

Application for Recognition of Exemption
Under Section 501(c)(3) of the Internal Revenue Code

OMB No. 1545-0056
Expires 3-31-89
To be filed in the key district
for the area in which the
organization has its principal
office or place of business.

For Paperwork Reduction Act Notice, see page 1 of the instructions.

This application, when properly completed, constitutes the notice required under section 508(a) of the Internal Revenue Code so that an applicant may be treated as described in section 501(c)(3) of the Code, and the notice required under section 508(b) for an organization claiming not to be a private foundation within the meaning of section 509(a). (Read the instructions for each part carefully before making any entries.) If required information, a conformed copy of the organizing and operational documents, or financial data are not furnished, the application will not be considered on its merits and the organization will be notified accordingly. Do not file this application if the applicant has no organizing instrument (see Part II).

Part I Identification	
1 Full name of organization Prospect Park Alliance, Inc.	2 Employer identification number (If none, see instructions) None - Form SS-4 attached
3a Address (number and street) 95 Prospect Park West	Check here if applying under section: <input type="checkbox"/> 501(e) <input type="checkbox"/> 501(f) <input type="checkbox"/> 501(k)
3b City or town, state, and ZIP code Brooklyn, New York 11215	4 Name and telephone number of person to be contacted Henry Christensen III, Esq.
5 Month the annual accounting period ends June	6 Date incorporated or formed May 30, 1984
7 Activity codes (212) 558-3949 297 915 379	
8 Has the organization filed Federal income tax returns or exempt organization information returns? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes," state the form number(s), years filed, and Internal Revenue office where filed.	

Part II Type of Entity and Organizational Document (see instructions)

Check the applicable entity box below and attach a conformed copy of the organization's organizing document and bylaws as indicated for each entity.

☒ Corporation—Articles of incorporation and bylaws. ☐ Trust—Trust indenture. ☐ Other—Constitution or articles of association and bylaws.

Part III Activities and Operational Information

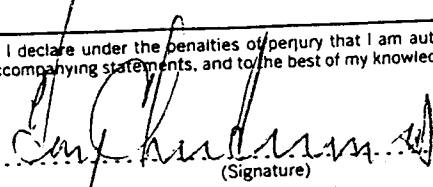
1 What are or will be the organization's sources of financial support? List in order of size.

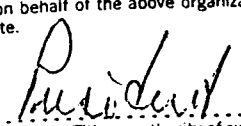
The Alliance's expected sources of financial support are, in the order of magnitude, corporations, foundations, individuals and governments.

2 Describe the organization's fund-raising program, both actual and planned, and explain to what extent it has been put into effect. (Include details of fund-raising activities such as selective mailings, formation of fund-raising committees, use of professional fund-raisers, etc.) Attach representative copies of solicitations for financial support.

The Alliance plans to solicit contributions from individuals, foundations, governments and corporations and to apply for grants from organizations such as the New York State Council of the Arts and the National Endowment for the Humanities. The Alliance plans to hire a development officer whose responsibilities will include fund raising and grant application writing. It is anticipated that some officers and directors of the Alliance will also be responsible for fund raising in the future.

I declare under the penalties of perjury that I am authorized to sign this application on behalf of the above organization and I have examined this application, including the accompanying statements, and to the best of my knowledge it is true, correct, and complete.

 (Signature)

 (Title or authority of signer)

12-29-86 (Date)

Part III Activities and Operational Information (Continued)

- 3 Give a detailed narrative description of the organization's past, present, and proposed future activities, and the purposes for which it was formed. The narrative should identify the specific benefits, services, or products the organization has provided or will provide. If the organization is not fully operational, explain what stage of development its activities have reached, what further steps remain for it to become fully operational, and when such further steps will take place. **(Do not state the purposes and activities of the organization in general terms or repeat the language of the organizational documents.)** If the organization is a school, hospital, or medical research organization, include enough information in your description to clearly show that the organization meets the definition of the particular activity that is contained in the instructions for Part VI-A.

See attachment.

4 The membership of the organization's governing body is:

a Names, addresses, and titles of officers, directors, trustees, etc.

b Annual compensation

See attachment.

Part III Activities and Operational Information (Continued)

- c Do any of the above persons serve as members of the governing body by reason of being public officials or being appointed by public officials? ☒ Yes ☐ No

If "Yes," name those persons and explain the basis of their selection or appointment. Howard Golden, Brooklyn Borough President, Tupper W. Thomas, Prospect Park Administrator, City of New York, and Henry J. Stern, Commissioner of Parks and Recreation, City of New York, serve by reason of holding the offices. In addition, the President and two directors are appointed by the Mayor of the City and two directors are appointed by the Brooklyn Borough President. See By-Laws

- d Are any members of the organization's governing body "disqualified persons" with respect to the organization (other than by reason of being a member of the governing body) or do any of the members have either a business or family relationship with "disqualified persons?" (See the Specific Instructions for line 4d.) ☐ Yes ☒ No

If "Yes," explain.

Some of the Alliance's directors are treated as disqualified persons only for purposes of Code Section 4941 by virtue of being government officials. See answer to 4c.

- e Have any members of the organization's governing body assigned income or assets to the organization, or is it anticipated that any current or future member of the governing body will assign income or assets to the organization? ☐ Yes ☒ No

If "Yes," attach a complete explanation stating which applies and including copies of any assignments plus a list of items assigned.

