games/Inflatables	CIT	
	1122	7/30/2009	\$ 1,200.00	CCFPD	Permit/Venue	CIT	
	1123	8/14/2009	\$ 1,823.27	Sam's Club	Door Prizes	CIT	
	1129	8/29/2009	\$ 4,000.00	Exquisite Touch	Catering	CIT	
	1130	8/29/2009	\$ 4,000.00	Lee & Eddie's Catering	Games/Inflatables	CIT and reviewed lease agreement	
	1131	8/29/2009	\$ 1,700.00	Prime Time Promotions	NASCAR racing	CIT and reviewed lease agreement	
	1135	8/29/2009	\$ 1,070.00	Record a Hit	Climbing wall rental	CIT and reviewed sales agreement	
	1136	8/29/2009	\$ 1,500.00	Liberty Travel	Door Prizes	CIT and reviewed sales agreement	
Employee of the Year	1070	1/8/2007	\$ 500.00	Yvette Preston	Reimbursement for Decorations	CIT and reviewed invoice	
	1071	1/9/2007	\$ 1,359.08	Chicago Journeymen Plumbers	Hall Deposit	CIT and reviewed lease agreement	
	1073	1/11/2007	\$ 4,150.00	C&C Catering	Catering Deposit	CIT and reviewed sales agreement	
	1074	1/18/2007	\$ 500.00	Yvette Preston	Reimbursement for Decorations	CIT and reviewed invoice	
	1075	1/18/2007	\$ 8,350.00	C&C Balance	Catering Deposit	CIT and reviewed sales agreement	
	1085	2/9/2007	\$ 3,569.70	American Trophy & Awards Co. Inc.	Awards	CIT and reviewed invoice	
	1086	2/28/2007	\$ 3,076.12	Chicago Journeymen Plumbers	Hall Balance	CIT and reviewed invoice	
	1089	5/1/2007	\$ 5,950.00	Kevin Murphy	Bulls Ticket Reimbursement	C	
	1090	5/4/2007	\$ 6,000.00	Kevin Murphy	Chicago Bulls Tickets	C	
	1091	1/9/2008	\$ 5,000.00	Willie Cole	Catering	CIT	
	1092	1/11/2008	\$ 1,391.15	Chicago Journeymen Plumbers	Hall Deposit	CIT and reviewed invoice	
	1096	1/18/2008	\$ 9,000.00	Thomas & Anthony Catering Co.	Catering	CIT and reviewed invoice	
	1103	2/5/2008	\$ 1,535.00	Hunt Insurance Agency	Hall Insurance	CIT and reviewed invoice	
	1104	2/28/2008	\$ 4,016.80	Chicago Journeymen Plumbers	Hall Balance	CIT and reviewed invoice	
	1105	3/12/2008	\$ 3,376.40	American Trophy & Awards Co. Inc.	Trophies	CIT and reviewed invoice	
	1108	1/12/2009	\$ 1,305.20	Chicago Journeymen Plumbers	Hall Deposit	CIT and reviewed invoice	
	1110	1/15/2008	\$ 2,600.00	Willie Cole	Catering Deposit	CIT and reviewed invoice	
	1115	1/23/2009	\$ 5,345.00	Willie Cole	Catering Balance	CIT and reviewed invoice	
	1121	1/30/2009	\$ 1,669.40	Plk-Kwik Liquor	Liquor	CIT and reviewed invoice	



Fund	Check#	Date	Amount	Payee	Good/Service	Finding	OIG's Comments
	1123	4/23/2009	\$ 4,205.55	American Trophy & Awards Co. Inc.	Trophies	CIT and reviewed invoice	
	1124	5/29/2009	\$ 3,024.15	Chicago Journeymen Plumbers American Trophy & Awards Co. Inc.	Hall Balance	CIT and reviewed invoice	
	1125	5/29/2009	\$ 1,247.70		Additional Trophies	CIT and reviewed invoice	

Total Audited Amount \$ 205,301.15

**Key**

- C = Cancelled check
- I = Invoice, receipt or contract
- T = Tied information

**Scope:**

- \$1,000 for disbursements made to businesses
- \$250 for disbursements made to individuals
- Any unusual transactions



**A COMPLETE ANNUAL FINANCIAL REPORT (AG990-IL with all required attachments and applicable fees) is due within six months after the organization's fiscal year end. A REPORT WILL NOT BE CONSIDERED FILED UNLESS IT IS COMPLETE. A COMPLETE ANNUAL FINANCIAL REPORT must include the following items:**

