

# Creating Supporting Organizations: An Option for Conversion Foundations

---

Julie Silas, Staff Attorney  
West Coast Regional Office  
Consumers Union of U.S., Inc.

---

This report was prepared by the West Coast Regional Office of Consumers Union of U.S., Inc.

## **Consumers Union of U.S., Inc.**

The West Coast Regional Office represents consumers' interests, with a focus on the concerns of low and moderate income consumers. Office staff advocates on behalf of consumers in the legislature, administrative agencies, and the courts. The office regularly works in coalition with other groups on public education campaigns. Consumers Union's income is derived from the sale of *Consumer Reports*, its other publications and from nonrestrictive, noncommercial contributions, grants and fees. Consumers Union's publications carry no advertising and receive no commercial support.

## **Acknowledgments**

The author would like to thank the following people for their assistance with this paper: Deborah Cowan, Community Catalyst; Robert Wexler, Silk, Adler, and Colvin; Darcy Oman of the Community Foundation Serving Richmond and Central Virginia; Alan Pardini, Community Planning and Research; and Lynn Lohr, Judith Bell, Diana Bianco, Carol Rivas Pollard, and Ven Barrameda, Consumers Union.

Design and Typography: Minerva Novoa

© 1998 Consumers Union of U.S., Inc.

Consumers Union of U.S., Inc.  
West Coast Regional Office  
1535 Mission Street  
San Francisco, CA 94103

All rights reserved. No part of this publication may be reproduced, stored in any retrieval system, or transmitted in any form or by any means, electronic, mechanical, photocopying, recording, or otherwise without prior permission.

---

# CREATING SUPPORTING ORGANIZATIONS: AN OPTION FOR CONVERSION FOUNDATIONS

BY JULIE SILAS<sup>1</sup>

Across the country, nonprofit health care organizations are converting to for-profit status. When this happens, the converting nonprofit organization is legally required to ensure that its charitable assets continue to be used in the nonprofit sector. It cannot give its assets to the new for-profit without violating the law. Neither the for-profit corporation, its owners, executives, staff, nor its board members, can benefit from the nonprofit's assets.

In many states, the best way to preserve charitable assets in the nonprofit sector is to create a new and independent foundation that can continue the charitable health purposes of the former nonprofit health care organization. As of December 31, 1996, more than eighty-one new health foundations had been created as a direct result of nonprofit to for-profit conversions.<sup>2</sup> In some conversions, however, community groups, regulators, legislators, and/or philanthropists are considering other alternatives to establishment of a wholly new and separate foundation. One such alternative is to create what is known as a "supporting organization," which is a separate legal entity with a close relationship to at least one established public charity.

Historically, supporting organizations have been created by families or individual donors who find "running a foundation is too onerous for themselves or their families, that the asset level is too low to support rising administrative expenses, or that Federal taxes and regulations on private foundations are too burdensome."<sup>3</sup> Yet, donors still want some level of influence over how their donated money is to be spent. Rather than create a new foundation with its own staff, administrative responsibilities, investment strategies, and the like, donors create a supporting organization with a close relationship to an established public charity. In so doing, they realize the efficiencies of sharing staff, investment responsibilities, and administrative costs, but retain the right to influence the manner and method by which their money will be distributed. They also avoid the "burdensome" requirements on private foundations imposed under federal tax law and regulations.

There may be benefits to establishment of a supporting organization rather than a new and independent private conversion foundation. In order to evaluate those benefits in any given community and situation, it is important to understand how a supporting organization works.

---

<sup>1</sup> Julie Silas is a staff attorney for the West Coast Regional Office of Consumers Union, nonprofit publisher of *Consumer Reports*, located at 1535 Mission Street, San Francisco, CA 94103 - (415) 431-6747.

<sup>2</sup> Isaacs, Stephen L., et al., Health Care Foundations: 1997 Status Report, Grantmakers in Health, October 1997

<sup>3</sup> Virginia P. Sikes, Supporting Organizations Have Advantages of Private Foundations, but Fewer Headaches. *Journal of Taxation of Exempt Organizations*, November/December 1992, Vol. 4, No. 3.

## WHAT IS A SUPPORTING ORGANIZATION?

A supporting organization is an organization governed under the Internal Revenue Code, §509(a)(3). Like private foundations and public charities, it is tax-exempt under I.R.C. §501(c)(3). It is a nonprofit organization that is similar to a private foundation, but with fewer restrictions and, in some cases, less public accountability. While it is a separate organization with its own incorporation papers, it must be organized *exclusively* to support one or more public charities.<sup>4</sup> Hence the name "supporting organization." Its organizational structure and funding do not qualify the organization, on its own, as a public charity. However, it is treated as a public charity under the Internal Revenue Code due to its close relationship to one or more organizations that are public charities. So long as it is related to one or more public charities and is operated or controlled in conjunction with an established public charity it will be exempt from some of the requirements imposed on private foundations.