- 5 Does the organization control or is it controlled by any other organization? ☐ Yes ☒ No
- Is the organization the outgrowth of another organization, or does it have a special relationship to another organization by reason of interlocking directorates or other factors? ☐ Yes ☒ No
- If either of these questions is answered "Yes," explain.

- 6 Is the organization financially accountable to any other organization? ☐ Yes ☒ No
- If "Yes," explain and identify the other organization. Include details concerning accountability or attach copies of reports if any have been submitted.

- 7 a What assets does the organization have that are used in the performance of its exempt function? (Do not include property producing investment income.) If any assets are not fully operational, explain their status, what additional steps remain to be completed, and when such final steps will be taken. None

b To what extent have you used, or do you plan to use, contributions as an endowment fund, i.e., hold contributions to produce income for the support of your exempt activities? The Alliance plans to spend substantially all contributions collected in furtherance of its exempt purposes and does not plan to hold contributions to produce income for support of its activities.

- 8 Will any of the organization's facilities be managed by another organization or individual under a contractual agreement? ☐ Yes ☒ No
- If "Yes," attach a copy of each contract and explain the relationship between the applicant and each of the other parties.

Part III Activities and Operational Information (Continued)

- 9 a Have the recipients been required or will they be required to pay for the organization's benefits, services, or products? ☒ Yes ☐ No

If "Yes," explain and show how the charges are determined. The Alliance may sell some items, such as t-shirts or post cards, as souvenirs of Prospect Park. The income from such sales would constitute only a small amount of the Alliance's resources, and the primary purpose of such sales would be to increase public awareness of Prospect Park.

- b Does or will the organization limit its benefits, services, or products to specific classes of individuals? ☐ Yes ☒ No
- If "Yes," explain how the recipients or beneficiaries are or will be selected.

- 10 Is the organization a membership organization? ☐ Yes ☒ No
- If "Yes," complete the following:

a Describe the organization's membership requirements and attach a schedule of membership fees and dues.

b Describe your present and proposed efforts to attract members, and attach a copy of any descriptive literature or promotional material used for this purpose.

- c Are benefits, services, or products limited to members? ☐ Yes ☐ No
- If "No," explain.

- 11 Does or will the organization engage in activities tending to influence legislation or intervene in any way in political campaigns? ☐ Yes ☒ No
- If "Yes," explain. (Note: You may wish to file Form 5768, Election/Revocation of Election by an Eligible Section 501(c)(3) Organization to Make Expenditures to Influence Legislation.)

- 12 Does the organization have a pension plan for employees? ☐ Yes ☒ No

- 13 a Are you filing Form 1023 within 15 months from the end of the month in which you were created or formed as required by section 508(a) and the related regulations? (See General Instructions.) ☐ Yes ☒ No
- b If you answer "No," to 13a and you claim that you fit an exception to the notice requirements under section 508(a), attach an explanation of your basis for the claimed exception. See attachment
- c If you answer "No," to 13a and section 508(a) does apply to you, you may be eligible for relief under regulations section 1.9100 from the application of section 508(a). Do you wish to request relief? ☐ Yes ☐ No
- d If you answer "Yes," to 13c, attach a detailed statement that satisfies the requirements of Rev. Proc. 79-63.
- e If you answer "No," to both 13a and 13c and section 508(a) does apply to you, your qualification as a section 501(c)(3) organization can be recognized only from the date this application is filed with your key District Director. Therefore, do you want us to consider your application as a request for recognition of exemption as a section 501(c)(3) organization from the date the application is received and not retroactively to the date you were formed (see instructions)? ☐ Yes ☐ No

Part IV Statement as to Private Foundation Status (see instructions)

- 1 Is the organization a private foundation? ☐ Yes ☒ No
- 2 If you answer "Yes," to question 1 and the organization claims to be a private operating foundation, check here ☐ and complete Part VII.
- 3 If you answer "No," to question 1, indicate the type of ruling you are requesting regarding the organization's status under section 509 by checking the box(es) below that apply:
- a Definitive ruling under section 509(a)(1), (2), (3), or (4) ☐ Complete Part VI.
- b Advance ruling under ☒ sections 509(a)(1) and 170(b)(1)(A)(vi) or ☐ section 509(a)(2)—see instructions.
- (Note: If you want an advance ruling, you must complete and attach two Forms 872-C to the application.)

Part V Financial Data

Statement of Support, Revenue, and Expenses for the period beginning 19..... and ending 19.....

Note: Complete the financial statements for the current year and for each of the three years immediately before it. If in existence less than four years, complete the statements for each year in existence. If in existence less than one year, also provide proposed budgets for the two years following the current year.