- 1. \$15 Annual Filing Fee** - Make check or money order payable to "ILLINOIS CHARITY BUREAU FUND." **An annual financial report submitted without proper fees will not be considered filed.**
  - **Soliciting Organizations** are required to pay a \$15 Annual Report Filing Fee if gross contributions are greater than \$15,000 or assets are greater than \$25,000.
  - **Trust Organizations registered under the Charitable Trust Act only** are required to pay a \$15 Annual Report Filing Fee if gross revenues or assets are greater than \$25,000.
- 2. Form AG990-IL** - Complete all sections and line items applicable to the organization. See 6 below for **Simplified Filing Option for Small Organizations**. **An annual financial report submitted with an incomplete Form AG 990-IL will not be considered filed.**
  - A. CO#:** Include CO# on the Form AG 990-IL. Correct any incorrect name or address information if using preprinted form and highlight any corrections.
  - B. SIGNATURES:** The Form AG 990-IL must be signed by **two** different officers (president or other authorized officer and the chief fiscal officer) or by **two** trustees. One signature shall be accepted if there is only one trustee. **A Form AG 990-IL without required signatures is incomplete.**
  - C. Part I, Line D:** Report "contributions" as defined by the Solicitation for Charity Act. The Solicitation for Charity Act defines "contributions" to include the **gross** amounts of cash donations as well as **gross** sums paid by the public for merchandise, special events, rights or services of the organization. **A Form AG 990-IL that fails to report "contributions" as defined by the Solicitation for Charity Act is incomplete.** (A complete definition of "contribution" under the Solicitation for Charity Act is shown on the back of these instructions.)
  - D. Part II, Line J1:** Report all program costs associated with a combined fund-raising appeal to the extent such was allocated to Charitable Program Service Expense and entered on line J as Charitable Program Service Expense. The amount should equal the amount reported on the back of the AG990-IL form, question 7b(ii). You must have and maintain the documentation to support the allocations made.
  - E. Part III, Line S:** Report fees paid to all fund-raising consultants during the year. Attach a list identifying each consultant by name and address and specify the amount paid to each.
  - F. Part V, Lines W, X, Y Program Service Codes:** Select up to three codes from those on back of these instructions which best describe the program service(s) for which the organization spent funds.
- 3. IRS Return or Report** - IRS form 990 (excluding Schedule B), 990EZ (excluding Schedule B), 990PF, 1041, 1120 or other, must be attached if required by the IRS. If the organization did not file a federal return or report, attach explanation. **An annual financial report submitted without the required federal return or report is incomplete.**
- 4. Audited Financial Statements** - must be attached by a public charity if contributions exceeded \$300,000 **or** if the public charity raised contributions in excess of \$25,000 through the services of professional fund-raiser. The Solicitation for Charity Act defines "contributions" to include the **gross** amounts of cash donations as well as **gross** sums paid by the public for merchandise, special events, rights or services of the organization. (A complete definition of "contribution" under the Solicitation for Charity Act is shown on the back of these instructions.) **An annual financial report without required audited financial statements is incomplete.**
- 5. Form IFC - Report of Individual Fundraising Campaign** - If the organization used a paid professional fund-raiser, a separate Form IFC is required for each campaign, and each must be signed by **both** the professional fund-raiser **and** an officer or director of the organization. **An annual financial report without the required Form IFC is incomplete.**
- 6. Simplified Filing Option for Small Organizations:**
  - **Soliciting Organizations** with gross contributions and assets of \$25,000 or less during the fiscal year may file an AG990-IL with all required signatures, disclosing only total revenue, total expenditures, and assets at the fiscal year end (Line A, G and O of the AG990-IL). A \$15 annual report filing fee is due only if gross contributions were more than \$15,000.
  - **Trust Organizations registered solely under the Charitable Trust Act** with gross revenue and assets of \$25,000 or less during the fiscal year may file an AG990-IL with all required signatures, disclosing only total revenue, total expenditures, and assets at the fiscal year end (Line A, G and O of the AG990-IL). A \$15 annual report filing fee is not due.

**60 DAY EXTENSION and LATE REPORT FILING FEES:**

- A 60 day extension will be granted only upon the filing of a written request with the Attorney General prior to the report due date.
- If a proper and complete annual report (AG990-IL with all required attachments and applicable fees) or a written extension request is not received prior to the due date, a \$100 late report filing fee (checks payable to the "Illinois Charity Bureau Fund") is required by Illinois law. The report cannot be accepted and will not be considered filed if it is late and the late fee is not paid.