## WHAT IS A PUBLIC CHARITY?

The I.R.S. recognizes public charities as tax-exempt and imposes fewer restrictions on them than it does on other tax-exempt organizations because public charities are "publicly-supported." To meet the I.R.S.'s public support test, an organization must show that a substantial portion of its revenue is generated through donations from the public. Foundation grants, government grants, and individual charitable contributions are considered donations from the public.<sup>5</sup> There are some types of organizations that are automatically deemed public charities, e.g., churches, hospitals and other medical service providers, and some educational institutions. Other organizations qualify as public charities because they can show to the I.R.S. that they satisfy the public support test. An example of one such public charity would be a community foundation.

---

<sup>4</sup> 24 U.S.C. § 509(a)(3)(A).

<sup>5</sup> Silk, Adler & Colvin. "Qualifying for Public Charity Status."

## HOW DOES A PUBLIC CHARITY COMPARE TO A PRIVATE FOUNDATION?

A private foundation is subject to various restrictions and reporting requirements that do not apply to public charities. By virtue of its support from the public, a public charity is not subject to these same restrictions and reporting requirements. For example, a public charity

- is not subject to a 2% excise tax on net investment income (which can be reduced to 1% in some circumstances);
- is not explicitly prohibited from transactions that involve self-dealing;
- does not have to satisfy a minimum annual pay-out of 5% of the fair market value of its assets held for investment;
- is not prohibited from lobbying and other political activity; and
- does not have to adhere to strict excess business holdings requirements.

In addition, gifts to a public charity receive more favorable treatment than gifts to private foundations under IRS regulations governing tax deductibility. The rules governing public charities are also less restrictive in terms of grantmaking.

Avoiding the excise tax is a clear advantage of a public charity over a private foundation. However, conversion foundations established as private foundations have the potential to be more responsive and/or accountable to their communities because of some of the above mentioned restrictions and requirements. For example, the minimum pay-out requirement for private foundations is an important means to ensure that a conversion foundation actually distributes its assets into the community on an annual basis. The board is prevented from holding onto its endowment and interest income, but instead is required to distribute some of its resources on a regular basis.

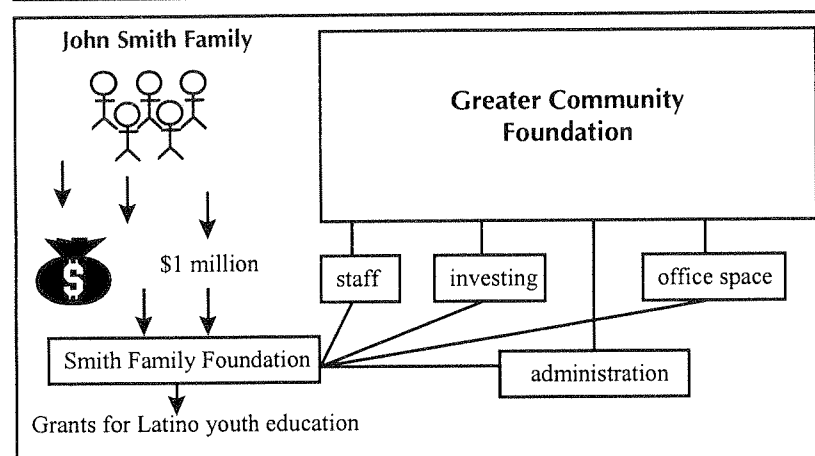
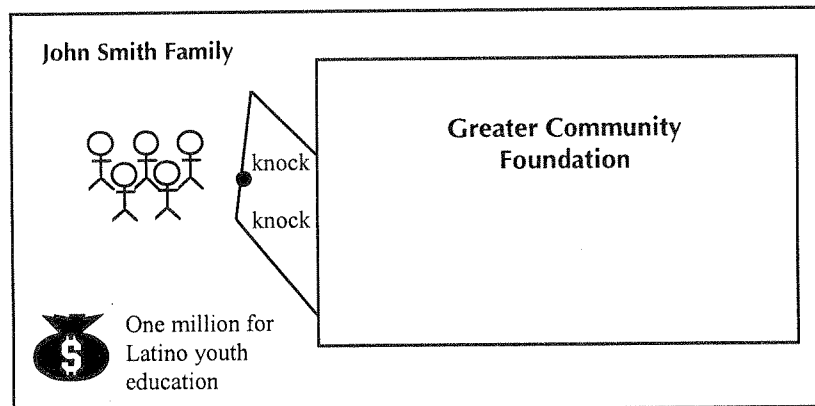
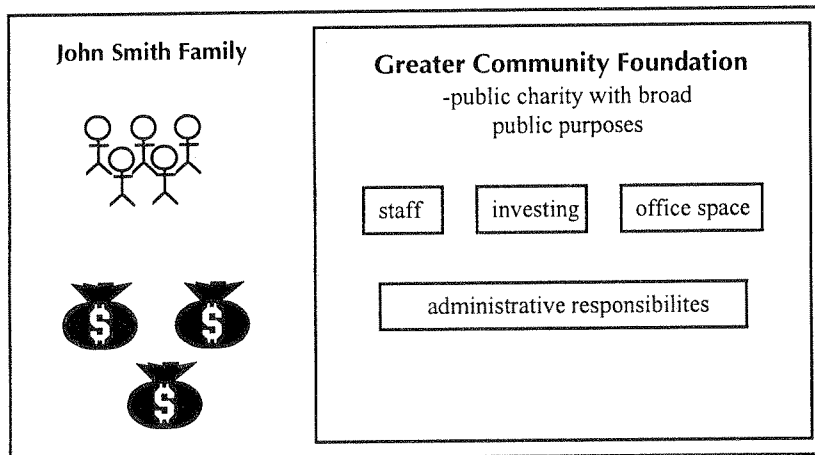
When Blue Cross of California converted to a for-profit company, the plan agreed to establish a foundation that would abide by many of the restrictions imposed on private foundations in order to protect the community's interest in the charitable assets.<sup>6</sup> "The state of Colorado created a conversion statute to govern nonprofit insurers, including Blue Cross and Blue Shield of Colorado. The statute allows a new charitable entity to be created to receive the conversion proceeds. It requires, however, that any entity that receives the conversion assets must meet most of the restrictions imposed on private foundations, including the prohibition on lobbying and the prohibition against self-dealing. C.R.S. 10-16-324."