Support and Revenue	1	Gross contributions, gifts, grants, and similar amounts received	1	
	2	Gross dues and assessments of members	2	
	3 a	Gross amounts derived from activities related to organization's exempt purpose (attach schedule)	3c	SEE ATTACHED BUDGETS FOR FIRST SIX YEARS
	b	Minus cost of sales		
	4 a	Gross amounts from unrelated business activities (attach schedule)	4c	
	b	Minus cost of sales		
	5 a	Gross amount received from sale of assets, excluding inventory items (attach schedule)	5c	
	b	Minus cost or other basis and sales expenses of assets sold		
6	Investment income (see instructions)	6		
7	Other revenue (attach schedule)	7		
8	Total support and revenue	8		
Expenses	9	Fundraising expenses	9	
	10	Contributions, gifts, grants, and similar amounts paid (attach schedule)	10	
	11	Disbursements to or for benefit of members (attach schedule)	11	
	12	Compensation of officers, directors, and trustees (attach schedule)	12	
	13	Other salaries and wages	13	
	14	Interest	14	
	15	Rent	15	
	16	Depreciation and depletion	16	
	17	Other (attach schedule)	17	
	18	Total expenses	18	
	19	Excess of support and revenue over expenses (line 8 minus line 18)	19	

Balance Sheet

(at the end of the period shown above)

Assets		
20 Cash: a	Interest bearing accounts	20a
b	Other	20b
21	Accounts receivable, net	21
22	Inventories	22
23	Bonds and notes (attach schedule)	23
24	Corporate stocks (attach schedule)	24
25	Mortgage loans (attach schedule)	25
26	Other investments (attach schedule)	26
27	Depreciable and depletable assets (attach schedule)	27
28	Land	28
29	Other assets (attach schedule)	29
30	Total assets	30
Liabilities		
31	Accounts payable	31
32	Contributions, gifts, grants, etc., payable	32
33	Mortgages and notes payable (attach schedule)	33
34	Other liabilities (attach schedule)	34
35	Total liabilities	35
Fund Balances or Net Worth		
36	Total fund balances or net worth	36
37	Total liabilities and fund balances or net worth (line 35 plus line 36)	37

If there has been any substantial change in any aspect of your financial activities since the period shown above ended, check the box and attach a detailed explanation ☐

Part VII Non-Private Foundation Status (Definitive ruling only)**A.—Basis for Non-Private Foundation Status (Check one of the boxes below.)**

The organization is not a private foundation because it qualifies as:

	✓	Kind of organization	Within the meaning of	Co.
1		a church or a convention or association of churches	Sections 509(a)(1) and 170(b)(1)(A)(i)	
2		a school	Sections 509(a)(1) and 170(b)(1)(A)(ii)	
3		a hospital or a cooperative hospital service organization or a medical research organization operated in conjunction with a hospital	Sections 509(a)(1) and 170(b)(1)(A)(iii)	
4		a governmental unit described in section 170(c)(1)	Sections 509(a)(1) and 170(b)(1)(A)(v)	
5		being organized and operated exclusively for testing for public safety	Section 509(a)(4)	
6		being operated for the benefit of a college or university that is owned or operated by a governmental unit	Sections 509(a)(1) and 170(b)(1)(A)(iv)	P VI
7		normally receiving a substantial part of its support from a governmental unit or from the general public	Sections 509(a)(1) and 170(b)(1)(A)(vi)	P VI
8		normally receiving not more than one-third of its support from gross investment income and more than one-third of its support from contributions, membership fees, and gross receipts from activities related to its exempt functions (subject to certain exceptions)	Section 509(a)(2)	P VI
9		being operated solely for the benefit of or in connection with one or more of the organizations described in 1 through 4, or 6, 7, and 8 above	Section 509(a)(3)	P VI

B.—Analysis of Financial Support (Complete if you checked box 6, 7, or 8 above.)

	(a) Most recent tax year	(Years next preceding most recent tax year)			(e) Total
	19	(b) 19	(c) 19	(d) 19	
1 Gifts, grants, and contributions received					
2 Membership fees received					
3 Gross receipts from admissions, sales of merchandise or services, or furnishing of facilities in any activity that is not an unrelated business within the meaning of section 513					
4 Gross investment income (see instructions for definition)					
5 Net income from organization's unrelated business activities not included on line 4					
6 Tax revenues levied for and either paid to or spent on behalf of the organization					
7 Value of services or facilities furnished by a governmental unit to the organization without charge (not including the value of services or facilities generally furnished the public without charge)					
8 Other income (not including gain or loss from sale of capital assets)—attach schedule					
9 Total of lines 1 through 8					
10 Line 9 minus line 3					
11 Enter 2% of line 10, column (e) only					

12 If the organization has received any unusual grants during any of the above tax years, attach a list for each year showing the name of the contributor, the date and amount of grant, and a brief description of the nature of such grant. Do not include such grants on line 1 above—(See instructions).

(continued on next page)

Part VI Non-Private Foundation Status (Definitive ruling only) (Continued)**B.—Analysis of Financial Support (Continued)**

13 If the organization's non-private foundation status is based on:

a Sections 509(a)(1) and 170(b)(1)(A)(iv) or (vi).—Attach a list showing the name and amount contributed by each person (other than a governmental unit or "publicly supported" organization) whose total gifts for the entire period were more than the amount shown on line 11.

b Section 509(a)(2).—For each of the years included on lines 1, 2, and 3, attach a list showing the name of and amount received from each person who is a "disqualified person."

For each of the years on line 3, attach a list showing the name of and amount received from each payor (other than a "disqualified person") whose payments to the organization were more than \$5,000. For this purpose, "payor" includes, but is not limited to, any organization described in sections 170(b)(1)(A)(i) through (vi) and any governmental agency or bureau.