Submit the complete annual financial report (AG990-IL with all required attachments and applicable fees) or written extension request to:

OFFICE OF THE ATTORNEY GENERAL  
CHARITABLE TRUST BUREAU  
ATTN: ANNUAL REPORT SECTION  
100 WEST RANDOLPH STREET, 11th FLOOR  
CHICAGO, ILLINOIS 60601-3175  
(312) 814-2595

**Section 1(b) of the Solicitation for Charity Act defines contributions as follows:** "Contribution." The promise or grant of any money or property of any kind or value, including the promise to pay, except payments by union members of an organization. Reference to the dollar amount of "contributions" in this Act means in the case of promises to pay, or payments for merchandise or rights of any other description, the value of the total amount promised to be paid or paid for such merchandise or rights and not merely that portion of the purchase price to be applied to a charitable purpose. Contribution shall not include the proceeds from the sale of admission tickets by any not-for-profit music or dramatic arts organization which establishes, by such proof as the Attorney General may require, that it has received an exemption under Section 501(c)(3) of the Internal Revenue Code [26 U.S.C. @ 501 et seq.] and which is organized and operated for the presentation of live public performances of musical or theatrical works on a regular basis. For purposes of this subsection, union member dues and donated services shall not be deemed contributions. (225 ILCS 460/1(b))

**Part V Lines W, X, Y Program Service Codes:**

Charitable activity code numbers (select up to three codes which best describe the activity and/or the program service for which your organization expends funds). Enter in Part V of the first page of the AG 990-IL. Enter first the code which most accurately identifies you.

**SCHOOLS**

- 001 Pre-School
- 002 Elementary or High Schools
- 003 College & Universities
- 004 Trade Schools, Vocational Schools & Job Training

**PUBLIC EDUCATION OTHER THAN SCHOOLS**

- 010 Public Education by Mail
- 011 Seminars and Conferences
- 012 Other Educational Materials for the Public

**RELIGIOUS ACTIVITIES**

- 020 Church, Synagogue, etc.
- 021 Missionary Activities

**CULTURAL AND HISTORICAL**

- 030 Performing Arts (Ballet, Symphony, Theatre)
- 031 Art and/or Literature
- 032 Museum
- 033 Library
- 034 Historical Societies

**RECREATIONAL & SOCIAL ACTIVITIES**

- 040 Youth
- 041 Adult
- 042 Music Groups & Youth Bands
- 043 Youth Clubs (i.e. Boy Scouts, Girl Scouts, 4-H, Boys Club, etc.)
- 044 Community Recreational facilities

**RESEARCH**

- 050 Scientific Research
- 051 Heart Disease Research
- 052 Cancer Research
- 053 Other Medical and Disease Research

**HEALTH FACILITIES**

- 060 Hospitals
- 061 Nursing Homes
- 062 Health Clinics
- 063 HMO
- 064 Hospice

**ANIMAL WELFARE**

- 070 Animal Shelter, Humane Society and/or Anti-cruelty Society
- 071 Wildlife Preservation & Shelter for Wildlife

**ENVIRONMENT**

- 080 Preservation & Conservation of Natural Resources
- 081 Prevention of Pollution

**CIVIC ACTIVITIES**

- 090 Legal Services and legalAid
- 091 Civil Rights Activities

**PUBLIC POLICY**

- 100 Legislative and Political Activities
- 101 Lobbying & Advocacy
- 102 Consumer Interest Group (non-education)
- 103 Peace
- 104 Other Public Policy

**HUMAN SERVICES**

- 110 Day Care Centers
- 111 Family and Individual Services
- 112 Neighborhood and Community Development
- 113 Nursing Services (i.e. Home Care)
- 114 Programs for Minority Advocacy
- 115 Programs for Needy Children
- 116 Rescue and Emergency Service
- 117 Services for the Aged
- 118 Services for Alcohol or Drug Abuse
- 119 Services for Blind Adults
- 120 Services for Blind Children
- 121 Services for Developmentally Disabled Adults
- 122 Services for Developmentally Disabled Children
- 123 Services for Handicapped Adults
- 124 Services for Handicapped Children
- 125 Services for the Hearing Impaired
- 126 Services for the Poor
- 127 Services for Veterans

**HOUSING**

- 130 Housing for Youth
- 131 Housing for the Poor
- 132 Housing for the Aged
- 133 Women Shelter
- 134 Housing for the Disabled

**BENEFITTING PUBLIC SAFETY EMPLOYEES & FAMILY**

- 140 Firemen & Families
- 141 Law Enforcement Personnel & Families

**ACTIVITIES INVOLVING OTHER ORGANIZATIONS**

- 150 Grants to Other Charitable Organizations
- 151 Furnished Services or Facilities to Other Organizations
- 152 Umbrella Parent Organization

**OTHER PROGRAM SERVICES**

- 200 Scholarships and Student loans

**MISCELLANEOUS PROGRAM SERVICES**

- 300 (Write in Description)