---

<sup>6</sup> If you are in a state or community that is considering creating a supporting organization to receive the assets of a conversion, it is important that you call on regulators to impose important community protections that are embodied in private foundation rules on your conversion foundation, including the minimum pay-out requirement.

## WHAT IS A SUPPORTED ORGANIZATION?

A "supported organization" is a public charity that has a close relationship with a supporting organization. On its own, a supported organization must be organized as a public charity under federal law. A public charity must either meet the public support test, or be deemed automatically a public charity by virtue of the type of organization it is, e.g., churches, hospitals and other medical service providers, and some educational institutions.



**An Example:** The Smith family will establish a foundation and contribute \$1 million dollars for education of Latino youth. The family, however, does not want the requirements imposed on the foundation if it is organized as a 501(c)(3) private foundation. It is also a small fund and the family does not wish to waste assets by creating a new investment structure, hiring new staff, renting out space, and paying administrative costs. Instead, it establishes a relationship with the Greater Community Foundation,<sup>7</sup> which is an established public charity. The new Smith Family Foundation becomes a supporting organization to the Greater Community Foundation. The Greater Community Foundation becomes the "supported organization." The Greater Community Foundation shares its administrative costs, staff, investment strategies, etc. with the Smith Family Foundation and permits the Smith Family Foundation board members to use meeting space of the community foundation.

<sup>7</sup> This is a fictitious foundation for purposes of the example only.

## WHAT I.R.S. CRITERIA MUST A NONPROFIT CORPORATION MEET TO BECOME A SUPPORTING ORGANIZATION?

There are four tests that a nonprofit corporation must satisfy in order to be recognized under federal law as an I.R.C. § 509(a)(3) supporting organization:

- I. The Relationship Test;
- II. The Operational Test;
- III. The Organizational Test; and
- IV. The Control Test.

### SUPPORTING ORGANIZATIONS

**To qualify, all four tests must be met.**

#### I. RELATIONSHIP TEST

- A. Operated, supervised, or controlled by OR
- B. Supervised or controlled in connection with OR
- C. Operated in connection with
  1. Responsiveness test AND
  2. Integral part test

#### II. OPERATIONAL TEST

- A. Make payments solely to permissible beneficiaries OR
- B. Conduct an independent program with permissible beneficiaries

#### III. ORGANIZATIONAL TEST

- A. Purposes limited to purposes of one or more public charities
- B. Cannot engage in activities that are beyond the purposes of one or more public charities
- C. Must explicitly identify organizations or class of organizations it intends to benefit
- D. Cannot support or benefit any organization other than the ones explicitly identified

#### IV. CONTROL TEST

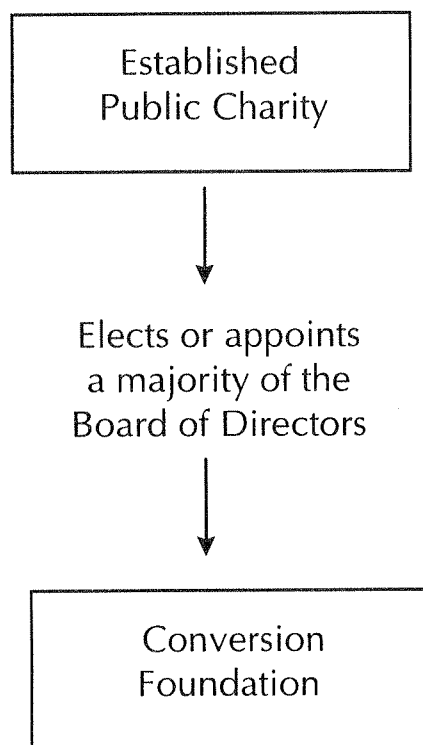
A supporting organization may not be controlled directly or indirectly by disqualified persons.