C.—Supplemental Information Concerning Organizations Claiming Non-Private Foundation Status Under Section 509(a)(3)

1 Organizations supported by applicant organization:

Name and address of supported organization

Has the supported organization received a ruling or determination letter that it is not a private foundation by reason of section 509(a)(1) or (2)?

☐ Yes ☐ No☐ Yes ☐ No☐ Yes ☐ No☐ Yes ☐ No☐ Yes ☐ No

2 To what extent are the members of your governing board elected or appointed by the supported organization(s)?

3 What is the extent of common supervision or control that you and the supported organization(s) share?

4 To what extent do(es) the supported organization(s) have a significant voice in your investment policies, the making and timing of grants, and in otherwise directing the use of your income or assets?

5 Does the mentioning of the supported organization(s) in your governing instrument make you a trust that the supported organization(s) can enforce under State law and compel to make an accounting? ☐ Yes ☐ No
If "Yes," explain.

6 What portion of your income do you pay to each supported organization and how significant is the support to each?

7 To what extent do you conduct activities that would otherwise be carried out by the supported organization(s)? Explain why these activities would otherwise be carried on by the supported organization(s).

8 Is the applicant organization controlled directly or indirectly by one or more "disqualified persons" (other than one who is a disqualified person solely because he or she is a manager) or by an organization which is not described in section 509(a)(1) or (2)? ☐ Yes ☐ No
If "Yes," explain.

Part VII Basis for Status as a Private Operating Foundation

If the organization claims to be an operating foundation described in section 4942(j)(3) and—

- (a) bases its claim to private operating foundation status on normal and regular operations over a period of years; or
 (b) is newly created, set up as a private operating foundation, and has at least one year's experience;

provide the information under the income test and under one of the three supplemental tests (assets, endowment, or support). If the organization does not have at least one year's experience, complete line 21. If the organization's private operating foundation depends on its normal and regular operations as described in (a) above, attach a schedule similar to the one below showing the tabular form for the three years next preceding the most recent tax year. (See regulations section 53.4942(b)-1 for additional information before completing the "Income Test" section of Part VII.) Organizations claiming section 4942(j)(5) status must satisfy the income test and the endowment test.

Income Test		Most recent tax year
1a	Adjusted net income, as defined in regulations section 53.4942(a)-2(d)	1a
b	Minimum investment return, as defined in regulations section 53.4942(a)-2(c)	1b
2	Qualifying distributions:	
a	Amounts (including administrative expenses) paid directly for the active conduct of the activities for which organized and operated under section 501(c)(3) (attach schedule)	2a
b	Amounts paid to acquire assets to be used (or held for use) directly in carrying out purposes described in sections 170(c)(1) or 170(c)(2)(B) (attach schedule)	2b
c	Amounts set aside for specific projects that are for purposes described in section 170(c)(1) or 170(c)(2)(B) (attach schedule)	2c
d	Total qualifying distributions (add lines 2a, b, and c)	2d
3	Percentages:	
a	Percentage of qualifying distributions to adjusted net income (divide line 2d by line 1a)	3a
b	Percentage of qualifying distributions to minimum investment return (divide line 2d by line 1b) (Percentage must be at least 85% for 3a or 3b)	3b
Assets Test		
4	Value of organization's assets used in activities that directly carry out the exempt purposes. Do not include assets held merely for investment or production of income (attach schedule)	4
5	Value of any stock of a corporation that is controlled by applicant organization and carries out its exempt purposes (attach statement describing corporation)	5
6	Value of all qualifying assets (add lines 4 and 5)	6
7	Value of applicant organization's total assets	7
8	Percentage of qualifying assets to total assets (divide line 6 by line 7—percentage must exceed 65%)	8
Endowment Test		
9	Value of assets not used (or held for use) directly in carrying out exempt purposes:	
a	Monthly average of investment securities at fair market value	9a
b	Monthly average of cash balances	9b
c	Fair market value of all other investment property (attach schedule)	9c
d	Total (add lines 9a, b, and c)	9d
10	Subtract acquisition indebtedness related to line 9 items (attach schedule)	10
11	Balance (subtract line 10 from line 9d)	11
12	Multiply line 11 by 3 1/3% (2/3 of the percentage for the minimum investment return computation under section 4942(e)). Line 2d above must equal or exceed the result of this computation.	12
Support Test		
13	Applicant organization's support as defined in section 509(d)	13
14	Subtract amount of gross investment income as defined in section 509(e)	14
15	Support for purposes of section 4942(j)(3)(B)(iii) (subtract line 14 from line 13)	15
16	Support received from the general public, five or more exempt organizations, or a combination of these sources (attach schedule)	16
17	For persons (other than exempt organizations) contributing more than 1% of line 15, enter the total amounts that are more than 1% of line 15	17
18	Subtract line 17 from line 16	18
19	Percentage of total support (divide line 18 by line 15—must be at least 85%)	19
20	Does line 16 include support from an exempt organization that is more than 25% of the amount of line 15?	<input type="checkbox"/> Yes <input type="checkbox"/> No
21	Newly created organizations with less than one year's experience: Attach a statement explaining how the organization is planning to satisfy the requirements of section 4942(j)(3) for the income test and one of the supplemental tests during its first year's operation. Include a description of plans and arrangements, press clippings, public announcements, solicitations for funds, etc.	