## I. The Relationship Test

(3 options available)

The relationship test requires that a new conversion foundation have a close relationship to an established public charity, the "supported organization," in order to be exempt from the private foundation rules. There are three different structures that the I.R.S. considers satisfactory to meet the relationship test. To eliminate confusion between "supported organizations" and "supporting organizations," the rest of this paper will refer to supported organizations as "public charities" and to supporting organizations as "conversion foundations."

### The Relationship Test Type #1 - The Parent-Subsidiary *"operated, supervised, or controlled by"*

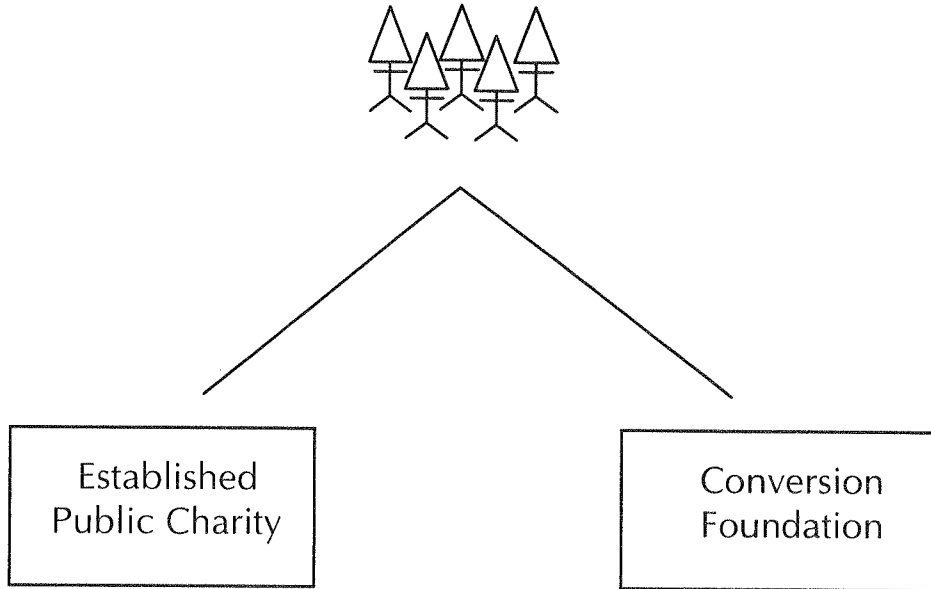


One way for a conversion foundation to satisfy the relationship test is to ensure that the conversion foundation is "operated, supervised, or controlled by" a public charity. To meet this requirement, a majority of the board members of the conversion foundation is elected or appointed by the board of the public charity. The new board members of the conversion foundation do not have to be board members of the public charity, just appointed by board members of the public charity. This is known as the "parent-subsubsidiary type."



**The Relationship Test**  
**Type #2 - The Brother-Sister Type**  
*“supervised or controlled in connection with”*

**Board of Directors**



**Same Board of Directors**

Another way to satisfy the relationship test is to establish a “brother-sister type” of association between the conversion foundation and a public charity. Under this structure, the conversion foundation is “supervised or controlled in connection with” a public charity. To meet this requirement, there must be common control and supervision between the two organizations. In most cases, this is accomplished by having the same board of trustees in charge of both organizations.

# The Relationship Test

## Type # 3 - Responsiveness & Integral Part Test

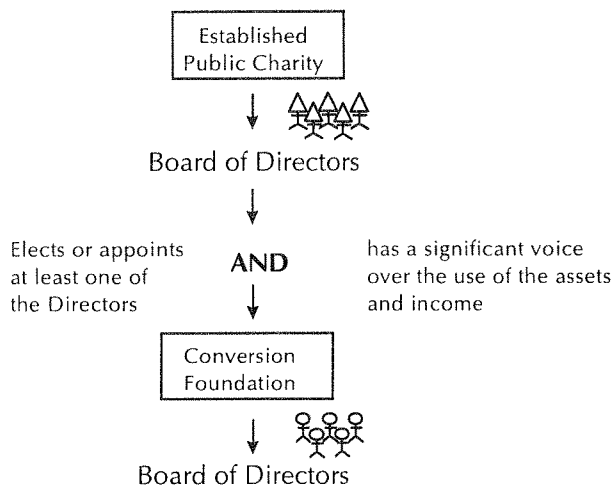
### “operated in connection with”

The third way to satisfy the relationship test is to show that the conversion foundation is “operated in connection with” a public charity. This is the most complex and complicated of the three ways to satisfy the relationship test. A conversion foundation must show that it meets both the “responsiveness test” and the “integral part test” in order for the I.R.S. to consider that it is operated in connection with a public charity.<sup>8</sup>

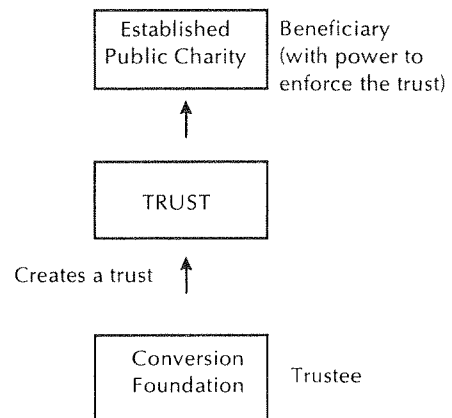
### The Responsiveness Test

A conversion foundation can meet the responsiveness test in one of two ways: 1) where the public charity appoints at least one of the directors of the conversion foundation and the public charity has a “significant voice in the [conversion foundation]’s investment policies, grant making and other uses of the [conversion foundation]’s income or assets;”<sup>9</sup> or 2) where the conversion foundation creates a charitable trust and the public charity is the beneficiary of the trust with the power to enforce the trust and compel an accounting by the conversion foundation.

#### Option 1



#### Option 2



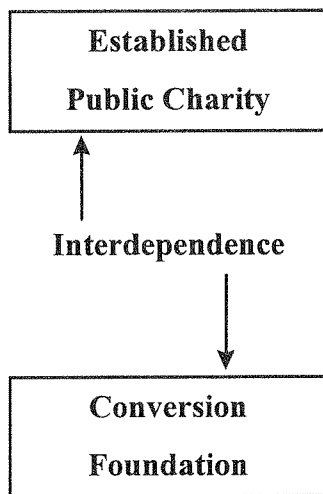
<sup>8</sup> In order to satisfy this third relationship test, it is important to be aware that there are many subtleties and complexities associated with the responsiveness/integral part test. The concepts involved are complex and therefore consultation with counsel experienced in these structures is advised. In addition to consulting with legal counsel, it is important to consult with the I.R.S. Based on particular facts or circumstances involved in the establishment of a Type 3 supporting organization, the I.R.S. may allow for greater flexibility than is outlined here.

<sup>9</sup> Silk, Adler & Colvin, *supra*.

## The Integral Part Test

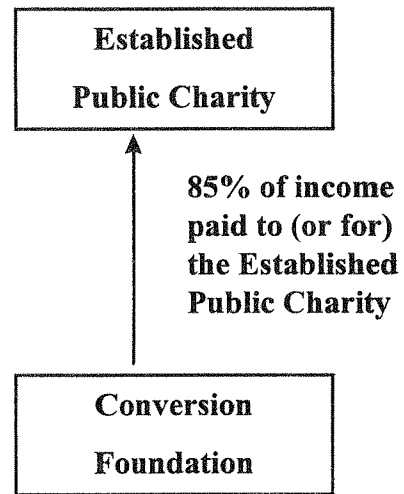
The integral part test requires that the conversion foundation is involved in the activities of the public charity in a manner that clearly shows that the public charity depends on the conversion foundation. There are two ways a conversion foundation can show this kind of dependent interrelationship: 1) where the conversion foundation operates its own programs separate from the public charity, it must show that, but for the conversion foundation, the public charity would be operating those same programs; or 2) where the conversion foundation does not operate its own programs, it must pay at least 85 percent of its income to (or for) the public charity and the amount must be sufficient to the public charity to insure that it is attentive to the operations of the conversion foundation.

### Option 1



**Established public charity relies on the conversion foundation to fund programs the public charity would otherwise operate itself**

### Option 2



**\*\* Remember, both the responsiveness test AND the integral part test must be satisfied in order for a supporting organization to meet the "operated in connection with" option of the relationship test. \*\***

## II. The Operational Test

In order to meet the operational test, the conversion foundation must show that it is operated exclusively to benefit or support one or more public charities. It may directly operate service programs that fulfill its charitable purpose by hiring its own staff or contractors. Depending on the relationship type model it adopts, some conversion foundations can also make grants to public charities that are identified specifically, or by class, in its Articles of Incorporation.<sup>10</sup> It may not make grants to any other organizations. It may also make grants to individuals who are beneficiaries of the public charity or charities that the conversion foundation supports. If a conversion foundation intends to make grants to more than one public charity, those charities must be identified by name or by class in its Articles. In all cases, conversion foundations created as supporting organizations are limited by the purposes of the public charities that it identifies in its incorporation papers.

**GREATER COMMUNITY  
FOUNDATION**

broad charitable purpose: to  
improve the quality of life for  
residents of Great County



**HEAD INJURY FOUNDATION**

to treat & support persons with  
head injury and reduce the incident  
of head injury in the Greater  
County community

Each public charity identified should have purposes sufficient to ensure that the conversion foundation's broad community health mandate can be met. Below is an example using the fictitious Greater Community Foundation.