Part VIII Required Schedules for Special Activities	If "Yes," check here	And complete schedule—
1 Is the organization, or any part of it, a school?		A
2 Does the organization provide or administer any scholarship benefits, student aid, etc.?		B
3 Has the organization taken over, or will it take over, the facilities of a "for profit" institution?		C
4 Is the organization, or any part of it, a hospital or medical research organization?		D
5 Is the organization, or any part of it, a home for the aged?		E
6 Is the organization, or any part of it, a litigating organization (public interest law firm or similar organization)?		F
7 Is the organization, or any part of it, formed to promote amateur sports competition?		G

Schedule A.—Schools, Colleges, and Universities

- 1 Is the organization an instrumentality of a State or political subdivision of a State? ☐ Yes ☐ No
If "Yes," document this in Part III and do not complete items 2 through 9 of this schedule. (See instructions for Schedule A.)
- 2 Does or will the organization. (or any department or division within it) discriminate in any way on the basis of race with respect to:
- a Admissions? ☐ Yes ☐ No
- b Use of facilities or exercise of student privileges? ☐ Yes ☐ No
- c Faculty or administrative staff? ☐ Yes ☐ No
- d Scholarship or loan program? ☐ Yes ☐ No
- If "Yes," for any of the above, explain.
- 3 Does the organization include a statement in its charter, bylaws, or other governing instrument, or in a resolution of its governing body, that it has a racially nondiscriminatory policy as to students? ☐ Yes ☐ No
Attach whatever corporate resolutions or other official statements the organization has made on this subject.
- 4 a Has the organization made its racially nondiscriminatory policies known in a manner that brings the policies to the attention of all segments of the general community which it serves? ☐ Yes ☐ No
If "Yes," describe how these policies have been publicized and state the frequency with which relevant notices or announcements have been made. If no newspaper or broadcast media notices have been used, explain.
- b If applicable, attach clippings of any relevant newspaper notices or advertising, or copies of tapes or scripts used for media broadcasts. Also attach copies of brochures and catalogues dealing with student admissions, programs, and scholarships, as well as representative copies of all written advertising used as a means of informing prospective students of your programs.
- 5 Attach a numerical schedule showing the racial composition, as of the current academic year, and projected as far as may be feasible for the next academic year, of: (a) the student body, (b) the faculty and administrative staff.
- 6 Attach a list showing the amount of any scholarship and loan funds awarded to students enrolled and the racial composition of the students who have received the awards.
- 7 a Attach a list of the organization's incorporators, founders, board members, and donors of land or buildings, whether individuals or organizations.
- b State whether any of the organizations listed in a have as an objective the maintenance of segregated public or private school education, and, if so, whether any of the individuals listed in a are officers or active members of such organizations.
- 8 Indicate the public school district and county in which the organization is located.
- 9 Has the organization ever been determined by a State or Federal administrative agency or judicial body to be racially discriminatory? ☐ Yes ☐ No
If "Yes," attach a detailed explanation identifying the parties to the suit, the forum in which the case was heard, the cause of action, the holding in the case, and the citations (if any) for the case. Also describe in detail what changes in your operation, if any, have occurred since then.

Schedule B.—Organizations Providing Scholarship Benefits, Student Aid, etc. to Individuals

- 1 a Describe the nature of the scholarship benefit, student aid, etc., including the terms and conditions governing its use, whether it is a gift or a loan, and the amount. If the organization has established or will establish several categories of scholarship benefits, identify each kind of benefit and explain how the organization determines the recipients for each category. Attach a sample copy of any application the organization requires or will require of individuals to be considered for scholarship grants, loans, or similar benefits. (Private foundations that make grants for travel, study or other similar purposes are required to obtain advance approval of scholarship procedures. See regulations sections 53.4945-4(c) and (d).)
- b If you want this application considered as a request for approval of grant procedures in the event we determine that you are a private foundation, check here
- 2 What limitations or restrictions are there on the class of individuals who are eligible recipients? Specifically explain whether there are, or will be, any restrictions or limitations in the selection procedures based upon race and whether there are, or will be, restrictions or limitations in selection procedures based on the employment status of the prospective recipient or any relative of the prospective recipient. Also indicate the approximate number of eligible individuals.
- 3 Indicate the number of grants you anticipate making annually
- 4 List the names, addresses, duties, and relevant background of the members of your selection committee. If you base your selections in any way on the employment status of the applicant or any relative of the applicant, indicate whether there is or has been any direct or indirect relationship between the members of the selection committee and the employer. Also indicate whether relatives of the members of the selection committee are possible recipients or have been recipients.
- 5 Describe any procedures you have for supervising grants (such as obtaining reports or transcripts) that you award, and any procedure you have for taking action if the terms of the grant are violated.