The Head Injury Center has been sold to an investor-owned company for \$10 million. It proposes to establish the Head Injury Foundation with the money it receives from the sale. Rather than become a new, stand-alone foundation, the Head Injury Foundation wishes to become a supporting organization to the Greater Community Foundation whose broad charitable purpose is to "improve the quality of life for residents of Greater County." In order to satisfy the operational test, the Head Injury Foundation's articles of incorporation would have to specify that the foundation would operate as a supporting organization to that class of public charities,

including the Greater Community Foundation, that benefit the residents of Greater County through grants to organizations helping individuals with head injuries, nonprofit providers of treatment for head injuries, rehabilitation/support services for people with head injuries, and educational programs about head injury prevention. It would not be necessary to name grantees specifically, so long as the potential class of grantees is specifically identified and so long as the class members are potential grantees of the Greater Community Foundation.<sup>11</sup>

<sup>10</sup> As noted throughout, a supporting organization satisfying the responsiveness/integral part test cannot make grants to a class of organizations, unless the entire class is individually identified by name in its incorporation papers. However, as articulated in footnote #8 above, based on particular facts or circumstances involved in the establishment of a Type 3 supporting organization, the I.R.S. may allow for greater flexibility than is outlined here.

<sup>11</sup> The Foundation for the Homeless, another public charity with more restricted purposes "to provide support to homeless individuals and prevention services to at risk homelessness" would not be an appropriate choice to

### III. The Organizational Test

The third test involves the governing documents of the conversion foundation (these are called the articles of incorporation). The articles of incorporation must meet four requirements:

1. The purposes of the conversion foundation must be limited to the purposes of one or more public charities it has a relationship with, including its “supported organization”;
2. The articles cannot permit the conversion foundation to engage in activities that are beyond the purposes of the identified public charities;
3. The articles must explicitly identify the public charities<sup>12</sup> that the conversion foundation intends to benefit; and
4. The articles must make it clear that the conversion foundation cannot support or benefit any organization or organizations other than the ones explicitly specified.<sup>13</sup>

### IV. The Control Test

The control test does not identify who controls the conversion foundation, but instead identifies who cannot control it. The rule states that “disqualified persons” cannot have fifty percent or more of the voting power in the conversion foundation or cannot have the power to veto, prohibiting both direct and indirect control by disqualified persons. A disqualified person is defined as:

1. A substantial contributor;
2. The creator of a trust (if the supporting organization is a trust);
3. An owner of a substantial contributor, when the substantial contributor is a corporation, trust, or partnership;
4. A family member of people described in 1, 2, and 3 above;
5. A corporation, partnership, or trust where people described in 1, 2, and 3 above own more than thirty-five percent of the voting power, profits, or beneficial interest; and
6. Employees of any of the above.

---

establish a supported organization relationship with the Head Injury Foundation. Its purposes are too narrow. If the Head Injury Foundation were to affiliate with the Foundation for the Homeless, it would be limited to supporting organizations and grantees who are homeless or at risk of homelessness.

<sup>12</sup> Or a class of public charities if the conversion foundation satisfies the relationship test through the parent subsidiary structure or the brother sister type structure. See later section on forming foundations.

<sup>13</sup> For foundations created to satisfy the parent-subsidiary type or brother-sister type relationship test, a clearly described class of public charities could be identified in the incorporation papers.

## **WHAT IS THE IDEAL STRUCTURE OF A SUPPORTING ORGANIZATION THAT WOULD RECEIVE CONVERSION ASSETS?**

Conversion foundation endowments are created from community assets held in trust for the public's benefit. The endowments are, in essence, owned by the broader public that the nonprofit once served. The public, therefore, stands in the place of the individual, corporate or community donor. This unique aspect of conversion foundations requires a high degree of engagement with and accountability to the community that the foundation serves. Thus, when considering creation of a supporting organization to receive conversion assets, it is important to create a structure and relationship to an established public charity that will allow for the most community involvement and accountability.

Choosing the right public charity to become the "supported organization," the nature of the relationship between the conversion foundation and its primary public charity, and the identification of the public charity (or class of public charities) that the conversion foundation will benefit or support, are the most important considerations for a community.

### **Type of Public Charities to Benefit or Support**

The public charity (or class of public charities) identified by a conversion foundation must serve a broad beneficiary or grantee base to assure that the conversion proceeds can be used to serve the same community and populations historically served by the converting nonprofit. The operational test requires that the conversion foundation be organized exclusively to benefit the public charity(s). It is essential, therefore, to be sure that the public charity(s) are defined in such a way to cover the service area and purposes of the converting entity. And, most important, the public charity that is identified as the "supported organization" must have a purpose clause that does not direct the conversion foundation's resources outside the health arena or limit its ability to fulfill its original purposes.

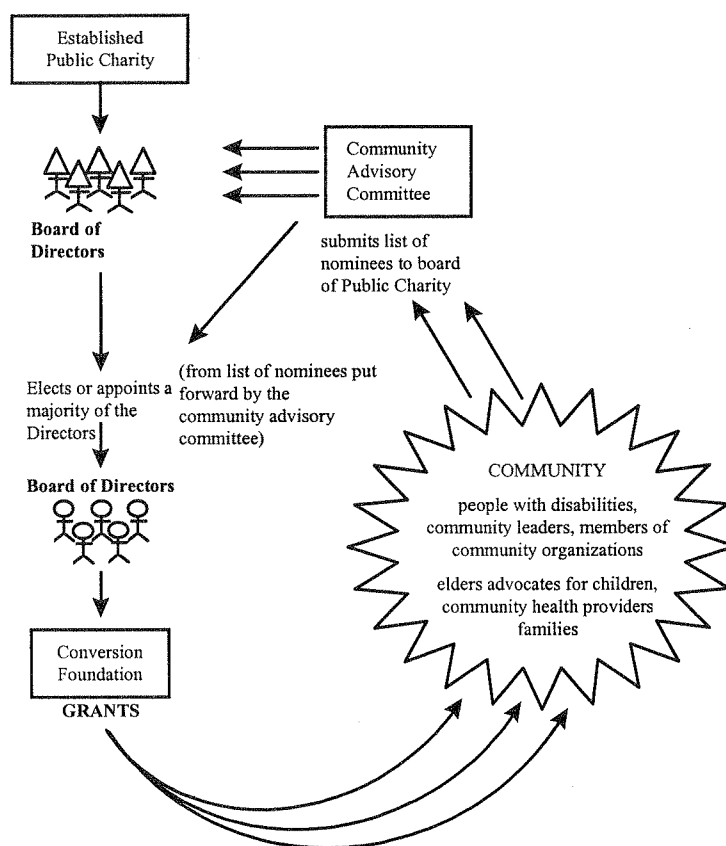
## Forming the Right Relationship with an Established Public Charity

There are three ways a conversion foundation can become a supporting organization to satisfy the relationship test. Since the conversion foundation's donor is the broader public, it is important to establish a relationship structure that allows for the greatest involvement of the community.

### The Parent-Subsidiary Model:

The parent-subsidary type relationship is one of the best ways to provide a conversion foundation the independence and representation that ensures community accountability. The parent-subsidary type of relationship allows a new board to be created for the conversion foundation, one that represents the community intended to benefit from the nonprofit's assets. The board is separate from the board of the primary public charity/supported organization, although its members are elected or appointed by the board of the public charity.

Under the parent-subsidary model, the public charity's board has the power to elect a majority of the board of the conversion foundation.<sup>14</sup> But it would be the new conversion foundation's board that would be responsible for determining how the public's assets should be used. The conversion foundation would be responsible for determining grant guidelines, sending out requests for proposals, conducting community needs assessments, and making grant recommendations. The public charity could share its staff with the conversion foundation and be responsible for administrative activities, investment strategies, staff assistance, etc. etc.



<sup>14</sup> The nominees could be provided from a list of nominations generated by a community advisory committee. For a more in depth discussion of community advisory committees, see "Examples of Community Advisory Committees in Action," and "Community Advisory Committees: An Important Structural Provision for Conversion Foundations" both available from Consumers Union of U.S. Inc.

## **The Brother-Sister Model:**

Under the brother-sister type of relationship, it may be more difficult to achieve the broad community involvement in the governing board that is appropriate for a conversion foundation. Under the generic model, the board of an established public charity automatically becomes the board of the new conversion foundation. However, an advance arrangement could be made with the public charity to change its board structure to involve the broader community. This could be done in a number of ways:

1. The public charity board could add new board members to include community members, particularly those affected by the nonprofit conversion;
2. The public charity board could commit to filling any vacancies in its current board membership with community members, particularly those affected by the nonprofit conversion; and/or
3. The public charity board could seek board nominations from a community advisory committee consisting totally of community members.

The above are just a few examples of ways in which a public charity could make an effort to ensure that a new conversion foundation created as a supporting organization allows for broad community input and engagement.

## **The Integral Part/Responsiveness Test Model:**

We have found that the few nonprofit conversions that have resulted in the creation of supporting organizations rather than wholly new and independent foundations, have satisfied the relationship test through the integral part/responsiveness test. Under this test, the public charity is only required to appoint one board member to the conversion foundation. However, in most situations, at least 85% of the income of the conversion foundation must go to the public charities that are identified in its articles. It is prohibited from making direct distributions to organizations that are not specifically named in its articles. Unlike the parent-subsidiary type or brother-sister type relationship, this third model cannot identify a class of public charities to support. It must identify each organization specifically by name.<sup>15</sup>

Before community members became active in conversion activities, this model was proposed by converting nonprofits, particularly nonprofit hospitals. It allowed the converting nonprofit to retain a majority of board members on the new foundation. It is our understanding that converting nonprofit's preferred this test in order to permit the their board members to become the conversion foundation's board members. However, in return for autonomy in board selection, the public charity has a more integral role in the day-to-day operations of the conversion foundation as is required by the responsiveness/integral part test. The conversion foundation most often must distribute 85% of it income to the public charity it derives its relationship with. The structure required by the responsiveness/integral part test limits the conversion foundation's autonomy, flexibility, and direct role in grantmaking.