SCHEDULE C.—Successors to "For Profit" Institutions

- 1 What was the name of the predecessor organization and the nature of its activities?
- 2 Who were the owners or principal stockholders of the predecessor organization? (If more space is needed, attach schedule.)
- | Name and address | Share or interest |
|------------------|-------------------|
| | |
| | |
| | |
| | |
| | |
| | |

(continued on next page)

SCHEDULE D.—Hospitals and Medical Research Organizations (Continued)**Part I Hospitals (continued)**

- 3 a Does the hospital maintain a full-time emergency room? ☐ Yes ☐ No
- b What is the hospital's policy on administering emergency services to persons without apparent means to pay?
- c Does the hospital have any arrangements with police, fire, and voluntary ambulance services for the delivery or admission of emergency cases? ☐ Yes ☐ No
Explain.
-
- 4 a Does or will the hospital require a deposit from persons covered by Medicare or Medicaid in its admission practices? ☐ Yes ☐ No
If "Yes," explain.
- b Does the same deposit requirement apply to all other patients? ☐ Yes ☐ No
If "No," explain.
-
- 5 Does or will the hospital provide for a portion of its services and facilities to be used for charity patients? ☐ Yes ☐ No
Explain (include data on the hospital's past experience in admitting charity patients and arrangements it may have with municipal or government agencies for absorbing the cost of such care).
-
- 6 Does or will the hospital carry on a formal program of medical training and research? ☐ Yes ☐ No
If "Yes," describe.
-
- 7 Does the hospital provide office space to physicians carrying on a medical practice? ☐ Yes ☐ No
If "Yes," attach a list setting forth the name of each physician, the amount of space provided, the annual rent (if any), and the expiration date of the current lease.

Part II Medical Research Organizations

- 1 Name the hospital(s) with which you have a relationship and describe the relationship(s).
-
- 2 Describe your present and proposed (indicate which) medical research activities, show the nature of the activities, and the amount of money which has been or will be spent in carrying them out. (Making grants to other organizations is not direct conduct of medical research.)
-
- 3 Attach a statement of assets showing the fair market value of your assets and the portion of the assets directly devoted to medical research.

SCHEDULE E.—Homes for Aged

1 What are the requirements for admission to residency? Explain fully and attach promotional literature and application forms.

2 Does or will the home charge an entrance or founder's fee?

☐ Yes ☐ No

If "Yes," explain.

3 What periodic fees or maintenance charges are or will be required of its residents?

4 a What established policy does the home have concerning residents who become unable to pay their regular charges?

b What arrangements does the home have or will it make with local and Federal welfare units, sponsoring organizations, or others to absorb all or part of the cost of maintaining those residents?

5 What arrangements does or will the home have to provide for the health needs of its residents?

6 In what way are the home's residential facilities designed to meet some combination of the physical, emotional, recreational, social, religious, and similar needs of the aged?

7 Has the home established or will it establish any reserves for future expenditures?

☐ Yes ☐ No

If "Yes," state the source of such reserves and explain how they will be used.

8 Attach a sample copy of the contract or agreement the organization makes with or requires of its residents.

SCHEDULE F.—Litigating Organizations (Public Interest Law Firms and Similar Organizations)

- 1 Will the organization conform to the guidelines for organizations engaged in litigation activities issued by the Internal Revenue Service in Rev. Proc. 71-39, 1971-2 C.B. 575, and Rev. Proc. 75-13, 1975-1 C.B. 662? ☐ Yes ☐ No
If "No," explain.

- 2 What is the organization's area of public interest or concern?

- 3 Is the organization set up primarily to try the case of a particular person or prosecute a particular cause of action? ☐ Yes ☐ No
If "Yes," explain.

- 4 What are the organization's criteria for selection of cases?

- 5 In what cases has the organization started legal proceedings and in what other cases is it preparing to start proceedings? Describe the legal issues involved in each case and explain how they relate to the organization's area of concern.

- 6 a Composition of the organization's board of directors or trustees:

Name and address	Business or Occupation
.....	
.....	
.....	

- b Will any of the attorneys hired by the organization be a trustee or member of the board of directors of the organization or be associated in the practice of law with any such trustee or member? ☐ Yes ☐ No
If "Yes," explain.

- 7 Does or will the organization share office space with a private law firm? ☐ Yes ☐ No
If "Yes," explain.

- 8 Does or will the organization receive fees for its professional services? ☐ Yes ☐ No
If "Yes," explain.

SCHEDULE G.—National or International Amateur Sports Competition

- 1 Does your organization directly or indirectly provide any facilities or equipment for the use of amateur athletes engaged in national or international sports competition? ☐ Yes ☐ No
- 2 How do you foster national or international sports competition?
- 3 Do you provide financial assistance to amateur athletes? ☐ Yes ☐ No

ATTACHMENT TO FORM 1023 FILED BY
PROSPECT PARK ALLIANCE, INC.

Part III, Item 4

<u>Name and Address</u>	<u>Title</u>	<u>Compensation</u>
Henry Christensen III 61 Prospect Park West Brooklyn, NY 11215	President; Chairman of the Board of Directors*	None
F. Murray Abraham 135 Eastern Parkway Brooklyn, NY 11238	Director	None
Michael J. Armstrong 453 State Street Brooklyn, NY 11217	Director	None
Anthony E. Fahnestock 19A Garden Place Brooklyn, NY 11201	Director	None
Pam Fishman 95 Prospect Park West Brooklyn, NY 11215	Treasurer; Executive Director	None
Alan Goldberg 62 Greenhaven Road Rye, NY 10580	Director	None
Leslie Hollander-Eichner 222 Columbia Heights Brooklyn, NY 11201	Director*	None
David Jones 297 Prospect Place Brooklyn, NY 11238	Director**	None

* Directors appointed by the Mayor of the City of New York.

** Director appointed by the Brooklyn Borough President.

Elwin Larson Brooklyn Union Gas 195 Montague Street Brooklyn, NY 11201 718-403-3309	Director	None
Wilbur A. Levin 131 East 66th Street New York, NY 10021	Director	None
Wilfredo Lugo 6925 Shore Road Brooklyn, NY 11209	Director	None
Joseph F. McDonald 277 Clinton Street Brooklyn, NY 11201	Director	None
Carmel Carrington Marr 333 New York Avenue Brooklyn, NY 11213	Director	None
Mary Macchiarola 3431 Bedford Avenue Brooklyn, NY 11210	Director*	None
Joel Motley 328 Clinton Avenue Brooklyn, NY 11205	Director	None
Bonnie Nuzum 551 2nd Street Brooklyn, NY 11215	Director	None
Richardson Pratt, Jr. 30 Dock Hollow Road Cold Spring Harbor, NY 11724	Director	None
Duncan Stewart 264 Berkeley Place Brooklyn, NY 11217	Director	None
David G. Trager 627 3rd Street Brooklyn, NY 11215	Director	None

Ex Officio Directors

The Honorable Howard Golden
Brooklyn Borough President

Director

None

Henry J. Stern, Commissioner
New York City Parks and Recreation

Director

None

Tupper Thomas, Administrator
Prospect Park

Secretary,
Director

None

ATTACHMENT TO FORM 1023 FILED BY
PROSPECT PARK ALLIANCE, INC.

Part III, Item 3

When Prospect Park, a 526-acre park in Brooklyn, New York, was built in 1867, it was hailed as the masterpiece of its creators, Frederick Law Olmsted and Calvert Vaux. The Park's deterioration in the 1960's and 70's led to the development of a master plan for the rehabilitation of the Park and the creation of the office of Prospect Park Administrator with centralized authority to oversee the Park. These steps have had a dramatic and visible effect on the Park, from rehabilitation of Olmsted's historic landscape to the frequency of litter collections. A wide variety of cultural and educational programs has been initiated to increase the public's use and understanding of the Park. As a result of these efforts, a 1982-1983 census showed nearly 4.5 million visits to the Park during that period, a 150 percent increase from the 1.7 million visits shown by a 1979-1980 census. The Park is again considered one of Brooklyn's and New York's premiere public amenities.

Prospect Park Alliance, Inc. (the "Alliance") was formed by the New York City Parks Commissioner, the Prospect Park Administrator and a group of private citizens who recognized the need for an organization devoted to the restoration and preservation of Prospect Park. The Alliance was formed to direct the energies of private benefactors

interested in Prospect Park and to foster public awareness of and support for the Park. The Alliance is similar in purpose to the Central Park Conservancy, a public charity located in New York, New York, which was formed to assist in the restoration, maintenance and safety of Central Park.

The Alliance's certificate of incorporation as a New York not-for-profit corporation was filed with the New York Secretary of State on May 30, 1984. The Alliance was delayed in completing its organizational structure and moving forward with its activities pending the completion of internal reviews by the City of New York. These reviews have now been completed and the Alliance expects to become fully operational as soon as the City's investigations into the background of each Director has been completed.

The first and primary function of the Alliance is to raise and allocate private donations for the restoration, maintenance and management of Prospect Park. Hundreds of thousands of dollars have been given to the Park every year by major foundations, corporations, and private individuals to help in the capital improvements and to take care of the trees. See attached summary of private contributions to Prospect Park. It is anticipated that the current private donations to Prospect Park and to the Tree Trust will be made to the Alliance in the future, where donations for the Park can be held directly and administered by an independent Board. In addition to continuing to solicit support from

present donors, the Alliance will expand its fund-raising efforts to include greater individual, foundation, corporate and government support for the Park.

Fund-raising will be coordinated by Pam Fishman, the Alliance's Treasurer and Executive Director who formerly worked as a fund-raising and public relations consultant to the Prospect Park Administrator's Office. Ms. Fishman's duties include fund-raising research and proposal and grant-application writing. It is anticipated that some members of the Board of Directors will take an active role in fund-raising for the Alliance.

The Alliance's Board will work closely with the Prospect Park Administrator in deciding how monies are to be spent. The Alliance will be the private body taking responsibility for the Park, to see to it that the master plan for the Park's restoration is completed and that there is the needed staff to maintain the restored Park.

Projects are now planned or under consideration by the Alliance include the restoration of the carousel, continued improvement of plantings around the Park, attention to the skating rink, and improvements in visitor services and the concessionaires throughout the Park. Working with the Prospect Park Administrator's Office, the Alliance may undertake capital improvements to the Park under the license agreement with the City of New York.

The second function of the Alliance is to assist and advise public officials concerned with Prospect Park and to facilitate communication between public and private interests in the Park. The inclusion on the Board of Directors of the Brooklyn Borough President, the New York City Parks Commissioner and the Prospect Park Administrator, each serving ex officio, and directors appointed by the Mayor of New York and the Brooklyn Borough President, will enable the Alliance to work in close cooperation with the public officials concerned with Prospect Park. See By-Laws Section 1.3. The majority of the Alliance's directors will be private individuals who are neighborhood residents, business and community leaders, which will insure that the Alliance remains an independent body representing the private sector's interests in Prospect Park.