---

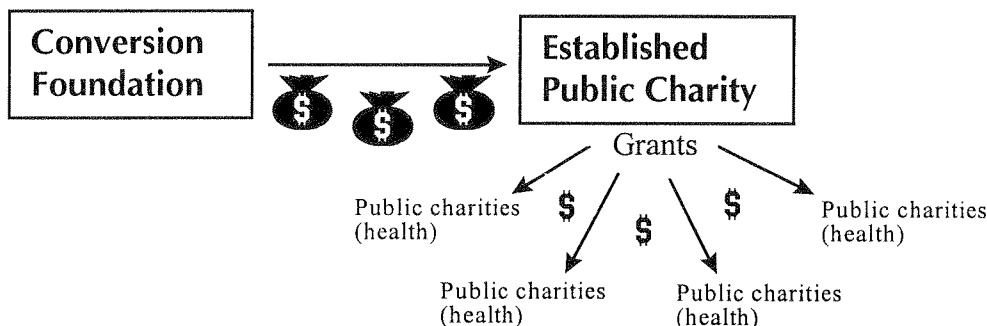
<sup>15</sup> See I.R.C. §1.509(a)-4(d)(2). It is important to consult with legal counsel and the I.R.S. when establishing a supporting organization. Based on particular facts or circumstances involved, the I.R.S. may allow for greater flexibility than is outlined here.



## How Distributions are Made in Supporting Organizations

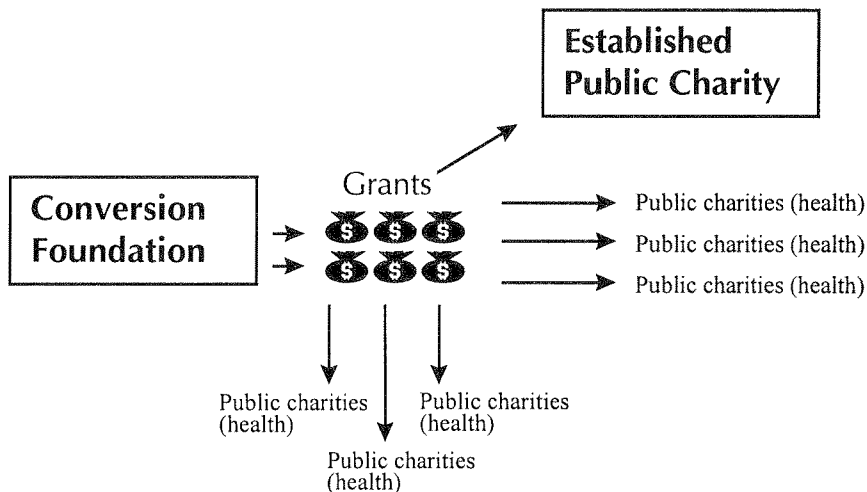
There are two ways for the assets to be distributed by a conversion foundation that is organized as a supporting organization under the parent-subsidiary or brother-sister type models. Both asset stream options identified below are available. For the responsiveness/integral part test model, asset stream 1 is the only available option<sup>16</sup>:

### Asset stream 1



The conversion foundation makes grants to an established public charity, named as its supported organization with recommendations for grants distribution.<sup>17</sup> The established public charity can then distribute grants, considering the conversion foundation's recommendations, to the community.

### Asset stream 2



The conversion foundation creates a broad purpose clause to support public charities *or a class of public charities* undertaking health activities in a particular geographic area, including its "supported organization". If the purpose clause is sufficiently broad

permitting distribution to a class of public charities, the conversion foundation can make grants directly to this broad class, rather than make grants solely to the specifically defined public charities from its articles (as asset stream # 1 requires).

<sup>16</sup> However, as articulated in footnote #8 above, based on particular facts or circumstances involved in the establishment of a Type 3 supporting organization, the I.R.S. may allow for greater flexibility than is outlined here.

<sup>17</sup> This should be the same public charity that the conversion foundation has a special relationship with to satisfy the relationship test.

## CONCLUSION

In some instances, when nonprofits convert to for-profit status, their assets might best be preserved by distributing them to a supporting organization, affiliated with one or more public charities. Each community must decide what is the best place for conversion assets, often based on the size of the converting nonprofit, the value of the assets, and the quality of one or more of the public charities in the community historically served by the converting nonprofit. In those cases where a supporting organization is chosen, it is important to create a structure that ensures a high level of community accountability and engagement.



*Additional copies of this report  
may be requested from the  
West Coast Regional Office  
Consumers Union of U.S., Inc.  
1535 Mission Street  
San Francisco, CA 94103  
(415) 431-6747  
Fax: (415) 431-0906*