ATTACHMENT TO FORM 1023 FILED BY
PROSPECT PARK ALLIANCE, INC.

Part III, Item 13b

The Prospect Park Alliance, Inc. (the "Alliance") is not a private foundation and has had no gross receipts in its first three taxable years ending June 30, 1986. As of the date of this filing, the Alliance has not received more than \$15,000 in contributions. Accordingly, the Alliance meets the notice requirements of Section 508(a) of the Code and Section 1.508-1(a)(3)(b) of the Regulations.

ATTACHMENT TO FORM 1023 FILED BY
PROSPECT PARK ALLIANCE, INC.

Part V

Budget
Fiscal Year Ending June 30, 1984*

Revenue

Gross contributions, gifts, grants and similar amounts received	-0-
Interest, dividends, rents and royalties	<u>-0-</u>
Total Revenue	-0-

Expenses

Legal and accounting fees	-0-
Projects and programs paid for by the Alliance	<u>-0-</u>
Total Expenses	-0-
Excess of revenue over expenses	-0-
Fund balance at May 30, 1984	-0-
Fund balance at June 30, 1984	-0-

* The Alliance was not operational during its first
fiscal year ending June 30, 1984.

ATTACHMENT TO FORM 1023 FILE BY
PROSPECT PARK ALLIANCE, INC.

Part V

Budget
Fiscal Year Ending June 30, 1985*

Revenue

Gross contributions, gifts, grants and similar amounts received	-0-
Interest, dividends, rents and royalties	<u>-0-</u>
Total Revenue	-0-

Expenses

Legal and accounting fees	-0-
Projects and programs paid for by the Alliance	<u>-0-</u>
Total Expenses	-0-
Excess of revenue over expenses	-0-
Fund balance at July 1, 1984	-0-
Fund balance at June 30, 1985	-0-

* The Alliance was not operational during its second
fiscal year ending June 30, 1985.

ATTACHMENT TO FORM 1023 FILED BY
PROSPECT PARK ALLIANCE, INC.

Part V

Budget
Fiscal Year Ending June 30, 1986*

Revenue

Gross contributions, gifts, grants and similar amounts received	-0-
Interest, dividends, rents and royalties	<u>-0-</u>
Total Revenue	-0-

Expenses

Legal and accounting fees	-0-
Projects and programs paid for by the Alliance	<u>-0-</u>
Total Expenses	-0-
Excess of revenue over expenses	-0-
Fund balance at July 1, 1985	-0-
Fund balance at June 30, 1986	-0-

* The Alliance was not operational during its third
fiscal year ending June 30, 1986.

ATTACHMENT TO FORM 1023 FILED BY
PROSPECT PARK ALLIANCE, INC.

Part V

Proposed Budget
Fiscal Year Ending June 30, 1987

Revenue

Gross contributions, gifts, grants and similar amounts received (see attached)	\$391,000.00
Interest, dividends, rents and royalties	<u>-0-</u>
Total Revenue	\$391,000.00

Expenses

Projects and programs paid for by the Alliance (see attached budget)	<u>\$391,000.00</u>
Total Expenses	\$391,000.00

Excess of revenue over expenses	\$ -0-
Fund balance at July 1, 1986	\$ -0-
Anticipated fund balance at June 30, 1987	\$ -0-

ATTACHMENT TO FORM 1023 FILED BY
PROSPECT PARK ALLIANCE, INC.

Part V

Proposed Budget
Fiscal Year Ending June 30, 1988

Revenue

Gross contributions, gifts, grants and similar amounts received (see attached)	\$605,000.00
Interest, dividends, rents and royalties	<u>90,000.00</u>
Total Revenue	\$695,000.00

Expenses

Projects and programs paid for by the Alliance (see attached budget)	<u>\$682,000.00</u>
Total Expenses	\$682,000.00
Excess of revenue over expenses	\$ 13,000.00
Fund balance at July 1, 1987	\$ -0-
Anticipated fund balance at June 30, 1988	\$ 13,000.00

ATTACHMENT TO FORM 1023 FILED BY
PROSPECT PARK ALLIANCE, INC.

Part V

Proposed Budget
Fiscal Year Ending June 30, 1989

Revenue

Gross contributions, gifts, grants and similar amounts received (see attached)	\$650,000.00
Interest, dividends, rents and royalties	<u>90,000.00</u>
Total Revenue	\$740,000.00

Expenses

Projects and programs paid for by the Alliance (see attached budget)	<u>\$710,000.00</u>
Total Expenses	\$710,000.00
Excess of revenue over expenses	\$ 30,000.00
Fund balance at July 1, 1988	\$ 13,000.00
Anticipated fund balance at June 30, 1989	\$ 43,000.00

PROSPECT PARK ALLIANCE
PROJECTED SOURCES OF INCOME

	<u>1986-87</u>	<u>1987-88</u>	<u>1988-89</u>
Foundations	\$ 82,500	\$220,000	\$225,000
Corporations	250,500	300,000	325,000
Government Grants	15,000	25,000	25,000
Individuals	43,000	60,000	75,000
Revenue	-0-	90,000	90,000
	<hr/>	<hr/>	<hr/>
TOTAL	\$391,000	\$695,000	\$740,000